

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MASSACHUSETTS**

MARIA ALEJANDRA CELIMEN SAVINO,  
*et al.*,

Petitioners-Plaintiffs,

v.

THOMAS HODGSON, *et al.*,

Respondents-Defendants.

Case No. 1:20-cv-10617-WGY

**Declaration of Yesenia Leyva**

I, Yesenia Leyva, hereby declare under penalty of perjury, that the following is true and correct to the best of my knowledge:

1. My name is Yesenia Leyva. Francisco Ortiz Ortiz is my partner.
2. Francisco was apprehended by ICE officers in Stamford, CT on 25, 2020 from Stamford CT. He was taken to Bristol County House of Correction where he has been for about one month.

I had heard about Bristol County House of Correction from members of Unidad Latina en Accion (ULA) in New Haven because the conditions are so terrible. Several ULA members had been detained there and they said the conditions are deplorable

3. Francisco told me three days ago that all of the prisoners are going to do a hunger strike to protest the conditions on the facility. None of the prisoners agree with unsafe conditions.
4. Francisco told me that two guards went to work sick last week. One of the guards was coughing a lot. The detention center sent both of the guards home.
5. When Francisco told me that the guards arrive sick at work. I got very worried. Yesterday we went to the protest outside of Bristol County and we saw posters that said, "This place will turn into a death camp." I am very worried because if one person gets infected there is no way to protect everyone else. I am very worried.

6. This declaration was read to me in English, and I swear it is true to the best of my knowledge. I have authorized Aseem Mehta, a law student intern working on *Savino v. Hodgson*, to sign for me.

Date: March 27, 2020

/s/ Yesenia Leyva  
Yesenia Leyva

**CERTIFICATE OF SERVICE**

I hereby certify that on March 27, 2020, the above-captioned document was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants.

/s/ Oren M. Sellstrom