Declaration of Matilde Flores de Saavedra

I, Matilde Flores de Saavedra, declare as follows:

- 1. My name is Matilde Flores de Saavedra. I am 78 years old and a Mexican citizen. I am currently detained at LaSalle ICE Processing Center in Jena, Louisiana.
- 2. In early March of 2020, I went to the medical unit in the detention center because I was feeling lightheaded. That day, detention center medical staff did a blood test.
- 3. On March 18, medical staff received the results and told me that my blood sugar level was 450 and that I had diabetes. Medical staff gave me an insulin injection that day and I now receive two insulin injections every day. Still, when I stand up, I feel lightheaded and dizzy. I feel like the ceiling starts spinning and like I'm going to fall.
- 4. I was also recently diagnosed with high blood pressure. On March 23, 2020, when medical staff took my blood pressure, they told me that my blood pressure was 170, far outside the normal range. I still regularly have heart palpitations and feel pressure in my eyes and nose.
- 5. I am confined to a room called Falcon-D dorm in LaSalle with about 80 other women. We sleep on bunk beds about a yard and a half from each other. There are people in both bunks next to me. The dorms are only cleaned once a day by other detainted people who are not given masks.
- 6. If were released, I would go live with my son Osvaldo Saavedra, who lives at County Road-205a #116, Falfurrias, Texas 78355.
- 7. Tensions are running high as everyone in the dorm is worried that the detention center is doing nothing to prevent them from contracting the disease. Neither the staff nor the detainees use gloves or masks around the dorm and neither the staff or ICE have said anything to any of us about coronavirus. All we know is what we see on television.
- 8. I have authorized my attorney to sign on my behalf, given the difficulty of arranging visitation and travel in light of the current COVID-19 pandemic. If required to do so, I will provide a signature when I am able to do so.

I declare under penalty of perjury that the foregoing information is true and correct to the best of my knowledge.

Date: 03/24/2020

Jeremy Jong signing on behalf of Matilde Flores de Saavedra