

EXHIBIT A

U.S. Immigration and Customs Enforcement I.C.E.
Office of Detention and Removal
U.S. Department of Homeland Security
10 New England Executive Park
Burlington, MA 01803

BRISTOL COUNTY SHERIFF'S OFFICE
Sheriff Thomas M. Hodgson
400 Faunce Corner Road
North Dartmouth, MA 02747

CPS Correctional Healthcare
Bristol County Correctional Center
400 Faunce Corner Road
North Dartmouth, MA 02747

Massachusetts Department of Health
250 Washington Street
Boston, MA 02110

A.C.L.U.
American Civil Liberties Union Foundation Massachusetts
Att. Kathleen Navin, Esq.
211 Congress Street
Boston, MA 02110

North Dartmouth, March 18, 2020

To whom it might concern:

The I.C.E. detainees of unit B of the Bristol County Correctional Center, individually and collectively would like to highlight serious concerns about the outbreak of the COVID-19 Virus within the facility of Bristol Correctional Center.

The facility safety conditions and the conditions of it's personnel, in light of two recent and separate episodes have raised the concern into a very serious matter.

Specifically, on March 14, 2020 a Correctional Officer was observed to be symptomatic of the COVID-19 Virus during his shift followed by another C.O. on March 16, 2020 that was later on replaced by a colleague.

Two separate and serious episodes recently occurred and have alarmed the entire detainee population of unit B and prompted a number of detainees to file their own Sick Call /Medical Encounter Request.

Unit B in comprised of sixty-six (66) beds, fifty-seven (57) of them occupied, one of them filled as recently as 24 hours ago.

Two major concerns are expressed in this letter:


- 1 The reckless behaviour of the two separate Correctional Officers that reported for duty showing symptoms of the COVID-19 Virus created extreme alarm and anxiety among all detainees;
- 2 The overcrowded living conditions of the detainees in unit B, fifty-seven (57) to be precise is in net contrast with State mandatory guidelines of max 25 and Federal guidelines of a max of 10. This is unacceptable to the health and wellbeing of all detainees.
On March 15, 2020 a note was posted in the unit by Sheriff Thomas M. Hodgson's office stating among other the following: "...Given the close quarters and need for daily contact, our correctional facilities and jail are extremely vulnerable for residents, staff, volunteers, and visitors to become infected."
The three (3) feet distance between bunk beds is in net contrast with the mandatory six (6) feet safety distance between individuals.
- 3 Today at around 12:00pm medical personell in their unofficial vest stated that the infection of the whole ICE facility population is inevitable and will occur within the next 30 days.
Such statement spreaded faster than the virus itself among detainees that are now extremely agitated and panicking.

Accordingly, it is imperative that the following measures should be implemented effectively immediately:

- 1 Detainees with serious medical condition should be released immediately;
- 2 Detainees considered low risk (without aggravated felonies), or detainees who have not had their bond hearing should be released immediately;
- 3 Detainees with scheduled hearings that gets rescheduled shall qualify for immediate bond hearing/release;
- 4 Detainees who consented to be deported, yet still present at the facility shall depart the U.S. within five (5) business days.

If you have any further question please address your correspondence to TEAM B attention Darcy McMenamin Bristol County Correctional Center, ICE B, 400 Faunce Corner Road North Dartmouth, MA 02747

Respectfully submitted and signed by 51 detainees. Original is attached.
The remaining six inmates refused to sign the petition in fear of retaliation.

ID # 192910	Firma 
ID # 196670	Arreaga Mayuín
ID # 198234	Elmer Gomez Gomez
#196644	Carlos Menjivar Rojas
#198722	JOSÉ CALDAS
#198811	Oscar Alvarez
#197021	Diego Isael Amador Galindo
198647	Morale Figueroa Julio
198280	Manuel CHUN
198409	Rodríguez Segura Erik
197694	- Bonilla Garcia DARWIN
197273	- Julian Mesa Franco
198225	Segundo Armiño
198810	- Jose H. Deltrán Araujo
198213	DIEGO GUILLAN TIXI
198657	- Sandro Vera
198627	- Alarcón Mercedes
198656	- Francisca Artiz
198744	MARCO BATTISTOTTI
198734	Juane Lema

Team Letter

BED #	ID #	NAME
1	VACANT	
2	196586	Victor PEFUERO - OSQUEZ
3	VACANT	
4	198275	SEGUNDO ARMIGOS
5	198273	GUAMAN TIXI DIEGO
6	198744	MARCO BATTISTOTTI
7	198210	Edmundo Tejada
8	194843	Andy Cruz
9	168302	MIGUEL LUCAS IXE
10	198234	Fimer Gomes Gomes
11	198792	JOSE CAIDAS
12	197021	Diego Israel Amado Galindo
13	VACANT	
14	198318	Ricardo Flores
15	197934	Mario Ivan Pillco Morocho
16	196566	Sanchez Lopez Victor Manuel
17-20	19-5877	Abdoulcaye Fall
18	193485	Pascual Montes Santos
19	198718	German Miranda T.
20-17	—	
21	198810	Jose Beltran Araujo

Team Letter

22	198647	Julio C. Figueroa Morales
23	198627	Alarcon Mercedes
24	197919	Kevin G. Nieto
25	NA	No Bed
26	NA	No Bed
27	191813	GARANG LUAL
28	198315	Osvaldo Mateo
29	198636	RENZO JIMENEZ JEREZ
30	_____	_____
31	198681	Julio Jimio
32	_____	_____
33	VACANT	_____
34	196784	Lloyd Wafulea
35	198654	Sandro Uera
36	197273	Julian Mesa Franco
37	198299	JUAN CARLOS ILICACHI
38	196670	Arceaga E. Marvin
39	198280	Marvel Chum
40	196644	Carlos Menjivar
41	198654	Jesús Mato
42	196815	Conroy Lewis
43	198634	Donovan Smith

914233

Team Letter
HUSSEIN HUSSEIN

44

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45

VACANT

46

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47

198656

Francisco Ortiz

48

197694

Bonilla Garcia Darwin

49

198734

Juana Louisa

50

198409

Rodriguez Osegvera, Evik

51

197695

Edy Ramirez

52

154243

Cesar F. Vargas Vasquez

53

VACANT

54

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55

197826

AMMED HASSAN

56

895606

Harlem Perez

57

VACANT

58

197734

Aaron Sol

59

198811

Oscar Ruiz

60

197558

Edson Martin

61

VACANT

62

197670

Wally Williams

63

VACANT

64

195838

Flora Prado

65

198259

Javier Lorenzo Mota

66

198195

ABEL PROMOTOR DOMINGUEZ

67

198586

Page 5 Ricardo Ortega Vazquez

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NOTE:

WE ARE HOPING THAT YOU WILL MOBILIZE ON OUR BEHALF BY CONTACTING YOUR LOCAL CONGRESSMAN AND ANY AND ALL TV AND MEDIA OUTLET, ALONG WITH YOUR LOCAL AMERICAN CIVIL LIBERTIES UNION FOUNDATION (U.C.L.U.) AT THE ADDRESS POSTED ON OUR LETTER.

WE ARE TRAPPED INSIDE A STORAGE AND IN FEAR FOR OUR LIFE. PLEASE HELP!

THANK YOU. TEAM B

