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Via email crcl@dhs.gov and dhs-oig.officepublicaffairs@oig.dhs.gov

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2707 Martin Luther King, Jr. Avenue, SE, Mail Stop # 0190
Washington, DC 20528-0190

Dr. Joseph V. Cuffari
Inspector General
Office of Inspector General
U.S. Department of Homeland Security
245 Murray Lane SW, Mail Stop # 0305
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**Re: Civil Rights Complaint Asserting Abuse Of 48 Black Immigrants
Fleeing Haiti, Including Racial Discrimination, Medical Deprivation,
Inhumane Detention Conditions, Due Process Violations, and
Language Access Violations**

Dear Attorney Culliton-González and Dr. Cuffari,

Lawyers for Civil Rights (LCR) respectfully files this complaint, pursuant to 6 U.S.C. § 345 and 42 U.S.C. § 2000ee-1, with the U.S. Department of Homeland Security's ("DHS") Office for Civil Rights and Civil Liberties and Office of Inspector General on behalf of **Haitian-Americans United, Inc.** ("HAU" or "Complainant"). Complainant is a non-profit organization in Massachusetts dedicated to improving the quality of life for Haitian and Haitian-American families and children through advocacy, education, training, cultural programming, social support, and other services. HAU is based in Greater Boston, home to the third-largest Haitian-American population in the United States.

Within the last several weeks, HAU has been inundated with families recently arrived from the U.S. border, who have fled life-threatening conditions in Haiti, and who survived unconscionable mistreatment under the custody of federal officials at the U.S. border with Mexico between July 2021 to September 2021. The harrowing experiences of 24 of these Black families (48 individuals) form the factual basis for this complaint.

All were fleeing from Haiti and subjected to inhumane conditions and unconstitutional deprivations at the U.S. border. Many were illegally held by federal officials in an overcrowded and squalid “camp” under a bridge near Del Rio, Texas. One individual was held in a makeshift outdoor camp set up in the desert near Tucson, Arizona. DHS officials discriminated against all 48 individuals based on their race and national origin.

The federal government’s blatant mistreatment of Black refugees from Haiti raises serious constitutional concerns under the Fifth Amendment (Due Process) and Fourteenth Amendment (Equal Protection).

In light of DHS’s racialized abuse, HAU files this complaint seeking an immediate DHS and Inspector General investigation into how racial animus and national origin discrimination produced the unlawful detention conditions outlined in this complaint. This investigation must be systemic in scope and specifically include a racial audit to identify how anti-Black and anti-Haitian sentiments infect DHS practices and procedures, especially in connection with apprehension and detention of Black immigrants at the border. The audit must include an assessment of how long white immigrants are detained before they are released by DHS compared with Black immigrants.

HAU seeks urgent policy changes, under DHS Delegation Number 19003 (issued October 26, 2012), to ensure that future Black refugees from Haiti are treated in a lawful manner consistent with federal laws and well-established constitutional protections. The policy changes must ensure that Haitian Creole translators and interpreters are available to effectively and meaningfully communicate with refugees arriving at the border. DHS should commit — in writing — to materially improving conditions for all immigrants, including Black families from Haiti. This commitment should include access to proper food, shelter, medical care, and hygiene — along with the immediate reduction of overcrowded conditions that place families at imminent risk of life-threatening COVID-19 infection, illness, and death. Protocols must ensure that all immigrants are tested for COVID-19, offered vaccines, and released from immigration detention facilities within 72 hours.

HAU requests mandatory anti-bias training for border agents to address the anti-Black and anti-Haitian sentiments that are exacerbating the Haitian refugee crisis at the border, including the unlawful placement of individuals, families, and children in makeshift and squalid conditions under a bridge near Del Rio, Texas.

HAU urges DHS to conduct affirmative, intentional and deliberate community engagement with affected Black families fleeing from Haiti to learn more — firsthand — about their experiences with DHS. HAU and its members are eager to provide testimony in connection with this complaint.

Complainant asks that the results of this requested investigation be outlined in a comprehensive report setting forth all factual findings, determinations, and outcomes from the investigation, made available to the Complainant, the American public, and Congress, pursuant to 6 U.S.C. § 345 and 42 U.S.C. § 2000ee-1.

Background

As news accounts confirm, thousands have fled Haiti in recent months.¹ The country has experienced an incessant wave of political instability — including the recent assassination of the president² — along with severe economic crises, rampant violence, and public health hazards. Natural disasters are common, including earthquakes, the most recent of which struck in August 2021.³ This constellation of apocalyptic devastation compounds the need for Haitians to flee seeking safety abroad.

The Black families whose experiences form the basis of this complaint have experienced particularized violence in Haiti. They reasonably fear returning to Haiti based on past persecution and imminent risk of future persecution and torture. Nevertheless, they are now living under the specter of deportation and removal.⁴

This complaint collects the factual accounts and lived experiences of 48 of these individuals, consisting of individuals, families, and children who fled their homes and arrived at the U.S. border between July and September 2021. Among this group, the common elements are chilling:

- Many saw loved ones persecuted, targeted, and murdered in cold blood by gangs in Haiti, including a young man who found his slayed father's corpse after a violent, yet alarmingly common, machete attack.

¹ "Hundreds of Haitians Arrive in Massachusetts from Southern Border Lacking Housing, Health Care." Boston Globe (Oct. 10, 2021). Available at: <https://www.bostonglobe.com/2021/10/10/metro/mass-scrambles-provide-housing-medical-care-haitian-refugees-arrive-mexico-border/>

² "Haiti Since the Assassination of President Moïse." Reuters (Aug. 14, 2021). Available at: <https://www.reuters.com/world/americas/haiti-one-month-without-assassinated-president-jovenel-moise-2021-08-06/>

³ "Why Earthquakes in Haiti Are So Catastrophic." NPR (Aug. 16, 2021). Available at: <https://www.npr.org/2021/08/16/1027990749/haiti-earthquake-why-deadly-explainer> (noting that "Haiti was hit by a magnitude 7.2 earthquake that crumbled homes and buildings and killed more than 1,200 people").

⁴ "U.S. Expels Nearly 4,000 Haitians in 9 Days As Part of Deportation Blitz." CBS (Sept. 27, 2021). <https://www.cbsnews.com/news/haiti-migrants-us-expels-nearly-4000-in-nine-days/>

- Gang violence is brutal and rampant, and even the late president admitted that the government’s efforts to protect the people were ineffectual to curb the explosion of kidnappings plaguing the country.⁵
- Many were victims of persecution themselves in Haiti. For example, a young man was kidnapped for ransom twice before fleeing for his life after Haitian police officers refused to help.
- Many confirm that asking for help from local Haitian officials would make them targets of not just gang members, but also of government officials, which are often one and the same.⁶
- Some fled after being involved with political parties and social movements, including a couple whose lives were threatened for working at a polling center, and an individual who was threatened with death after the assassin of a candidate he supported won a local election.
- Deep fear and uncertainty are common. As one individual noted: **“If they cannot protect the president, what hope do any of us have?”** Another refugee was more blunt: **“To return to Haiti is to walk into the arms of death with eyes wide open.”**

Fleeing families have risked everything — and have survived rape, assault, robbery, and kidnapping — while seeing their relatives and friends die. They left everything they knew behind to make it to the United States.

Overview of Lived Experiences Under DHS Custody

The Black Haitian families whose experiences are outlined in this complaint were uniformly re-victimized and discriminated against by DHS officers and officials immediately upon their arrival at the U.S. border. DHS has a duty, responsibility, and legal obligation to treat all people — including Black families from Haiti — without racial animus and violence. Immigration detainees are afforded the same Constitutional protections as others in federal custody. *Zadvydas v. Davis*, 533 U.S. 678 (2001).

⁵ “Descent into Hell’: Kidnapping Explosion Terrorizes Haiti.” Reuters (April 26, 2021). Available at: <https://www.reuters.com/world/americas/descent-into-hell-kidnapping-explosion-terrorizes-haiti-2021-04-26/>

⁶ “Haiti Braces for Unrest as a Defiant President Refuses to Step Down.” New York Times (February 7, 2021). Available at: <https://www.nytimes.com/2021/02/07/world/americas/haiti-protests-President-Jovenel-Mois.html>

Yet, DHS subjected these individuals to unconstitutional treatment and inhumane conditions of confinement that amount to cruel and unusual punishment. *Farmer v. Brennan*, 511 U.S. 825 (1994). At the border and while in DHS custody, Black Haitian families were subjected to conditions that threatened their health and safety. For example:

- All of the Black families fleeing from Haiti were kept in overcrowded conditions that threatened their health and wellbeing, particularly in light of COVID-19.
- DHS confined all of these families without protection from or screening for COVID-19.
- Families were denied medical care. Even pregnant women and children experiencing illness were deprived of medical assistance.
- At least one woman suffered a miscarriage while in custody. Another soon-to-be-mother's medications were confiscated and discarded by DHS officials.
- While kept by DHS in makeshift outdoor "camps," they did not have access to food, water, hygiene products, sanitation or protection from the elements. Families were deprived of blankets — or any protection from the ground — while under the bridge near Del Rio, Texas.
- Even once they were removed by DHS from the "camps" and transferred to detention facilities, many families — including those with infant children — continued to experience a deprivation of food and water. Over the course of multiple days, some families received food only once. They had no access to showers, hygiene products, blankets, or beds. Many slept without any covers on concrete floors.

DHS confined Black families from Haiti in these inhumane and dangerous conditions for an unnecessarily and excessively long period of time. Some families were **confined for up to 10 days under the border bridge** near Del Rio, Texas. Once transferred to DHS detention facilities, fleeing **immigrants were confined for up to 49 days** before being released. With few exceptions, the fleeing families were not screened for asylum. **Only two of 48 Black immigrants fleeing from Haiti were asked if they were afraid to return home.**⁷

⁷ Since asylum screenings in the context of the unprecedented and unlawful invocation of the Public Health Service Act (Title 42 of the U.S. Code), are the subject of ongoing litigation in federal court, this complaint will not focus on this particular harm and injury. See *Huisha-Huisha v. Mayorkas*, 21-CV-100

A recurring harm and injury involves the denial of language assistance. None of the Black families from Haiti were offered an interpreter or translator to facilitate communication with DHS. Even though the refugees speak Haitian Creole, no effort was made to communicate in a linguistically competent manner. Even upon release, these families were given written orders and reporting requirements only in English and Spanish. This raises serious concerns surrounding DHS's language compliance policies and systemic practices at the border.

Although the basis of this complaint is the experiences of 48 Black immigrants fleeing Haiti, the commonalities in their experiences demonstrate that the inhumane and dangerous conditions they were subjected to are systemic. The federal government injured and harmed the Black families from Haiti who arrived at the U.S. border in search of safety and human dignity.

In support of this complaint and the requested relief, factual accounts are described in greater detail below.⁸

Facts

I. Deprivation of Medical Care in Violation of the Fifth Amendment (Due Process — Unlawful Punishment and Cruel Treatment)

Despite being under DHS custody, none of the fleeing families were offered medical care, including pregnant women and children. Many expressly requested medical assistance, but they were denied care and treatment, regardless of the length of their detention. DHS also failed altogether to address COVID-19.

1. Denial of Medical Care

Pregnant women were not given proper care, placing their lives and the lives of their unborn children at risk. **DHS's failure to provide medical care led to at least one miscarriage.** More specifically, Frantz's wife, Marjory, was carrying her first child when she was detained by DHS. Both Frantz and his wife made sure to tell DHS officials at two detention centers that she was pregnant and required medical care. After being **separated from her husband**, Marjory was sent to a detention center near San Antonio, Texas.

(D.D.C. filed 2021) (challenging the constitutionality of Title 42 expulsions). This should not be construed to waive any claims or rights related to asylum. All parties reserve their right to pursue asylum-related claims, including claims surrounding the lack of screening. Additional claims may be raised in the future.

⁸ Due to the traumatic and personal nature of the facts asserted herein, pseudonyms will be used in this complaint to preserve privacy.

Marjory begged detention center officials for medical assistance and was blatantly ignored. Days later she suffered a miscarriage. This gross neglect to provide a pregnant woman medical care has only led to further traumatization for this family. They both continue to mourn as the mother attempts to physically recover with support from HAU in Boston. Marjory's miscarriage at the hands of DHS officials rises to the level of deliberate indifference. See *Estelle v. Gamble*, 429 U.S. 97 (1976); see also *Youngberg v. Romeo*, 457 U.S. 307 (1982) (protecting civil detainees from deliberate indifference).

Stories like Frantz and Marjory's are unfortunately not uncommon. Another pregnant woman, Marie, had done everything she could to care for herself and her pregnancy while making the trek to the United States to seek asylum. She arrived at the border with prenatal and other vital medications. **DHS discarded the pregnant woman's medications**, and failed to provide any medical care or replacement medications. Instead of acting with care, DHS confiscated her critical medication directly harming the pregnant mother.

Similarly, when taken into custody, Martine was visibly pregnant at the end of her second trimester. Despite requesting medical care, she was denied any medical attention. Instead, the **pregnant mother was detained for 4 days and forced to sleep on the concrete floor of an overcrowded cell without sufficient food or water**.

Jaqueline, another **pregnant mother, was given no medical attention for the 10 days that she was detained by DHS**.

Many of the Black families from Haiti came to the United States to protect their children's futures. The families' first days and weeks in DHS custody imperiled those same children. While in DHS custody, Joceline, previously an active and giggling **two-year-old child, suffered an ear infection, diarrhea, and a high fever for 8 days before receiving medical attention**. For days, Joceline's parents attempted to secure medical assistance while they were kept by DHS outdoors under a bridge in squalid conditions, and again once they were moved to an indoor, overcrowded detention facility without sufficient food.

Marie, mentioned above, feared not only for her unborn child after being deprived of medication by DHS, but also struggled to care for her infant child who was very ill.

Another parent, Janette, had to watch closely over her daughter Monique, a **two-year-old suffering from an extremely high fever for 8 days**. These families, and others, were deprived of medical assistance by DHS. Seven additional families had infants or toddlers with them, and none received medical care.

One man was **held for 46 days in a detention center and submitted multiple requests in writing for help with a mouth infection**. He did not receive medical care until after he was released from DHS custody.

2. DHS Failed to Address COVID-19

DHS further violated the rights of the Black Haitian families by inhumanely subjecting them to **unsanitary conditions during a global pandemic**. *Savino v. Souza*, 459 F. Supp. 3d 317 (D. Mass. 2020). Detention facilities are at particularly heightened risk during the COVID-19 pandemic. *Id.* These facilities force detainees into close contact with a large number of people. Constant transfers and new intakes increase the likelihood of viral transmission. DHS facilities holding the Black Haitian families did little to mitigate the significant risk of COVID-19 transmission.

Black families from Haiti were housed in overcrowded cells where they could not follow public health protocols or engage in social distancing. **They were confined in close quarters without the basic protection of facemasks**. They could not wash their hands. They had no access to sanitizers or disinfectants.

None were tested for COVID-19 or screened for symptoms before being packed into unsanitary conditions. Before being released from custody into the community, none were tested for COVID-19.

None were vaccinated or offered COVID-19 vaccines. DHS further imperiled lives by failing to provide proper nourishment (discussed below). Malnutrition weakened immune systems and placed Black Haitian families at greater risk of COVID-19 infection and death.⁹

As these factual accounts confirm, Black Haitian families were denied medical care and treatment. An insufficient number of doctors were available to monitor the wellbeing of the families.¹⁰ While under the care and custody of the federal government, these families experienced gross neglect, deprivation, injury, and harm.

⁹ "Malnutrition Linked to Higher Risk of Death from COVID-19." Open Access News. (July 22, 2021). Available at: <https://www.openaccessgovernment.org/malnutrition-linked-to-higher-risk-of-death-from-covid-19/115893/>

¹⁰ "Concerns about ICE Detainee Treatment and Care at Detention Facilities." DHS Office of Inspector General, OIG-18-32 (Dec. 11, 2017). Available at: <https://www.oig.dhs.gov/sites/default/files/assets/2017-12/OIG-18-32-Dec17.pdf> (noting systemic lack of medical care).

II. Inhumane Conditions in Violation of the Fifth Amendment (Due Process — Conditions of Confinement)

Of the 24 Black families from Haiti, nearly all experienced inhumane conditions, including overcrowding, malnourishment, and makeshift detention setting. Each of these unlawful and unconstitutional conditions is discussed below.

1. Dangerous Overcrowding and Malnourishment

Jean Paul, a two-year-old, and his two parents were **torn apart and separated at the detention facility. The father was placed into an overcrowded cell, the son and mother into another.** They were not provided blankets or beds, nor allowed to shower. **For five days, the only food they received were apples.** These insufficient meals were not enough to provide proper nutrition to the two-year-old child or his parents.

Similarly, Janet's family was torn apart, separated, and forced into overcrowded cells with no ability to maintain proper hygiene. Janet remained with the child while the father was in a separate cell. Janet was only **provided with a single slice of bread each day** to share with the child. **For seven days, the mother and child survived on these meager rations.** Watching over her infant, the mother feared for days that the baby would starve and die before they were released.

Multiple **children risked malnourishment and starvation as they were not given their own food rations.** They were left to share individually-portioned meals with a parent. Some children only had bread or apples while being held for days at various detention centers.

One individual was **given food only one out of the four days he was confined.**

A middle-aged man **blacked-out and fainted from malnourishment during his 19 days in DHS detention.**

Marie, who was 6 months pregnant, **slept on a concrete floor with no bedding except for a single piece of cardboard.** With barely any space to move, she attempted to sleep on the overcrowded concrete floor. Her infant stayed with her and was given only bread and water. However, **despite being visibly pregnant, she was given no food** during her confinement. Her husband was placed in a separate but equally crowded cell where he suffered the same mistreatment.

A family travelling with a three-year-old counted themselves lucky to have a few apples to quell their child's hunger while in DHS detention, as families around them had nothing. **The family was refused wipes and diapers for the baby, and were not allowed to wash the baby for the entirety of their confinement.**

Another young man did not even have enough space to lie down during his detention, let alone blankets to protect him from the freezing concrete floor. For almost a week, he and his overcrowded **cellmates were only fed when there were enough leftovers from feeding other prisoners.** Leftovers were infrequent.

These stories are typical of what the Black families encountered. Even those who were fed regularly did not receive enough food, and reported being hungry for the entirety of their DHS confinement. Nearly every person was held in overcrowded conditions, and almost all spent days deprived of the ability to take care of their basic needs through showers or access to a toothbrush. They did not even have the ability to wash their hands. These conditions — particularly the level of overcrowding — would have been inhumane at the best of times. **During the pandemic, overcrowding is unconscionable in light of COVID-19 and lethal variants.** It is also deliberate indifference to a substantial risk of serious harm to the detainees' health. *Savino*, 459 F. Supp. 3d at 317 (finding likelihood of irreparable harm in coronavirus class action due to overcrowding coupled with "minimal efforts at testing and contact tracing" at immigration detention facility).

2. Makeshift and Squalid Conditions

Under DHS supervision, approximately half of the 24 Black families from Haiti were **forced to spend days outdoors before they were moved to indoor detention facilities.** In these makeshift "camps," the families were deprived of food and water, despite the extreme heat. For many, the only shelter from the searing sun was a bridge where DHS agents directed them to wait for processing. Joceline, who is only two-years-old, developed debilitating diarrhea from the unsanitary conditions in the camp. Her parents were unable to secure her medical care for 8 days, by which time she had also developed a serious infection and high fever. Many others, including a number of pregnant women and children under the age of 3, were kept in these life-threatening "camps" without access to medical care for days.

III. Unnecessary and Prolonged DHS Detention in Violation of the Fifth and Fourteenth Amendments

Many families, and young men in particular, were unnecessarily held by DHS for prolonged periods. In light of the harrowing experiences in the detention facilities, **all immigrants should be released from DHS custody within 72 hours.** That is

sufficient time to ascertain whether anyone poses a national security or public safety threat.¹¹

Black families from Haiti were detained for days to months with no information as to when they would be released. One young man who was detained at the border and transferred to Mississippi was **confined for 46 days in a detention facility**. He was never provided with any information about his immigration status or future release.

Frantz spent 19 days trapped in a detention center, unable to contact his wife who was suffering a miscarriage in a different DHS facility. Others spent over a month crowded into various facilities located across the southern United States, where they were unable to access adequate food or medical services.

Due to their race and national origin, Black Haitian families experienced prolonged detention and exposure to life-threatening conditions.

VI. Lack of Legally-Required Language Access in Violation of the Fourteenth Amendment and Title VI

At the border, immigrants are not being provided information in a language they can understand. Of the 48 Black people who fled Haiti — whose experiences form the basis of this complaint — **not a single person was ever given information in Haitian Creole.**

DHS has internal regulations requiring that U.S. Customs and Border Protection (“CBP”) provide meaningful language access to immigrants, and is supposed to facilitate this by providing agents access to interpretation services via telephone.¹² These regulations are required by Executive Order 13166 (2000), which directs federal agencies to identify and address the language needs of those with whom they interact. 65 C.F.R. 159 (2000). Furthermore, to comply with other requirements of the immigration process — such as “credible fear” and asylum-related screenings — immigrants must be provided the means to understand and communicate with DHS agents.

¹¹ See also CBP “National Standards on Transportation, Escort, Detention and Search” (Oct. 2015). Available at: <https://www.cbp.gov/sites/default/files/assets/documents/2020-Feb/cbp-teds-policy-october2015.pdf>

¹² CBP Language Access Plan, sec 4.1 (Nov. 2016). Available at: <https://www.dhs.gov/sites/default/files/publications/final-cbp-language-access-plan.pdf>; see also DHS “How to Request Language Services.” Available at: <https://www.dhs.gov/publication/dhs-language-access-materials>

Nevertheless, HAU members were forced to rely on ad-hoc translations from fellow detainees or insufficient Spanish to understand what was required of them by DHS and the federal government.

If language assistance had been provided, Haitian Creole speakers would have been processed and released faster, thus, materially reducing their exposure to prolonged detention and mistreatment. The lack of language access also hindered the Black families in being properly screened for asylum or other forms of humanitarian relief and immigration protection — and in advocating for much-needed medical care.

Upon release, most families were provided written information only in English and Spanish regarding their legal proceedings and reporting obligations with DHS and the federal government. Immigration authorities did not provide any documentation in the native language of the fleeing families, but instead resorted to Spanish. This was an unacceptable and inaccessible language option. The failure to provide Black immigrants from Haiti with appropriate language support raises serious concerns based on national origin discrimination.

Conclusion

As outlined above, Black families from Haiti experienced serious mistreatment, abuse, and discrimination at the hands of DHS officials at the border with Mexico. This is unlawful, unconstitutional, unconscionable, and unacceptable. People were detained in life-threatening and inhumane conditions. DHS and the federal government have an obligation to do better, and must begin to do so immediately.

In light of DHS's racialized abuse, HAU demands that DHS immediately remedy inhumane and squalid conditions, including overcrowding and malnourishment. DHS must also investigate how race and national origin discrimination resulted in Black people from Haiti being disproportionately subjected to these patently unlawful conditions.

Specifically, HAU demands:

- An immediate DHS and Inspector General investigation into how racial animus and national origin discrimination produced the unlawful detention conditions outlined in this complaint. This investigation must be systemic in scope.
- A racial audit to specifically identify how anti-Black and anti-Haitian sentiments infect DHS practices and procedures, especially in connection with apprehension and detention of Black immigrants at the border. This audit must include an

assessment of how long white immigrants are detained by DHS before they are released compared with Black immigrants.

- Urgent policy changes, under DHS Delegation Number 19003 (issued October 26, 2012), to ensure that future Black immigrants from Haiti are treated in a lawful manner consistent with federal laws and well-established constitutional protections. This must include ensuring that Haitian Creole translators and interpreters are available to effectively communicate with people arriving at the border.
- Mandatory anti-bias training for border agents to address the anti-Black and anti-Haitian sentiments that are exacerbating the Haitian refugee crisis at the border, including the placement of individuals, families, and children in makeshift and squalid conditions under a bridge near Del Rio, Texas.
- Affirmative, intentional and deliberate DHS community engagement with affected Black families fleeing from Haiti, including those affiliated with Complainant to learn more — firsthand — about their experiences with DHS.
- A report outlining all factual findings, determinations, and outcomes from the investigation and community engagement efforts concerning DHS's mistreatment of Black refugees from Haiti. The report must be made available to the Complainant, the American public, and Congress, pursuant to 6 U.S.C. § 345 and 42 U.S.C. § 2000ee-1.
- A written commitment that conditions for all immigrants — including Black families fleeing from Haiti — will materially improve. This includes a specific time line for improved access to food, shelter, medical care, and hygiene along with the immediate reduction of overcrowded conditions that place families at imminent risk of life-threatening COVID-19 infection, illness, and death.
- Protocols to ensure that all immigrants are tested for COVID-19, offered vaccines, and released from immigration detention facilities within 72 hours.

Undersigned counsel and Complainant are available to meet immediately with the Office for Civil Rights and Civil Liberties and the Office of Inspector General to discuss this complaint and urgent next steps.

Counsel may be reached at asharma@lawyersforcivilrights.org.

Respectfully submitted,

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