

Declaration of Tatalu Helen Dada

I, Tatalu Helen Dada, declare as follows:

1. My name is Tatalu Helen Dada. I am a 40-year-old Nigerian woman currently detained by ICE at LaSalle ICE Processing Center in Jena, Louisiana. Before ICE detained me, I was a nursing student at Grambling State University.
2. I have suffered from Graves' disease since 2017. Graves' disease is an autoimmune disorder in which a person's immune system attacks their thyroid. The disorder caused me to develop a mass in my thyroid and for my thyroid to become overactive. I have been hospitalized about seven times due to my condition.
3. In October 2019, I received radiation treatment at LSU Health Shreveport to suppress my immune system. After the treatment, I was hospitalized for 8 days, but ICE kept me in shackles the entire time, except when I showered.
4. After the radiation treatment, my condition worsened. I had irregular heart palpitations, my blood pressure went up, and I lost half of my hair. About a month after the radiation treatment, I was taken back to LSU Health to see an endocrinologist at LSU-Health, who told me that the radiation did not work and then placed me on an iodine potassium solution for two or three months to help suppress my immune system so that it would not attack my thyroid anymore.
5. In January 2020, medical staff at LaSalle did a blood test for me. Doctor Morales at LaSalle told me that my organs were shutting down and sent the results of the lab work to LSU Health.
6. On February 14, I had difficulty breathing and severe chest pain and was taken to the emergency room at LSU Health. The emergency room doctors there told me that I now suffer from hypothyroidism and that I am now immunocompromised. They told me that I was lucky to be alive because my immune system was barely functioning anymore. Despite being close to death, LaSalle staff kept my shackled around my waist so tightly during that visit that I urinated blood.
7. On February 24, I was taken to an appointment with LSU Health endocrinologists. One endocrinologist told me that my immune system is compromised and that this case is the worst case he has seen in 32 years of practice. Another endocrinologist there told me that my immune system readings were essentially the second lowest ever recorded and that the doctors were surprised that I was alive.
8. I also suffer from asthma. Almost every day, I require four inhalers to breathe. Moreover, I was recently diagnosed with an eye condition that is robbing me of my vision.

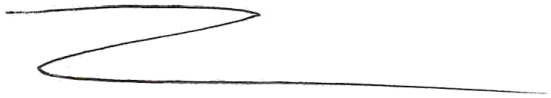
9. My health is rapidly deteriorating. Because of my multitude of conditions, I constantly have trouble breathing and chest pains. I have lost chunks of my hair and suffer from chronic ulcers.
10. I have also been on a liquid diet since August of 2019. However, I cannot keep anything down, even Ensure. Because of this, I have become extremely malnourished. In the last six months, I have lost about 20 pounds.
11. On March 22, 2020, Captain Naggy at LaSalle told me that they were moving me into a solitary cell. I asked Naggy to talk to the mental health specialists at the facility because I mentally cannot survive in isolation. I suffer from anxiety and depression due to attacks on my family in Nigeria in which I saw my neighbors burned alive in their home, a fate I narrowly escaped. I therefore have panic attacks whenever I am left alone in a confined space and have been seeing mental health staff about my condition every week. The captain told me that I had to explain my condition to the medical staff myself.
12. I then heard Naggy tell two officers and a sergeant to “drag my boney skin ass to the cell.” He then told other guards, “make sure you drag the bitch to the cell.” When the guards surrounded me, I told them that if they forced me into solitary, I would take my own life.
13. After I discussed the situation with medical staff, Naggy told me that if I refused to go to solitary, I would have to sign a statement saying that if I died from coronavirus, the facility would not be responsible. Because I was surrounded by guards who I knew were instructed to drag me, I signed.
14. On March 23, 2020, the ICE supervisor at LaSalle, Bulvin Dunn, denied my request for release in light of COVID-19.
15. I am currently in dorm Falcon-D. There are about 80 people detained with me. The dorm is at capacity because ICE is still bringing people into the detention center. There are new people who ICE brought from a county jail that arrived on March 23, 2020. One person that ICE brought a couple of days ago was sneezing and coughing.
16. In my dorm, all detained people share three working toilets, six showers and eight telephones. The toilets, showers, and telephones are sprayed by other detainees in the voluntary work program once a day, but those detainees do not wear masks. They all sleep in bunk beds about a yard and a half apart. There is no hand sanitizer available to us and the guards come in and out of the dorm without wearing masks or gloves. I have not been told anything about COVID-19 by facility staff or ICE. There are no flyers or written materials in the dorm about social distancing or hand washing.
17. Because I suffer from malnutrition, asthma, Graves’ disease, hypertension, and I'm severely immunocompromised, I am at extreme risk for serious injury or death from COVID-19. Even if LaSalle had sufficient medical staff and isolation rooms to keep me

apart from COVID-19 infected detained people, such isolation would damage my already fragile mental health. The only way to keep me safe is to release me.

18. If I were released, I would go live with my sister Damilola Tamara Dada at 2000 West Barnett Springs #205 in Ruston, Louisiana, 71270.

19. 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.

A handwritten signature in black ink, appearing to be 'Jeremy Jong', written over a horizontal line.

Jeremy Jong signing on behalf of Tatalu Helen Dada

Date: 03/23/2020