

DECLARATION OF KARINA N. VALENCIA

1. My name is Karina N. Valencia. I am an attorney licensed to practice law in Massachusetts and Rhode Island. Currently, I am the Staff Attorney for the Immigrant Coalition of Rhode Island, with offices at the Dorcas International Institute. My role entails providing legal services to indigent clients seeking asylum or deportation defense. This includes both non-detained as well as detained individuals.
2. Since May of 2019, I have performed “Know Your Rights” presentations and given one-on-one consultations to ICE detainees at the Donald W. Wyatt Detention Facility (“Wyatt”). These consultations are intended to provide information to the detainees, determine what representational services they might be eligible for, and what legal defenses to deportation might be available to them.
3. I have provided these services within the Wyatt units which house immigrants detained by ICE, approximately twice monthly since May of 2019, and have observed the conditions there.
4. Based upon my own observations, after approximately 1 year of work within those units, I can report the following:
 - a. Immigration detainees at the Wyatt are housed in two units exclusively for detainees in immigration custody (“J-1” and “J-2”)
 - b. Unit J-1 is the smaller of the two units while J-2 is the larger.
 - c. Over the past year, at various times, there were anywhere from 25-84 detainees housed within J-1 and J-2.
 - d. The detainees are housed two to a cell and sleep on bunk beds. Detainees take meals together in a communal space, at small round tables three to four feet in

diameter. The tables are fixed to the floor and four chairs are fixed in place for each table. The unit includes shared lavatories and two shared shower units.

- e. Each of these areas contains many metallic and plastic surfaces that detainees touch and breath on and as to which constant disinfection is impracticable.
 - f. The detainees' recreation area is also within the units and not an open-air space. It is partitioned by a plexiglass wall, reaching from floor to ceiling, with a single-door entrance. The recreation space is constructed of concrete and rectangular in shape.
5. Correctional officers and staff rotate regularly in and out of the unit, as do third party vendors and service providers. Detainees also regularly rotate in and out of the facility as they are arrested, released, or deported.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 16th day of April, 2020, in Fall River, Massachusetts.



Karina N. Valencia, Esq.

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