

Declaration of Sirous Asgari

I, Sirous Asgari, declare as follows:

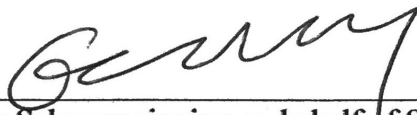
1. My name is Sirous Asgari. I am a 59-year-old Iranian man currently detained by ICE at the Winn Correctional Center in Winnfield, Louisiana. I was transferred here on Friday, March 27, 2020, from the Alexandria Staging Facility (“ASF”) in Alexandria, Louisiana, after a suspected COVID-19 infection in my pod was discovered.
2. I have been in several different immigration detention facilities since I was arrested by ICE in November, 2019, upon my acquittal of all charges in a federal trial. Although I wanted to take voluntary departure to Iran, ICE opposed my request and instead detained me. I was first detained in Northeast Ohio Correctional Center in Youngstown, Ohio for three months, then transferred to immigration detention in Seneca County Jail in Tiffin, Ohio. I was transferred to ASF on March 10, 2020, and then to Winn on March 27, 2020.
3. In about 2013, I began developing severe lung infections during winters and at other times. In 2016, after it took me a month and several medications to get rid of one infection, I went to a specialist in Iran. I was given several tests and x-rays and told I am susceptible to pneumonia and chronic lung infections, and that I should be sure to treat any infections as quickly as possible.
4. In February 2020, about two weeks after I was transferred to Seneca County Jail, I got the flu, which immediately went to my lungs. I went to the medical staff and said I had pneumonia, and they immediately put me on antibiotics for 8 days. At that time, in advance of my custody review, I wrote to my deportation officer to advise him that I am susceptible to lung infections and to pneumonia and needed to be released. I received no response, and ICE decided to keep me in custody.
5. On March 10, I was transferred to ASF, which is a deportation hub. It took twelve hours to travel to ASF from Seneca. I was shackled and handcuffed for hours, and when I arrived at ASF, as I was walking into the facility, I collapsed. I was told I had high blood pressure of 160 over about 90. A few days later a nurse at ASF told me that my blood pressure continued to be high, and had hit 190 over another number, I think 110.
6. I also have Grade 2 fatty liver disease, which I control with diet.
7. I was detained at ASF for seventeen days, long past the maximum that people are supposed to stay there, which I understood is seven days. The facility is one where people go in and out for deportation, and I was exposed to approximately 600 different detained people during my stay, both at ASF and in the attempts to deport me.

8. ICE put me on nine different flights in an attempt to deport me during my stay at ASF. On March 17, 2020, I was placed on a flight to Boston, where several people left the plane and several others boarded. From Boston I was flown to Newark, New Jersey, and again, many more detained people boarded. At Newark, I was supposed to get off the plane, but I was informed that my flight to Iran was cancelled. The plane then went to Texas, and from there back to ASF.
9. On March 23rd I was put on another flight, this time to Harrisburg, Pennsylvania, where the plane picked up additional detained people. From there we flew to Brownsville, Texas, and several of us disembarked and rode on a bus to the CBP Station at Rio Grande. There, the Mexican men among us were removed to Mexico. Four of us remained, and from there we were taken on a bus to Port Isabel Detention Center in Brownsville. We slept on a concrete floor and then were taken to the airport the next morning flown to Toledo, Ohio. There I was told I would be returning to ASF. Another few dozen detained people boarded. From there we went to Richmond, Virginia, picked up more detained people, and then returned to ASF on March 24 with more than 100 people on board.
10. After each of these journeys, I was so traumatized that I consulted with the mental health staff at ASF. If I would have been allowed to depart voluntarily, all this suffering could have been avoided.
11. I have been in three different pods in ASF. Each pod houses about 80 people in 40 double bed bunks. Hygiene is very low, and the pod smells very bad. People are sent there directly from their arrest and in the clothes they traveled in. When I first arrived I was in a suit, because I was arrested in court. I slept in that suit for four days, with my coat as my pillow.
12. Except for wiping down of the dining tables, no cleaning process is performed by ASF itself. Instead, cleaning of showers and floors is left to the people who are detained. There are some supplies for cleaning materials. For personal use, detained people are provided with one all-purpose liquid foam soap for shaving and for everything else.
13. At ASF, many people are coming in and out every day, sometimes 30, 40 or even 60 people. I believe about 100 staff work there. As news of the coronavirus spread, there began to be a major problem with people coughing, which was absolutely terrifying for everyone. On March 12 or 13, when I was in Pod D, I asked for a mask and was denied. I said I had a mask in my suitcase, which a friend had given me. But they didn't give me access to the mask.
14. After I returned from Newark, I was transferred to Pod E and was there until March 23, when I was flown to Toledo. When I returned to ASF on March 24, I was placed in Pod C. By then there was much more awareness of the coronavirus in Louisiana, and many staff were using masks. On about March 25 I talked to a manager at the facility about my susceptibility to pneumonia, and after I insisted

- they finally gave me a mask. I also asked for masks for two elderly people and another person with asthma, but the staff would not give masks to them.
15. On March 26, a warning sign was put on our pod, Pod C. The sign said the pod was under medical observation. The sign had places to check off whether the risk of exposure was low, medium, or high, and high was checked off. People began to panic. We asked for the manager to explain. He said that a man who had slept the night before in our pod and was then deported had possibly been exposed to the coronavirus. That night, instead of being allowed to walk to medication storage to pick up our medicines, people in our pod were told not to leave the pod and instead brought the medication.
 16. The day after, on March 27, at around 8 a.m., guards came into the pod and chained and shackled everyone. Usually this takes place outside the pod. Some people started to cry. There was a young man, nineteen years old, who had asthma, and he was very scared.
 17. They transferred us to the facility that I am in now, Winn. I am with the same group of a little more than 30 people that I arrived with, along with a dozen more men who were already here, and we have the impression that we are under quarantine. At some point, I saw a transfer letter for me with ICE letterhead with a sticker on it saying that the person may have been exposed to COVID-19.
 18. Conditions at Winn are absolutely humiliating, and horrible when it comes to hygiene. There are 44 men here and only one shower and two unenclosed toilets. The beds are less than two feet apart, and they are metal and rusted. The rust gets on the sheets when we sleep. The environment is very humid, and the bed sheets are wet from our perspiration when we wake up. There are some fans, but the floor and ceiling are concrete. I have been in 6 jails in the United States, and none have been as bad as the one I am in now.
 19. Guards and medical staff people come in to our pod. They take us to the recreation center and take our temperature twice a day. We are isolated from the other people detained here. While other pods eat in a dining area, we eat inside our pod. We see medical staff wearing masks, but the guards do not always wear them.
 20. Winn does not provide cleaning. They give us two solid soaps for our own use, and we clean the facility with some Clorox. There are a couple of signs instructing people to wash hands, but no involvement in educating people about how to prevent the spread of coronavirus or other infections.
 21. I expect to be transferred back to ASF, to be exposed to hundreds more people entering and leaving the facility, and to go through the same process of being taken on flights that may not result in my deportation.

22. Because of my chronic lung issues, my high blood pressure, and my liver disease, I am very concerned that if I contract COVID-19 I will become very sick and may not survive.
23. If I were released, I would go live with my 30-year-old daughter Zahra Asgari in Redwood City, California. She will cover all my expenses. I was living with her for a year while I was out on bail during the federal trial that ended with my acquittal.
24. 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, 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.



Ghita Schwarz signing on behalf of Sirous Asgari

Date: 03/30/2020