

4. I arrived at the Mexico Texas border on or about August 5, 2019. There I was told that I would not be processed until my number was called. I was finally allowed to request asylum in the US after I was processed by US border authorities at the Presidio, Texas port of entry on or about October 15, 2019. Soon after, I was detained under the custody of Immigration and Customs Enforce

interpreters when we communicate with officials. On or about January 31, 2020, I was once again provided a boilerplate denial letter stating that ICE considers me to be a flight risk without further explanation.

Incidents in March 2020

15. In March 2020, several dorms, including mine, were placed under quarantine due to an outbreak of H1N1 influenza. During this time, I attempted to file a fourth parole request with a fresh packet of documents, including extensive evidence from my first cousin who is a US citizen living in South Florida, where my other cousins and aunt reside. I was not able to drop the packet off in the mailbox.
16. An ICE officer approached the door of our dorm, and I asked her to please accept my packet of documents in support of my parole-redetermination request. She did not want to be near us, so she cracked open the door and ordered me to place it on the floor. She then proceeded to kick it across the floor with her boots to the other side of the room. Luckily, I had placed all of the documents in a sealed envelope. It was very upsetting to watch. Worse still, when I spoke with my newly assigned DO days later, he told me he did not receive the packet and had not seen it anywhere. That packet was lost, and I had to collect the documents all over again.

Incidents in April 2020

17. A few days ago, I once again submitted a parole packet with additional evidence requesting a redetermination. I handed it in to ICE around 2 or 3 PM on a Friday. That same evening, a private-prison guard returned my packet to my dorm. The packet remained sealed and unopened, and a DO had placed a sticky note on top of the packet

with the following words handwritten

18. Last night, approximately 12 women in total were released from the facility. It appears that five were released on arriving alien parole and seven were released on humanitarian parole due to medical conditions, some of whom were not arriving aliens with previously filed parole requests.
19. The five women who were released on arriving alien parole did not have anything particular in common and at least two of them did not have immediate relatives serving as their sponsors. In fact, of the few women that have been released on parole from this facility, some have used uncles and in-laws as sponsors. One used a boyfriend. There does not seem to be any consistency in who ICE decides will be the lucky few to be released of the approximately 300 to 400 women that are detained here at any given time.
20. Today I was finally able to retain an attorney to represent me in my case. She is planning to submit a parole-redetermination request on my behalf and represent me in my asylum claim before the Immigration Judge.

Fear of Continued Detention and Plans if Released on Parole

21. I have now endured over six months of detention in ICE custody. I suffer from chronic gastritis and ulcer issues. I am also missing sufficient cartilage in my knee and it requires operating. Additionally, due to high level of anxiety, stress, fear and poor nutrition in detention, my face is covered with marks, the inside of my mouth is covered in sores, and externally on my lips, I have visible blisters. I am not provided any medication for these chronic issues.

22. Last month the director of this facility expressly told us that he would continue to transfer new people into the detention center despite our fears of contracting COVID-19. Even as a few more women are released, more are transferred in from Texas facilities and elsewhere. There are 72 beds in my dorm and currently only two remain empty.
23. Each day that passes, my fear of getting gravely ill or dying in this facility increases. Under these circumstances, it feels like mental torture continuously asking for release and submitting documents without any explanation as to why I am considered a flight risk or what evidence would be sufficient to satisfy ICE.
24. In addition to the aforementioned parole documents, ICE has in its possession my
a Cuban national photo identification
card. They also have photocopies of both as well as a photocopy of my Cuban passport.
25. Despite the length of my detention, I had my first court hearing before Immigration Judge Pedro Espinal, who sits in Puerto Rico, via video teleconference just last week. I explained my repeated, failed efforts to secure release on parole and the difficulty we face in accessing the law library to work on our cases as well as the loss or destruction of evidence our families mail to us at this facility. The Judge told me that if he had the authority, he would grant me a \$5,000 bond on the spot but that unfortunately he does not have jurisdiction over my custody as an arriving alien.
26. If I am granted release on parole, I plan to live with my first cousin and proposed US citizen sponsor in South Florida. I plan to self-quarantine to keep safe and to rely on the assistance of my several US citizen family members in the area to continue pursuing my asylum claim. I plan to continue working with my recently retained lawyer and to comply with any conditions of release. I plan to go to any and all appointments or hearings

