

Declaration of Pardeep Kumar

I, Pardeep Kumar, declare as follows:

1. My name is Pardeep Kumar. I was born on November 10, 1991 in India, and I am currently detained by ICE at Lasalle ICE Processing Center in Jena, Louisiana.
2. I have been hunger striking since November of 2019 to protest my detention. The detention center staff often threatens to force-feed me if I don't at least drink Boost, a liquid meal supplement. The force-feeding involves staff forcing tubes up my nose, so sometimes I will comply and drink the Boost, but most of the time, my body rejects the Boost and I throw it up. On March 25, 2020, staff told me that they would begin force-feeding me today or tomorrow.
3. The lack of food has left my body extremely weak. I now weigh 117 pounds, even though I weighed 141 pounds at the beginning of my hunger strike. I now need a wheelchair to get around. My genitals burn when I urinate. The vision in both of my eyes is cloudy and I have difficulty seeing. My right arm is constantly swollen and large amounts of my hair continue to fall out. Even as I keep losing weight, my stomach keeps getting bigger.
4. In February, 2020, ICE tried to deport me, but the pilot on my deportation flight refused to take off because it was clear that I was emaciated and unwell.
5. On the week of March 9, 2020, doctors told me that my kidneys are not working properly and that they had to do some tests. On March 18, those doctors told me that my body is extremely weak and that I could die. On March 20, I was taken to a hospital, where doctors told me that I have a kidney infection. Every day they're giving me an injection for the kidney issue. This kidney issue is causing 24-hour pain in my lower back that allows me to sleep only a couple hours a night.
6. I have also been experiencing chest pains and was hospitalized because of those chest pains on March 13, 2020.
7. Doctors at the detention center have also told me that Alexandria, Louisiana already has cases of coronavirus and they can't take me to the emergency room there because I'm already so weak.
8. In early February, my lawyers submitted to ICE a request that I be released from ICE custody because I was dying. In that request, a doctor who reviewed my records advocated for my release because my malnourishment caused my blood pressure and heart rate to fall dangerously low and that I was at a high risk of heart damage. The doctor informed ICE that these conditions are life threatening and that I should not be in detention.

9. On March 16, 2020, my lawyers submitted a request for my release to ICE. They included a letter from three doctors who evaluated me in January of 2020 in that request explaining that because I was malnourished and immunosuppressed and because coronavirus spreads very quickly in detention centers, I was at substantial risk of death. However, ICE denied my request this time as well.
10. If released, I would live with my uncle Bhim Singh Gollen, at 14316 SE 287th Street, Kent, Washington, 98042.
11. 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.



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Jeremy Jong signing on behalf of Pardeep Kumar

Date: 03/26/2020