

Katrina Huber
State of Louisiana

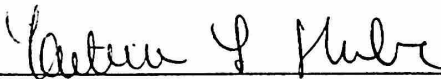
Declaration of Katrina Huber

I attest to the below under penalty of perjury:

1. My name is Katrina Huber and I work as a Project Coordinator for the Southern Poverty Law Center's Southeast Immigrant Freedom Initiative ("SIFI"). SIFI provides pro-bono legal services to immigrants detained in multiple detention centers in Georgia and Louisiana. My job requires me to make frequent visits to individuals in detention centers across the state of Louisiana. When unable to visit in person, I remain in contact with detained individuals through phone or video calls.
2. The majority of the individuals that I visit and communicate with are detained at Pine Prairie ICE Processing Center in Pine Prairie, Louisiana ("Pine Prairie"). I have also been in contact with individuals detained at LaSalle ICE Processing Center in Jena, Louisiana, South Louisiana ICE Processing Center in Basile, Louisiana ("South Louisiana"), and Winn Correctional Center in Winnfield, Louisiana ("Winn").
3. On March 18, 2020, I had a video call with a man detained in the Charlie-Alpha ("C-A") dorm of Pine Prairie. He told me that the previous day, the inhabitants of Charlie Alpha were placed under quarantine. They were told by guards that there was a man in the dorm who was suspected of being infected with COVID-19. This man was removed, and C-A dorm was put on lockdown. The residents of the dorm were not allowed to leave for any reason other than for legal visits.
4. On March 20, 2020, I visited Pine Prairie and conducted in-person legal visits with five men from C-A. During the visits, the detainees and I sat six feet apart at opposite ends of a table. Men from the quarantined dorm wore masks but no gloves, roughly half of the guards wore masks but no gloves, and men from non-quarantined dorms wore no form of protection. Quarantined and non-quarantined detainees stood in the same holding area while waiting for their legal visits to begin.
5. The five quarantined detainees I spoke with shared similar accounts of conditions under quarantine. They told me that apart from limiting their contact with the rest of the detention center, the staff were taking no measures to protect them from infection with COVID-19. Roughly 60 men were detained in C-A, in beds spaced two to three feet apart. They were given masks when leaving the dorm, but not while they were inside. They had no access to hand soap or hand sanitizer apart from the bars of soap they were given to use in the shower. Staff entered and exited the quarantined dorm without wearing masks. Detainees were still responsible for cleaning the dorm but were given no masks or gloves to wear while cleaning. Some new arrivals to the detention center were being moved into the quarantined dorm. One detainee told me that he knew of at least one staff member who quit out of fear of contracting COVID-19.
6. In the ten days following this visit, I received multiple calls from individuals detained in Pine Prairie, both in the quarantined dorm and in other dorms. Those subject to the quarantine told me that the conditions under quarantine did not change from what was described to me during my visit on March 20, 2020. Most callers expressed growing feelings of frustration over a lack of information as to why C-A was under quarantine. As the number of cases of COVID-19 continued to grow across Louisiana, they became increasingly fearful of contracting the virus, and were concerned that staff did not wear masks or gloves while entering the dorms. On March

24, 2020, two callers informed me that detainees in the Delta Bravo unit had staged a protest, and that guards responded by shooting at detainees with rubber bullets, pepper spraying them, and throwing gas bombs at them.

7. On March 30, 2020, a detainee from C-A called me to inform me that C-A had been removed from quarantine, but that a neighboring dorm, Charlie-Charlie (C-C) was newly quarantined. The caller told me that the residents of C-A had been visited on March 27, 2020 by Assistant Warden Alfonso Castillo, who told them that the quarantine in C-A would last until April 8, 2020. The caller was not sure why the quarantine ended early. He also informed me that on March 30, a guard was removed from C-A halfway through her shift and replaced, because she was sick (coughing and sneezing). She was not wearing a mask while she was working despite her symptoms.
8. Between March 27, 2020 and March 30, 2020, I spoke over the phone with at least five men detained at Winn. They told me that between four and five dorms, or around 150 individuals, are currently under a quarantine. Workers bring food into the quarantined dorms. However, one caller told me that men in the quarantined dorms use the same outside recreational area that the other dorms use (although at separate times). Callers also reported on at least two days that busses carrying 30 or 40 detainees from other centers were arriving at Winn. They reported noticing that many of these men appeared symptomatic and were coughing, and that many of them were moved into the quarantined dorms after being processed. Generally, the callers also expressed concern that staff were not wearing masks or gloves inside the detention center. On March 27, 2020 one caller told me that he has had symptoms of COVID-19 for two weeks, but his requests to see a doctor have been ignored. On March 30, 2020, one caller told me that a woman employed in the medical department was sent home for one to two weeks due to an unspecified illness.
9. On March 31, 2020, I spoke with a woman detained at South Louisiana. She told me that multiple dorms in South Louisiana are currently under quarantine, that her dorm is unclean and crowded, and that she has not been given soap because the facility has allegedly run out of it. My colleagues at the Southern Poverty Law Center have spoken at length with other women detained in this facility, who have also reported at least one dorm under quarantine, persistent rumors that a woman at the facility tested positive for COVID-19, and a lack of soap and unused gloves within the quarantined dorm.
10. Detainees in both Pine Prairie and Winn have informed me that their court hearings have been rescheduled. Hearings that were set for early April 2020 are now getting pushed back into May 2020. This further extends the already-lengthy periods of time that many of these men are held in detention.



Signature

03/30/2020

Date