

**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 Cristina Ortiz Ortiz

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

1. My name is Cristina Ortiz Ortiz. Francisco Ortiz Ortiz is my younger brother.
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.
3. 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.
4. When Francisco got to Bristol County, he told me that I need to deposit money in his account each day, because he does not have food. He is given only crackers, bread and coffee. After 5pm he is not given any food at all. Francisco is hungry a lot of the time. He and the others who are detained there do not have toilet paper or other supplies for personal cleaning. Francisco also suffers from a stomach hernia.
5. Since the beginning of the coronavirus pandemic, the only precautions that the facility has taken is to end visits by family members to individuals inside of the facility. However, the guards continue to enter the jail. That is not right, the guards can spread contagion inside of the jail. The family visits never had physical contact with detainees anyway. They always spoke through the phone or through glass.

6. Francisco suffers from respiratory problems. He has asthma. He also received surgery to insert a pacemaker into his body. He was held at the hospital for at least a week after that surgery. In recent weeks he has complained of a hernia. I worry that if he gets infected with coronavirus he will not come back alive.
7. The whole time that Francisco was inside Bristol, I felt powerless because I could not do anything for my brother. While I was eating three meals a day, he was going hungry. I felt powerless because he didn't even have soap to wash his hands. While I was sleeping in my bed, he was inside with dozens of other people in bunks. It was painful. It hurt me.
8. This declaration was read to me in English, and I swear it is true to the best of my knowledge. I have authorized Megan Yan, a law student intern working on *Savino v. Hodgson*, to sign for me.

Date: March 27, 2020

/s/ Cristina Ortiz Ortiz
Cristina Ortiz Ortiz

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