

DECLARATION OF ARISTOTELES SANCHEZ MARTINEZ

I, Aristoteles Sanchez Martinez, declare the following is true to the best of my knowledge:

1. I am at least 18 years of age and am competent to sign this declaration. I am originally from Venezuela. I was in ICE custody from approximately September 2018 to April 16, 2020. I was transferred to Stewart Detention Center in Lumpkin, Georgia, on March 23, 2020, from the Houston Contract Detention Facility (“HCDF”) in Houston, Texas. I had been at HCDF since about January 10, 2020. Before HCDF, I was at Stewart Detention Center (“Stewart”). Previously, I was at Folkston ICE Processing Center in Folkston, Georgia.
2. I am a named plaintiff in *Fraihat v. ICE*. I am also a petitioner in *Sanchez Martinez v. Donahue*. While I was detained at Stewart Detention Facility during the pandemic, my medical care continued to decline and I was very afraid, as my many medical conditions put me at a higher risk for contracting COVID-19. I faced many obstacles trying to speak to my attorneys in *Fraihat v. ICE* and *Sanchez-Martinez v. Donohue*.
3. I am 47 years old and have several medical conditions that make me vulnerable to COVID-19. I have Type II diabetes and hypertension, which both put me at a higher risk for contracting COVID-19. While I was in ICE custody, my hemoglobin A1C levels and sugar levels were dangerously high, at times at 9.7 and 345, respectively. I am recovering from a hernia repair surgery that occurred on or around March 11, 2020. The surgeon removed a large right flank hernia on my abdomen, which had grown substantially since being in ICE custody. I also have neuropathy, a bone spur on my left foot, Charcot foot, avascular necrosis, non-palpable pulses in lower extremities, and venous insufficiency.

their phone numbers *should* be on a “do-not-monitor” list, but that ICE had not given them a written confirmation of this fact. So, it was difficult to speak about important and confidential information.

7. I also was very careful about what I shared during these telephone calls because I was not very comfortable speaking in the common area and surrounded by other detainees. I was also scared to be using the phone too often, because I knew that it was not cleaned, and it was used by many other detainees. Because we were not provided with our own additional cleaning supplies, I used to use the alcohol pad that the nurse gives me when I receive my insulin shot to wipe down the telephone.
8. I was never given instructions for how to ensure my attorneys’ phone numbers were on the do-not-monitor list. One time, towards the end of the Skype, my attorney asked the guard who came to take me back to my unit if there was a way to confirm this fact or make this happen. The guard said that “he could do it,” referring to me. I did not know of any process and the guard did not explain anything to me when he brought me back to my unit.
9. One of the days I had coordinated with my attorney to speak with her on the shared telephone, I could not call her until because my entire unit was placed on lockdown. I was locked inside my cell.
10. Until March 31, I was living in a dorm unit with approximately eighty (80) other men. I shared a cell with another detainee. The entire unit had eight telephones to share. We were

13. ICE maintained the same schedule for distribution of personal hygiene supplies. Every Thursday, we received one toilet paper roll, batteries, one small bar of body soap (for washing hands and showering), one bottle of body lotion, and one tube of toothpaste. When we would run out of