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 SHERIF'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 behavior 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 a max of 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 personnel 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 spread 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.
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Team Letter

Julio C. Figueroa Morales
Aracon Mercado

Kevin Galento

W. Bed

No Bed

GARANG Lual

Donald Macte

Reino Sanchez Torres

Julio Junio

Vacant

Lloyd Wafuwai

Sandra Uana

Julion Mesa France

Juan Carlos Illincich

Arvega G. Marvin

Marivel Chiv

Carlos Menjivar

Jesus Hato

Conroy Lewis

Donovan Smith