

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

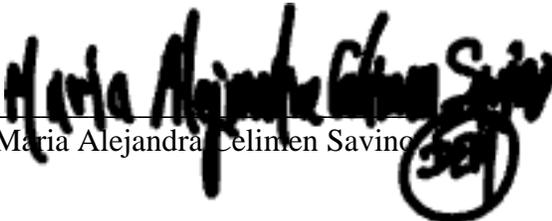
_____)	
Maria Alejandra Celimen Savino, <i>et al.</i> ,)	
)	
<i>Petitioners-Plaintiffs,</i>)	
)	Case No. 1:20-cv-10617 WGY
v.)	
)	
Thomas Hodgson, Bristol County Sheriff)	
in his Official Capacity, <i>et al.</i> ,)	
)	
<i>Respondents-Defendants.</i>)	
_____)	

DECLARATION OF MARIA ALEJANDRA CELIMEN SAVINO

1. My name is Maria Alejandra Celimen Savino.
2. I am detained at Bristol County.
3. I am in a unit called C. Carlos Carreiro Immigration Detention Center, Alley EB.
4. My unit has 8 cells of ICE detainees, 2 detainees are in each cell, and the total population varies often.
5. At this time, I am alone in my cell, which is 10 x 14 feet. I have been alone for the last two weeks, but this is unusual, there are usually 2 people per cell. At any time, someone can be brought to my cell.
6. The isolation cells are in front of this unit. That’s where people are brought when they are disciplined, and that happens often.
7. Upstairs, there are regular inmates, who are not detained by ICE. We share common areas, including the bathroom and a common room, where we eat.
8. The detention conditions are terrible. For the last week, we have not even had toilet paper, they ran out and they have not restocked for an entire week. I have to wipe using sanitary pads, which I must soak first.
9. I eat in the common area. We eat right next to each other, ICE detainees with the regular inmate population.
10. The cleaning inside this unit is done by inmates, there are no janitors coming from outside. The standards of sanitation are very poor, and I am forced to touch things that are potentially contaminated by diseases, including tables, chairs, dishes, and cutlery.

11. I am not able to engage in “social distancing,” the common areas do not provide for the space for that.
12. Just last week, a new inmate was added, she was not tested for Coronavirus, as far as I know. And there is a constant stream of new detainees. Also, there is people coming from outside regularly, including guards and other personnel. I don’t know if they are infected or if they have been tested.
13. I am afraid of getting infected and sick. I have suffered asthma since I am a child and in 2015, I had my last severe episode, which led to my hospitalization. If I were to be infected with Coronavirus, I will be at high risk.
14. I hear alarming stories about people getting sick and dying outside in the community. A former inmate, who was deported to Guatemala, called another inmate a couple of days ago, and said that inside this detention center there are people who tested positive for Coronavirus.
15. I am worried I am going to get sick and die too, especially because I can't follow proper hygiene and sanitation in here, and because of my medical condition.
16. I want to be released so I can avoid infection.
17. We are not provided any protection from getting infected.
18. All detainees share the same fear and risk of infection.
19. I am having trouble eating and sleeping. I am very worried.
20. There's no mental or emotional health support for me in here.
21. I am not detained for a crime, I should not be here. This is a place for criminal punishment, and I am here for my immigration status, not for a crime. I have been here for more than one year.
22. Please, release me from detention.
23. I fully authorize Lawyers for Civil Rights to use this declaration, which I narrated via phone, to file legal actions on my behalf.

Date: March 26, 2020


Maria Alejandra Celimen Savino

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