

April 20, 2022

The Honorable Alejandro Mayorkas
Secretary of the Department of Homeland Security (DHS)
U.S. Department of Homeland Security
2707 Martin Luther King Jr Ave SE
Washington, DC 20528

Re: PETITION Requesting the Administration to Abstain from Renewing Contract with Glades County (Florida) with a Performance Period End Date of April 30, 2022.

Dear Secretary Mayorkas,

The undersigned Florida and national organizations who represent the Shut Down Glades Coalition write to urge you to abstain from renewing the U.S. Immigration and Customs Enforcement (ICE) contract with Glades County, as the Glades County Detention Center (“Glades”) located in Moore Haven, Florida has demonstrated a long history of pervasive and persistent abuse of the immigrant population that reaches the level of inhumane and degrading treatment. The abuses against individuals detained at Glades warranted closure of this facility years ago, and now, with the current ICE population at zero and the performance period for the Intergovernmental Service Agreement (“IGSA”) between ICE and Glades County coming to an end on April 30, 2022, DHS can and should prevent further abuse of individuals at this detention center by permanently terminating the IGSA.

The Glades County Sheriff's Office, which operates Glades County Detention Center, has repeatedly evaded oversight and ignored ICE's own directions, demonstrating time and again that the detention center is beyond reform. We are concerned that the administration has decided to pause the facility's usage until a future, undetermined date, instead of abstaining from renewing the Glades contract altogether. While we are relieved to see that the administration has stopped placing individuals in ICE custody at Glades for the time being, ICE and Glades County have consistently demonstrated that they are unwilling and unable to appropriately mitigate and respond to the harm suffered by those in their care. Our organizations have filed at least 77 complaints to the DHS Office of Civil Rights and Civil Liberties (“CRCL”), the Office of Inspector General, and other oversight bodies requesting investigation of abuses at Glades since 2017, but the detention center continues to “pass” questionable inspections, including most recently in February 2022. While the CRCL complaints highlight the abuse suffered by roughly 140 individuals, the true extent of the harm is much broader. These complaints represent only the individuals who found the courage, resources, and allies to file the complaints.

The documents attached provide support for our claims and demonstrate why Glades needs to close completely, which you can do by abstaining to renew the contract with Glades County:

- Petition signed by more than 1592 individuals calling for the closure of the facility out of concern about the pervasive medical neglect, unlawful use of toxic chemicals, racialized violence, inhumane treatment, physical abuse, sexual misconduct, and attacks on individuals' dignity and safety that occur regularly at the Glades facility.
- Memo sent to DHS in November 2021 citing the systemic and consistent pattern of racism and anti-Blackness towards Black immigrants at Glades. The treatment of Black immigrants at Glades includes, but is not limited to, disproportionate: threats of physical violence, use of pepper spray, solitary confinement, extreme forms of physical violence like using the restraint chair, off-camera physical assault, and punitive, arbitrary administrative sanctions. Black immigrants at Glades are also subject to anti-immigrant verbal abuse that is often tied to their nationality.
- Letter from 17 members of Congress to DHS on February 1, 2022 calling for the facility's closure.
- Letter from eight members of Congress to DHS on July 22, 2021 calling for the facility's closure.
- Large multi-individual complaint from February 2021 citing reckless endangerment of the lives of those detained at Glades during the Covid-19 pandemic, including medical abuse, lack of PPE and hygiene products, haphazard transfers, exposing healthy people to the virus through the practice of cohorting, retaliation for peaceful protest, use of toxic chemicals in confined spaces, hospitalizations, deaths, disappearances, and other serious abuses.
- Multi-individual complaint submitted August 2021 on behalf of seven immigrant women, citing hostile, unsanitary, and unsafe living conditions including sexual voyeurism by male guards; unannounced entries in violation of privacy and Prison Rape Elimination Acts ("PREA") abuse prevention policies; sexually abusive behavior from medical staff; racist verbal abuse; violent and threatening interactions; and, hygiene products withheld abusively.
- Letter submitted December 2021 detailing a carbon monoxide buildup that resulted in the poisoning of nine people who were working in the kitchen at Glades: six detained individuals and three Glades staff members. Of these, four detained men and one female Glades staff member were hospitalized at Hendry Regional Medical Center, and two of the hospitalized men subsequently had to be airlifted from Hendry Regional Medical Center to AdventHealth hospital in Orlando because exposure to the gas caused such dire symptoms.

Through the submission of the complaints and letters identified above and other lawsuits¹, ICE and various oversight bodies have been aware of the long-standing pattern of abuses at Glades

¹ See *Gayle v. Meade*, 2020 WL 2203576 (S.D. Fla. May 2, 2020); *St. Louis v. Martin*, 2020 WL 3490179, at *1 (M.D. Fla. June 26, 2020).

for years, and yet multiple investigations and inspections have failed to permanently put a stop to the inhumane treatment at this facility. Based on this pattern, our coalition does not have confidence in the oversight process. We are not alone. The Committee on Homeland Security expressed the same concerns, explaining that “[DHS’s] oversight tools have few enforcement mechanisms to ensure compliance with law and policy. The enforcement mechanisms that do exist, such as canceling contracts or issuing financial penalties, are seldom used.”² While this coalition is relieved that the use of Glades as an ICE facility is “paused,” Glades has proven time and again that it cannot be reformed. More inspections and investigations by oversight bodies without enforcement authority will not ensure that immigrants are no longer harmed at Glades. The only thing that can achieve that goal is a decision by DHS to permanently end any contractual relationship with Glades County.

We are also concerned that Glades will simply be quietly repopulated in a matter of weeks or months based on similar occurrences across the country. For example, at the Yuba County Detention Center in California, the ICE population was decreased to zero in October 2021, following multiple complaints from detained individuals, advocates, and 24 congressional representatives who called for closure, only to be repopulated two months later without any internal changes or formal announcement made to community stakeholders and political representatives.

The Biden Administration must ensure that immigrants will no longer be harmed at the Glades County Detention Center by abstaining from renewing the IGSA with Glades County and terminating the relationship altogether.

Not only is the termination of the IGSA the only way the Biden Administration and DHS can prevent further harm, it is also the only just option in pursuing the agency’s goal of creating a more fair, just, and efficient immigration system. Thank you for your attention to this critical and urgent matter.

Sincerely,

American Civil Liberties Union of Florida
Americans for Immigrant Justice
Detention Watch Network
Doctors for Camp Closure
American Friends Service Committee Florida
Freedom for Immigrants

² See ICE Detention Facilities Failing to Meet Basic Standards of Care, U.S. House of Representatives Committee on Homeland Security, Majority Staff Report, September 21, 2020, <https://homeland.house.gov/imo/media/doc/Homeland%20ICE%20facility%20staff%20report.pdf>, last accessed April 18, 2022.

Immigrant Action Alliance
Southern Poverty Law Center
Florida Immigrant Coalition
Legal Aid Service of Broward County
Detention Kills
Black Lives Matter Palm Beach County
Community Hotline for Incarcerated People
Food Not Bombs Lake Worth
The Grey Tea Kettle Chaplaincy Community Care & Support
The Farm Worker Association of Florida
University of Miami School of Law Immigration Clinic
United We Dream
Human Rights Defense Center and QLatinx

Cc:

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To whom it may concern:

Message

I am deeply concerned about the abuses that have been repeatedly reported inside Glades Detention Center.

This pattern of abuses includes but is not limited to: high-ranking staff delivering death threats against Black immigrants and taunting of at least one Haitian immigrant with a noose; the rampant use of toxic chemicals and pepper spray, and targeting of Black immigrants and women. These reports are highly disturbing and completely unacceptable. No one should be treated this way.

I urge you to take action and shut down this detention center and end the pattern of abuses that we are seeing in Florida.

Sincerely,

[First Name] [Last Name]
[Your Address]

Elaine	Weston	Deerfield Beach	Florida
Wesley	Weston	Deerfield Beach	Florida
Jay	Schwartz	Winter Haven	Florida
Thomas	Keenan	Saint Augustine	Florida
Sylvie	Reichmann	Oneco	Florida
Alicia	Peterson	Tallahassee	Florida
Annik	Babinski	Miami	Florida
Audrey	Amarquaye	Saint Cloud	Florida
Alana	Cooney	Miami	Florida
Angela	Acosta	Gainesville	Florida
Aide	Aguilar Ayungua	Tallahassee	Florida
Aaron	Soriano	Miami	Florida
Anthony	Tijerino	Miami	Florida
Amy	Smitg	Orlando	Florida
Abe	Levy	Bonita Springs	Florida
Anne	Bulmer	Ocala	Florida
Alan	Clark	West Palm Beach	Florida
Yousef	Shams	Pcb	Florida
Elmer	Acevedo	Naples	Florida
Brenda	Diaz	Delray Beach	Florida
Alan	Pearlman	Delray Beach	Florida
Adrian	Shotwell	Port Charlotte	Florida
Adriana	Robledo	Sarasota	Florida
Michael	Hamilton	Orlando	Florida
Agate	Lawson	Holiday	Florida
Alison	Killelea	Siesta Key	Florida
Anna	Rodell	Gainesville	Florida
Aileen	David	Beverly Hills	Florida
Alice	Shurtz	South Pasadena	Florida
Albert	Kamhi	Casselberry	Florida
Alison	Kincaid	Jacksonville	Florida
Alan	Thomas	Miami	Florida
Anne	Landrum	Maitland	Florida
Alejo	Vada	Miami	Florida
Alexzandra	Newman	Tampa	Florida
Lexi	Tracton	Coral Springs	Florida
Alice	Gridley	Gainesville	Florida
Alice	Lovell	Cape Coral	Florida
Alice	Christy	Miami	Florida
Aline	Maynard	Delray Beach	Florida
A	Lippis	Miramar	Florida
Alison	Carville	Fort Myers	Florida
Alison	Levy	Tampa	Florida
Alexandra	Gordon	Miami	Florida
Stephanie	Anderson	Tampa	Florida

Alison	Sirak	North Fort Myers	Florida
B	Drake	Bradenton	Florida
Jessica	Alvarado	Cutler Bay	Florida
Alyssa	Henning	Plantation	Florida
Alyssa	George	Tampa	Florida
Amanda	Santiago	Winter Springs	Florida
Marianne	Amann	Port Orange	Florida
Anne-Marie	Bercik	Maitland	Florida
Thomas	Washburn	Fernandina Beach	Florida
Amy	Lund	Coral Gables	Florida
Amy	Clark	Ponte Vedra Beach	Florida
Amy	Donner	Sarasota	Florida
Amy	Meinstein	Clearwater	Florida
Ana	Reyes	Orlando	Florida
Anabel	Alfonso	Miami	Florida
Ana	Gutierrez	Chicago	Illinois
Alexander	Ochotorena	Palm Bay	Florida
Lorelle	Anderson	Sanford	Florida
Andrea	Wolfson	Seminole	Florida
Andrea	Johnson	Land O Lakes	Florida
Andreza	Ferreira	Coconut Creek	Florida
Angela	Carpenter	New Smyrna Beach	Florida
Angela	Wynn	Sarasota	Florida
Angelique	St.Pierre	Melbourne	Florida
Angel	Kelley	Estero	Florida
Michelle	Rocha	Tampa	Florida
Angela	Hill	Miami	Florida
Anil	Sawh	Pembroke Pines	Florida
Anita	Parmer	Ft Myers Beach	Florida
Aleecea	Ledford	Lake Monroe	Florida
Anna	Kuhlman	South Pasadena	Florida
Ann	Fonfa	Delray Beach	Florida
Ann	Bassett-Hite	Tequesta	Florida
Ann	Aguila	Miami Springs	Florida
Anita	Carey	Tampa	Florida
Antony	John	Sarasota	Florida
Miguel	Gimenez	Miami	Florida
Mary	Perry	Plantation	Florida
Alicia	Frecker	Brandon	Florida
Jean	Siegel	Port St.Lucie	Florida
Aranza	Diaz	Miami Beach	Florida
Ruth	Gore	Ocala	Florida
Arlie	Montez	Port Charlotte	Florida
Gregory	Harris	Tampa	Florida
Andy	Lynn	Pensacola	Florida

Aude Ml	Sicard	Pembroke Pines	Florida
Suzanne	Smither	New Smyrna Beach	Florida
Dick	Moller	Grand Rapids	Minnesota
Amy	Turkel	Miami	Florida
Audree	Karlosky	Naples	Florida
Audrey	Bomse	Miami Beach	Florida
Arlene	Ustin	Delray Beach	Florida
Ava	Jacques	Jacksonville	Florida
Carlos	Avila	Deland	Florida
Willow	Beltran	Dania Beach	Florida
Assata	Yaa-Asantewa	Bronx	New York
D	Couper	Green Cove Springs	Florida
Azra	Khan Md	Parkland	Florida
Betty	Barriga	Port Charlotte	Florida
Barbara	Coy	Sarasota	Florida
Elizabeth	Inman	Largo	Florida
Raymonda	Schwartz	Crestview	Florida
Bobby	Albritton	Sarasota	Florida
Andre	Ryland	Pensacola	Florida
Barry	Joseph	Boynton Beach	Florida
Judith	Basch	Davie	Florida
Barbara	Schanberg	St. Petersburg	Florida
Ben	Watson	Boynton Beach	Florida
Barry	Butin	Fort Lauderdale	Florida
Bb	Stephenson	Boynton Beach	Florida
Beth	Caterina	Miami	Florida
Bianca	Deleon	Fort Pierce	Florida
Joanie	Bigham	Hobe Sound	Florida
Rebecca	Roberts	New Port Richey	Florida
Bianca	Beckwith	Apopka	Florida
Miguel	Bejar	Jacksonville	Florida
Patti	Schultze	Lutz	Florida
Benoit	Braconnier	Bordeaux	Florida
Barry	Rubin	Largo	Florida
Bernita B	Smith	Naples	Florida
Beth	Hawley	Sarasota	Florida
Beth	Lashley Rothwell	Orlando	Florida
Betsy	Lyons	Jacksonville	Florida
Betsy	Blondin	Sarasota	Florida
Susan	Piotrowski	Ocala	Florida
Bette	Steinmuller	Saint Petersburg	Florida
Beverley	Markowitz	Miami	Florida
Francois	Bezuidenhout	Miami	Florida
Roberta	Richards	Port St Lucie	Florida
Lillian	Gorfain	Venice	Florida

Barbara	Hicks	Sarasota	Florida
Joseph	Duncan	Orange City	Florida
Grumpy	Grover	Naples	Florida
William	Mahl	Ft Myers	Florida
Bj	Griffith-Gerald	Ft Myers	Florida
Barbara	Glass	Miami	Florida
Elizabeth	Mcclaskey	Miami	Florida
Bruce	Kuechmann	Punta Gorda	Florida
Bianca	Vega	Altamonte Springs	Florida
Ana	Blanco	Miami	Florida
Ian	Anderson	Niceville	Florida
Karen	Roland	Greensburg	Kentucky
Craig	Bradley	Cape Coral	Florida
Kathryn	Bluhm	Sebring	Florida
Beatriz	Mester Allen	Saint Petersburg	Florida
Larry	Bennett	Delray Beach	Florida
Grace	Kreeger	Orlando	Florida
Norden	Lucke	Gainesville	Florida
Lisa	Dean	Sarasota	Florida
Bond	Perry	Fort Myers	Florida
Lorena	Bonilla Md	Weston	Florida
Bonnie	Helmer	Indialantic	Florida
B	S	Miami	Florida
Laura	West	Pensacola	Florida
J. Michael	Bossert	Holmes Beach	Florida
Bridget	Langford	Boynton Beach	Florida
Brittany	Bouton	Cape Coral	Florida
Bradley	Cox	Cooper City	Florida
Sara	Branscome	The Villages	Florida
Brian	Ainsley	Altamonte Springs	Florida
Brian	Miller	Naples	Florida
Brian	Baxter	Sarasota	Florida
Brianna	Ramos	Florida City	Florida
Michael	Hayden	Sarasota	Florida
Brittany	Schnitzler	Seffner	Florida
Brittany	Winsby	Lake Wales	Florida
Vincent	D'Emidio	Clwr	Florida
Brooke	Davis	Bradenton	Florida
Brooke	Gaebe	Miami	Florida
Brooklyn	Daves	Lakeland	Florida
Jeff	Weinberger	Tamarac	Florida
William	Rowe	Lake Mary	Florida
Matisse	Bruer	Dania Beach	Florida
Brian	Schanck	Saint Petersburg	Florida
Barbara	Singer	Lauderhill	Florida

Barbara	Tucker	Wellington	Florida
Karol	Klein	Dade City	Florida
Priscila	Godlan	Palm Harbor	Florida
William	Walker	Jacksonville	Florida
Sandfa	Levitt	Wpb	Florida
Burt	Binner	Clearwater	Florida
Howard	E Rouser	North Miami	Florida
Linda	Richardson	Port Charlotte	Florida
Bennie	Woodard	Saint Petersburg	Florida
Bruce	Rosen	New York	New York
Craig	Mowrer	St Petersburg	Florida
Carolyn	Bartholet	Fort Myers	Florida
Cheryl	Dowling	Jacksonville	Florida
Wayne	Ince	Sun City Center	Florida
Caroline	Hendryx	Gainesville	Florida
Caitlyn	Vasquez	Davie	Florida
Calan	Ree	St. Petersburg	Florida
Calvin	Hilton	Jacksonville	Florida
Marian	Grace	North Ft Myers	Florida
Camilla	Andrade	Lake Worth	Florida
Cam	Beardsley	Palm Beach Gardens	Florida
Christian	Camphire	Bradenton	Florida
Paul	Russo	Deerfield Beach	Florida
Adrienne	Diprima	Miami	Florida
Wilbur	Velarde	Palm Coast	Florida
David	Upton	Palm Beach Gardens	Florida
Thomas	Johnson	Belleglade	Florida
Sandra	Caputo	Dunnellon	Florida
Cara	Despain	Miami	Florida
Marc	Erwin	Sarasota	Florida
Carla	Amarista	Hallandale Beach	Florida
Carl	Meyer	Wesley Chapel	Florida
Carlos	Navarrete	Dania Beach	Florida
Carmen	Blakely	Lutz	Florida
Carol	Hagglund	Sarasota	Florida
Carol	Hospador	Bradenton	Florida
Carolyn	Stanley	Fort Myers	Florida
Catherine	Christensen	Sarasota	Florida
Elizabeth	Hyde	Largo	Florida
Chris	Belcher	Orlando	Florida
Cecily	Butler	Plant City	Florida
Cheryl	Mcdavitt	Middleburg	Florida
Catherine	Cirocco	Lady Lake	Florida
Cherie	Cray	Gainesville	Florida
Merrie	Saniat	Port St Lucie	Florida

Carl	Dahl	Sun City Center	Florida
Christine	Dudding	Winter Park	Florida
Cecelia	Shaw	Tallahassee	Florida
Cecil	Higgins	Alva	Florida
Pete	Vorac	Land O Lakes	Florida
Patti	Lowery	Cape Canaveral	Florida
Thomas	Cleary	Tampa	Florida
Marie Kyle	Moran	Venice	Florida
Chanel	Akins	Orlando	Florida
Charles	Behrens	Orlando	Florida
David	Branson	Clearwater	Florida
Chelsea	Kidd	Orlando	Florida
Chelsye	Ginn	Jacksonville	Florida
Zaida	Schneider	Miami	Florida
Chereeka	Garner	Orlando	Florida
Cheryl	Johnson	Dunedin	Florida
Cheryl	Rudin	Sarasota	Florida
Curtis	Hinckley	Saint Petersburg	Florida
Charlie	Hoefel	Key Largo	Florida
Chris	Lindsay	Orlando	Florida
Carrie	Roach	Sunrise	Florida
Christina	Ronning	Pierson	Florida
Chris	Rochester	Jacksonville	Florida
Chrissy	Das	Ponte Vedra	Florida
Christina	Fluegel	Jacksonville	Florida
Christine	Hicks	Palm Springs	Florida
Christopher	Mejia	Miami	Florida
Charles	David	Delray Beach	Florida
Cyndi	Hunt	Tallahassee	Florida
Sara	Solomon	Miami	Florida
Christopher	Jean-Louis	Coral Springs	Florida
Francis	Scheuer	Sarasota	Florida
Christopher	Feehan	Tallahassee	Florida
Cameron	Mansfield	Casselberry,	Florida
Carol	Klopper	Miami	Florida
Colleen	Adomaitis	Hudson	Florida
Claudia	Reed	Bokeelia	Florida
Jessica	Claudio	West Palm Beach	Florida
Caroline	Berthin	Miami	Florida
Francis	Clifford	Melbourne	Florida
Lawrence	Lintner	Cape Coral	Florida
C	Day	Vero	Florida
Christina	Sieloff	Leesburg	Florida
Christine	Moten	Boynton Beach	Florida
Cynthia	Luster	Titusville	Florida

Wendi	Myers	Weeki Wachee	Florida
Carolina	Montealegre	Woonsocket	Florida
Mary	Mcintyre	Napy	Florida
Carmen	Ramirez	Tallahassee	Florida
Vicky	Ruiz	Weston	Florida
Diana	Cowans	Bradenton	Florida
Colby	Alonso	Pompano Beach	Florida
Colleen	Edwardswalker	Orlando	Florida
Colleen	Oneal	Dunedin	Florida
Connie	Viator	Belleair	Florida
Leigh	Emerson Smith	S Miami	Florida
Christine	Reeder	Sebring	Florida
Sarah	Whittington	Tallahassee	Florida
Corey	Robertson	Jacksonville	Florida
Susan	Courtney	Apopka	Florida
Courtney	Lee	Clearwater	Florida
Kathryn	Coutcher	Bellevue	Florida
Craig	Alig	Orlando	Florida
Christina	Reichert	North Miami	Florida
Cristina	Dou	Saint Cloud	Florida
William	Cumming	Gainesville	Florida
Sandra	Boylston	Sanford	Florida
Cynda	Perun	Tierra Verde	Florida
Cynthia	Smyth	Sarasota	Florida
Cynthia	Lippert	St Petersburg	Florida
Cynthia	Friske	Hollywood	Florida
David	Weinfeld	West Palm Beach	Florida
David	Mercer	Jacksonville	Florida
Debra	Goodrich	Lake Placid	Florida
Stephen	Newman	Melbourne	Florida
Dana	Farmer	Tallahassee	Florida
Daniela	Bocanegra	Delray Beach	Florida
Danielle	Le Roy	Miami	Florida
Daniel	Rueda	Port St. Lucie	Florida
Daniel	Gomez	Hollywood	Florida
Dario	Morell	Miami	Florida
Darlene	Cruz	Riviera Beach	Florida
Dale	Shero	Fernandina Beach	Florida
David	Trenschel	Spring Hill	Florida
David	Kapell	Hobe Sound	Florida
Charles	Davids	Daytona Beach	Florida
Teresa	Botts	Melbourne	Florida
David	Hayes	Vero Beach	Florida
David	Wengert	Ormond Beach	Florida
Darlene	Bruner	Auburndale	Florida

Elliot	Shamis	Deltona	Florida
David	Cox	Sarasota	Florida
Deborah	Deland	Orlando	Florida
David	Hancock	Miami	Florida
David	Nichols	Lake Placid	Florida
Denisse	Pena	Lauderhill	Florida
Yma	Corrales	Miami	Florida
Kaylee Q	Ream	Yulee	Florida
John	Zeman	Thonotosassa	Florida
Deanna	Paull	Deltona	Florida
Deborah	Davidovic	Palm Beach Gardens	Florida
Debora	Schindler	Tamarac	Florida
Deborah	Kreusch	The Villages	Florida
Deborah	Vera	Bradenton	Florida
Debra	Poland	Cocoa	Florida
Deborah	Wertheimer	Saint Petersburg	Florida
Deborah	Veres	Palm Springs	Florida
Richard	Power	Tallahassee	Florida
Debra	Forman	Palm Beach Gardens	Florida
Debra	Wile	The Villages	Florida
David	Bozarth	Palm Harbor	Florida
Diane	Grayber	The Villages	Florida
Dee	Hood	Ruskin	Florida
De	Labbbby	Davenport	Florida
D	H	Fort Pierce	Florida
Denise	Syed	Orlando	Florida
Denise	Burchard	Sanford	Florida
Denise	Caffo	Boca Raton	Florida
Rita	Yanes	Miami	Florida
Daniel	Fairman	Orlando	Florida
Doug	Rader	Miami	Florida
Fred	Davis	Tampa	Florida
Dave	Griswold	Ft Lauderdale	Florida
Dorothy	Carlson	Longboat Key	Florida
Dian	Keller	Loxahatchee	Florida
Diana	Davis	Jacksonville	Florida
Diana	Ventura	Tacoma	Washington
Diane	Balsara	Lantana	Florida
Diane	Gottlieb	Coconut Creek	Florida
Lydia	Parison	Saint James City	Florida
Nicholas	De Villiers	Jacksonville	Florida
Diego	Maglione	Hollywood	Florida
David	Johnson	Orange Park	Florida
Donna	Janke	Port Saint Lucie	Florida
Dan	Tobin	Hobe Sound	Florida

Diane	Leone	Melbourne	Florida
Daryl	Purchase	Saint Petersburg	Florida
Debra	Moore	Wesley Chapel	Florida
Daniel	Lawrence	Dunedin	Florida
Darleen	Medeiros	Vero Beach	Florida
Alexander	Bess	West Palm Beach	Florida
Donald	Crosby	Tallahassee	Florida
Carole	Mcauliffe	Wellfleet	Massachusetts
Dorace	Peters	Sebastian	Florida
Dora	Sarli	Fort Pierce	Florida
Dorothy	Werner	Bradenton	Florida
Douglas	Morrison	Key Largo	Florida
Douglas	Engle	Fort Pierce	Florida
Douglas	Olander	Orlando	Florida
David	Parrett	Daytona Beach	Florida
Don	Jones	Debary	Florida
David	Reddy	Tampa	Florida
C.	Falls	Williston	Florida
Judith	Rainbrook	Tallahassee	Florida
Pamela	Elliott	Tequesta	Florida
Danny	Reich	Zephyrhills	Florida
Joyce	Hamilton	Tampa	Florida
Merry	Haber	Miami	Florida
Donna	Nassor	Wilton Manors	Florida
Dru	Greene	Osprey	Florida
Melissa	Weihnacht	Saint Johns	Florida
Dianne	Gray	Coconut Creek	Florida
Darilyn	Listort	Boynton Beach	Florida
Marla	Mcquay	Tampa	Florida
E	S	Lake Worth	Florida
Duane	Gore	Trinity	Florida
Sue	Duncan	Wellington	Florida
Diane	Downing	Ponte Vedra	Florida
David	Zimmerman	Venice	Florida
Eric	West	Port Orange	Florida
Emile	Langlois	Sarasota	Florida
Earl L.	Kerr	Clearwater	Florida
Eugenia	Economos	Orlando	Florida
Evie	Azeltine	Orlando	Florida
Eric	Cairns	Saint Augustine	Florida
Edmond	Malone	West Harrison	New York
Edward	Munson	Fort Myers	Florida
Esther	Garvett	Miami	Florida
Eileen	O'Sullivan	Largo	Florida
Elizabeth	King	Sarasota	Florida

Emma	Schuren	Davie	Florida
Victoria	Kilroy	Kissimmee	Florida
Elaine	Jacobson	Gainesville	Florida
Elaine	Lockey	Crestview	Florida
Elizabeth	Moeller	Umatilla	Florida
Eelta	Sisay	Carol Stream	Illinois
Elena	Garcia	Boynton Beach	Florida
Elizabeth	Major	Gulf Breeze	Florida
Elizabeth	Watts	Boynton Beach	Florida
Ellen	Kolb	Boynton Beach	Florida
Ellen	Allen	Gainesville	Florida
Mychel-Anne	Murphy	Windermere	Florida
Elliot	Eberhardt	Orlando	Florida
Janet	Ellis	Naples	Florida
Elisia	Lopez	Miami	Florida
Elmer	Flores	Homestead	Florida
Edwin	Poole	Cocoa	Florida
Elizabeth	Meyer	Clearwater Beach	Florida
Em	G	Eustis	Florida
Emily	Lamar	Marianna	Florida
Emma	Ortiz	Hollywood	Florida
Emmie	Wells	Sarasota	Florida
Eric	Myser	Cocoa Beach	Florida
Sally	K	St. Petersburg	Florida
Gloria	Ruiz	Miami	Florida
Eric	Dahlenburg	Merritt Island	Florida
Erica	Larson	Tampa	Florida
Erica	La Spada	Jacksonville	Florida
Samuel	Sledd	Daytona Beach	Florida
Erika	Blanco	Weston	Florida
Ellen	Matis	Wpb	Florida
Kristin	Ervin	Tallahassee	Florida
Esma	Lopez	Tampa	Florida
Edward	La Londe	Leesburg	Florida
Clarice	Evans	Miami	Florida
Donna	Evans	Gainesville	Florida
Scot	Evans	Miami	Florida
Sara	Schultz	Pineland	Florida
Evelyn	Lindgard	Jacksonville	Florida
Charles	Zagorac	Jacksonville	Florida
Franklyn	Soper	Pompano Beach	Florida
Richard	Rizzo	Bushnell	Florida
Fa	Ba	Orlando	Florida
Reid	Woolery	Gainesville	Florida
Francis	Dance	Englewood	Florida

John	Dearing-Brisk	Tampa	Florida
Fiona	Watson-Canning	Tampa	Florida
Anuj	Vaish	Riverview	Florida
George	Azzariti	Pensacola	Florida
Myron	Caldwell	Spring Hill	Florida
Angela	Fowler	Orlando	Florida
Kathy	Flocco-Mcmaster	Clearwater	Florida
Thomas	Roach	Vero Beach	Florida
Sandra	Brady	Pinellas Park	Florida
Frederick	Lucies	Tallahassee	Florida
Kathleen	Heid	Ocala	Florida
Jenifer	Barnes	Lake Clarke Shores	Florida
Tal Ziv	Bogart	Orlando	Florida
Heather	Strangeflower	Ft Myers	Florida
Francoise	Cham	Miami	Florida
Franklin	Hamilton	Winter Park	Florida
Franklin	Couts	Palm Bach Gardens	Florida
Francisco	Rodriguez	Homestead	Florida
Frances	Martini	Big Pine Key	Florida
Frances	Sheehan	Sebring	Florida
Frank	Pannizzo	Boynton Beach	Florida
Fran	Domino	Jacksonville	Florida
Anne	Greenberg	Delray Beach	Florida
Marilyn	Jordan	Venice	Florida
A	A	Melbourne	Florida
Karen	Heesch	Land O Lakes	Florida
Jonathan	Fried	Homestead	Florida
Alberto	Ribas	Orlando	Florida
Fred	Schieferstein	Pompano Beach	Florida
Francine	Slack	Bradenton	Florida
Kelly	Asbury	Okeechobee	Florida
Gregory	Simpson	Pinellas Park	Florida
Gaelyn	Todaro	Delray Beach	Florida
Gail	Flanders	Miami	Florida
Matthew	Hernandez	Crestview	Florida
Galileah	Harmon	Hollywood	Florida
Raul	Hernandez	Miami	Florida
Amy	Yuhasz-Richards	Saint Cloud	Florida
Gary	Davine	Stuart	Florida
Amanda	Hebden	Mexico Beach	Florida
Tabatha	Thorne	Tampa	Florida
Gwenn	Schemer	Wellington	Florida
Greg	Brown	Lake Worth Beach	Florida
Greg	Davies	Valrico	Florida
Kim	Oconnor	Tampa	Florida

George	Delaney	North Palm Beach	Florida
George	Gaskill	Cocoa	Florida
George	Heidenrich	Newberry	Florida
George	Hunt	Redington Beach	Florida
Barbara	Gimenez	Miami	Florida
Virginia	Lippert	Melbourne	Florida
Giulia	Radu	Hollywood	Florida
Gregory	Rosasco	Holiday	Florida
Ginnye	Cubel	Champions Gate	Florida
George	Lebovitz	Melbourne	Florida
Glenn	Barclift	Jacksonville	Florida
Gloria	Green	Boynton Beach	Florida
Gregory	Luning	Bonita Springs	Florida
Gabriel	Manasseh	Palmetto	Florida
Gary	Moore	Niceville	Florida
Gabby	Groos	Tampa	Florida
Gerald	Nicholas	Palm Coast	Florida
Godfrey	Hadley	Miami	Florida
David	Gonzalez	Brandon	Florida
Martha	Milton	Wimauma	Florida
Paul	Oppenheimer	Boca Raton	Florida
Grace	Stewart	Miami	Florida
Grace	Wong	Miramar	Florida
Janet	Berman	Saint Petersburg	Florida
Margaret	Medon	Dunnellon	Florida
Greg	Gaucher	Jacksonville	Florida
Beyssa	Buil	Miramar	Florida
Jamie	Gross	Pembroke Pines	Florida
Grover	Gregory	Rockledge	Florida
Kerry	Gruson	Miami	Florida
Kathleen	Guilmette	North Port	Florida
Gulam	Dean	Saint Petersburg	Florida
Lori	Sanderbeck	Ellenton	Florida
Gail	Pentz	Sarasota	Florida
Gregory	Esteve	Lake Wales	Florida
John	Lord Jr.	Miami Beach	Florida
Patience	Hall	Wilton Manors	Florida
Robert	Breisch	Melbourne	Florida
Gloria	Hannemann	Hernando	Florida
Nicole	Devore	Saint Petersburg	Florida
Harold	Buttitta	Boynton Beach	Florida
Bridget	Harig	Homestead	Florida
Kathy	Bailey	Lake Park	Florida
Harmony	Salvatore	Jacksonville	Florida
Kendra	Williams	Largo	Florida

Harper	Miller	Hollywood	Florida
Hipolito	Arriaga	Lauderhill	Florida
Pamela	Haun	Cooper City	Florida
Heather	Bladich	Naples	Florida
Heather	Smith	Miami	Florida
Heather	Beatty	Naples	Florida
Martha	Hedrick	Orange City	Florida
Barbara	Hermann	Fort Myers	Florida
Leone	Gentner	The Villages	Florida
Dolores	Parra	Land O Lakes	Florida
Helen	Fox	Bokeelia	Florida
Galileah	Harmon	Hollywood	Florida
Magdalene	Hines	Sarasota	Florida
Judith	Wellman	Bradenton	Florida
Helena	Kashleva	Sanibel	Florida
Hildegard	Benedick	Palm Coast	Florida
Holly	Picardi	Gulf Breeze	Florida
Howard	London	Naples	Florida
Virginia	Holliday	Vero Beach	Florida
Diona	Young	Miramar	Florida
Hope	Ebert	Pensacola	Florida
Gail	Clifton	Myakka City	Florida
H Roy	Kaplan	Clearwater	Florida
Norma	Rouser	North Miami	Florida
Heather	St Amand	Lutz	Florida
Hedda	Koslow	Miami Beach	Florida
Isabella	Ank	Lutz	Florida
Mary	Howard	Atlanta	Georgia
James	Joy	Miami	Florida
Peter	Hornmuller	Hollywood	Florida
Ida	Nissen	Pensacola	Florida
Ilana	Szarf	Dania Beach	Florida
Ilene	Schlicher	Boca Raton	Florida
Ilse	Gevaert	Miami Beach	Florida
Gisele	Abston	Jacksonville	Florida
Irma	Riley	Gainesville	Florida
Jacqueline	Carini	Miami	Florida
John	Cassaro	Oviedo	Florida
Jesse	Green	Delray Beach	Florida
Jean	Buchanan	Tampa	Florida
Jessica	Lickorish	Pensacola	Florida
John	Cloninger	Jupiter	Florida
John	Graham	Miami	Florida
Jacqueline	Azis	Saint Petersburg	Florida
James	Epaves	Sarasota	Florida

James	Ahearn	Clearwater	Florida
Joanna	Mauer	Tallahassee	Florida
Jamie	Katz	Miami	Florida
Jan	Carol	Boca Raton	Florida
Janet	Ross	Safety Harbor	Florida
Jane	Kosow	Boynton Beach	Florida
Janet	Deloria	Clearwater	Florida
Janet	Hoffman	Naples	Florida
Janet	Genova	Hernando	Florida
Jan	Hartman	Sarasota	Florida
Janice	Nall	Gainesville	Florida
Judith	Rose	Venice	Florida
Js	Sprague	Worcester	Massachusetts
John	Porinchak	Lakeland	Florida
Janine	Tibbatts	Palm Harbor	Florida
Jazmin	Pereyra	Hollywood	Florida
Jamie	Bendola	Fort Myers	Florida
John	Snook	Tampa	Florida
Joan	Anderson	Gainesville	Florida
Jacqueline	English	Fort Myers	Florida
Diana	Belbruno	Naples	Florida
Janis	Sawyer	Santa Rosa Beach	Florida
James	Teas	Palmetto Bay	Florida
Jean	Hock	Greenacres	Florida
Jean	Hesford	Melbourne Beach	Florida
Jeffrey	Bains	The Villages	Florida
Jayne	Bradford Yowler	Orlando	Florida
Jeffrey	Lizotte	Fort Myers	Florida
Jane	Mussey	Holiday	Florida
Jennifer	Murphy	Gainesville	Florida
Jen	Mullen	Seattle	Washington
Jennifer	Pena	Sebring	Florida
Jennifer	Wiggs	Tampa	Florida
Jennifer	Anderson	St. Petersburg	Florida
Jennifer	Houdeshell	Tampa	Florida
Jerrilynne	Titsworth	Sarasota	Florida
Gerald	Stein	Gainesville	Florida
Rebecca	Terrill	Zephyrhills	Florida
Jessica	Merino	Miami	Florida
Jessica	Butt	Key West	Florida
Jessica	Levy	Orlando	Florida
Jessica	Robertson	Cutler Bay	Florida
Jessica	Buchanan	Deltona	Florida
Jorge	Estomba	Hialeah	Florida
Bob	Jorgensen	East Peoria	Illinois

Jean	Trapani	Nokomis	Florida
Joanne	Gruber	Coconut Creek	Florida
Frances	Palacio	St Augustine	Florida
Juan	Elder	West Palm Beach	Florida
Jonathan	Gomez	Boynton Beach	Florida
Jeanne	Lebow	Tallahassee	Florida
Jan	Hawkins	St. Petersburg	Florida
John	Goshorn	Statesboro	Georgia
Janice	Bellinger	Orange City	Florida
Jill	Sheridan	Jupiter	Florida
Jillian	Sang	Coral Springs	Florida
Jim	Johnson	Oakland Park	Florida
Jim	Loveland	St. Petersburg	Florida
Jimmie	Robinson	Pensacola	Florida
Susan	Mcgivern	Sarasota	Florida
John	Markon	Jacksonville	Florida
Judy	Lucas	St. Cloud	Florida
James	Koopman	Bokeelias	Florida
Joyce	Burd	Key West	Florida
James	Adams	Saint Petersburg	Florida
Jason	Manboadh	Boynton Beach	Florida
Joshua	Kaye	St. Petersburg	Florida
Jane	Moscowitz	Coral Gables	Florida
Jeannie	Mounger	Tampa	Florida
Joan	Verret	Lakeland	Florida
Joanna	Kauer	Brandon	Florida
Jo	Chapman	Mims	Florida
Joel	Zoss	West Palm Beach	Florida
Joseph	Ruisi	Cape Coral	Florida
Johana	Mejia	Miami	Florida
Johana	Mejia	Gainesville	Florida
Johanna	Freeman	Sarasota	Florida
John	Kesich	Venice	Florida
John	Balseros	Miami	Florida
John	D'Orazio	Venice	Florida
John	Forma	Tampa	Florida
John	Morsman	Melbourne	Florida
John F.	Kennedy	Bradenton	Florida
John	Carel	Estero	Florida
Johnny	Harmon	Hollywood	Florida
Johnny	Wilson	Gainesville	Florida
John	Jackson	Bonifay	Florida
John	Ross	Nevada	Missouri
Melissa	Johnston	Port Charlotte	Florida
Joline	Barth	Jacksonville	Florida

James	Jolley	Tallahassee	Florida
Jonathan	Peck	Tampa	Florida
Jonathan	Pouliot	Palm Harbor	Florida
Stephanie	Jones	Boynton Beach	Florida
Jordan	Alvarez	Tampa	Florida
Jordan	Rutledge	Orlando	Florida
Josa Eve	Alvarez	Orlando	Florida
Joseph	Alicea	St. Cloud	Florida
Chelsea	Joseph	West Palm	Florida
Joshua	Klein	Lutz	Florida
Josmari	Zelaya	Miami	Florida
Joyce	Strickland	Sunrise	Florida
Jonathan	Pamplin	Apopka	Florida
Joseph Paul	Moniz Iv	Royal Oak	Florida
Joel	Gelb	Ponte Vedra Beach	Florida
Justin	Pita	Largo	Florida
Rob	B	Palm Bay	Florida
Joan	Revere	Coconut Creek	Florida
Joseph	Fasone	Plantation	Florida
Joan	Robertson	Cary	North Carolina
James	Ropicki	Gainesville	Florida
James	Rowland	Brooksville	Florida
John	Thomas	Punta Gorda	Florida
Stacy	Casson	Hollywood	Florida
June	Sefscik	Port Orange	Florida
James	Shaw	Tampa	Florida
James	Hencin	Gainesville	Florida
Judith	Shujman	Altamonte Springs	Florida
Joan	Sabba	Tamarac	Florida
Julia	Squitteri	Oviedo	Florida
Jessica	Wardlaw	Melrose	Florida
Jasmine	Thordin	North Miami	Florida
Judith	Melchionda	Fort Lauderdale	Florida
James	Turner	Merritt Island	Florida
Judith	Accardo	Paisley	Florida
Judith	Margolis	Tamarac	Florida
Judy	Nicol	Pt Charlotte	Florida
Judy	Levy	Naples	Florida
Julia	Bomfim	Saint Petersburg	Florida
Julie	Kagan	Boca Raton	Florida
Julie	Long	Plantation	Florida
Julie	Ericson	Lake Worth Beach	Florida
Juliette	Newton	Ft Pierce	Florida
Julio	Carela	North Miami Bch	Florida
Jeannine	Walsh	Winter Park	Florida

Lori	Wilson	Dade City	Florida
Jessica	Mcelroy	Thonotosassa	Florida
James	Robertson	Clearwater	Florida
James	Zitis	Holiday	Florida
Karen	Adler	Jacksonville	Florida
Karen	Eberly	Gainesville	Florida
Karen	Nelms	Tallahassee	Florida
Karla	Gonzales	Miramar	Florida
Kathleen	Stockman	Maitland	Florida
Kate	Sugarman	Potomac	Maryland
Kathryn	Dorn	Tempe	Arizona
Kathleen	Doyle	Miami Springs	Florida
Kathy	Jongsma	Venice	Florida
Katherine	O'Kane	Casselberry	Florida
Kayden	Karmazin	Palm Beach Gardens	Florida
Kathlyn	Gilpin	Bradenton	Florida
Kenneth	Holmes	Jacksonville	Florida
Karen	Mchugh	Riverview	Florida
Katrina	Coots	Jacksonville	Florida
Kathleen	Mcgrath	Pompano Beach	Florida
Kecia	Frierson	Miami	Florida
Keith	Kopp	Jensen Beach	Florida
Kelly	Shannon	Hollywood	Florida
Kendra	Blandon	Weston	Florida
Kendra	Mon	Tallahassee	Florida
Kendra	Slinker	Jacksonville	Florida
Katherine	Perriel	Jacksonville	Florida
Kimberly	Vanderpol	Jupiter	Florida
Kevin	O'Keefe	Davie	Florida
Peggy	Murray	Oakland Park	Florida
Kia	H.	Gainesville	Florida
Kimaja	Rhoda	Chipley	Florida
Christine	Moreno	Oakland Park	Florida
Kim	Williams	Flagler Beach	Florida
Kenneth	Key	Tampa	Florida
Katrina	Kimsey	Cape Coral	Florida
Kathleen	Ludlow	Belle Isle	Florida
Karen	Perez	Fort Lauderdale	Florida
Killian	Perez Garcia	Fort Lauderdale	Florida
Karl	Weinrich	Delray Beach	Florida
Krekel	Green	N Ft Myers	Florida
Kristin	Ladia	Fort Myers	Florida
Kristine	Oakhurst	Sorrento	Florida
Krsha	Sendon	Homestead	Florida
Kyle	Delaney	Bradenton	Florida

Kristine	Zobrosky	Saint Augustine	Florida
Lee	Dengler	Jacksonville	Florida
Leslie	Bouwman	St. Petersburg	Florida
Lacey	Frye	Gainesville	Florida
Laura	D'Alisera	Jacksonville	Florida
Laura-Isabella	Pais-Fries	St Augustine	Florida
Margot	Pomeroy	St Petersburg	Florida
Lee Ann	Grieser	Lantana	Florida
Christine	Laning	Winter Springs	Florida
María Inés	Doti-Pels	Palmetto Bay	Florida
Maria Laura	Alfonsin	Aventura	Florida
Laura	Turecki	Tequesta	Florida
Laura	Bensman	Naples	Florida
Laura	Fries	St Augustine	Florida
Laura R.	Goldstein	Miami	Florida
Laura	Watson	Fort Lauderdale	Florida
Laurel	Thorne	Ocala	Florida
Laurel	Rowen	The Villages	Florida
Lauren	Luis	Miami Beach	Florida
Laurie	Woodward-Garcia	Miramar	Florida
Michael	Lavin	Hollywood	Florida
Lawrence	Staunton	North Port	Florida
Linda	Broadlick	Jupiter	Florida
Lauren	Gibson	Brandon	Florida
Lea	Wright	Melbourne	Florida
Lisa	Burke-Eddib	Rockledge	Florida
Marion	Stevens	St. Augustine	Florida
Randolph	Astwood	Oviedo	Florida
Elaine	Larimer	Orlando	Florida
Lenore	Beck	Tampa	Florida
Jennifer	Graham	Fort Myers	Florida
Carla	Korrick	Lakeland	Florida
Lerick	Gordon-Cuevas	Lacey	Washington
Li	D.	Hollywood	Florida
Lisa	Alfonso	Jupiter	Florida
Lesley	Lafferty	Orlando	Florida
Maria	Pineda	Apopka	Florida
Lexie	Jordan	Fort Lauderdale	Florida
Leyna	Ely	Kissimmee	Florida
Louisa	Hewitt	Oviedo	Florida
Lynette	Fripp	Tampa	Florida
Laura	Hayes	Fort Pierce	Florida
Leonard	Helfand	Tallahassee	Florida
Lorraine	Henry	Palm Bay	Florida
Rev. Elizabeth	Dodd	Boca Raton	Florida

Alicia	Torres	Lakeland	Florida
Felicity	Hohenshelt	Jacksonville	Florida
Ellen	Walsh	Gulf Breeze	Florida
Ronni	Blumenthal	Sarasota	Florida
Linda	Canfield	Pompano Beach	Florida
Linda	Lane	Delray Beach	Florida
Linda	Rodriguez	Fort Myers	Florida
Lin	Deats	North Falmouth	Massachusetts
Sheila	Lindenbaum	Venice	Florida
Lindsey	Kohlenburg	Port Charlotte	Florida
Lisa	Bryan	Melbourne	Florida
Lisa	Cherrie	Casselberry	Florida
Lisa	Glastein	Boynton Beach	Florida
Lisa	Heard	Palm W	Florida
Lisa	Hernandez	Orlando	Florida
Jean	Dibble	Clermont	Florida
Elizabeth	Lawrence	Largo	Florida
Leonard	Everett	Leesburg	Florida
Loretta	Martin	Lakeland	Florida
Laurie	Gussak	Tallahassee	Florida
Lloyd	Shane	Miami	Florida
Maria	Castro	New Smyrna Beach	Florida
Linda	Harrison	Coral Springs	Florida
Lorraine	Minto	Georgetown	Florida
Lisa	Pales	Miami	Florida
Lisa	Tillmann	Orlando	Florida
Judith	Jennings	Largo	Florida
Bente	Humphrey	Orlando	Florida
Cassandra	White	Tallahassee	Florida
Loretta	Ditocco	Key West	Florida
Lori	Ravitz	Fort Myers	Florida
Louis	Lifson	Boca Raton	Florida
Linda	Piantieri	Orlando	Florida
Laura	Ramon	Niceville	Florida
Laura	Sayne	Orlando	Florida
Lynne	Siegfried	Panama City	Florida
Lisa	Gruber	Tallahassee	Florida
Larry	Lewis	Apopka	Florida
Lucia	Maxwell	Tallahassee	Florida
Lusette	Lilley	Port Saint Lucie	Florida
Christina	Coll	Apopka	Florida
Lynn	Artz	Crawfordville	Florida
Lynne	David	New Smyrna Beach	Florida
Lynn	Miller	Ocala	Florida
Lynnward	Lacy	St.Petersburg	Florida

Lynne	Ramonell	Lake Worth	Florida
Carolyn	Stanley	Fort Myers	Florida
M. Virginia	Grady	Indialantic	Florida
Des	Alsalman	Orange Park	Florida
Madison	Rodriguez	Palm Beach Gardens	Florida
Maggie	Davidson	Pompano Beach	Florida
Timothy	Magill	Kissimmee	Florida
Gustav	Sallas	West Palm Beach	Florida
Malcolm	Wattman	Palm Beach Gardens	Florida
Marsha	Martin	Gainesville	Florida
Michael	Andrews	Miami Beach	Florida
Margaret	Anglin	New Smyrna Beach	Florida
Marsha	Elston	Tarpon Springs	Florida
Marissa	Katz	Davie	Florida
Marcia	Hoodwin	Sarasota	Florida
Marcia	Bickmore	Venice	Florida
Beth	Povlow	Marco Island	Florida
Marc	Schreiber	Sarasota	Florida
Marc	Weiss	Boca Raton	Florida
Maggie	Gibson	Tallahassee	Florida
Marg	Chauvin	Citra	Florida
Margot	Bardeen	Orlando	Florida
Mari	Mennel-Bell	Lauderdale By The Sea	Florida
Maria	Cornell	Orlando	Florida
Marian	Carson	Bradenton	Florida
Marian	Ryan	Winter Haven	Florida
Marie	Focella	Upper Saddle River	New Jersey
Marie-Anise	Gisanrin	Fort Lauderdale	Florida
Marie	Raich	Delray Beach	Florida
Mariko	Yannacone	Palm Bay	Florida
Marilee	Hayman	Clearwater	Florida
Marion	Walsh	Lecanto	Florida
Mario	Velarde	Miami Lakes	Florida
Marissa	Shatkin	Sarasota	Florida
Marjorie	Oliver	Jacksonville	Florida
Mark	Carroll	St Petersburg	Florida
Mark	Cohn	Naples	Florida
Marni	Larose	Palm Coast	Florida
Roberta	Martin	Boynton Beach	Florida
Marrilee	Highfield	Jacksonville	Florida
Sasha	Labossiere	Hollywood	Florida
Marsha	Schaub	Naples	Florida
Wellington	Mendoza	Dunedin	Florida
Martha	Price	Sanibel	Florida
Martha	Burton	Lakewood Ranch	Florida

Mary	Martin	St Petersburg	Florida
Mary	Alexander	Miami	Florida
Mary	Brennan	Micco	Florida
Mary Lewis	Sheehan	Saint James City	Florida
Mary	Michel	Southwest Ranches	Florida
Mary	Russell	St Petersburg	Florida
Marysol	Acosta	Orlando	Florida
Martha	Singleton	Miami	Florida
Matthew	Maichuk	Palm Harbor	Florida
Maura	Poleon	Homestead	Florida
Maureen	Kowsky	Seminole	Florida
Maurice	Levy	Gainesville	Florida
Barbara	Maust	Deerfield Beach	Florida
Max Amichai	Heppner	Hillsboro Beach	Florida
Linda	Butler	Punta Gorda	Florida
Rhina	Lara	Washington	District Of Columbia
Michelle	Mrs	Spring Hill Fl	Florida
Marilyn	Vitolo	Boston	Massachusetts
Carol	Harris	Spring Hill	Florida
Chris	Mcbride	Fort Myers	Florida
Sheila	Mcchesney	St Pete Beach	Florida
Michael	Shnorette	Haines City	Florida
Matthew	Emmer	Fort Lauderdale	Florida
M. Diane	Hodson, Phd, Jd	St Petersburg	Florida
Owanza	Di Mdina	Lakewood Ranch	Florida
Michael	Halabi	Orlando	Florida
Meagan	Bell	Chapel Hill	North Carolina
Jonathan	Medeiros	Winter Garden	Florida
Mega	Boye	Orlando	Florida
Megan	Collins	Orlando	Florida
Meghan	Vega	Hollywood	Florida
Meitong	Hu	Miami	Florida
Melanie	Lachs	Tampa	Florida
Maryellen	Healy	Lake Worth Beach	Florida
Kelley	Melinn	Altamonte Springs	Florida
Mary	Babineau	St. Petersburg	Florida
Meredith	Martin Davis	Palm Coast	Florida
Meredith	Hagie-Mchugh	Lutz	Florida
Marcos	Fandino	Spring Hill	Florida
Michael	Balek	Boynton Beach	Florida
Marie	Fitzslmmons	Jacksonville	Florida
Michael	Thomas	Saint Petersburg	Florida
Michael	Welch	St. Pete Beach	Florida
Mia	Rivas	Miami	Florida
Kellyann	Morander	Weeki Wachee	Florida

Betsy Suero	Skipp	Miami	Florida
Tom	Wilson	Miami	Florida
Michael	Wallace	Sarasota	Florida
Michael	Bailey	Casselberry	Florida
Michael	Schrager	Vero Beach	Florida
Michelle	Mirabal	Hollywood	Florida
Michelle	Huckeba	Ocala	Florida
Sonia	Hernandez	Largo	Florida
Michael	Goehring	Fort Lauderdale	Florida
James	Wilkes	Stuart	Florida
Mike	Bruscell	Wellington	Florida
Michael	Forbes	Clermont	Florida
Mark	Rivers	Naples	Florida
Michael	Wagner	Davie	Florida
Andrelene	Babbitt	Clearwater	Florida
Angelo	Santisteban	Davie	Florida
Martha	Milne	Ft. Myerd	Florida
Gavi	Stevens	Largo	Florida
Stephanie	Roybal	Green Cove Springs	Florida
Melinda	Pipho	Jacksonville	Florida
Michelle	Mondragon	Altamonte Springs	Florida
Misty	Romine	Tallahassee	Florida
Melissa	Meyer	Wesley Chapel	Florida
Maryjo	Mosca	Hollywood	Florida
Maryjane	Jeffery	Saint Petersburg	Florida
Maureen	Kasischke	Coral Gables	Florida
Marsha	Kerr	Tampa	Florida
Mark	Kiester	Gainesville	Florida
Michelle	Mcleese	Ellenton	Florida
Marta	Wayne	Gainesville	Florida
Michael	Wong	Orlando	Florida
Mary	Deffebach	Indialantic	Florida
Melanie	Marshall	Jacksonville Beach	Florida
Maria	Irizarry	Miami	Florida
Miro	Morfa	Pembroke Pines	Florida
Melinda	Feinstein	Stuart	Florida
Lupe	Torre	St Petersburg	Florida
Colleen	Monson	Non Hispanic Or Latino	Florida
Terri	Monteforte	Tallahassee	Florida
Mary	Workman	Deland	Florida
Kelly	Moore	Saint Petersburg	Florida
Morgan	Danyi-Burton	Tallahassee	Florida
Morley	Schloss	Loxahatchee Groves	Florida
Michael	Potters	Pensacola	Florida
Mario	Molins	Doral	Florida

Melissa	Winchester	W Palm Bch	Florida
James	Strickland	Wesley Chapel	Florida
Meghan	Foley	Palm Beach Gardens	Florida
Marcia	Roy	Wellington	Florida
Andre	Meaux	West Palm Beach	Florida
Tanya	Lopez	Miami Gardens	Florida
Melannie	Sandoval	Miami	Florida
M S	Dillon Iii	Coconut Grove	Florida
Marcia	Halpern	Palm Beach Gardens	Florida
Judith	Turner	Debary	Florida
Mark	Tooher	Naples	Florida
Stacy	Muhammad	Fort Lauderdale	Florida
Mariela	Umanzor	Cocoa	Florida
Michael	Violante	Pompano Beach	Florida
Marjorie	Myers	Graham	Florida
Myra	Jammer	Gainesville	Florida
Nadine	Hughey	Saint Augustine	Florida
Valerie	Elder	Dade City	Florida
Nancy	Afflerbach	Cape Coral	Florida
Noreen	Allison	Naples	Florida
Lawrence	Holtzman	Miami	Florida
Cindy	Martinez	Clearwater	Florida
Nancy	Obyrne	St. Augustine	Florida
Nancy	Burke	Babcock Ranch	Florida
Nancy	Garmer	Melbourne	Florida
Nancy	Fuentes	Boynton Beach	Florida
Nancy	Linder	Hiram	Georgia
Nancy	Oliver	Sarasota	Florida
Naomi	Bissonette	Tallahassee	Florida
Naomi	Greenfield	North Lauderdale	Florida
Nasreen	Kakli	Palm Beach Gardens	Florida
Natali	Chau	Hollywood	Florida
Nat	Bender	Miami Beach	Florida
Nan	Callan	Winter Haven	Florida
Natalia	Cano	Wellington	Florida
Nancy	Plymale	Dade City	Florida
Nancy	Harrison	Naples	Florida
Nicholas	Jouriles	Miami Beach	Florida
Neseyah	Mcfarlane	West Palm Beach	Florida
Nia	Rucker	Mesilla	New Mexico
Nicholas	Corace	Tampa	Florida
Nicholas	Kidd	Saint Petersburg	Florida
Nicolle	Silva	Homestead	Florida
Nicolas	Rodrigues	Pembroke Pines	Florida
Susan	O'Connor	Clearwater	Florida

Nina	Schumann	Miami Beach	Florida
Daniel	Rein	Sarasota	Florida
Nick	Leo	Winter Park	Florida
Nancy	Harrington	Miami Beach	Florida
Nicole	Macomber	Barnegat	New Jersey
Robert	Nobrega	Davenport	Florida
Noelle	Corris	Davie	Florida
Nora	Michaud	Port Charlotte	Florida
Rachael	Riccobene	Panama City	Florida
Janet	Dennis	Saint Augustine	Florida
Richard	Nadler	Boynton Beach	Florida
Nancy	Roberts-Moneir	Hallandale	Florida
Stephanie	Nwaokoh	Miramar	Florida
Nycolle	Lfe	Winter Park	Florida
Jennifer	Morris	Babson Park	Florida
Kara	Ohlsen	Cape Coral	Florida
Martha	Burke	Clearwater Beach	Florida
Osborne	Lamoree	Fort Lauderdale	Florida
Richard	Yood	Tallahassee	Florida
Olivia	Eberhardt	Orlando	Florida
Wendy	Adams	Delta	Colorado
Copley	Smoak	Bonita Springs	Florida
Dafne	Ostermuenchner	Hollywood	Florida
Otis	Reynolds	Saint Petersburg	Florida
Patrick	Huey	Tampa	Florida
Pamela	Williams	Fort Pierce	Florida
Pam	Whigham	Windermere	Florida
Brian	Warren	Gulf Breeze	Florida
Reinaldo	Winer	Gainesville	Florida
Pastor Bob	Hoffman	Cape Coral	Florida
Patricia	Poock	Hernando	Florida
Patricia	Greiner	Naples	Florida
Patrick	Haller	Celebration	Florida
Patricia	Badillo	Margate	Florida
Patty	Walton	Englewood	Florida
Paul	Jones	Cutler Bay	Florida
Paula	Moats	Pinellas Park	Florida
Paulette	Ettachild	Key West	Florida
Paul	Bertolino	Port Saint Lucie	Florida
Donald	Shaw	Saint Petersburg	Florida
Nicolas	Davies	North Miami	Florida
P	Gray	Melbourne Beach	Florida
Peggy	Goodale	Largo	Florida
Peggy	Meserve	Tallahassee	Florida
Margaret	Mustelier	Miami	Florida

Penny	Goldman	Pompano Beach	Florida
Judith	Peter	Port Charlotte	Florida
Peter	Sigmann	Port Orange	Florida
Pam	Escarcega	Ocala	Florida
Paul	Genardi	Fort Myers	Florida
Paula	Higgins	Tampa	Florida
Phil	Welker	Naples	Florida
Phyllis	Derock	Hope Hull	Alabama
Karen	Iverson	Clearwater	Florida
Mark	Huckel	Seminole	Florida
Eugene	Pizzo	Tampa	Florida
Paula	Hunter	Vero Beach	Florida
Linda	Diemer	Bradenton	Florida
Lisa	Mccrum	Hollywood	Florida
Pam	Corrington	Chipley	Florida
Pamela	Vazquez	Fort Myers	Florida
Patricia M	Wolfenden	Maitland	Florida
Kathleen	Walker	Tallahassee	Florida
Pooja	Gehi	Micnopy	Florida
Nancy	Metz	Cape Coral	Florida
Doug	Landau	St Petersburg	Florida
Maria	Poulinas	Clearwater	Florida
Scott And Patti	Martin	Spring Hill	Florida
Emily	Nunez	Hollywood	Florida
Priscilla	Bell	Alachua	Florida
Rosemari	Mealy	Coral Springs	Florida
Mikki	Royce	Lake Worth	Florida
Pablo	Sabio	Fort Lauderdale	Florida
Mike	Riegel	Deland	Florida
Cecile	Dumornay	Hollywood	Florida
Oswaldo	Querales	Miami	Florida
Alexandra	Quintana	Miami	Florida
Quintaria	Hall	Tampa	Florida
Russell	Perlowski	Zephyrhills	Florida
Adriane	Caplowe	Boca Raton	Florida
Rachel	Edwards	Gainesville	Florida
Ramona	Purucker	Miami Beach	Florida
Valerie	Pitaluga	Plantation	Florida
Ruth Ann	Johnson	Sun City Center	Florida
Ralph	Milliken	Hobe Sound	Florida
Chloe	Ramsay	St. Petersburg	Florida
Eduardo	Forero	Greenacres	Florida
Randy	Kraft	Gainesville	Florida
Raveena	Patel	Miami	Florida
Robert	Williams	Saint Cloud	Florida

Raymond	Rosario Jr	Lakeland	Florida
Ray	Denzel	Stuart	Florida
Raymond	Simms	Safety Harbor	Florida
Roland	Delgado	Hollywood	Florida
Rebecca	Derdzinski	Naples	Florida
Renee	Schafer	Miami	Florida
Rebecca	Talbot	Fort Lauderdale	Florida
Vincent	Corrado	Melbourne	Florida
Rebecca	Redford	Gulfport	Florida
Red	Mendoza	North Miami	Florida
Maureen	Apostolos	St Petersburg	Florida
Regina	Walther	Stuart	Florida
Penelope	Reid	Fernandina Beach	Florida
Remy	Sharoff	Celebration	Florida
Renee	Burdick	Land O Lakes	Florida
Hunter	Hornby	La Jolla	California
Maria	M	Riverview	Florida
Robert	Thomas	The Villages	Florida
Jenna	Rhein	Delray Beach	Florida
Rhiannon	Riegel	Deland	Florida
Rhoda	Villanueva	Sarasota	Florida
Ron	Hopkins	Winter Springs	Florida
Jill	Rupprecht	Marco Island	Florida
Richard	Lundgren	Atlantic Beach	Florida
Richard	Coveny	Elfers	Florida
Rick	Jones	Largo	Florida
L.	Robson	St Petersburg	Florida
Ricardo	Colon	Fort Lauderdale	Florida
Amy	Barnes	Sarasota	Florida
Jose	Suarez	Clearwater	Florida
Brooks	Harrison	Fort Myers	Florida
Rita	Garvey	Clearwater	Florida
Robert	Kidd	St. Petersburg	Florida
Ruth	Hubing	Napled	Florida
Robin	Martin	Tallahassee	Florida
Mark	Panoff	Boca Raton	Florida
Robert	Meyer	Newberg	Oregon
Robert	Friedlander	Davie	Florida
Robert	Watson	Tallahassee	Florida
Robert	Henry	Bonita Springs	Florida
Robert	Ruggiero	Palm Harbor	Florida
Rob	Escallon	Miami Beach	Florida
Robin	Assarian	Estero	Florida
Mary	Robinson	Miramar	Florida
Robyn	Wright	Trenton	Florida

Rod	Si	Kissimmee	Florida
Roger	Grawe	Bonita Springs	Florida
Frank	Roder	Tampa	Florida
Ron	Wasdin	North Port	Florida
Ronnie	Bolling	Green Cove Springs	Florida
Ronnie	Heller	Fort Lauderdale	Florida
Ron	Dixon	Wildwood	Florida
Ronnie	Moseley	Grand Island	Florida
Elenora	Sabin	St. Petersburg	Florida
Rosanne	Cicanese	Punta Gorda	Florida
Kathy	Herland	Zephyrhills	Florida
Rose	Strain	Wellington	Florida
Michael	Rouse	Jacksonville	Florida
Rozy	Figueroa	Orlando	Florida
Randi	Paul-Heskins	Boca Raton	Florida
Robert	Paulson	Tampa	Florida
Renata	Bozzetto	Boca Raton	Florida
Stanley	McCleary	Fort Lauderdale	Florida
Rebecca	Sharpless	North Bay Village	Florida
Rosemary	Colson	Tallahassee	Florida
Robert	Schroll	Saint Petersburg	Florida
Rebecca	Wilson	St Pete Beach	Florida
Diana	Ventura	Tacoma	Washington
Ruby	Moore	West Palm Beach	Florida
Michelle	Unterberger	Gulfport	Florida
Rusty	Rollings	Palm Coast	Florida
Robert	Veltkamp	Jupiter	Florida
Steven	Horneffer	Casselberry	Florida
Saffy	Carson	Ocoee	Florida
William	Johnson	Sarasota	Florida
Sacha	Robertson	Hallandale	Florida
Marilyn	Himmel	Miami	Florida
Sally	Garfield	Sarasota	Florida
Samuel	Delgado	Orlando	Florida
Sam	Hadden	Miami	Florida
Sam	Hay	Stuart	Florida
Vincent	Corbett	Miami	Florida
Susan	Anderson	Sarasota	Florida
Leslie	Turner	Ft. Myers	Florida
Sandra	Pinzo	Coconut Creek	Florida
Sandra	Tagle	Miami	Florida
Sandra	Greco	Sanibel	Florida
Sylvana	Arguello	Miami	Florida
Sara	Rahmankhah	Margate	Florida
Susan	Aradeon	Aventura	Florida

Sara	Dickerson	Sarasota	Florida
Sarah	Doolittle	Fernandina Beach	Florida
Sarah	Burns	Shalimar	Florida
Sarah	Schaffer	Davenport	Florida
Sarah	Donaldson	Lake Worth	Florida
Sarena	Hicks	Davie	Florida
Sari	Crawford	Labelle	Florida
Sarah	Wood Borak	Miami Beach	Florida
Shelley	Arlen	Gainesville	Florida
Shawn	Singh	Orlando	Florida
Sofia A	Sotillo	Lakeland	Florida
Bill	Both	Leesburg	Florida
Tanara	Saarinen	Gig Harbor	Washington
Stuart	Baine	Wellington	Florida
Sommer	Brokaw	Heathrow	Florida
Susan	Carol	Port Orange	Florida
David	Schafer	Wilton Manors	Florida
Susan	Schlessinger	Port Saint Lucie	Florida
Scott	Aaseng	Chicago	Illinois
Scott	Rohlf	Orlando	Florida
Susan	Severino	Frostproof	Florida
Daniel	Rein	Sarasota	Florida
Shirley	Lewis-Brown	Pensacola	Florida
Darlene	Harbick	Pinellas Park	Florida
Susan	Drapkin	Sarasota	Florida
Susan	Bryant	Port Saint Lucie	Florida
Ronald	Sebben	Port St. Lucie	Florida
Susan	Dewitt	Largo	Florida
Susan	Epstein Garcia	Miami	Florida
Sue	Lenander	Melbourne	Florida
Sengrithey	Pich	Brunswick	Ohio
Seth	Lefkow	Naples	Florida
Suzanne	Gordon	Cape Coral	Florida
Samantha	Habermehl	Orlando	Florida
Edith	Gonzalez	Boca Raton	Florida
Shannen	Kelly	Tampa	Florida
Shari	Dworkin-Smith	Orlando	Florida
S.P.	Franklin	Naples	Florida
Shaun	Levin	Boynton Beach	Florida
Sheridan	Lorraine	Merritt Island	Florida
Sherolyn	Tramel	Winter Haven	Florida
Sherri	Rose	Fruitland Park	Florida
Sarah	Hewitt	Deland	Florida
Laura	Boone	St Petersburg	Florida
Mimi	Chan	Orlando	Florida

Kevin	Silvey	Seminole	Florida
Silvia	Hall	Boca Raton	Florida
Silvia	Munoz	Doral	Florida
Raven	Simon	Gainesville	Florida
Stephen	Johnson	Hollywood	Florida
Seaton	Bradford	Tallahassee	Florida
Susan	Golden	Naples	Florida
Robert	Markle	Dunedin	Florida
Linda	Collins	Cape Coral	Florida
Patricia	Jaffee	Naples	Florida
Sara	Leiter	Miami	Florida
Mary	Hillberg	Merritt Island	Florida
Sherri	Johnson	Lakeland	Florida
Steve	Lucas	Boca Raton	Florida
Sandra	Smallwood Beltran	Miami	Florida
Sandra	Defrates	Gainesville	Florida
Leah	Giordano Duff	Saint Petersburg	Florida
Amy	Smith	Gainesville	Florida
Ellen	Smith	Naples	Florida
Faith	Smith	Dona Vista	Florida
Sonia	Moreno	Fort Lauderdale	Florida
Stephanie	Ragusa	Clearwater	Florida
Susan	Ryan-Nelson	Titusville	Florida
Samantha	Corbitt	Jacksonville	Florida
Stephen	Marx	Cooper City	Florida
Kaylee	Pham	Sarasota	Florida
Sienna	Pinto	Parkland	Florida
Brad	Snyder	Port Saint Lucie	Florida
Shari	Oconnor	Tampa	Florida
Sofia	Djurinsky	Miami	Florida
Milo	Suarez	Pembroke Pines	Florida
Joan	Balfour	Boynton Beach	Florida
Sally	Eadie	Longwood	Florida
Kristen	Cavallini-Soothill	Fort Lauderdale	Florida
Margaret	Cobb	Archer	Florida
Jolita	Wainwright	Jacksonville	Florida
Steve	Schafir	Davie	Florida
Sue	Sefscik	Dunnellon	Florida
Susan	Sponnoble	Tamarac	Florida
Sue	Safford	Tallahassee	Florida
Gabriel	Stanley	Richton Park	Illinois
Marcelo	Rivero	Miami	Florida
Edward	Town	Sarasota	Florida
Ruth	Steger	St. Petersburg	Florida
Stephanie	Honore	Kissimmee	Florida

Steph	Garber	Celebration	Florida
Sharon	Stern	Seminole	Florida
Stephen	Mcwilliams	Fort Myers	Florida
Stephen	Donachie	Miami	Florida
Steve	Donoso	Terra Ceia	Florida
Susan	Thompson	Longwood	Florida
Jenna	Marsh	Spring Valley	California
Emily	Stone	St. Petersburg	Florida
Maryann	Piccione	New Port Richey	Florida
Patty	Street	Fort White	Florida
Stephanie	Gorman	Key West	Florida
Vin	Limoli	Hollywood	Florida
Susan	Tzareff	Merritt Island	Florida
Susan	Linden	Palm Bay	Florida
Susan	Acosta	Jacksonville	Florida
Zachary	Rosenberg	El Paso	Texas
Susan	Ketterer	Fort Pierce	Florida
Susan	Westcott	North Fort Myers	Florida
Susan	Linn	Sanford	Florida
Sue	Eichler	Flagler Bch	Florida
Suzanne	Desiato	Clewiston	Florida
Susan	Nelsen	Villages	Florida
Sarah	Sidbeck	Hollywood	Florida
Sally	Bibby	St. Petersburg	Florida
Susan	Wade	Saint Petersburg	Florida
Steven	Wetstein	Miami, Florida	Florida
Sybil	Donley	New Port Richey	Florida
Sylvia	Whiting	West Palm Beach	Florida
Diane	Tabbott	Jacksonville	Florida
Tina	Henize	Brooksville	Florida
Trudy	Horkin	Melbourne	Florida
Tarsila	Talarico	Fort Lauderdale	Florida
Tami	Akers	Sarasota	Florida
Owen	Whitman	Temple Terrace	Florida
Tammy	Lettieri	Coconut Creek	Florida
Thomas	Amundrud	Saint Petersburg	Florida
Tara	Clause	Davenport	Florida
Tara	Wolf	Sebastian	Florida
Tarika	Sankar	Miami	Florida
Valerie	Tarrant	Largo	Florida
Nina	Tatlock	Apollo Beach	Florida
Tracy	Newman	St Petersburg	Florida
Twila	Liggett	St Petersburg	Florida
Thomas	Aitken	Tampa	Florida
Gail	Teague	Temple Terrace	Florida

Thomas	Kennedy	Venice	Florida
Telene	Thomas	Delray Beach	Florida
Teonia	Burton	Hollywood	Florida
Nancy	Terreri	Ft Myers	Florida
Theresa	Lianzi	Fort Myers	Florida
Terry	Livingston	Powell	Tennessee
Tom	Scarcella	Naples	Florida
Tom	Galvagni	Inverness	Florida
Thorayya	Said	Tampa	Florida
Bruce	Harker	Tampa	Florida
Ofelia	Uribe	Bradenton	Florida
Matthew	Hinton	Lake Worth	Florida
Ed	Haff	Lake Worth	Florida
Matthew	Vargas	Tallahassee	Florida
Alisom	Thomas	Yellow Springs	Ohio
Anita	Thompson	Orlando	Florida
Thor	Blevins	Gainesville	Florida
Timothy	Leslie	Gainesville	Florida
Thyra	Joseph	Miami	Florida
Shannon	Lemos	Boca Raton	Florida
Sharyn	Brooks	St. Augustine	Florida
Judy	Moran	Panama City	Florida
Rose	Zelaya	Palmetto	Florida
Timothy	Kugel	Stuart	Florida
Tee	Kay	Vero	Florida
Patricia	Gragg	Port St Lucie	Florida
Thomas	Deboni	Windsor	Vermont
Tanya	Lawson	West Palm Beach	Florida
Tara	Morningstar	Sarasota	Florida
Terry	Mason	Sarasota	Florida
John	Manning	Lake Helen	Florida
Toby	Robinson	Oviedo	Florida
Christopher	Toledo	West Palm Beach	Florida
Tom	Miller	Fort Myers	Florida
Tonya	Andreacchio	Port Saint Lucie	Florida
Sara	Toosarvandani	Delray Beach	Florida
Blima	Mandelbaum	Sarasota	Florida
Tatiana	Pomerantz	Pittsburgh	Pennsylvania
Thomas	Stewart	Boca Raton	Florida
Thomas	Urquhart-Myers	Tampa	Florida
Tracey	Dare	Miami	Florida
Tracey	Wiseman	Saint Petersburg	Florida
Tracy	Holey	Tampa	Florida
Richard	E Swope	Palmetto Bay	Florida
Diane	Desenberg	Sarasota	Florida

Trenia	Cox	St. Petersburg	Florida
D. Burks	Hunt	Gainesville	Florida
Triana	Almeyda	Davie	Florida
Beverley	Clarke	Hollywood	Florida
Theresa	Petticini	North Lauderdale	Florida
Trisha	Lane	North Port	Florida
Kathy	Venrooy	Leesburg	Florida
Nadine	James	Apopka	Florida
Jeffrey	Trout	Lake Wales	Florida
Timothy	Bussell	Oakland Park	Florida
Tami	Schreurs	Boynton Beach	Florida
Tammy	Swoboda	Indianapolis	Indiana
Terrence	Swonk	Delray	Florida
Ruth	Tucker	Tierra Verde	Florida
Isobel	Fernandez	St. Augustine	Florida
Josephine	Cohen	Lutz	Florida
William	White	Fort Walton Beach	Florida
Kevin	Chapman	Silver Springs	Florida
Juan	Elder	West Palm Beach	Florida
Larry	Heiny	Sarasota	Florida
Carolina	Barrick	Miami	Florida
Avani	Vijayalakshmi-Ramanathan	Oakland Park	Florida
Kathryn	Copeland	Orlando	Florida
Vanessa	Lauzon	San Diego	California
Vanessa	Mcatee	Wilton Manors	Florida
Vanette	Mcconahey	Stuart	Florida
Ellen	Minkoff	Boynton Beach	Florida
Antonina	Vaznelis	Spring Hill	Florida
Veda	Roubideaux	St Petersburg	Florida
Quinn	Attika	West Palm Beach	Florida
Verajane	Hurlbut	Winter Haven	Florida
Alfredo	Berdecia	Hialeah	Florida
Valeria	Alvarado	Miramar	Florida
Sylvia	Blazek	Port Saint Lucie	Florida
Vicki	Rosenthal	Fort Lauderdale	Florida
Victoria	Olson	Fort Lauderdale	Florida
Vida	Perlow	Sarasota	Florida
Violaine	Babolat	Miami Beach	Florida
Virginia	Weaver	Cocoa	Florida
Victoria	Dunn	St Petersburg	Florida
Wayne	Harris	Bradenton	Florida
Victoria8Th	Mckenna	Ocala	Florida
Victoria	Olson	Fort Lauderdale	Florida
Meg	Banks	Royal Palm Beach	Florida
Vincent	Petta	Ocala	Florida

Victoria	Wildow	Stuart	Florida
Victoria	Seawall	Miami Beach	Florida
William	Fisk	Palm Bay	Florida
Wajid	Aminu	Jacksonville	Florida
Kent	Smith	Melbourne	Florida
Cecilia	Parry	Englewood	Florida
Wil	Sloan	Destin	Florida
Wayne	Schucker	Tampa	Florida
William	Densmore	Fort Lauderdale	Florida
Pamela	Weisbrod	Jupiter	Florida
William	Heer	Cocoa	Florida
Ilia	Medina	Saint Petersburg	Florida
Whitney	Oren	Ponte Vedra Beach	Florida
Wilbert	West	West Palm Beach	Florida
Wilhein	Milanes	Sanford	Florida
Willa	Hillman	West Palm Beach	Florida
William	Garrison	West Palm Beach	Florida
Leola	Williams	Jacksonville	Florida
Wilma	Diaz	Miami	Florida
Wilma M	Katz	Englewood	Florida
Bret	Windhauser	Sarasota	Florida
Winnie	Verna	Hollywood	Florida
Jane	Washington	Miami	Florida
Nancy	Panem	Punta Gorda	Florida
Nicole	Puig	Miramar	Florida
Martha	Ashley	Deland	Florida
Corinne	Woodland	Bradenton	Florida
Margaret	Handley	Orlando	Florida
David	Stevenson	Land O Lakes	Florida
Walter	Pinkus	Mesa	Arizona
Jean Marie	Leles	Tavernier	Florida
Yemel	Bryan	Delray Beach	Florida
Barbara	Williams	Ormond Beach	Florida
Leo	Souto	Orlando	Florida
Yolanda	Torres	Spring Hill	Florida
Rose	Merriam	Vero Beach	Florida
Zachary	Fluke	Winter Park	Florida
Sam	Zahn	Bradenton	Florida
Danessa	Balamani	Atlanta	Georgia
Abigayle	Zelaya	Homestead	Florida
Millard	Johnson	The Villages	Florida
Tami	Hillman	Cocoa Beach	Florida
Zoila	Alvarez Hernandez	Albuquerque	New Mexico
Mj	Sutcliffe	Lacey	Washington
Sharon	Zohar	Boynton Beach	Florida

Phyllisia
Zoha

Taylor
Hopps

Miami Gardens
Boca Raton

Florida
Florida

To: U.S. Department of Homeland Security (DHS) Officials
From: Shutdown Glades Coalition
Date: November 18, 2021
Subject: Racism at Glades County Detention Center

The following organizations — American Civil Liberties Union of Florida, Americans for Immigrant Justice, Borderless Existence Initiative, Detention Watch Network, Doctors for Camp Closure, Envision Freedom Fund, Freedom for Immigrants, Immigrant Action Alliance, Southern Poverty Law Center, University of Miami School of Law Immigration Clinic, United We Dream, and Qlatinx - write to request U.S. Immigration and Customs Enforcement (ICE) cancel its contract with Glades County for the Glades County Detention Center (“Glades”) in light of its systemic and consistent pattern of racism and anti-blackness towards Black immigrants.

Background

The numerous cases involving use of force against Black immigrants are part of a documented pattern of anti-Black racism by ICE officials and their contractors. Anti-blackness is defined as “behaviors, attitudes and practices of people and institutions that work to dehumanize black people in order to uphold white supremacy,”¹ treatment and behavior that “strips Blackness of value.”² A 2019 report on South Florida detention facilities cites disproportionate use of force and racial slurs directed at Black immigrants.³ At Glades, this pattern is unmistakable and goes back many years.

As supported by the documentation attached to this memo, racism manifests at Glades in various ways. The treatment of Black immigrants at Glades includes but is not limited to disproportionate: threats of physical violence, use of pepper spray, solitary confinement, extreme forms of physical violence like using the restraint chair, off-camera physical assault, and punitive, arbitrary administrative sanctions. Black immigrants at Glades are also subject to anti-immigrant verbal abuse that is often tied to their nationality. In the last month alone, the facility’s director reportedly suggested he would leave a noose in a Black immigrant’s cell and racially based complaints on behalf of at least 10 Black immigrants have been filed. As another example, a few months ago, officers called a Black woman “monkey,” “low life,” and “porky pig.” While these incidents are not new, they have continued at an alarming rate under this Administration.

Documentation of Racist Abuse at Glades

There is a pattern and practice of racially based abuse of immigrants at Glades that has been documented via direct testimony from current and former individuals detained at Glades,

¹ “Terms and Definitions,” Amherst College, available at:

<https://www.amherst.edu/campuslife/our-community/multicultural-resource-center/terms-and-definitions>

² “Racial Equity & Anti-Black Racism,” University of California San Francisco, Multicultural Resource Center, available at: <https://mrc.ucsf.edu/racial-equity-anti-black-racism>

³ Southern Poverty Law Center and Americans for Immigrant Justice, Prison By Any Other Name: A Report on South Florida Detention Centers (December 9, 2019), https://www.splcenter.org/sites/default/files/cjr_fla_detention_report-final_1.pdf.

litigation, and in Civil Rights and Civil Liberties (CRCL) complaints filed with DHS over many years. Below is a non-exhaustive list of CRCL complaints filed in the past few years that highlight racially based abuse. Since the start of the COVID-19 pandemic, there have been at least 35 complaints filed related to a breadth of abuses at Glades, including at least 15 filed under this Administration.

- October 20, 2021 - CRCL complaint filed on behalf of Abraham Keita and Mohamed Farah, both Black, African immigrants, who were subjected to punitive administrative sanctions and solitary confinement and deprived of mental health care. Mr. Keita was subjected to a retaliatory strip search by a Glades official, while Mr. Farah was physically assaulted by officers out of view of surveillance cameras. (Appendix 1)
- October 1, 2021 - CRCL complaint filed on behalf of N.T., a Black immigrant. At Glades, county correctional officials subjected N.T. to pepper spray, excessive use of force, medical neglect, abusive withholding of hygiene products, and punitive placement in a restraint chair. While taking N.T. into solitary, a lieutenant pepper sprayed him directly in the eyes in a hallway without any cameras. (Appendix 2)
- September 22, 2021 - CRCL complaint filed on behalf of A.S., E.E., and five other Black, African immigrants after county correctional officers subjected them to pepper spray, excessive use of force, medical neglect, and arbitrary and retributive imposition of administrative sanctions including solitary confinement. As a result of this violence, the men were under extreme duress, and two attempted suicides. (Appendix 3)
- September 16, 2021 - CRCL complaint filed on behalf of Ernst Francois after guards subjected him to targeted harassment and intimidation; racialized threats of death; and arbitrary and retributive imposition of administrative sanctions including solitary confinement. The facility's director reportedly, and on more than one occasion, suggested he would leave a noose in Mr. Francois' cell. (Appendix 4)
- August 26, 2021 - CRCL complaint filed on behalf of seven women at the facility citing various abuses, including racist verbal abuse. Danielle Harris, one complainant, reported filing multiple grievances about discrimination from officers. One officer called her "monkey," "low life," and "porky pig." (Appendix 5)
- April 26, 2021 - CRCL complaint filed after an officer at Glades injured Sean Taylor, a Jamaican national, while taking him to solitary confinement. An officer slammed him against the wall and then slammed his head onto the floor, injuring his head and shoulders. (Appendix 6)
- March 3, 2021 - CRCL complaint filed after Kemar Williams and Kevin Brown, both Jamaican nationals, were beaten, pepper sprayed, and taken into solitary confinement in retaliation for their participation in a previous CRCL complaint. (Appendix 7)
- January 8, 2018 - CRCL complaint filed on behalf of a group of Somali nationals who were subjected to various abuses, including verbal (called racial slurs such as "monkeys" by guards) and physical assault. (Appendix 8)

Request for Contract Termination

The pattern of abuse at Glades makes clear that its continued operation directly undermines the Biden Administration's commitments to racial equity and improving our immigration system. Investigating these complaints filed with DHS is crucial, but insufficient. The consistent pattern

of complaints already demonstrates a systemic issue at Glades. Lives continue to be in danger as long as this facility is in operation. The facility should no longer be entrusted with the custody of immigrants. Accordingly, we respectfully request that ICE cancel its contract with Glades County, effective immediately.

DEBBIE WASSERMAN SCHULTZ
23RD DISTRICT, FLORIDA

CHIEF DEPUTY WHIP

COMMITTEE ON APPROPRIATIONS

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NATIONAL SECURITY

STEERING AND POLICY COMMITTEE

Congress of the United States
House of Representatives
Washington, DC 20515

February 1, 2022

The Honorable Alejandro Mayorkas
Secretary
U.S. Department of Homeland Security (DHS)
2707 Martin Luther King Jr Ave SE
Washington, DC 20528

Dear Secretary Mayorkas:

We write once again to request that you move expeditiously to close the Glades County Detention Center in Moore Haven, Florida. Glades operates as a migrant detention center under contract with Immigration and Customs Enforcement (ICE). Many of us wrote to you this past summer requesting the contract be terminated and that no individuals be transferred to or from the facility.¹ Reports of abuse of both local residents detained and those transferred in from across the country have unfortunately escalated since that time. We understand the facility's contract is up for renewal in March 2022. The situation is not improving and we respectfully urge the Department to immediately terminate its contract with Glades County and close this facility.

We remain extremely concerned about the reports coming out of Glades and understand a group of advocacy organizations sent your department a memorandum² (memo) specifically on racist abuse at the facility last month. The memo outlines a systemic pattern of racially based abuse, documented via independent complaints to several lawyers and organizations. The treatment of Black immigrants at Glades includes but is not limited to disproportionate: veiled death threats and threats of physical violence, use of pepper spray, solitary confinement, extreme forms of physical violence like using the restraint chair, off-camera physical assault, and punitive, arbitrary administrative sanctions. Black immigrants at Glades are also subject to anti-immigrant verbal abuse that is often tied to their nationality. These events are unacceptable and have continued at an alarming rate under this Administration.

¹ See

<https://static1.squarespace.com/static/5a33042eb078691c386e7bce/t/60f9b4f9ada0083784a9c028/1626977529997/Glades+County+Detention+Letter+Signed.pdf>

² See

https://www.aclufl.org/sites/default/files/field_documents/memo_to_dhs_re_racism_at_glades_detention_center_11.18.21.pdf

Further, we have been apprised of reports on the overuse of toxic chemicals³ and a recent carbon monoxide leak⁴ in the facility, both of which resulted in individuals in the facility needing urgent medical care. On November 23, 2021, a carbon monoxide buildup in the kitchen at Glades due to staff negligence resulted in the poisoning of nine people who were working in the kitchen: six detained individuals and three Glades staff members. Of these, four detained men and one female Glades staff member were hospitalized. The other two detained individuals and two Glades staff members who were exposed to the gas experienced symptoms of carbon monoxide poisoning, including headaches, dizziness, and shortness of breath, but were not taken to the hospital that day. Weeks after the carbon monoxide poisoning occurred, many of the affected individuals report continuing to experience symptoms of the poisoning and have received little to no medical treatment for these ongoing medical issues.

As a result of these tragic events, other federal oversight bodies have been notified about the conditions at Glades and have even reached out to advocacy organizations in Florida for further information. Pertaining to the carbon monoxide leak, a letter⁵ was recently sent to DHS leadership and ICE officials, the Occupational Health and Safety Administration (OSHA), and relevant State and local entities. The letter details how the leak violated both 2019 National Detention Standards for Non-dedicated Facilities (“NDS”) and OSHA regulations.

Complaints related to a breadth of other hostile conditions, such as sexual harassment and abuse, retaliation for peaceful protest, and patterns of COVID endangerment and medical abuse have also continued at the facility, in addition to the reports of racist abuse, toxic chemicals, and the carbon monoxide leak. This is demonstrated by the over 35 complaints filed related to Glades since the onset of the pandemic, with at least 15 filed under this Administration.

These reports are highly disturbing and completely unacceptable. Further, as noted previously Glades should be closed for the sake of good governance and responsible stewardship of taxpayer dollars. The detention center is not operationally necessary. ICE has guaranteed Glades County payment for 300 beds, yet the current population is around 30. No one should be treated this way, especially under your watch and at the taxpayer’s expense. People’s lives continue to be in danger every minute that the Glades Detention Center remains open.

We respectfully urge you to terminate your contract with Glades County immediately. Thank you for your attention to this important matter.

Sincerely,


Debbie Wasserman Schultz
Member of Congress

³ See <https://www.scientificamerican.com/article/immigrants-in-u-s-detention-exposed-to-hazardous-disinfectants-every-day/>

⁴ See <https://www.miamiherald.com/news/glades-county-detention-center-carbon-monoxide-exposure-13425720>

⁵ See https://www.aclufl.org/sites/default/files/field_documents/carbon_monoxide_poisoning_glades_dec_2021.pdf



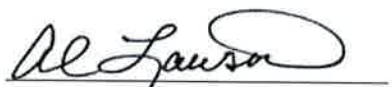
Earl Blumenauer
Member of Congress



Charlie Crist
Member of Congress



Ted Deutch
Member of Congress



Al Lawson
Member of Congress



Grace Meng
Member of Congress



Mark Pocan
Member of Congress



Darren Soto
Member of Congress



Bonnie Watson Coleman
Member of Congress



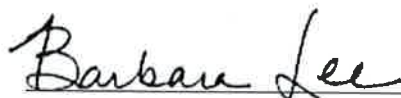
Shella Cherfilus-McCormick
Member of Congress



Madeline Dean
Member of Congress



Lois Frankel
Member of Congress



Barbara Lee
Member of Congress



Eleanor Holmes Norton
Member of Congress



Jamie Raskin
Member of Congress



Rashida Talib
Member of Congress



Frederica Wilson
Member of Congress

Congress of the United States
Washington, DC 20515

July 22, 2021

The Honorable Alejandro Mayorkas
Secretary
U.S. Department of Homeland Security
2707 Martin Luther King Jr Ave SE
Washington, DC 20528

Dear Secretary Mayorkas:

We write to request that you move expeditiously to close the Glades County Detention Center in Moore Haven, Florida. Glades operates as a migrant detention center under contract with Immigration and Customs Enforcement. This detention center has a troubling history of abuses and continues to generate reports of alleged medical neglect, excessive use of force, and other violations of human dignity. For these reasons, we respectfully urge the Department to terminate its contract with Glades County and close this facility.

We commend the Department and the Biden administration for your efforts to raise standards of care throughout the civil immigration enforcement process, especially after the last administration established policies that facilitated deplorable and even deadly conditions in migrant detention centers. However, our nation's migrant detention system continues to expose detained people to inhumane conditions at significant costs to American taxpayers. As you know, ICE operates more than 200 facilities nationwide. ICE must continue to systematically evaluate the quality of care at each facility and move to close or terminate contracts with facilities that fail to meet basic standards of care. Glades stands out as such a facility. Additionally, as transfers of detained people continue to happen across the country to the southern U.S., and with COVID-19 outbreaks still plaguing our region's facilities, we must avoid transfers to and from detention centers like Glades.

Advocacy, legal, and medical organizations across the country have reported that Glades has exhibited some of the most egregious cases of the systemic inhumanity that plagues the migrant detention system. A coalition of organizations, including Americans for Immigrant Justice, Freedom for Immigrants, Immigrant Action Alliance, the American Civil Liberties Union of Florida, Doctors for Camp Closure, Detention Watch Network, United We Dream, Florida Immigrant Coalition, and others have filed lawsuits and complaints on behalf of detained people who have suffered abuses at Glades.

In February, several of these organizations jointly filed a multi-individual civil rights complaint with the DHS Office of the Inspector General (OIG) and the Office for Civil Rights and Civil Liberties (CRCL). The complaint includes 25 testimonies of currently and formerly detained individuals. These testimonies detail patterns of medical abuse; lack of soap, hygiene products, sanitation, and PPE; continued transfers between facilities without quarantine; failures to follow court orders to release individuals from Glades; retaliation for peaceful protest, including a pattern of off-camera physical assault; use of toxic chemical spray in enclosed spaces; and

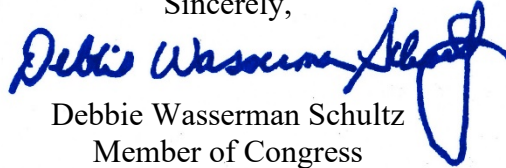
hospitalizations and death. Since February, additional CRCL complaints have been filed, demonstrating that conditions at Glades have not substantially improved.

Further, Glades should be closed for the sake of good governance and responsible stewardship of taxpayer dollars. The detention center is not operationally necessary. ICE has guaranteed Glades County payment for 300 beds, yet the current population is around 60. Our constituents should not be paying for a facility that is at one-fifth capacity and that routinely disrespects the humanity of those detained there.

It is important that the Biden administration take this opportunity to end the previous administration's legacy of immigrant rights abuses. Terminating the contract with Glades County and closing this facility would be a critical step towards the Department's larger goal of creating a fairer, more just, and more efficient civil immigration system.

Thank you for your attention to this matter.

Sincerely,


Debbie Wasserman Schultz
Member of Congress

Ted Deutch
Member of Congress

Eleanor Holmes Norton
Member of Congress

Lois Frankel
Member of Congress

Earl Blumenauer
Member of Congress

Val B. Demings
Member of Congress

Rashida Tlaib
Member of Congress

Jamie Raskin
Member of Congress



February 22, 2021

SENT VIA EMAIL AND CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Inspector General Joseph V. Cuffari
Office of Inspector General / MAIL STOP 0305
Department of Homeland Security
245 Murray Lane SW
Washington, DC 20528
DHSOIGHOTLINE@dhs.gov

Kathy Culliton-Gonzalez
Office for Civil Rights and Civil Liberties
U.S. Department of Homeland Security
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CRCLCompliance@hq.dhs.gov

Cc: Field Office Director Michael Meade
Enforcement and Removal Operations
Immigration and Customs Enforcement
U.S. Department of Homeland Security
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miami.outreach@ice.dhs.gov

Sheriff David Hardin
Glades County Sheriff's Office
P.O. Box 39
Moore Haven, FL 33471
dhardin@gladessheriff.org

Re: Violations of Civil Rights, COVID-19 Protocols, Reckless Endangerment, and other Abuses at the Glades County Detention Center (Florida)

Dear Inspector Cuffari and Officer Culliton-Gonzalez:

The following organizations—Americans for Immigrant Justice, Freedom for Immigrants, Immigrant Action Alliance, Southern Poverty Law Center, American Civil Liberties Union (ACLU) of Florida, Florida Immigrant Coalition, Doctors For Camp Closure Florida Chapter, Detention Watch Network, and United We Dream—submit this multi-individual civil rights complaint on behalf of Steve Cooper, Rodney

London, Romaine Wilson, Sebastian Radetic, those previously harmed while detained who may suffer long term consequences, and the approximately 300 individuals whose lives are being recklessly endangered today at the Glades County Detention Center ("GCDC"). We urge the DHS Office for Civil Rights and Civil Liberties (CRCL), pursuant to its authority under 6 U.S.C. § 345, to immediately 1) Investigate Medical Practices at GCDC and Denial of Release, 2) Recommend that ICE Terminate the Intergovernmental Services Agreement (IGSA) with Glades County, and 3) Recommend the Immediate Release of All Individuals Detained to Community.

The above named organizations provide this accounting of Immigration and Customs Enforcement ("ICE"), Glades County Sheriff's Office, and its contractors' reckless and ongoing endangerment of the lives and well-being of those they are contractually and constitutionally obligated to care for in the Glades County Detention Center from pandemic onset to present. We file this complaint in an attempt to secure immediate oversight preventing additional deaths and long term health consequences of those whose civil rights are being violated.

Direct testimony from 25 individuals currently or formerly detained underscore persistent patterns or practices of abuse:

This complaint includes direct testimony from 25 individuals currently and formerly detained. All reports made by those who remain in detention are submitted anonymously due to concerns of retaliation. Some of these individuals are willing to be identified in the case of a formal investigation. Together, these testimonies clearly demonstrate informed and deliberate indifference toward the safety and well being of those under the care of ICE and Glades County, as these entities were made aware of these complaints and conditions for the past ten months. This disregard for the welfare of those in their custody includes violations of ICE's own detention standards and COVID-19 protocols, CDC guidance, and the U.S. Constitution.¹

Sources of direct testimony include:

- Legal declarations submitted within the *Gayle v. Meade* litigation spanning April, May, and June 2020, including initial lawsuit filing and two subsequent motions to enforce the court's order;
- Civil rights complaints detailing 1) medical abuse and medical neglect, 2) physical violence and pepper spray in response to peaceful protest and public reporting, and 3) the use of highly toxic chemical spray intended to combat the spread of COVID-19;
- Habeas petitions in federal court detailing constitutional violations;
- Interviews conducted in January 2021 detailing current conditions;
- Reports regarding the death of Onoval Perez Montufar who died due to COVID-19 negligence at the Glades County Detention Center.

¹ 2019 National Detention Standards for Non-Dedicated Facilities, U.S. Immigration and Customs Enforcement, <https://www.ice.gov/doclib/detention-standards/2019/nds2019.pdf>. (hereinafter "2019 NDS"); U.S. Immigration and Customs Enforcement, Enforcement and Removal Operations COVID-19 Pandemic Response Requirements (Version 5.0, October 27, 2020), <https://www.ice.gov/doclib/coronavirus/eroCOVID19responseReqsCleanFacilities.pdf>. (hereinafter "PRR"); Interim Guidance on Management of Coronavirus Disease 2019 (COVID-19) in Correctional and Detention Facilities, Center for Disease Control and Prevention (Updated Dec. 31, 2020) https://www.cdc.ca.gov/ccjbh/wp-content/uploads/sites/172/2020/04/CDC_guidance-correctional-detention.pdf. (hereinafter "CDC Guidance"); Order Adopting in Part Magistrate Judge's Report and Recommendation, *Gayle v. Meade*, No. 1:20-cv-21553-MGC, ECF No. 76 at 6-7 (S.D. Fla. Apr. 30, 2020). (as a result of the evidence the record as of April 30, 2020, this Court concluded conditions at Glades constituted "a violation of the Petitioners['] Fifth and Eighth Amendment rights.").

These direct testimonies provide a timeline from the onset of the pandemic to the present, including persistent pattern or practice of:

- Medical abuse;
- Lack of personal protective equipment (PPE), sanitation, soap and other hygiene products;
- Transfers without implementing appropriate quarantine or medical screening
- Mixing of people who have tested positive for COVID-19 or who have been exposed to the virus with people who had tested negative or had not yet tested
- ICE failing to follow court orders and release high-risk individuals from GCDC;
- Hunger strikes demanding basic medical protections, oversight and release due to the entire population's vulnerability;
- Retaliation for peaceful protest and public reporting;
- Use of toxic chemical spray in enclosed spaces at GCDC, contributing to virus spread and harming detained people's health; and
- Hospitalizations, deaths, and disappearances.
- Restrictions to COVID-19 testing access.

The testimony of people detained at GCDC demonstrates both Glades County's negligence, as well as complete inability to guarantee the wellbeing of those in their custody. Although there are basic needs that should be addressed immediately, such as ensuring access to PPE and soap, these steps alone cannot ensure the safety of people detained at GCDC. In its own Pandemic Response Requirements ICE admits that "strict social distancing may not be possible in congregate settings such as detention facilities."² As shown throughout this complaint, people detained repeatedly also shed light on the county's inability to safely quarantine people without recourse to cruel practices such as solitary confinement, a practice that increases an individual's risk for injury and even death³ and which the United Nations has previously described as torture.⁴ In addition to these factors, medical professionals have also cited poor ventilation and disconnect from public health systems as systemic issues across carceral settings and contributing factors to the spread of COVID-19.⁵ Adding ICE⁶ and particularly Glades County's well-documented history of systemic medical neglect and abuse even before the onset of the pandemic,⁷ the urgent need to cancel Glades County's contract and to release people to complete their immigration cases in community is clear.

Today, ten months after the onset of the pandemic, individuals detained at Glades County Detention Center report life-threatening medical malpractice, including the intentional denial of treatment and diagnosis qualifying them for medical release. Reported as well is continued widespread medical neglect,

² PRR at 28.

³ Jayne Leonard, *What are the effects of solitary confinement on health?*, Medical News Today (August 6, 2020), <https://www.medicalnewstoday.com/articles/solitary-confinement-effects>.

⁴ Tom Miles, *U.N. expert says solitary confinement in U.S. prisons can be torture*, Reuters (August 3, 2013), <https://www.reuters.com/article/us-usa-california-torture/u-n-expert-says-solitary-confinement-in-u-s-prisons-can-be-torture-idUSBRE97M0QU20130823>.

⁵ *Amid pandemic, U.S. must reduce incarceration to protect public safety, report finds*, Brown University (October 22, 2020), <https://www.brown.edu/news/2020-10-22/decarceration>.

⁶ Detention Watch Network, American Civil Liberties Union, and National Immigrant Justice Center, *Fatal Neglect: How ICE Ignores Deaths in Detention*, (February 2016), <https://www.detentionwatchnetwork.org/pressroom/reports/2016/fatal-neglect>.

⁷ Southern Poverty Law Center and Americans for Immigrant Justice, *Prison By Any Other Name: A Report on South Florida Detention Centers* at 10, 30-32 (December 9, 2019), https://www.splcenter.org/sites/default/files/cjr_fla_detention_report-final_1.pdf.

dangerous "cohorting" or mixing of those well and sick, intrinsic impossibility of implementing social distancing measures, lack of sanitation and disinfection, inadequate mask provisions and usage, lack of infection control, lack of testing, and lack of release for individuals who have qualifying risk factors within the facility, in direct violation of *Fraihat* litigation and ICE's own COVID-19 Pandemic Response Requirements (PRR). The use of highly toxic chemical spray fumigated throughout the facility only further exacerbates the viral spread and causes detained individuals to experience difficulties breathing, with initial studies noting potential long term health consequences, including for women and men's fertility.⁸

All of these factors place people at imminent risk of becoming severely ill or dying from COVID-19. Shockingly, there have also been reports of individuals who were removed from the general population after passing out and their whereabouts were unknown to others in detention as well as to their family members. This, combined with reports from people in detention of overhearing guard conversations about deaths not yet publicly reported, pose serious questions about the true death toll due to COVID-19 in the facility. Advocates and attorneys nationwide express concern that the true number of fatalities due to COVID-19 in ICE detention is higher than publicly reported, due to lack of information regarding the fate of people released from ICE detention after being exposed to or having contracted COVID-19, including release of people who are very ill. Meanwhile, a complete lack of security and accountability exists for those wishing to report their fears for personal safety, harm to others, and the egregious conditions of their confinement. Individuals report retaliation in the form of pepper spray and physical assault, as well as solitary confinement, closing of commissary and texting accounts, and blocking of legal lines. Combined, these reports demonstrate clear violations of ICE's own COVID-19 PRR, the 2019 National Detention Standards, the U.S. Constitution, and public health protocols from the CDC.

Oversight efforts to date have been severely lacking to the point of intentional gross negligence. ICE and the Glades County Sheriff's Office staff who oversee the jail have all been made well aware of what is taking place within the facility and have had ample time to redress grievances and concerns. All parties are contractually responsible, and legally liable, for any harm that takes place, including wrongful death occurring inside the facility. It is clear both ICE and Glades County are unable and unwilling to appropriately mitigate and respond to harm for those in their care.

Under ICE's own COVID-19 policies, facilities that are unable to ensure the care and safety of those in their care should be subject to investigation, followed by the potential removal of the entire detention population from the facility.⁹ Given all that is accounted for from pandemic onset to present, despite numerous lawsuit directives, civil rights complaints, public testimony, and grievances filed within the facility, we demand an investigation into the ICE Miami Field Office and GCSO's reckless endangerment of people's lives and we call for CRCL and OIG to recommend that ICE terminate its Intergovernmental Service Agreement with Glades County and immediately release all individuals from the facility given the ample body of evidence already provided against GCDC.

ICE and Glades County's Failure to Uphold Obligations:

When a person is in government custody, either civil or criminal, the law requires the provision of necessary medical care. The Fifth Amendment of the Constitution requires adequate medical care and additional protections for individuals detained. Glades County Detention Center, like all ICE facilities, is

⁸ Anthony Luz, Paul DeLeo, Nathan Pechacek, and Mike Freemantle, *Human health hazard assessment of quaternary ammonium compounds: Didecyl dimethyl ammonium chloride and alkyl (C12-C16) dimethyl benzyl ammonium chloride*, REGULATORY TOXICOLOGY AND PHARMACOLOGY (July 5, 2020), <https://doi.org/10.1016/j.yrtph.2020.104717> ("DDAC and C12-C16 ADBAC are irritating/corrosive to skin at high concentrations, and are acutely toxic via the oral, dermal (C12-C16 ADBAC only), and inhalation exposure routes.")

⁹ PRR at 7-8.

also subject to ICE's own standards, which are in place to govern the operations of detention facilities across the country. GCDC is governed by the National Detention Standards ("NDS"), which were initially created in 2000, but were updated in late 2019. The NDS require that all detained individuals receive "medically necessary and appropriate medical" health care, emergency care, and timely responses to medical complaints."¹⁰ The NDS also require that the facility have "written plans that address the management of infectious and communicable diseases, including, but not limited to, testing, isolation, prevention, and education."¹¹ Reporting and collaboration with local or state health departments are also required.¹²

In response to the COVID-19 pandemic, ICE issued its Pandemic Response Requirements ("PRR"), a set of guidelines and expectations for detention facility operators in "sustaining detention operations while mitigating risk to the safety and wellbeing" of those detained in ICE custody.¹³ The PRR was developed in consultation with the Center for Disease Control and Prevention ("CDC").¹⁴ The PRR contains four stated main objectives: protecting detained individuals, among others, from exposure to the virus and "establish[ing] the means to monitor, cohort, quarantine, and isolate the sick from the well."¹⁵

To address compliance, the PRR calls for "onsite in-person monthly spot checks" at all the facilities.¹⁶ Specifically for "non-dedicated" facilities, such as GCDC, failure to meet the PRR's requirements should lead to ICE issuing a Notice of Intent indicating that the intergovernmental service agreement is in jeopardy due to noncompliance.¹⁷ In response to a facility's noncompliance, ICE may remove or reduce the facility's population.¹⁸

ICE and GCSO have an obligation to abide by the requirements put forth by ICE ERO and the CDC. The ERO states that it issued these "mandatory requirements to be adopted by all detention facilities...during this unprecedented public health crisis."¹⁹ Additionally, ERO requires all facilities to "adhere to CDC recommendations for cleaning and disinfection during the COVID-19 response."²⁰ None of the protocols required by the CDC, ICE's own 2019 NDS, or the PRR, have been followed at Glades County Detention Center since the onset of the pandemic until the present day crisis based on the direct testimony referenced in this complaint, in direct violation of the legal and constitutional rights of those detained.

Timeline of Events:

Pandemic Onset: March and April 2020

The COVID-19 pandemic's veracity and fatality became widespread knowledge in March 2020 throughout the entirety of the United States. Rather than utilizing basic precautions to attempt treatment

¹⁰ 2019 NDS, Medical Care, II.A., at 12.

¹¹ *Id.* Medical Care, II.D.2., at 114.

¹² *Id.*

¹³ PRR at 5.

¹⁴ *Id.*

¹⁵ *Id.* at 7.

¹⁶ *Id.* ("A spot check is an in-person visit to a detention facility by an ICE Detention Service Manager (DSM) or Detention Standards Compliance Officer (DSCO) for the purpose of assessing whether the facility is complying with the requirements of the ERO PRR. DSMs and DSCOs review policies, logs and records; observe facility operations; speak with facility staff and detainees; and complete a standardized form to note observations and findings.")

¹⁷ *Id.*

¹⁸ *Id.* at 7-8.

¹⁹ *Id.* at 5.

²⁰ *Id.* at 23.

and containment of communicable spread, during the first months of the pandemic the Glades County Detention Center staff and ICE officials flagrantly ignored our nation's public health protocols, as well as ICE's own guidance. By March 22, 2020, over 100 people detained at GCDC launched a hunger strike, citing deterioration of already unsanitary conditions, a lack of antibacterial soap, lack of testing, overcrowding, inedible food and the danger posed by in-transfers from other facilities.²¹ The following day, March 23, 2020, the Center for Disease Control released Interim Guidance on Management of Coronavirus Disease 2019 (COVID-19) in Correctional and Detention Facilities²², which were followed by ICE's PRR, which the agency issued in its first iteration on April 10, 2020. Firsthand accounts from people detained revealed that individuals were being brought into custody on a daily basis without adequate screening for COVID-19, and ICE was indiscriminately transferring individuals between facilities without employing safety protocols, including quarantine which is impossible in a detention setting. Instead, in the general population housing units GCDC was cohorting, or "mixing," people who were ill with others who were not. During this time period, individuals detained at GCDC also reported people exhibiting clear symptoms for COVID-19, though ICE continued to deny there were positive cases in the facility.

News reports and direct testimony, like the following made to Immigrant Action Alliance ("IAA"), appear to confirm the detention center did, in fact, have people ill with COVID-19²³, despite ICE only formally reporting the first two cases at GCDC on May 28, 2020. The organization also received reports that GCDC was running out of food and had run out of basic toiletries, hygiene products, and medication, including for colds, pain relief, and diabetes:

"They came and removed one person yesterday. He never came back. He went to medical. They packed up all his stuff with gloves and masks. I just found out yes he was taken to quarantine. They had to stop court because three guys tested positive for the virus. Please if this gets out, we are helpless. And they have run out of medicine for four days now and there is no supply of hand sanitizer. We ask for it and they say no.... We are all stuck in an unsanitary box together."
Anonymous, March 30, 2020

Meanwhile, GCDC failed to provide a basic level of care in other regards as well, compounding the medical abuse detained individuals experienced. For instance, IAA filed two civil rights complaints with DHS on April 2, 2020 and April 13, 2020 citing separate incidents of medication denial, amongst other abuses. In the first incident, a man reported experiencing full withdrawal, including passing out and vomiting, after not receiving his medications for his traumatic brain injury, seizure disorder, mental health disorder, and high cholesterol for at least 4 days. This could have had fatal consequences. The man filed multiple grievances using GCDC's grievance system to no avail, then Immigrant Action Alliance filed a subsequent CRCL complaint on his behalf regarding additional medication denials on July 3, 2020, emphasizing that if he were to have a seizure, he could require immediate brain surgery because of his prior traumatic brain injury. No response was received.

²¹ Manuel Madrid, *Florida ICE Detainees Start Hunger Strike Over Coronavirus Concerns*, Miami New Times (March 26, 2020), <https://www.miaminewtimes.com/news/florida-ice-detainees-on-hunger-strike-amid-coronavirus-1160750>.

²² CDC Guidance at 19 (The CDC's Guidelines specifically caution that "[c]ohorting multiple quarantined close contacts of COVID-19 case could transmit COVID-19 from those who are infected to those who are uninfected. Cohorting should only be practiced if there are no other available options.").

²³ Manuel Madrid, *Florida ICE Jail Quarantines Detainees Amid Coronavirus Testing*, Miami New Times (March 10, 2020), <https://www.miaminewtimes.com/news/ice-immigrant-detainees-in-glades-county-florida-tested-for-coronavirus-11581235>.

IAA also filed a complaint on behalf of Mr. Romaine Wilson on April 13, 2020 regarding denial of medication. Mr. Wilson reported an April 9, 2020 incident where a sergeant physically assaulted and used abusive language against him, followed by placement in solitary confinement the next day. While in solitary confinement, Mr. Wilson felt unwell and asked twice for his medication for grand mal seizures, with his requests denied. Mr. Wilson proceeded to have a seizure, hitting his head and face. He woke up in the medical unit the following day. As of April 13, 2020, he still had not received the life-saving medication needed to prevent his grand mal seizures. On April 19, 2020, a follow up CRCL was filed reporting Mr. Wilson's face wound had gone untreated and become infected, raising concerns for sepsis. He had been placed again in solitary confinement two days prior, during which time he reported being unable to shower and a nurse refusing to clean his wound, stating he should "call ICE" if he wanted to make a complaint. The DHS Office for Civil Rights and Civil Liberties did not interview participants or provide closure to either complaint.

Early detailed accounts of this reckless endangerment prompted 25 community, legal, and human rights monitoring organizations to submit a letter to Rep. Murcasell Powell on April 3, 2020 calling for the release of all detained people in order to avoid a public catastrophe. On April 13, 2020, a federal class action lawsuit followed suit, seeking the immediate release of all individuals in ICE custody across three detention centers in South Florida, including Glades County Detention Center.²⁴ Through public declarations, individuals in detention provided firsthand accounts of the dangerous practices being employed that placed people at increased risk of COVID-19 exposure and harm.²⁵

Medical Abuse: GCDC denied elderly and immunocompromised individuals proper care, placing them at great risk for severe negative health impacts and death from COVID-19. These risks were compounded by medical neglect, a longstanding issue at Glades²⁶:

"Despite my vulnerabilities to COVID-19, no member of the medical staff has evaluated my conditions or well-being to determine whether any additional precautionary measures are necessary to protect me from the illness. I am scared for my life... There are some people in my pod who are coughing, but their medical requests are not being addressed." Alejandro Vincenzo Mugaburu Tapia, Declaration in Gayle v. Meade, 1:20-cv-21553-MGC (S.D. Fla. April 22, 2020)

"I have not been tested for COVID-19 and I am not aware of anyone who has been tested. I have not received any medical attention... that is very concerning because I know there are also other people who have chronic illnesses who are high risk for COVID-19 complications, just like me." Anonymous, April 22, 2020

"I have significant health issues that I understand put me at high risk of serious complications if I catch COVID-19, including obesity and high blood pressure. I take Amlodipine 10 mg twice a day for my high blood pressure, along with hydrochlorothiazide 25 mg every night. I have been detained by ICE for more than ten months in three different detention centers. First, they held me at the Krome detention center, before they transferred me to Glades County Jail on March 19, 2020. Then I was transferred to Baker on April 28, 2020. When I arrived at Glades, they checked my temperature, and that's it. After that transfer, I had cold symptoms. While at Glades,

²⁴ Verified Petition for Writ of Habeas Corpus and Complaint for Declaratory and Injunctive Relief, *Gayle v. Meade*, No. 1:20-cv-21553-MGC, ECF No. 1 (S.D. Fla. Apr. 13, 2020).

²⁵ Appendix II Detainee Declarations, *Gayle v. Meade*, No. 1:20-cv-21553-MGC, ECF No. 8-1 (S.D. Fla April 13, 2020).

²⁶ Southern Poverty Law Center and Americans for Immigrant Justice, Prison By Any Other Name: A Report on South Florida Detention Centers at 10, 30-32 (December 9, 2019), https://www.splcenter.org/sites/default/files/cjr_fl_a_detention_report-final_1.pdf.

I had problems with my medical care. Whenever I happened to be asleep or indisposed when the guards passed out medications in the morning, they just skipped me and forced me to wait until the next day." Anonymous, May 11, 2020

Lack of Soap, Sanitation, and PPE: Documented shortages of soap, toilet paper, disinfectant, and hand sanitizer, as well as lack of or improper use of personal protective equipment (PPE) and dangerous practices employed in food management, all directly contributed to the widespread proliferation of COVID-19 at GCDC:

"There is no hand sanitizer in the pod for detained people to use... We previously asked the guards for hand sanitizer and they refused. The guards told us the use of hand sanitizer is only for them... The food is usually delivered by one detained person and about four guards. No one wears masks or gloves for the food delivery." Alejandro Vincenzo Mugaburu Tapia, Declaration in Gayle v. Meade, 1:20-cv-21553-MGC (S.D. Fla. April 22, 2020)

"We do not have any hand sanitizer available in the common area and they do not provide us with hand sanitizer. They do not provide us with masks or gloves either... Detainees have been asking for masks for weeks but there are none available... Not even the guards who come in and out of the detention center are wearing gloves." Anonymous, April 22, 2020

"We often run out of soap, because the guards give us soap only once every two weeks, and when I asked for a refill they told me I was wasting the soap and that I had to wait for soap day. Sometimes when I try to wash my hands in the sink, there is none." Dushane Spaulding, Declaration in Gayle v. Meade, 1:20-cv-21553-MGC (S.D. Fla. May 20, 2020)

"I estimate approximately sixty percent of guards, staff, and ICE officials wear protective gear. The guards who are stationed inside the pod only sometimes use them. They do it when their boss comes around, but they do not always have it on. I have seen guards coughing, both inside and outside the pod... My pod-mates and I also get really nervous when the guards in our pod sneeze... I am aware that there are other pods under quarantine. There are also transfers of detained people to hospitals due to the coronavirus. The same guards that go into those pods or help with transfers come into my pod. This makes me and my pod-mates very nervous." Alejandro Vincenzo Mugaburu Tapia, Declaration in Gayle v. Meade, 1:20-cv-21553-MGC (S.D. Fla. April 22, 2020)

Retaliation for Peaceful Protest and Public Reporting: This complete disregard for individuals' health and safety led to another widespread hunger strike inside the facility that began April 28, 2020. The facility responded by retaliating against people for reporting abuse and neglect to the public. ICE and the GCSO used solitary confinement and/or transfers to other facilities to punish those who spoke out, isolate them from others at the facility, and make it far more difficult for them to continue to report conditions.

"I was also mistreated by non-medical staff at Glades. I was in solitary confinement for weeks in April 2020, I think because guards were retaliating against me for reporting what goes on in the facility to people outside." Anonymous, May 11, 2020

In a message to Immigrant Action Alliance on April 16, 2020, one man said of his solitary confinement: *"I just spoke with LT. Palladino, he told me that I'm going to be in confinement forever until I leave Glades County Detention Facility."* This man did remain in solitary until he was transferred to the Baker County Detention Center at the end of April 2020.

Rather than remedy conditions, GCSO responded by punishing and silencing those who reported them. But because conditions at the facility have not materially changed, hunger strikes have continued throughout the pandemic as one of the only ways to draw attention to their condition, yet one that makes them more vulnerable to becoming severely ill or dying from COVID-19. As reported in the following habeas petition filed by a man who had engaged in peaceful protest, prolonged hunger strike can have severe negative health impacts:

"On the April 28,2020, in Glades County Jail B1 dorm where I was detained, detainees and I started a hunger strike because of COVID-19. Four days after I was transferred to B.C.D.C. in Jacksonville where I continued with my hunger strike with no food and no water, and then six days after I was transferred to W.C.D.C. in Tallahassee where I continued hunger strike with no food and no water until May 12, 2020. Few days after on the June 29,2020, with no explanation I was transferred (back) to the Glades County Jail in Moore Haven. In that period of 15 days with no food and no water I lost 37 pounds and got lot of medical complication, water in my lungs, enema in the lungs, water retention in the legs, kidney not working properly any more, and start having hard time breathing and dry coughing and as a result of that now I have to use asthma pump to get more air in my lungs." Habeas Petition, Radetic v. Miami Field Office Immigration and Customs Enforcement, No. 1:20-cv-23783-MGC, ECF 1 (S.D. Fla. September 11, 2020).

Virus Spread - Transfer & Impossibility of Quarantine: Even as the CDC and others warned against the transfers from state corrections departments to ICE custody as well as between ICE facilities, citing clear evidence that these transfers are fueling the spread of COVID-19, ICE continued to carelessly transfer those in its custody between the GCDC and other ICE facilities.²⁷ The ICE Miami Field Office responded to court orders to reduce the detention population by transferring individuals around the country, instead of opting to release detained people—even those who were at high risk medically—to their loved ones. Also documented were instances in which transfers were used as a form of retaliation. Amidst a global pandemic, transfers always and inevitably increase propagation risks. Still, ICE and its contractors, including GCSO, exacerbated risk and placed people in danger by failing to even conduct temperature screenings before transfers, attempt to implement even limited social distancing guidelines on the buses used to transport detained people, provide PPE, and to even attempt to quarantine new arrivals at the detention center. These negligent actions indiscriminately spread the virus in detention and within surrounding communities.²⁸

"I was never quarantined when I arrived at the Glades County Jail, and since my arrival on March 11, 2020 new detainees have not been quarantined. On April 13, one of the other detainees in my pod was complaining that he was feeling sick. He was coughing and he said he had the chills and a headache. They came to the pod and examined him, and later one of the guards came and brought him some pills. He has not been removed from the pod. The fear is that he has COVID-19. Prior to April 13th there was another detainee in my pod who was throwing up and was removed. Right now there are other detainees in my pod coughing. The staff has not taken any measure to protect the rest of the detainees from the detainees who are currently ill. No one, including the sick detainees, are provided with masks or any other type of protection. To the best of my knowledge none of the detainees have been tested for COVID-19. There also have not

²⁷ See generally, COVID-19 in ICE Jails, Real-time Conditions Reports, Freedom for Immigrants (last accessed January 27, 2021), <https://www.freedomforimmigrants.org/covid19>.

²⁸ Detention Watch Network, Hotbeds of Infection: How ICE Detention Contributed to the Spread of COVID-19 in the United States at 26 (December 2020), https://www.detentionwatchnetwork.org/sites/default/files/reports/DWN_Hotbeds%20of%20Infection_2020_FOR%20WEB.pdf.

been any visible increase in medical staff." Omar Lopez-Jaramillo, Declaration in *Gayle v. Meade*, 1:20-cv-21553-MGC (S.D. Fla. April 22, 2020)

Facility-wide Communicable Spread: May - December 2020

By May, ICE and GCSO's abysmal handling of people's acute medical needs and COVID-19 safety precautions from the onset of the virus had led to a catastrophe. Very little changed in terms of the GCSO or ICE's response, leading to an uncontrolled, fully avoidable facility-wide outbreak. The GCSO and ICE's pandemic response constituted not only clear civil rights violations for everyone detained, but full culpability for long-term health impacts and death inside the facility.

On May 28, 2020, IAA filed another civil rights complaint to the attention of the Glades County Sheriff Hardin, Field Office Director Martin, and the civil rights division of DHS, with IAA's Director Wendy King stating:

"On May 25th, a person with a fever of 106 degrees was told to take a shower and given pain pills as treatment. As of May 26th, the bathrooms in the A1 housing unit had not been cleaned or sanitized for two days. On May 27th, the facility temporarily ran out of medication. As of May 27th, Glades County Jail was still reporting that no one had a fever. Despite a deputy at Glades County Jail testing positive for COVID-19, we are receiving reports that NO detained person has been tested for the virus. This morning we received multiple reports about detained people passing out from high fevers. No one has reported being able to see a doctor. Based on the reports we are receiving from people detained at Glades County Jail, we believe the entire population of the jail is at serious risk of illness or death due to the inability to social distance, lack of precautions being taken, lack of testing and lack of medical care. We urge Glades County Sheriff's Office and ICE officials to take immediate action."

CRCL responded requesting the names and A numbers of individuals in order to follow up on medical concerns. Fearing retaliation towards those reporting, these were not provided but IAA instead requested an independent medical team be sent to investigate the entire facility. Both ICE and GCSO failed to reply or implement any changes to protocols or facilitate medical release, including for those at high risk.

Medical Abuse: The summer months saw widespread disease transmission and acute medical neglect, with people cohorted together indiscriminately in the general population units, including those who were symptomatic and asymptomatic. Many individuals still were not tested for COVID-19, including people who were symptomatic. Those who did test positive were not provided appropriate medical care, including those who were known to be at high risk for severe medical complications or death from COVID-19.

The medical staff had no room to isolate individuals who had tested positive for the coronavirus because the medical observation rooms were at capacity. Generally, the staff at GCDC elected not to isolate those who tested positive for COVID-19 due to overcrowding, a direct result of ICE's failure to follow court orders to release those who were medically vulnerable and generally exercise its discretion in favor of release. The doctor at GCDC also completely dismissed concerns and provided questionable medical diagnoses. All of the above violated people's right to appropriate medical care while detained.

"I have asthma but I do not receive treatment for it at GCDC... Last week, I went to medical to speak to the doctor about my constant headaches and body aches. As I was waiting, I heard the doctor tell men who had tested positive for the coronavirus that they are "young carriers" and that they will be fine, essentially ignoring their concerns and requests for medical attention." Steve Cooper, Declaration in *Gayle v. Meade*, 1:20-cv-21553-MGC (S.D. Fla. June 16, 2020)

"Currently, I am experiencing shortness of breath, a dry cough, and headaches right in the middle of my forehead...At this time, the only medical care I have been offered after testing positive for COVID-19 is vitamins...I have heard the nurses say that all the medical observation rooms are currently full. They do not have space to isolate the individuals who have recently tested positive for COVID-19." Anonymous, June 11, 2020

"In the cubicle where I sleep, we are four people total. The person that sleeps directly in front of me is less than one foot away. In my cubicle, there is one person who is positive for the coronavirus. After he received his results, he was not isolated, and he remains in close living quarters with the rest of us. Despite having symptoms of the coronavirus, I have not been tested. I started feeling sick around May 24, 2020, and I am currently experiencing diarrhea, vomiting, chest pains, and body aches. Last Sunday, I was vomiting and coughing up blood. Previously, I had written sick call requests which explain that I have chest pains, back pains, and was vomiting. On June 10, 2020, I was finally able to see the doctor about my symptoms. When I was with the doctor, I asked to be tested for COVID-19, but he refused. I explained to the doctor the frequent pain I was feeling in my chest as well as the vomiting, diarrhea, and body aches I am experiencing. The doctor said that the chest pains are due to muscle pain; he said he would prescribe me a muscle relaxer. He did not attribute the chest pains to be a symptom of the coronavirus... Because I do not feel well, I stay in bed most of the day. This visit on June 10, 2020 was the first time I had seen the doctor in a long time. He often has an attitude and refuses to speak to people who request medical attention." Anonymous, June 12, 2020

"On June 12, 2020, one man who was feeling sick for a few days passed out around 12:45 p.m. He was taken out of the pod. Some people who are sick are not eating. Right now, medical attention for people who are sick is limited to a two to four-ounce cup of Gatorade, two Tylenol pills or two ibuprofen pills, and a cold pill. However, the medical staff is keeping a list of people with high fevers. Sometimes, if your name is not on this list and you go to the cart to ask for Gatorade or other medications, you cannot get it. It seems as if high fever is the only COVID-19 symptom that the Glades medical staff take seriously. I do not currently have a high fever and have not been able to access a COVID-19 test." Anonymous, June 12, 2020

"Temperature checks happen twice daily... From what I have seen, when someone has a high temperature, they are given a cold pack and vitamins or Tylenol. Recently, a man in my pod told me that the nurse told him that his fever was 103 degrees. This man was given a cold pack and some pills and remained in general population... I filled out a medical request two weeks ago and have not been called to medical. In the meantime, I have only been given cold packs, vitamins, and sometimes Tylenol for my symptoms. I have four young U.S. citizen children at home who need me, and I am afraid for my health and safety with the coronavirus pandemic and its widespread outbreak at Glades County Detention Center." Clayton Warner, Declaration in *Gayle v. Meade*, 1:20-cv-21553-MGC (S.D. Fla. June 16, 2020)

"Recently, I have been feeling feverish, fatigued, have a lack of smell and taste, and have had trouble breathing due to an asthma problem that I have had since childhood... Within the pod, there are people who are experiencing the aforementioned symptoms and some that are not. Some of the people in my pod have been tested for the Coronavirus, and some have not. Of those who have been tested, some have been told by officers that they were positive, but they refuse to give us a copy of our test results." Jermaine Scott, Declaration in *Gayle v. Meade*, 1:20-cv-21553-MGC (S.D. Fla. June 16, 2020)

*"In Pod A1, there are currently people who have not been tested for the coronavirus and people who have. Those who are positive for the coronavirus have not been taken out of the pod...I have not been tested for the coronavirus although I have had some of the symptoms, like constant body aches. **There are people in my pod who are requesting coronavirus tests because they are exhibiting symptoms, but they have not been tested. One of my pod-mates was told by the doctor that there are not enough tests.**"* Steve Cooper, Declaration in *Gayle v. Meade*, 1:20-cv-21553-MGC (S.D. Fla. June 16, 2020)

In one egregious example, ICE only tested individuals after they started showing symptoms post-transfer to Krome, in route for deportation. Then, detention staff both at Krome and GCDC lied to people in detention about the test results. Detained people's acute fear for their lives was mocked by guards at the facility. One man who requested to self-quarantine was outright denied the ability to do so, and the medical staff at GCDC denied him an inhaler although he was struggling to breathe.

*"I asked him if we had the virus and if so, who had it. The officer replied that he could not tell me without violating patient confidentiality. **He did say that three of the five of us have the coronavirus.** The officer asked me if we had received the test results, but we had not. The AGS staff then transferred us back to Glades (from Krome).. Then, the Glades staff escorted me to medical... While I waited, I asked the nurse which of us five have the virus. The nurse did not respond. **An officer who was in booking walked in and said that ICE told Glades staff that four out of five of us tested positive.** The staff or the nurses still did not tell me my test results. **I asked if I could self-quarantine since I either had or was exposed to the virus. The Glades staff refused and said there was no room. I was escorted back to general population to pod A1.** The next day, I had an asthma attack in the pod. The doctor was not available to see me or prescribe an inhaler or any breathing treatment. I was told that Glades could not provide me with an inhaler. I was forced to use my cellmate's extra inhaler. **Since I returned to Glades, I have not been seen by the doctor.** The last time I saw the doctor at Glades was the end of March 2020. The only thing I am provided for my coronavirus symptoms are Tylenol or ibuprofen or a cold pack... As of the date this declaration is made, **I still have not been provided the results to my COVID-19 test...** My body still aches, my chest hurts, my eyes hurt, I am having migraines, and I have lost my sense of smell." Terrance Taylor, Declaration in *Gayle v. Meade*, 1:20-cv-21553-MGC (S.D. Fla. June 16, 2020)*

ICE Fails to Follow Court Orders and Release High-Risk Individuals from GCDC: Many of these individuals qualified for release under the *Fraihat* litigation²⁹ and ICE's own policies due to their pre-existing medical conditions³⁰, but it is common for ICE to refuse to release individuals who are detained at GCDC. Despite the fact that these individuals remained at heightened risk of severe illness and death, they remained detained, at imminent risk of harm and further compounding overcrowding at the facility.

"I have seen people in my pod coughing, but we do not know if anyone has COVID because we have not received tests. We heard that one guard tested positive for COVID. I am not aware of any increases of medical staffing or medical screenings. My temperature was taken once before I entered the facility, but otherwise I have received no screening. Despite my vulnerabilities to COVID-19, no member of the medical staff has evaluated my conditions or well-being to determine whether any additional precautionary measures are necessary to protect me from the illness. I am afraid for my life. If released, I would live with my U.S. Citizen wife (redacted) in

²⁹ Order, *Fraihat, et al v. U.S. Immigration and Customs Enforcement, et al*, No. 5:19-cv-01546-JGB-SHK, ECF No. 132 (C.D. Cal. Apr. 20, 2020). ("[ICE] shall make timely custody determinations for detainees with Risk Factors, per the latest Docket Review Guidance[.]")

³⁰ PRR at 19.

Palm Bay, Florida, where I would be able to socially distance" Dushane Spaulding, Declaration in *Gayle v. Meade*, 1:20-cv-21553-MGC (S.D. Fla. May 20, 2020)

According to one Haitian man, who is high risk due to chronic asthma for which he uses an inhaler, *"ICE officers have not visited my pod at GCDC for the last month while I have been detained at GCDC. I am not able to speak directly to ICE and make complaints about the conditions at the facility or ask questions about my case. On Monday, May 12, 2020, I filed a release request with ICE asking that I be released from detention pending my removal proceedings given my multiple health issues and increased risk of complications if I were to contract COVID-19 in detention. Since I made that request, the deportation officer has not provided a response to my release request."* James Saintyl, Declaration in *Gayle v. Meade*, 1:20-cv-21553-MGC (S.D. Fla. May 20, 2020)

His request for release for medical reasons was ultimately denied, despite his COVID-19 risk factors and numerous family ties here in Florida, and he was deported to Haiti in mid-August 2020.

Another individual whose medical condition placed him at heightened risk for COVID-19 ultimately ended up signing his voluntary deportation after 14 years in the United States, leaving behind his wife and child. Despite a formal *Fraiha* petition and U.S.-based family, ICE never responded to his release request.

"I previously requested release from detention based on my significant mental health issues and the risk I face to contracting COVID-19 in this facility, but ICE never responded to my request. The ICE officers do not come visit GCDC, therefore, the only way we can currently communicate with the officers is through phone calls. The officer assigned to my case has not answered my calls." Anonymous, June 12, 2020

Continued Lack of Soap, Sanitation, and PPE: Despite the facility-wide outbreak, Glades still did not provide detained people with sufficient soap, hand sanitizer or basic cleaning supplies, severely undermining people's ability to protect themselves from virus exposure during the outbreak. Additionally, the facility failed to provide an adequate supply of masks, so that the only masks people had became dirty or broken.

"We are given masks, but they are often dirty and broken. The masks are replaced inconsistently. The mask I have right now I have had for 5 days... Detainees wear their masks sometimes. In my experience, some detainees don't always wear their masks because they want to preserve it since we don't know when we will get a new one..." Jermaine Scott, Declaration in *Gayle v. Meade*, 1:20-cv-21553-MGC (S.D. Fla. June 16, 2020)

*"About two weeks ago, on May 1, 2020, we started receiving a mask each Friday. Up to this point, I have received two masks from GCDC staff. The first mask looked like a proper, blue medical mask. However, the second mask appears to have been stitched together by hand. **It was made out of a hair net and a coffee filter.** I do not believe that this makeshift mask will block germs or air carrying the virus. **Many of the officers have masks but they wear them around their necks** and do not use the masks to cover their mouths."* James Saintyl, Declaration in *Gayle v. Meade*, 1:20-cv-21553-MGC (S.D. Fla. May 20, 2020)

*"When you go to medical, the GCDC staff or the nurses do not require that we wear a mask. **The transporting officer will escort about twenty people at a time** to reduce trips back and forth to*

*the pods, so we all walk together to medical and **wait in close quarters in the medical department waiting room.** When I went to medical on May 14, 2020, only one or two of the fifteen people in the waiting room were wearing a mask."* James Saintyl, Declaration in *Gayle v. Meade*, 1:20-cv-21553-MGC (S.D. Fla. May 20, 2020)

*"We do not have consistent access to soap. There is hand soap in the bathroom, but when it runs empty, the staff do not come to fill it up until after dinner time. We never have access to hand sanitizer... The common areas and bathrooms are being cleaned by detainees after every meal. However, we are not provided with enough cleaning supplies to do so. Since my last statement, **the bathrooms are still being cleaned with toilet water.**"* Anonymous, June 12, 2020

*"In the bathroom, there is a soap dispenser that the GCDC staff refill every Monday. With approximately 75 to 80 people living in this pod (A1), **the soap in the dispenser runs out very quickly.** It does not last more than a couple days, but the staff only refill the dispenser once a week."* Steve Cooper, Declaration in *Gayle v. Meade*, 1:20-cv-21553-MGC (S.D. Fla. May 20, 2020)

These issues directly contributed to the spread of the virus. Moreover, kitchen staff mismanaged the distribution of food and exposed detained people to COVID-19.

*"I have learned that a staff person who manages the kitchen tested positive for COVID-19. **Approximately five people who lived in my pod and worked in the kitchen became sick and never returned to the pod.** Two people from Pod A1 who worked in the barbershop got sick and never came back. We are told that people who are exhibiting symptoms of the coronavirus are held in holding cells in the booking unit of GCDC or in cells in solitary confinement."* Steve Cooper, Declaration in *Gayle v. Meade*, 1:20-cv-21553-MGC (S.D. Fla. May 20, 2020)

*"We have no hand sanitizer in the pod. We have a soap dispenser, which is only refilled once a week. There has been no change in how often the soap dispenser is refilled since June 5, 2020...**The food trays are not cleaned properly. They usually are covered in mildew..** This is a sanitation issue."* Astley Thomas, Declaration in *Gayle v. Meade*, 1:20-cv-21553-MGC (S.D. Fla. June 16, 2020)

Toxic Chemical Spray: By the end of May 2020, GCDC had one of the highest COVID-19 rates of infection in the country. However, rather than take immediate steps to mitigate the likelihood of death in the facility—for instance, to provide sufficient PPE, sanitation supplies, and release those at high-risk—ICE and GCSO chose to spray a highly toxic chemical multiple times daily in the enclosed housing units and in the presence of detained people. GCSO officials have not made efforts to increase ventilation in the housing units when they spray this chemical, nor do they permit detained individuals to exit the pod for the period of time between when the chemical is sprayed and when it dissipates.

On April 10, 2020, ICE issued a statement³¹ asserting that it would follow guidance issued by the Environmental Protection Agency (EPA) regarding the usage of disinfectant products to prevent the spread of COVID-19 in detention facilities, which clearly state the following: 1) the EPA does not

³¹ PRR at 24.

recommend use of fumigation or wide-area spraying³² and 2) "follow the manufacturer's instructions for all cleaning and disinfection products for concentration, application method, contact time[...]"³³

On May 23, 2020, an initial complaint filed by IAA to the attention of the Glades County Sheriff Hardin, Field Office Director Martin, and the civil rights division of DHS named the harmful health impacts of this toxic chemical. On June 23, 2020, a supplemental complaint was filed that included over a dozen reports from people in ICE detention at GCDC regarding the serious health consequences that they were suffering due to being exposed to hazardous chemicals.³⁴ These reports noted that GCSO failed to provide protective gear to the individuals administering the toxic chemical, nor did they improve ventilation before the chemical was sprayed. As a result, the fumigation exacerbated difficulty in breathing as the chemical hung in the air. The use of this chemical also led to the spread of aerosol droplets, spreading the virus and placing everyone at greater risk. Individuals who were positive for COVID-19 struggled to breathe once this chemical was sprayed in their housing units. Finally, the complaint noted that neither those requesting medical attention to address the impact of the chemicals nor those seeking help for the exacerbation of COVID-19's already life-threatening symptoms were provided appropriate medical care.

According to the complaint, at least a dozen individuals housed in units across the facility had reported the following symptoms as widespread among the population of detained people inside Glades, as direct results of the hazardous chemicals being sprayed on them:

- Painful, burning, red, and swollen eyes, nose, and throat;
- Painful breathing, sneezing and coughing;
- Nosebleeds;
- Sneezes and coughs that produce blood;
- Severe nausea;
- Stomach pain;
- Headache.

Reports in the civil rights complaint were provided anonymously due to fear of retaliation:

*"[They] spray the dorms three times a day every day and it's causing shortness of breath in a lot of people. **The containers look like a backpack with a hand pump to spray the chemical mist in the air.**"* June 23, 2020 Complaint

*"Yes, they are still spraying the chemical in the dorms 3 times per day.... **I've been suffering from chronic pain and shortness of breath, especially when they spray the chemical in the dorm,** but they keep telling me and other people with medical issues that there is nothing wrong with us. It's been two weeks since I put in a medical request to see the doctor and I have not gotten a response."* June 23, 2020 Complaint

³² *Can I use fogging, fumigation, or electrostatic spraying or drones to help control COVID-19?*, United States Environmental Protection Agency (last visited January 26, 2021), <https://www.epa.gov/coronavirus/can-i-use-fumigation-or-wide-area-spraying-help-control-covid-19>.

³³ *Guidance for Cleaning and Disinfecting: Public Spaces, Workplaces, Business, Schools, and Homes*, United States Environmental Protection Agency at 5 (April 28, 2020), https://www.epa.gov/sites/production/files/2020-04/documents/316485-c_reopeningamerica_guidance_4.19_6pm.pdf.

³⁴ Freedom for Immigrants and Friends of Miami Dade Detainees Complaint to Miami Field Office Director, Sheriff David Hardin, and DHS Office of Civil Rights and Civil Liberties (June 23, 2020), <https://static1.squarespace.com/static/5a33042eb078691c386e7bce/t/5ef2341bf2c09a07f1ff4775/1592931355823/Glades+Toxic+Exposure+of+People+in+ICE+Detention+to+Hazardous+Chemicals+%282%29.pdf> (Hereinafter referred to as the "June 23, 2020 Complaint").

*"Today they took one more person out of our pod and I overheard the nurse said where we going to put the guy that they taken out and saying they don't have any space. I'm scared and I know they're scared, too. **We're really not safe here. Yes, they are (spraying the chemical) and people have been getting really high fevers and stuff and I'm really scared because I got asthma.**"*

June 23, 2020 Complaint

*"The facility staff continues to spray the disinfectant while we are all in the pod. The chemical that is used causes us difficulty to breathe and also burns our eyes. When the chemical is sprayed, it goes all over the whole pod. **The chemical also causes us to cough, which could potentially further the spread of the virus.**" Astley Thomas, Declaration in *Gayle v. Meade*, 1:20-cv-21553-MGC (S.D. Fla. June 16, 2020)*

"We are not permitted to leave the pod while the chemical is sprayed... There is no ventilation in the pod, so the chemical does not quickly dissipate." Anonymous, June 12, 2020

Glades did not respond directly to the complaint filed by Immigrant Action Alliance, and, when questioned by the media, the GCSO chief deputy ridiculed the concerns.³⁵

Not only did Glades County not follow EPA guidance and ICE failed to intervene, but information obtained from an anonymous source indicates this spray was being administered at levels far more highly concentrated than recommended due to directives made by those employed by Glades County. Initial medical studies also note the probability of long term health consequences of these chemical agents, including infertility in women and men detained.³⁶

Continued Transfers & Impossibility of Quarantine: As noted previously, this complete lack of appropriate safety precautions led to a facility-wide outbreak. On June 4, 2020, ICE officially reported 57 positive cases, and 60 on June 5, 2020; however, as documented throughout this complaint, others who were experiencing severe symptoms made multiple requests for tests, but were denied. At the June 25, 2020 *Gayle vs. Meade* hearing, ICE admitted that in early June it had "discovered" 58 COVID-19 cases at Glades, but rather than identifying and treating individuals who had contracted the virus in a hospital setting and releasing those who had not contracted the virus, ICE opted to cohort the entire 320-person population at Glades for 14 days.³⁷

*"I am currently detained in Pod D1 at GCDC... The bunk beds are about four feet apart, but the person to my head is less than one foot away. The cell is very crowded... Given that my cell is currently full, and the housing unit continues to receive transfers from outside of GCDC, **the only way I can social distance is by going to solitary confinement, but I am fearful of the conditions***

³⁵Hunter Walker, *Immigrant detainees say ICE is using coronavirus disinfectant sprays that cause bleeding, burns and pains*, Yahoo Entertainment (May 29, 2020), <https://www.yahoo.com/entertainment/immigrant-detainees-say-ice-is-using-coronavirus-disinfectant-sprays-that-cause-bleeding-burns-and-pain-170426900.html>.

³⁶ Anthony Luz, Paul DeLeo, Nathan Pechacek, and Mike Freemantle, *Human health hazard assessment of quaternary ammonium compounds: Didecyl dimethyl ammonium chloride and alkyl (C12-C16) dimethyl benzyl ammonium chloride*, REGULATORY TOXICOLOGY AND PHARMACOLOGY (July 5, 2020), <https://doi.org/10.1016/j.yrtph.2020.104717> ("DDAC and C12-C16 ADBAC are irritating/corrosive to skin at high concentrations, and are acutely toxic via the oral, dermal (C12-C16 ADBAC only), and inhalation exposure routes."); Judy S. LaKind and Michael Goodman, *Methodological evaluation of human research on asthmagenicity and occupational cleaning: a case study of quaternary ammonium compounds ("quats")*, ALLERGY, ASTHMA & CLINICAL IMMUNOLOGY (2019), <https://doi.org/10.1186/s13223-019-0384-8>.

³⁷ Hearing, *Gayle v. Meade*, No. 1:20-cv-21553-MGC, ECF No. 186 (S.D. Fla. June 25, 2020).

of solitary confinement at this facility." James Saintyl, Declaration in *Gayle v. Meade*, 1:20-cv-21553-MGC (S.D. Fla. May 20, 2020)

"On May 14th, 2020, I was transferred from Krome to Glades on a bus with 24 other detainees. We all sat very close together on the bus and we were not able to practice social distancing. We also were not given masks for the bus ride, so none of us had masks during the transfer." Clayton Warner, Declaration in *Gayle v. Meade*, 1:20-cv-21553-MGC (S.D. Fla. June 16, 2020)

*"I was brought to Glades just a few weeks ago, and I was not put into isolation before I was placed in a large pod and shared bedroom with five other men in bunk beds. Since I was brought in, I have been moved to a different pod, so I have shared a pod with a total of nearly 200 men since I arrived here. **I have seen new men brought into my pod from different detention facilities and from outside of detention, and they have not been placed into quarantine when they have first arrived.**"* Dushane Spaulding, Declaration in *Gayle v. Meade*, 1:20-cv-21553-MGC (S.D. Fla. May 20, 2020)

*"There has been a lot of movement in and out of the pod where I am at GCDC. The pod was nearly emptied about a week ago when people were transferred and then filled back up with new arrivals within a matter of hours. As far as I am aware, **there is no routine intake quarantine at GCDC. When people are transferred to GCDC, they are brought directly to the pods.** On May 15, 2020, I spoke to one man in my pod who was transferred from Krome to GCDC on May 15, 2020 with 30 other people on a bus. He was immediately placed in the pod at GCDC and was not placed in quarantine first."* James Saintyl, Declaration in *Gayle v. Meade*, 1:20-cv-21553-MGC (S.D. Fla. May 20, 2020)

ICE argues that such cohorting is permitted under the CDC's Guidelines, which states "[i]f an entire housing unit is under quarantine due to contact with a case from the same housing unit, the entire housing unit may need to be treated as a cohort and quarantine in place."³⁸ However, the CDC's Guidelines on the issue of cohorting is clear. Cohorting should be avoided and utilized only as a last resort, not as a primary preemptive measure. The CDC's Guidelines specifically caution that "[c]ohorting multiple quarantined close contacts of COVID-19 case could transmit COVID-19 from those who are infected to those who are uninfected. Cohorting should only be practiced if there are no other available options."³⁹ Had ICE adhered to the CDC's Guidelines cautioning against arbitrary transfers and comingling symptomatic individuals with non-confirmed COVID-19 cases and released people, the enormous cohort created at Glades may have been avoided.

*"On May 28, 2020, I was tested for COVID-19. Days later, I received the results that I am positive for the coronavirus... In my experience, when tested, the staff will not give us a copy of the results of the coronavirus test. Some people are told they are positive, like I was, but some people who are tested do not know whether they are positive or not... Because some of the detainees are not told or given the results of their test, we are not sure of everyone who is positive, but we feel that the entire pod is positive based on the symptoms that we are all exhibiting. I requested my medical records three weeks ago and have not received a response... **While I am no longer experiencing symptoms of coronavirus and have recovered from my fever of 105, others in my pod and cell are still coughing, feeling weak, and have chills. In my experience, when a symptomatic detainee seeks medical attention, the medical staff doesn't really do anything. They just leave you there in the general population. They used to give out Gatorade, but I think they ran out. They are only giving out cold packs now...** In my experience,*

³⁸ CDC Guidance at 19.

³⁹ *Id.*

a medical request is supposed to be responded to in three to five days. However, I have heard of symptomatic people who have sent in medical requests weeks ago and still have not been responded to or been called down to medical to be seen. It seems like they just don't care. " Anonymous, June 12, 2020

*"On June 10, 2020, eight men were brought into the pod. I am not sure where they came from. By adding more people to the pod, social distancing is now even harder. My section of the pod is now full with six people. The person who sleeps across from me is about four feet away; the person in front of me is less than twelve inches away, and the person who sleeps in the top bed is about two feet above me...The beds are close together, so we are not able to practice social distancing. Everyone in my cell is symptomatic... **No one in my cell has been tested for the coronavirus.**"* Terrance Taylor, Declaration in *Gayle v. Meade*, 1:20-cv-21553-MGC (S.D. Fla. June 16, 2020)

*"In the pod where I am assigned (Pod B1), there are both people who have tested positive for COVID-19 and people who have not been tested... For example, one man in my pod has chronic obstructive pulmonary disease ("COPD") and asthma. **He tested positive for COVID-19 but remains in the pod in general population.** Another man who has hypertension tested positive for COVID-19 and is feeling weak. He has not been isolated since he tested positive and also remains in the pod...This arrangement is putting people who are not yet COVID-19 positive at a high risk for contracting the disease. **Close to forty people in this pod have not yet been tested for COVID-19....**"* Anonymous, June 12, 2020

"Now, I would estimate that almost the entire pod is experiencing symptoms of coronavirus. Some symptomatic people in our pod have been tested for coronavirus, and some have not. There are also some people in our pod who are not symptomatic and have not been tested. I feel that my pod is a cohorted pod of people with the coronavirus, because after we are tested, they do not transfer anyone in or out of the pod. However, I know of some people in this pod who are not symptomatic and have not been tested, but they are still kept in this pod. I am not sure why they would keep the sick people in the same pod as people who are not sick. It seems like the officials and ICE do not care about our health and safety." Anonymous, June 12, 2020

Hunger Strikes, Pepper Spray, and Retaliation for Public Reporting: Little to no information was provided to those detained, creating an atmosphere of desperation and fear. ICE officers refused to respond to detainees' questions, and guards physically assaulted and pepper sprayed individuals for naming safety concerns and protesting peacefully.

"Since my last statement, I still do not feel safe. Since my last statement, there is still a feeling of hysteria based on the lack of information. We all feel panicked because we think that we all have the coronavirus. We do not feel that anyone here cares about us." Anonymous, June 12, 2020

*"On June 10, 2020, in the morning, I spoke to a lieutenant and told him there are too many people in the pod. I told him the pod is crowded, and we are unable to properly practice social distance. I spoke to the lieutenant stating that I need to speak to ICE about what is going on because **we haven't seen an ICE officer in about three and a half months.** The lieutenant claimed he would try to get ICE to come to the facility. **I still have not heard from or seen ICE yet.**"* Steve Cooper, Declaration in *Gayle v. Meade*, 1:20-cv-21553-MGC (S.D. Fla. June 16, 2020)

In June, hundreds again went on hunger strike in response. Some individuals stopped eating as their only recourse for obtaining medical care, while others did so demanding ICE officers respond to their concerns

around imminent health and safety threats and lack of release. A news article published June 17, 2020 reported individuals being pepper sprayed, then denied access to water until the following morning, for speaking up about life-threatening conditions inside the facility.⁴⁰

*"Recently, the detainees went on hunger strike and told officers that we were not going to follow any of the facility rules until ICE came to speak with us. We did not go to meals, did not go to recreation, or go to medical to take out prescription. ICE came two days ago. Officials from ICE told us that we were cohorted and under quarantine. **They told us that we would be cohorted for fourteen days, but that the quarantine could be extended. They explained that the cohort was necessary because there was no place to put anybody, they did not have space.**"*
Anonymous, June 12, 2020

*"I have observed people not eating because they are so sick that they cannot get out of bed to come to meals. Others have told me they are not eating as a form of protest because **they believe it is the only way to get attention from officials and receive medical attention...**"* Jermaine Scott, Declaration in *Gayle v. Meade*, 1:20-cv-21553-MGC (S.D. Fla. June 16, 2020)

Shockingly, individuals also reported pepper spray being used against them for such innocuous activities as refusing to touch an item a guard handled without gloves, and asking for water, all of which violate ICE's own policies around excessive force. Pepper Spray also placed people at greater danger of covid exposure and/or negative health impact through aerosol spray:

On June 10, 2020, between six a.m. and 6:45 a.m., a Haitian man named Mr. Simeon asked an officer for drinking water because the jug was empty. Sergeant Sierra refused and told the man to step outside the pod. Mr. Simeon refused because he was fearful that the officer would take him outside of the pod and into the hallway outside of the sight of video surveillance cameras and beat or physically harm him. When he refused to leave the pod, Sergeant Sierra pepper sprayed Mr. Simeon directly in his eyes. He was standing just ten feet from the door to exit the pod when he was sprayed. When I saw this happen, I went to assist Mr. Simeon and help him go to the bathroom to clean the pepper spray off of his face. The pepper spray got on me, and I had trouble breathing and stopped breathing...The doctor never....sought me out to check on me afterwards even though I have tested positive for COVID-19, I am an asthmatic with serious respiratory problems, and complications could arise from being exposed to chemical agents." Anonymous, June 12, 2020

*"On June 10th in the morning, one detainee was asking the sergeants for water, because they are the ones who usually bring us water. He did not have any water all through the night, so he was thirsty and asking for water. **The sergeant denied him water and told him to get back to his cell, but he refused and demanded water. The sergeant pepper sprayed him. That spray often spreads throughout the pod and it makes some people cough.**"* Anonymous, June 12, 2020

Hospitalizations, Deaths and Disappearances: By July, sadly but unsurprisingly, a death at Glades due to COVID-19 was formally reported by ICE. A Mexican immigrant, Onoval Perez Montufar, died of COVID-19 complications at the age of 51 on July 11, 2020.⁴¹ His death is a prime example of the

⁴⁰ Monique Madan, *ICE 'retaliated' against detainees for speaking to media, federal complaint says*, Miami Herald (June 17, 2020), <https://www.miamiherald.com/article243603327.html>.

⁴¹ Adolfo Flores and Hamed Aleaziz, *A 51-Year-Old Immigrant Man From Mexico Has Died In ICE Custody After Testing Positive For COVID-19*, BuzzFeed News (July 13, 2020), <https://www.buzzfeednews.com/article/adolfoflores/mexican-immigrant-dies-in-ice-custody>; Monique Madan, *ICE detainee dies of COVID at South Florida hospital - the state's first immigration death*, Miami Herald (July 13,

seriousness of Glades County's lack of appropriate care and provision of safety for those in their custody. It also highlights the reckless endangerment of ICE's unwillingness to release individuals from ICE custody due to the pandemic, especially those whose underlying medical conditions place them at a higher risk of dying from COVID-19.⁴² Mr. Montufar's rights and his family's rights were violated and his preventable death is the responsibility of ICE and Glades County.

Others were hospitalized or removed to unknown locations, then disappeared. Alarming, those detained provide examples of people who are hospitalized, some to return repeatedly to the facility despite being in acute distress. Others who passed out and were removed were never heard from again.

*"Recently, I have been feeling weak and fatigued, feverish, and have a lack of taste and smell. Others in my pod have experienced similar symptoms, to include coughing, sneezing, headaches, fevers, and feeling weak or fatigued. Some are throwing up. I have witnessed people who are so sick that they cannot get out of bed. A man in my pod has been experiencing the aforementioned symptoms, including feeling weak and fatigued, high fever, and coughing for about ten days. **He has been so weak that he had to be carried out of the pod around four or five times. Sometimes they take him to medical, but last week, he was taken to the hospital. Three or four days later, he was released from the hospital and came back into my pod. When he returned, he was still showing symptoms and was very weak. Last night, after about six hours of being back in the pod, this man passed out in the pod and was unresponsive, so he was carried outside and put in a chair to wait for the ambulance to arrive...** I would say that approximately seventy-five percent of the detainees in my pod are experiencing symptoms of the coronavirus. **Commanding officers have told the detainees that none of us are dying so it was going to be okay and that we would be fine.** However, I do not feel fine and I, along with many other detainees I have spoken to, are very afraid and worried for our health and safety." Clayton Warner, Declaration in *Gayle v. Meade*, 1:20-cv-21553-MGC (S.D. Fla. June 16, 2020)*

*"I have personally seen two people in my pod pass out. **When people pass out, they are carried out of the pod on a stretcher and they do not come back.** In my experience, the only time someone is provided with immediate medical attention is when they pass out... if medical staff do respond to a medical request, medical staff treat the aforementioned symptoms by administering Tylenol and giving a cold pack. After this, detainees are returned to the general population. Most recently, I filled out a medical request over a week ago and still have not received any kind of medical attention." Jermaine Scott, Declaration in *Gayle v. Meade*, 1:20-cv-21553-MGC (S.D. Fla. June 16, 2020)*

The true death toll at Glades County Detention Center is unknown. ICE's formal figures are highly suspect due to lack of information regarding the fate of people released from ICE detention after being exposed to or having contracted COVID-19, including release of people who are very ill.⁴³

2020), <https://www.miamiherald.com/news/local/immigration/article244191262.html>; Alexi Cardona, *Miami Group Plans Vigil for Detainee Who Died in ICE Custody*, Miami New Times (July 17, 2020), <https://www.miaminewtimes.com/news/onoval-perez-montuf-dead-glades-detention-center-florida-covid-19-11667658>.

⁴² Another man named Kuan Hui Lee died while in ICE custody within the Miami Field Office on or about August 5, 2020, demonstrating a broader pattern of medical neglect within the south Florida facilities. See Taiwanese man in ICE custody passes away in Florida, U.S. Immigration and Customs Enforcement (August 6, 2020), <https://www.ice.gov/news/releases/taiwanese-man-ice-custody-passes-away-florida>.

⁴³ See Monique Madan, *'Either he's dead or he's been kidnapped': ICE detainees go 'missing' amid coronavirus*, Miami Herald (June 17, 2020), <https://www.miamiherald.com/news/local/immigration/article243545852.html>.

Present Crisis: January 2021

This complete lack of oversight and failure to release people on the part of ICE and GCDC has allowed conditions to continue to deteriorate throughout the facility. According to people detained, GCDC is in the midst of a full-scale crisis with another facility-wide outbreak, and conditions are at their worst point since the start of the pandemic. Recent interviews with Immigrant Action Alliance and Americans for Immigrant Justice provide a chilling picture of the abysmal conditions and failure of oversight to address their critical needs.

Medical Abuse: It is unsurprising that so many are sick, given the combination of the conditions mentioned throughout our report. The detention center doctor's own failure to wear a mask while treating individuals detained led to the virus' spread in the facility when he himself became ill with COVID-19 in late November 2020. Even basic precautions that were previously being employed, such as taking temperatures twice daily, have been rescinded.

"Sometimes there are no masks, not even the doctor is wearing one. The doctor was not wearing a mask before. He just started wearing it after he caught the virus, not before." Steve Cooper, Interview, January 10, 2021

*"Temperature checks used to be conducted once or twice daily whereas now they are only checked sporadically, and many with serious medical issues who should be released are remaining detained.. There is no COVID-19 testing taking place at this time, despite many people being sick. I myself was tested in July 2020, but wasn't provided my test results, and I have not been tested since.. **I think attention will only come once someone drops dead.** There is no sanitation, social distancing. The county jail was better than this. They have us in here like sardines in a can.." Anonymous, January 8, 2021*

In another example of medical abuse, from a CRCL complaint submitted by IAA on January 22, 2021, "[a man detained at Glades], who has been diagnosed with a heart murmur, saw the doctor at Glades County Jail because he was experiencing chest inflammation. He was given ibuprofen 400 mg during his first visit, then 600 mg. Lastly, he was given a muscle relaxer, which caused a near-fatal reaction. After being given the muscle relaxer, [he] fell asleep, but when he woke up, he was unable to breathe. His leg was shaking and he felt extremely dizzy. The incident occurred around 12/23/20. Afterward, he submitted two medical requests, but when these went unanswered, he walked in to see the nurse. [He] says that after the muscle relaxer was prescribed and he experienced such an extreme adverse reaction, he has not trusted the doctor. Meanwhile, he is having extreme chest pain." DHS has not responded to this complaint.

What is surprising is the direct COVID-19 exposure and potential medical malpractice being reported against medical staff. Following a recent court order in the *Fraihat* litigation ICE was legally obligated to release those in their care who were high-risk for severe illness and death from COVID-19.⁴⁴ At Glades, ICE and medical staff were well aware of the majority of these individuals since the pandemic onset, particularly since numerous *Fraihat* release requests were submitted and ignored. In addition, ICE's own COVID-19 protocols which demanded they be prioritized for release. Shockingly, rather than upholding the hippocratic oath and doing all they could for the safety and medical well-being of those detained, medical staff began intentionally refusing to put medical diagnoses on people's charts in attempts to block their release under the law and lying about previous diagnoses, according to reports from several detained people. For instance, the doctor also continued to state that severe chest pain, a sign of acute medical

⁴⁴ *Fraihat, et al v. U.S. Immigration and Customs Enforcement, et al*, No. 5:19-cv-01546-JGB-SHK, ECF No. 240 (C.D. Cal. Oct. 7, 2020).

distress due to COVID-19, was simply muscle strain, leading to the near death of an individual mid January:

"I went to the doctor last week about my chronic chest pain which had been occurring since June 2020. The same doctor informed me in June this pain was due to hypertension, which still has not been treated. On this recent visit the doctor said, "Oh, another one with chest pain," then performed an EKG which gave an abnormal reading. The doctor then confiscated my asthma pump, saying he had not diagnosed it and this was the cause of the chest pain - he said an investigation into who had given it to me would take place. However, the doctor himself diagnosed the inhaler last June when my lifelong asthma became acute as they began spraying the chemicals throughout the center. I've heard from others that the doctor told them he refuses to give new diagnoses in light of the Fraihat litigation which requires high-risk individuals be evaluated for medical release. A group of us wrote a grievance against the doctor last week." Anonymous, January 8, 2021

"Despite being diagnosed with numerous medical conditions that I take medication for and the fact that I use an asthma pump daily, the doctor says there's nothing wrong me. I received no medical care when I got sick with COVID-19. The medical staff just told me to take a shower and I would be okay...I've been waiting for my medical records since April or May of last year when I first requested them. Last week, another man here had a seizure while hospitalized, which was confirmed by the hospital doctor. He told us when he returned to the detention center Dr. Charles denied the seizure had taken place." Anonymous, January 8, 2021

"The doctor doesn't care for the detainees, he is just working for himself and ICE. Even if there wasn't a virus, people would get sick." The interviewee added that this was because people could become very sick but the medical staff would say they don't require hospitalization because the in-house medical department was sufficient. He noted that it takes a very long time to see a doctor outside of Glades. " Anonymous, January 4, 2021

"Despite the fact that I had a severe asthma attack in December, which they didn't treat, and I still feel shortness of breath that requires the use of an inhaler 5-10 times daily, racing heart, and fatigue, ICE denied my Fraihat medical release request because they said I had no medical conditions. They told me if I did face any medical issues, I should access care at the jail." Anonymous, January 11, 2021

"The chronic health issues I've had for many years, such as bronchitis, are noted on my medical chart but still going untreated. I placed a sick call over 3 weeks ago which has gone ignored, and I'm forced to use a friend's inhaler since the medical staff refuses to give me one." Anonymous, January 8, 2021

"I have heard that two to three people died here, in addition to Onoval. I don't know their names. My friends who worked at the clinic overheard guards there talking about others who have died at Glades." Anonymous, January 4, 2021

On January 26, a man detained at Glades reported to Immigrant Action Alliance that when he mentions his health problems, medical staff and the guards have begun to tell him, "no, you're in good health." He was taken off the breathing machine the week of January 25, even though he had regularly received treatments previously, and he is struggling to breathe.

Similarly, IAA received a letter postmarked January 21, 2021 from a man detained at Glades, who cannot get records from the medical department at Glades saying he was diagnosed with

asthma, even though he signed paperwork in June 2020 in order to receive an inhaler. When he noted this to Dr. Jean Saint Charles, Dr. Saint Charles replied that he had not ordered the inhaler; however, the doctor's name is on the box, as shown in the following screenshot obtained by IAA. In a text to IAA, he says he is now unable to get an asthma pump refill after submitting three requests (all of which went unanswered). "I have been complaining to them about having trouble breathing for (2) two weeks now," he wrote, "and still they have not let me see a doctor yet."

How are this is the document that I got from The medical department when they gave me the asthma pump. Im just puzzled because they did not enter my medical condition in their computer about my medical condition.
You can use this to help me send in my Frailhat release request please and thank you.

KEEP ON PERSON (KOP) CONTRACT

If I meet the requirements for the "Keep on Person" medication program, and agree to the requirements below, I will be allowed to keep my medication in my possession:

1. I understand that only medications that are approved and ordered by the facility clinician will qualify for this program.
2. I understand that medication may be given to me in a special package that will contain no more than a (30) day supply of medication. The package will contain a label that includes my name, identification number, the medication name, and directions for its use.
3. I understand I must follow instructions on the medication label. Health care staff can check my medicine at any time to make sure I am taking it correctly.
4. I understand, if I believe I am having a problem with the medication, it is my responsibility to notify the nurse or doctor as soon as possible.
5. I AM RESPONSIBLE FOR MY MEDICATION. If I lose, tamper with, share or trade the medication, I will be terminated from the program and may be subject to disciplinary action.
6. If I am transferred or released from this facility I may take the medication with me to complete the prescription. I understand that the medication is not in a child proof container, and accept responsibility.
7. I have received a pre-printed information sheet on all my initial Keep on Person Medications.
8. Once released, I will need to follow up with my health care provider as needed.
9. My Keep on Person (KOP) Medication(s) is/are:

VENTOLIN HFA 90MCG INHALER

ALLERGIES: Tramadol, WOOL

I HAVE READ THE KEEP ON PERSON (KOP) CONTRACT. I ACCEPT THESE TERMS AND ACCEPT RESPONSIBILITY FOR MY MEDICATION. I KNOW HOW TO TAKE MY MEDICATIONS PROPERLY. ALL OF MY QUESTIONS HAVE BEEN ANSWERED.

PATIENT'S SIGNATURE

Dwaine Smith

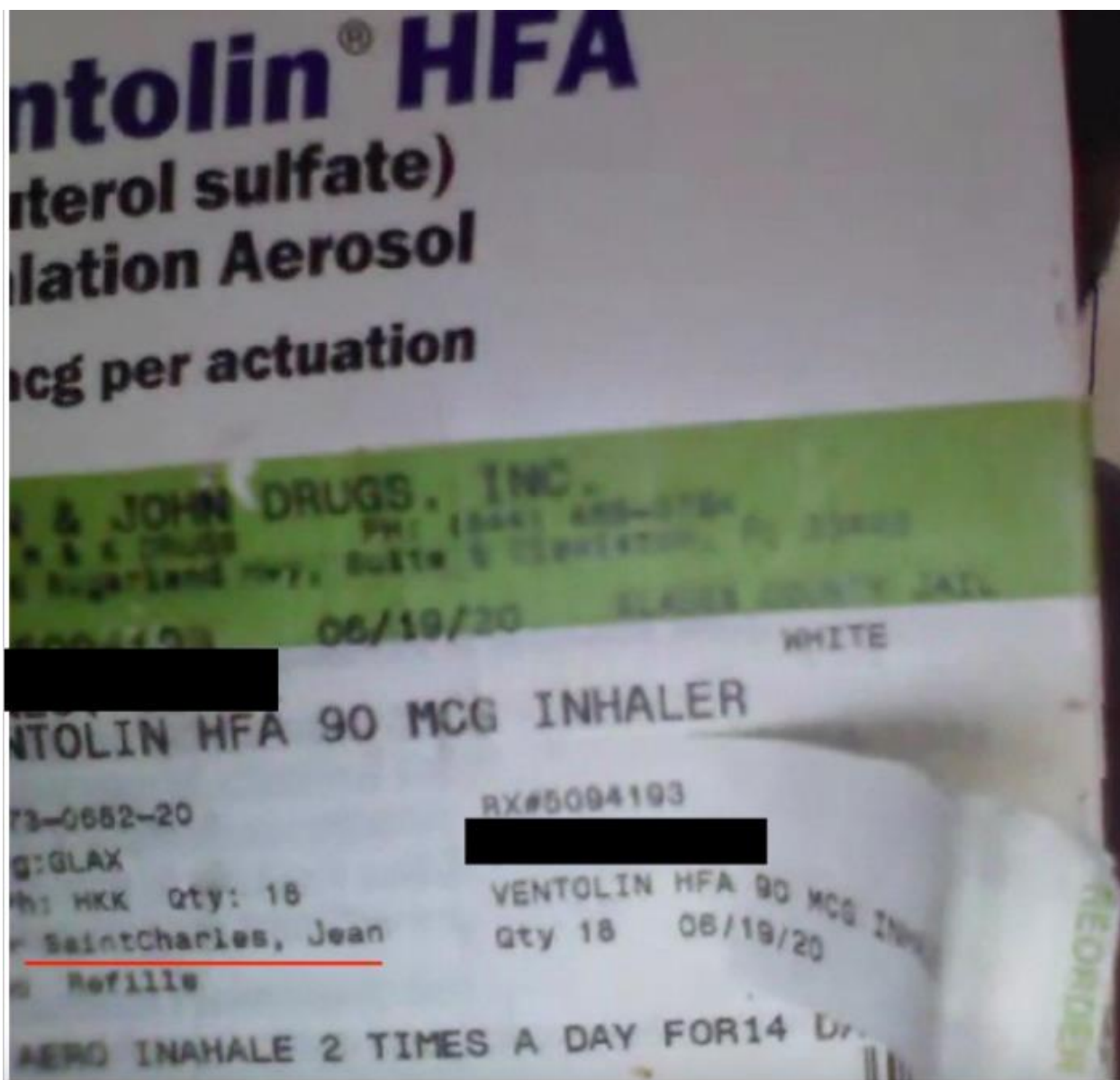
WITNESS (MEDICAL STAFF)

DATE

06-20-2020 Sat 07:14 PM

DATE

PATIENT NAME:	NO:	D.O.B.	SEX:	LOCATION:
	GCSO11MNI001604	09-20-1987	M	1*DORM 1*C*096 1*DORM 1*C*096



Hunger Strikes, Pepper Spray, and Retaliation for Public Reporting: In response, people detained are using whatever means possible to seek protection and accountability, including filing grievances, considerations of personal injury lawsuits, and facing the risk of retaliation and long term health consequence of putting their body in harm's way through hunger strikes. In late December over 100 people went on yet another hunger strike, demanding the ICE officers whom they have not seen for many months come speak to them. They sought ICE to address the deplorable and dangerous conditions they are living with and their concerns around medical care and continued denial of release:

"Men and women here went on a hunger strike December 27, which lasted four days. Guards threatened us with pepper spray, and on the 31st a man was dragged out onto the floor and assaulted in the midst of our sit in when we refused to return to our bunks to be counted. I believe they did this to him to intimidate the rest of us to break our strike...ICE Officers did visit us that day, December 31st, and again on Monday, January 4, when they expressed shock at the sight of

the bathroom. Glades County is getting the benefits and not treating us right. They are taking the money to take care of the county side." Anonymous, January 8, 2021

"I filed a civil rights complaint after my friend was forcefully dragged to the floor by 4 guards during a peaceful sit in the middle of our hunger strike. My friend was released that same day, before ICE officials came. ICE later threatened me that if I continued to hunger strike I would lose privileges and be placed in solitary confinement." Anonymous, January 8, 2021

"I would like to start a multi-individual personal injury lawsuit because of the long-term effects on us. And they keep doing it. They have to be held accountable." Anonymous, January 2, 2021

"The officers, the way they treat you—they don't want to give you masks.... Then they got more mean with us. DHS wanted to treat us like criminals. To them, we're criminals. A lot of officers were leaving to other facilities. They know what's going on—they know it's going to get shut down, not going to renew the contract." Rodney London, deported on approximately November 22, 2020, Interview on January 3, 2021

"ICE officer Joseph Brown was brought in after things got intense and a detainee was dragged out on the floor because he refused to talk or walk when ordered to do so ... During the hunger strike most detainees refused canteen for three days because we demanded to speak with a senior ICE official about the unsanitary condition of the facility. Which was never met. Instead Joseph Brown was sent in to calm the situation at hand due to unresponsiveness by ICE and facility staff. We asked Mr. Brown about how current COVID 19 settings are within the dorms in this facility with no real consideration for detainees health risks of being exposed and no 6 ft social distancing. His reply was 'no comment, due to lawsuit in progress in reference to Fraihat vs ICE,' when asked about the conditions of the facility in terms of sanitation, bathroom toilets leaking, and limited access due to malfunction and availabilities." Anonymous, January 9, 2021

The last individual reported two days later, through another, that his account was suspended for sending the above message to IAA to confirm the hunger strike and deplorable living conditions they still faced. That same day, the legal line for Americans for Immigrant Justice was cut off mid interview during a separate individuals' abuse reporting.

Lack of Soap, Sanitation, and PPE: Improper sanitation and insufficient access to hygiene products and PPE at the facility persist into early 2021.

"We reported a broken sink in the second floor bathroom in D1 dorm in October. Maintenance staff at Glades said to me, "We aren't fixing anything until after the election," and repairs still haven't been made. Now, there is water leaking down into the cell below the bathroom, and the bed in that cell can't be used because water from the bathroom leaks down onto it." Anonymous, January 8, 2021

"This place is not fit to inhabit for anybody, human or animal. There is black mold in the bathroom, and it's not safe. B dorm is leaking. Shitwater runs down the wall, besides people's beds. The inspector IGNORED these things. We said, 'Are you going to check the bathroom?' and they replied, 'No, we already saw one,' 'Yeah but there's another one!' The roof leaks some kind of icicles which are hanging from the ceiling and forming the same thing on the ground. They're 2 inches long, and look like a calcium deposit. We don't know if it's asbestos? They couldn't get approval to open with these things happening. With these things, the place should not be open at all." Rodney London, January 2, 2021

"Even the kitchen, they got roaches in the kitchen, in the cakes. Food is spoiled. Health conditions are terrible. They are not abiding by the rules and the laws." Steve Cooper, January 4, 2021

Virus Spread: Transfer & Impossibility of Quarantine: lack of ability to self-protect, and continual transfers into the detention center without people being able to properly quarantine upon arrival or COVID-19 outbreaks properly contained. According to those detained, testing is still not taking place, including for people symptomatic.

"On December 18, 2020 about 10 detained people were brought to my dorm C1 from B1 (quarantine dorm) after spending only 5 days in quarantine post transfer from Krome Detention Center in Miami, Florida. Others who had been transferred in at the same time were spread to two additional non-quarantine pods in the facility. People in quarantine dorm B1 are regularly mixed with the general population as soon as others are transferred into the facility, regardless of the length of time under quarantine." Anonymous, January 8, 2021

"Whenever new people are placed in the dorm, there is a COVID-19 outbreak which is not controlled. I have seen people released who were actively ill with COVID-19." Anonymous, January 8, 2021

"Someone went to work in the kitchen and caught COVID-19. He was in my unit but they only took him out that day, then 3 more people started to get sick right after that. They still haven't tested anyone else. The person that they took out from the unit that works in the kitchen came back last night. I guess he was just showing symptoms" Anonymous January 18 and 19, 2021

Lack of Appropriate Oversight:

Despite the humanitarian crisis that has unfolded since the onset of the pandemic, neither ICE nor Glades County took adequate action to prevent further harm as required by the US Constitution, the NDS and CDC Guidelines.

The Due Process Clause provides that no person shall "be deprived of life, liberty, or property, without due process of law." *U.S. Const. amend. V*. Its protections extend to every person within the nation's borders regardless of immigration status. *Mathews v. Diaz*, 426 U.S. 67, 77, (1976) ("Even one whose presence in this country is unlawful, involuntary, or transitory is entitled to that constitutional protection.") "[W]hen the State takes a person into its custody and holds him there against his will, the Constitution imposes upon it a corresponding duty to assume some responsibility for his safety and general well-being." *DeShaney v. Winnebago Cty. Dep't. of Soc. Servs.*, 489 U.S. 189, 199- 200 (1989). The government must provide detained individuals with basic necessities, such as adequate medical care, food, clothing, and shelter; the failure to provide these necessities violates due process. *Hamm*, 774 F.2d at 1573; *Cook ex rel. Estate of Tessier v. Sheriff of Monroe Cty.*, 402 F.3d 1092, 1115 (11th Cir. 2005).

At a minimum, the Fifth Amendment Due Process Clause prohibits ICE's deliberate indifference to a substantial risk of serious harm that would rise to the level of an Eighth Amendment violation in the post-conviction criminal context. *Revere v. Mass. Gen. Hosp.*, 463 U.S. 239, 244, (1983) ("[T]he due process rights of a [detained immigrant] are at least as great as the Eighth Amendment protections available to a convicted prisoner."); *see also Hale v. Tallapoosa County*, 50 F. 3d 1579, 1582 n.4 (11th Cir. 1995). Furthermore, the government may violate the Eighth Amendment of the Constitution when it "ignore[s] a condition of confinement that is sure or very likely to cause serious illness and needless suffering the next

week or month or year," including "exposure of inmates to a serious, communicable disease, "even when "the complaining inmate shows no serious current symptoms." *Helling*, 509 U.S. at 33.

Conditions of confinement for individuals in immigration detention violate the Fifth Amendment of the Constitution when the government fails, with deliberate indifference, to safeguard the health and safety of those in its custody. The government acts with deliberate indifference when it knowingly exposes an individual in its custody to a substantial risk of serious harm. The facts illustrated above clearly demonstrate that ICE and GCDC have subjected those in their custody to conditions of confinement that create a substantial risk of contracting a serious or even fatal case of COVID-19. ICE and GCDC know, or should be aware, of the fact that detained individuals' underlying conditions render them especially vulnerable to severe illness or even death if they contract COVID-19. ICE and GCDC are therefore knowingly subjecting individuals in their custody to an unreasonable risk of serious harm, in violation of constitutional due process. ICE and GCDC have exposed individuals in their custody to a substantial risk of serious harm. ICE and GCDC have known of, or disregarded, the substantial risk of harm to detained individuals' health and safety and as a result have acted with deliberate indifference.

GCDC is subject to ICE's National Detention Standards ("NDS").⁴⁵ The current governing version of the NDS is the 2019 National Detention Standards for Non-Dedicated Facilities. Section 1.1(I) of the NDS mandates that "facilit[ies] will operate in accordance with all applicable regulations and codes, such as those of . . . the Centers for Disease Control and Prevention (CDC)."⁴⁶ ICE and GCDC have failed to follow their duty to comply with the NDS, which requires compliance with CDC guidelines and federal, state, and local laws. Namely, ICE and GCDC have not implemented the recommended cleaning and disinfecting practices, recommended hygiene practices, nor given the nature of detention can they implement adequate social distancing practices per CDC guidelines. Moreover, ICE and GCDC's cohorting practices violate CDC guidance and increase the threat posed to individuals in their custody.

On April 30, 2020, the court in *Gayle v. Meade* found "record evidence demonstrating that ICE has failed in its duty to protect the safety and general well-being" of 34 petitioners from three south Florida detention centers, including the Glades County Detention Center.⁴⁷ The court concluded ICE's failures "amount to cruel and unusual punishment because they are exemplary of deliberate indifference."⁴⁸ As a result of the evidence in the record as of April 30, 2020, much of which documented the conditions at GCDC, the court concluded conditions at Krome and Glades constituted "a violation of the Petitioners[]" Fifth and Eighth Amendment rights."⁴⁹ The court in *Gayle* further determined that ICE had failed to comply with its own Performance-Based National Detention Standards and Pandemic Response Requirements, violating the individuals' due process rights under the *Accardi* doctrine.⁵⁰ Despite this order finding clear constitutional violations at Glades County Detention Center at the end of April 2020, not much has changed in the conditions of the facility nor in ICE's own ability to provide sustained and meaningful oversight over those in its custody at GCDC.

⁴⁵ See Inter-governmental Service Agreement between the United States Department of Homeland Security U.S. Immigration and Customs Enforcement Office of Detention and Removal and Glades County, Moore Haven, Florida at 4 (executed on May 30, 2007), <https://www.documentcloud.org/documents/1658083-glades-county-fl-igsa-contract.html>.

⁴⁶ 2019 NDS at 1.

⁴⁷ Order Adopting in Part Magistrate Judge's Report and Recommendation, *Gayle v. Meade*, No. 1:20-cv-21553-MGC, ECF No. 76 at 6 (S.D. Fla. Apr. 30, 2020).

⁴⁸ *Id.*

⁴⁹ *Id.* at 6-7.

⁵⁰ *Id.* at 7-9.

From August 31 to September 3, 2020, ICE's Office of Detention Oversight ("ODO") conducted a "compliance inspection" of GCDC.⁵¹ In Fiscal Year 2019, ODO found 12 deficiencies in a variety of areas. In the most recent inspection, in Fiscal Year 2020, ODO found a total of 17 deficiencies among the categories it assesses.⁵² Within the deficiencies were some regarding the inadequate medical care provided in the facility, with ODO noting that medical care is an "area of concern."⁵³ Individuals detained reported that facility conditions were temporarily improved simply to pass the inspection. This lack of appropriate oversight is not only a result of the pandemic, but a longstanding occurrence at GCDC. GCDC and ICE must be held accountable for their negligence.

"Before the inspection at G.C.D.C. officers used to wear masks and gloves 24/7, and they used to give masks to us detainees twice a week when [there] was supply for toilet papers and shampoo. Since inspection left[,] officers are walking with no gloves, they take off the masks, and we are not getting masks any more on the regular supply bases. With all this said I am afraid for my life here in the detention center, because the officers are breaking all the rules and regulations from CDC and also ICE guidelines." Complaint, *Radetic v. Miami Field Office Immigration and Customs Enforcement*, No. 1:20-cv-23783-MGC, ECF 1 (S.D. Fla. September 11, 2020).

Over six months since the first case of COVID-19 came to Glades, despite the rampant spread of COVID at the facility, nothing significant had changed in GCDC's procedures. Individuals filing habeas corpus petitions in federal district court argued the government violated their right to due process. Declarations like the one following led them to argue such failures amount to cruel and unusual punishment because they are exemplary of deliberate indifference.

"People with confirmed cases are deliberately cohorted with people with suspected cases, which shows a total disregard for our safety and well being. This practice also violated ICE April 10, 2020 COVID-19 Pandemic Response Requirements. We are congregated in groups of more than ten people. I am currently in a dorm with about twenty five people that came from Krome within the last three weeks that are confirmed positive for COVID-19 and are cohorted with people that are asymptomatic, or have not been tested at all, just like I was not once tested for COVID-19, or put in the quarantine for 14 days, in all my 5 transfers since April 22, 2020, until June 29, 2020. I am cohorted with people that have high temperatures and showing symptoms of illness, that have been tested for COVID-19, and I have not been tested yet. When I ask for a test I am told no." Complaint, *Radetic v. Miami Field Office Immigration and Customs Enforcement*, No. 1:20-cv-23783-MGC, ECF 1 (S.D. Fla. September 11, 2020).

Recognizing that environment conditions can be the basis for the state-created danger, Rodney London, an individual over the age of fifty diagnosed with hypertension and asthma, argued that these failures placed him at a heightened risk of not only contracting COVID-19, but also succumbing to the fatal effects of the virus due to his chronic medical conditions. Complaint, *London v. Miami Field Office Immigration and Customs Enforcement*, No. 1:20-cv-23770-MGC, ECF 1 (S.D. Fla. September 11, 2020).

⁵¹ Office of Detention Oversight, U.S. Immigration and Customs Enforcement, U.S. Dep't of Homeland Security, ERO Miami Field Office Glades County Detention Center August 31-September 3, 2020, https://www.ice.gov/doclib/foia/odo-compliance-inspections/gladesCoDetCntrMooreHavenFL_Aug31-Sep3_2020.pdf.

⁵² *Id.* at 6.

⁵³ *Id.* at 10.

Moreover, Glades County has failed to engage in adequate oversight actions to minimize the burgeoning health crisis. Although the nonprofit Glades Correctional Development Corporation is used to enable relationships with bondholders and shift liability away from Glades County, the county retains certain oversight. For instance, the commissioners have the power to appoint and approve members to the GCDC Board. Furthermore, GCSO is still partially funded by county taxes, and the commissioners must vote to approve its annual budget.

Despite this responsibility, the Sheriff's reports to the county commissioners at their regular meetings focus almost exclusively on the jail finances and the number of people detained there. Any questions about jail conditions that arise are quickly dismissed.

For instance, in the July 7, 2020 Board of County Commissioners meeting, Commissioner Storter Long mentioned news reports regarding the treatment of individuals detained at the facility. To this, GCSO Finance Director Shelley Ridgill stated they have passed all their inspections so if they were mistreating the detained individuals, they would be failing their inspections.⁵⁴ This was just days before Onoval Perez Montufar died on July 11, 2020 after contracting COVID-19 at the jail. No discussions of Mr. Montufar's death or the dangerous conditions of confinement were recorded in the Board meeting minutes for meetings directly following.

On August 25, 2020, Onoval Perez Montufar's family, as well as advocates, attorneys, people currently and formerly detained, and family members of those currently detained, all sought congressional oversight through a public Congressional Roundtable. They demanded an investigation into the cause of death, demanded in-person congressional visits to witness the horrors first hand inside the facilities, and an end to all transfers. Representative Greg Steube, who represents Glades County, declined to participate.

On November 23, 2020, nine months after the pandemic onset and as significant rights violations and direct harm were happening to immigrants in the county jail's custody, it remained unclear how much information was provided and what oversight role was being played by responsible officials within Glades County. Glades County Commissioner John Ahern, who serves on both the county commission and the board of the Glades Correctional Development Corporation, told fellow commissioners, "Everything is going fine now." This prefaced a report on the current finances and jail capacity--that ICE was continuing to pay the jail to detain 425 people though they were only detaining 307 individuals for ICE at the time. Commissioner Ahern also reported that they had lost "well over a million of income" because the court in *Gayle* had ordered them to maintain their ICE detained population at 75% capacity or lower. Only after Commissioner Ahern covered the finances did Sheriff Hardin disclose that the doctor assigned to the facility had contracted COVID-19.

Similarly, during the December 8, 2020 commissioners meeting, there was no mention of detention conditions, just concern over whether ICE would continue to pay GCSO for 425 beds.

⁵⁴ The Office of the Inspector General has stated that inspections by the Nakamoto Group, which has conducted inspections at Glades, are "not consistently thorough" and that "its inspections do not fully examine actual conditions." With all inspections, whether conducted by Nakamoto or others, the OIG found that "ICE does not adequately follow up on identified deficiencies or systematically hold facilities accountable for correcting deficiencies." See Office of the Inspector General, U.S. Dep't of Homeland Security, OIG-18-67, *ICE's Inspections and Monitoring of Detention Facilities Do Not Lead to Sustained Compliance or Systemic Improvements* (June 16, 2018), <https://www.oig.dhs.gov/reports/2018/ices-inspections-and-monitoring-detention-facilities-do-not-lead-sustained-compliance>.

This pattern was repeated at the January 12, 2021 meeting. The December 27, 2020 to January 1, 2021 hunger strike in response to unsanitary conditions and fear for their safety was not discussed, nor was there any mention of an officer's assault on one of these peaceful protestors. Commissioner Ahern only mentioned the fact that it was a "lot easier to pay the bills" with the 425 rate from ICE, which was not guaranteed to be paid after January of this year.

Equally concerning is the GCSO's lack of intervention, despite full awareness of all the above taking place. Although the county could exercise a measure of oversight regarding the present humanitarian crisis at GCDC, their concern over the jail's finances distracts them from the larger human cost.

Recommendations & Conclusion:

1. Immediate Investigation of Medical Practices and Denial of Release:

Based on the myriad of concerning reports from detained individuals at Glades County Detention Center since the onset of the pandemic, we believe the entire population of the jail is at serious risk of illness or death due to the inability to practice social distancing, lack of precautions being taken, lack of testing, and lack of adequate medical care led by a doctor whose motives remain questionable. We urge CRCL and OIG to immediately investigate the medical practices at the Glades County Detention Center. Further, every person detained should be provided with an individualized assessment, under a presumption of release, prioritizing those most medically vulnerable to complications from COVID-19.

2. ICE should terminate the Intergovernmental Services Agreement (IGSA) with Glades County

We further urge CRCL and OIG to recommend that ICE terminate the Intergovernmental Services Agreement (IGSA) with Glades County as they have repeatedly demonstrated their inability to provide adequate care to those in their custody.

All parties contractually obligated to uphold the safety and well-being of those detained in ICE custody under the IGSA, namely ICE and Glades County were well aware of the risk created by their negligence and failure to provide adequate care to the people detained in their custody. Internal grievances were filed, concerns around poor medical care and lack of release were publicized widely as people's hunger strikes—and the swift retaliation—was made public through the media. Moreover, congressional representatives from Florida acknowledged the abusive conditions at Glades during a congressional roundtable on August 25, 2020, in which three people directly impacted by Glades' abuses spoke, including Onoval Perez Montufar's niece, who reported the conditions at Glades leading to her uncle's death on July 11, 2020.⁵⁵ In addition, a major class action lawsuit was filed in federal court documenting egregious and alarming conditions within the facility. Despite a deluge of information, including ongoing reports over a period of ten months detailing the day-to-day atrocities happening inside GCDC, appropriate response, oversight, and remedy at the time of this filing have been wholly insufficient.

Far from being an appropriate crisis response to a deadly pandemic and facility-wide outbreak, the way in which ICE and Glades County failed to protect and release people under their care is evidenced, over and over, throughout the entirety of the pandemic to date.

⁵⁵ United We Dream, *Testimonies on ICE Cruelty: A Conversation with FL Reps*, (August 25, 2020) <https://www.facebook.com/watch/live/?v=309472236990575>.

3. All Individuals Detained Should Be Immediately Released to the Community

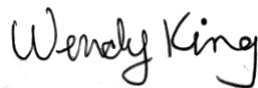
Finally, we remain extremely concerned that the conditions inside Glades are dire, with attempts to seek external support quelled in retaliation, and ongoing inadequate and abysmal medical care. Given reports of disappearances and unconfirmed deaths, the true death toll due to COVID-19 remains in question. Coupled with the intrinsic nature of congregate settings which cause the spread of infectious disease, Glades County Jail has proven itself unable and unwilling to provide those in its care with safety and due process. We believe that without immediate intervention to adequately address the ongoing pandemic and health crisis at GCDC, history will continue to repeat itself. Given the acute crisis which has been unfolding since the pandemic onset to date, we demand the immediate release of all individuals from Glades County Jail's custody. We are extremely concerned that many more individuals will continue to contract COVID-19 in the coming days and weeks, leading to severe illness and potential death.

We look forward to your prompt attention to this issue. Should you have any questions, please contact Jessica Schneider of Americans for Immigrant Justice at jschneider@aijustice.org, Wendy King of Immigrant Action Alliance at wendy@immigrantactionalliance.org, or Sofia Casini of Freedom for Immigrants at scasini@freedomforimmigrants.org.

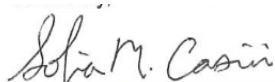
Sincerely,



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August 26, 2021

SENT VIA EMAIL AND CERTIFIED MAIL, RETURN RECEIPT REQUESTED

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Re: Violations of Womens' Civil Rights, Toxic Chemical Spray, Sexual Voyeurism, and other Abuses at the Glades County Detention Center (Florida)

Dear PREA Joint Intake Coordinator, Inspector Cuffari, and Officer Culliton-Gonzalez:

The following organizations—Americans for Immigrant Justice, Freedom for Immigrants, Immigrant Action Alliance, Southern Poverty Law Center, American Civil Liberties Union (ACLU) of Florida, Florida Immigrant Coalition, Doctors for Camp Closure National, Doctors for Camp Closure Florida Chapter, Detention Watch Network, QLatinx, Legal Aid Service of Broward County, United We Dream, Florida Prisoner Solidarity, Community Justice Project, Bergen County Immigrant Strategy Group, Florida Indigenous Alliance, Community Hotline for Incarcerated People, Florida Legal Services, Sabarish P. Neelakanta Law Firm, Abolish ICE NY-NJ Coalition, Human Rights Defense Center, Dignity Power, Inc., and the National Immigration Project of the National Lawyers Guild—submit this multi-individual civil rights complaint on behalf of seven women currently detained at, or recently released from, Glades County Detention Center (“Glades”):

- 1) Petrona Lopez (A#029 393 387)
- 2) Marlissa Joseph (A#216 358 618)
- 3) Lunise Clerveaux (A# 042 892 088)
- 4) Danielle Harris (A# 216 654 262)
- 5) Iris Martinez Napper (A# 096 564 294)
- 6) Anonymous
- 7) Anonymous

Concerningly, a full six months after community-based organizations and legal service entities submitted a 35-page civil rights complaint naming a myriad of human rights violations taking place inside Glades, ICE leadership and Glades County officials with oversight authority have summarily disregarded these concerns, enabling these more recent violations to take place. Toxic chemical spray exacerbating the spread of COVID-19 and with links to infertility continues to pose serious health risks, as does medical neglect towards those suffering serious ailments or ill with COVID-19. Lack of release for those whose illness places them at great risk of severe illness or death due to COVID-19 remains a critical issue. Sanitation supplies remain insufficient, PPE extremely limited, and large-scale incoming transfers from all over the country are taking place at an alarming rate without proper safety protocols. Facing all of these dangers, those bravely speaking out continue to suffer retaliation for their public reporting. In fact, not

only have the coalitions' grave concerns gone ignored, but individuals who participated in the February complaint were retaliated against with off-camera physical assault mirroring the abuse others reported repeatedly in prior complaints. ICE leadership's response to advocates that video evidence had been reviewed and found lacking was negligent and dismissive.¹

Into these deplorable conditions, recent weeks have seen mass transfer of individuals, including large groups of women who report living conditions which are unsanitary, hostile, and unsafe. These women report that previously named concerns remain ongoing, such as continued exposure to toxic chemical spray in confined spaces, acute medical neglect, deplorable conditions, and insufficient protections from COVID-19, while raising additional concerns unique to women in the facility such as sexual voyeurism by male guards; unannounced entries in violation of privacy and Prison Rape Elimination Acts (PREA) abuse prevention policies; sexually abusive behavior from medical staff; racist verbal abuse; violent and threatening interactions; and hygiene products withheld abusively. Sexually inappropriate behavior and intentional humiliation from Glades County Sheriff's Office's guards and psychiatric staff, in particular, is creating a hostile and unsafe environment for women detained. This environment puts their lives and well-being at constant risk. Such disregard for the welfare of those in their custody includes violations of ICE's own detention standards and COVID-19 protocols, CDC guidance, PREA protocols, and the U.S. Constitution.²

The following reports are made by seven women both currently detained and recently released. Reports by those who remain in detention are submitted both named and anonymously due to concerns of retaliation. Some of these individuals are willing to be identified in the case of a formal investigation.

Toxic chemical spray

"Do you know something? Last night, they were spraying a chemical, and it's not fair. Yesterday, we were coughing a lot because we couldn't take the vapor and smell of the chemical."

¹ On March 5, a meeting took place between ICE Field Office Director Mr. Ripa and advocates from Americans for Immigrant Justice, Freedom for Immigrants, and Immigrant Action Alliance, at which Mr. Ripa informed advocates that a cursory review of video evidence had found no wrongdoing. This is a completely inappropriate response to a request for immediate investigation into the pattern and practice of off-camera assault taking place inside Glades County Detention Center for those who speak up publicly.

² 2019 National Detention Standards for Non-Dedicated Facilities, U.S. Immigration and Customs Enforcement, <https://www.ice.gov/doclib/detention-standards/2019/nds2019.pdf>. (hereinafter "2019 NDS"); U.S. Immigration and Customs Enforcement, Enforcement and Removal Operations COVID-19 Pandemic Response Requirements (Version 5.0, October 27, 2020), <https://www.ice.gov/doclib/coronavirus/eroCOVID19responseReqsCleanFacilities.pdf>. (hereinafter "PRR"); Interim Guidance on Management of Coronavirus Disease 2019 (COVID-19) in Correctional and Detention Facilities, Center for Disease Control and Prevention (Updated Dec. 31, 2020) https://www.cdcr.ca.gov/ccjbh/wp-content/uploads/sites/172/2020/04/CDC_guidance-correctional-detention.pdf. (hereinafter "CDC Guidance"); Order Adopting in Part Magistrate Judge's Report and Recommendation, *Gayle v. Meade*, No. 1:20-cv-21553-MGC, ECF No. 76 at 6-7 (S.D. Fla. Apr. 30, 2020). (as a result of the evidence the record as of April 30, 2020, this Court concluded conditions at Glades constituted "a violation of the Petitioners[] Fifth and Eighth Amendment rights.").

The new women say that it's not good that they sprayed this chemical because there are women who are allergic or have other illnesses." Anonymous report, August 17, 2021

The use of highly toxic chemical disinfectant sprayed throughout the facility further exacerbates the spread of COVID-19 by spreading aerosol droplets and causes detained individuals to experience headaches, coughing, and difficulty breathing. In addition to placing general population and individuals who have contracted COVID-19 at even greater risk, studies note potential long term health consequences, including for women and men's fertility.³

For example, Marliisa Joseph, who has chronic asthma, reported on August 18, 2021, that the chemical disinfectant that is sprayed in the women's pod is very strong and causes her shortness of breath. She explained that the chemical is sprayed after every meal, usually at approximately six a.m., twelve p.m., and six p.m. Ms. Joseph and the other women are not permitted to leave the pod while the chemical dissipates. When she complained to the doctor at the facility about the use of the chemical disinfectant, the doctor brushed off her complaint.

Lunise Clerveaux, who was detained for several months at Glades, also reports that the toxic chemical "turns the air gray" and lingers. When the chemical was sprayed, the women would scatter around the pod and away from the areas that were sprayed. Ms. Clerveaux herself would hide under her bed sheet until the "gray cloud" went away a bit more. She recounts that she could see the gray air leaving the pod when guards would open the door to enter or exit.

Ms. Clerveaux also reports that the ventilation in the pod is so poor that when pepper spray was used in neighboring pods, the women's pod would feel the effects of pepper spray for days. Women would cough, rinse their eyes, and cover their faces with blankets for several days.

Multiple CRCL complaints have been filed naming this issue. In fact, Immigrant Action Alliance first filed a CRCL complaint on this issue on May 23, 2020, citing the serious respiratory distress the chemical spray caused among people with asthma, bronchitis, and other medical conditions. The complaint reported that after the spray is used, people with asthma struggled to breathe, used their inhalers more frequently, and some people suffered from shortness of breath and/or headaches. Subsequent CRCL complaints named that the manner of aerosol fumigation and lack of ventilation were in violation of appropriate protocols and EPA policies. In fact, toxic chemical spray with the same basic compound, HDQ Neutral, is the subject of two current EPA

³ Anthony Luz, Paul DeLeo, Nathan Pechacek, and Mike Freemantle, *Human health hazard assessment of quaternary ammonium compounds: Didecyl dimethyl ammonium chloride and alkyl (C12-C16) dimethyl benzyl ammonium chloride*, REGULATORY TOXICOLOGY AND PHARMACOLOGY (July 5, 2020), <https://doi.org/10.1016/j.yrtph.2020.104717> ("DDAC and C12-C16 ADBAC are irritating/corrosive to skin at high concentrations, and are acutely toxic via the oral, dermal (C12-C16 ADBAC only), and inhalation exposure routes.")

investigations of detention facilities in California⁴ and Washington.⁵ As shared in the February 2021 civil rights complaint, information obtained by an anonymous source indicates that Glades County Officials have directed the toxic chemicals be administered at a much more highly concentrated state than allowable by the manufacturer or the EPA. These earlier civil rights complaints named medical hardships resulting directly from the spray, including nosebleeds, vomiting, and additional difficulties breathing for those suffering with COVID-19. Well over a year later, the use of toxic chemical spray in confined spaces persists, posing a serious health threat and long-term consequences for these women, including potential infertility.

Sexual misconduct by guards: Voyeurism and Unannounced Entry

Based on reports our organizations have received, there is alleged sexual misconduct taking place inside the Glades County Detention Center that could amount to violations under the Prison Rape Elimination Act (PREA).

According to the accounts of several women, male guards allegedly enter the women's pod without announcing themselves, which is a violation of policy and their personal privacy. Showers are open inside the women's quarters, with unannounced entries leading to circumstances in which the women report being watched while they shower and made to feel very unsafe.

For example, Lunise Clerveaux was selected to answer a PREA survey around June 2021 and knew male guards should be announcing themselves when they enter the pod. However, more often than not, the guards enter without announcing themselves when they call women for medical or other reasons. Ms. Clerveaux believes that male guards do not feel that they need to announce themselves when they walk in with female guards.

Ms. Clerveaux also reported, and it was substantiated by a second woman, that male guards watch the women from the guard tower, looking down into the dorm space and bathrooms. The light in the guard tower would be turned off, so she could only see the outline of the male guards standing by the glass, looking at her. It happened several times that she would step out of the wet and moldy shower to dry and dress herself outside of the shower, and she would look up and see up to three male guards standing by the glass watching her. She states, "If there's an opportunity for them to look, they look."

⁴ Andrea Castillo, "Prison company violated federal pesticide law in misuse of disinfectant inside immigration detention center," *Los Angeles Times*, March 22, 2021, [https://www.latimes.com/california/story/2021-03-22/prison-company-violated-federal-\[...\]in-misuse-of-disinfectant-inside-immigration-detention-center](https://www.latimes.com/california/story/2021-03-22/prison-company-violated-federal-[...]in-misuse-of-disinfectant-inside-immigration-detention-center).

⁵ Tina Vasquez, "EPA warns an immigrant detention center to stop cleaning microwaves with pesticides," *The Counter*, August 11, 2021, <https://thecounter.org/ice-processing-detention-center-immigration-tacoma-pesticides-covid/>.

These conditions and inappropriate behavior enable voyeurism, which constitutes sexual abuse according to the Prison Rape Elimination Act (PREA), where inappropriate visual surveillance of a nude detainee is explicitly named in the definition of sexual abuse.⁶

The NDS 2019 standards specify that, per DHS PREA Standards, ICE detention facilities must adhere to a zero-tolerance policy for all forms of sexual abuse and assault. Moreover, the 2019 PREA audit of Glades says that “staff of the opposite gender... announce their presence when entering an inmate housing unit”; eyewitness accounts refute that this is happening. Glades’ receipt of passing marks on their 2019 PREA audit indicates either there have been significant changes in the facility or investigators did not get an accurate account of what was taking place. These formal allegations of sexual misconduct must be investigated immediately to ensure the women’s safety inside the facility.

Racist verbal abuse

Danielle Harris has reported filing multiple grievances about discrimination from officers. One officer called her “monkey,” “low life,” and “porky pig.” Despite this racist verbal harassment, Glades staff responded to her multiple grievances by calling her a liar. One Lieutenant said in response that she could pursue mental health counseling if she had concerns about her treatment at the facility.

Iris Martinez Napper also reported significant discrimination against Latino immigrants inside the facility. She stated they are subjected to verbal abuse whenever they request anything they need, with particularly abusive treatment coming from Officer Livingston, specifically, who subjects her and others to regular racist and sexist comments, including “bitch/puta.”

Petrona Lopez, an indigenous woman whose primary language is Akateko, reports that officers discriminate against her and other indigenous women due to their ethnicity. Officers make fun of the way she and several other indigenous women speak; for instance, calling one woman “dirty.” Ms. Lopez reports that a staff person working commissary called a Mexican woman stupid, in addition to using another derogatory term.

Additionally, women in ICE custody in B1 are also housed with those in county custody and are subjected to racist verbal abuse, such as, “You need to go back to your country” or “Hit me so that you can actually get deported.” Danielle Harris recounts that another woman in the pod said to her and another Haitian woman, “You look like you climbed the wall to come here.” Lunise Clerveaux reports hearing women say, “go back to your country,” and have heard the women in ICE custody being called “wall climbers.” The guards allow these statements to be made without consequence, creating a hostile environment for immigrants detained at Glades. Ms. Clerveaux

⁶ Voyeurism, which is defined as the inappropriate visual surveillance of a detainee for reasons unrelated to official duties. Where not conducted for reasons relating to official duties, the following are examples of voyeurism: staring at a detainee who is using a toilet in his or her cell to perform bodily functions; requiring an inmate detainee to expose his or her buttocks, genitals, or breasts; or taking images of all or part of a detainee’s naked body or of a detainee performing bodily functions. (DHS PREA, § 115.6)

believes the guards often favor the women who are in county custody, and when arguments break out between women in ICE custody and county custody, the guards often side with the women in county custody and offer the women in ICE custody the possibility of solitary confinement for “safety.”

One woman reported that there is a Muslim woman currently detained at Glades who wears a hijab, and the officers have yelled at her, “You with the blanket on your head!” Glades has a long record of anti-Muslim discrimination, and the sheriff’s office and the county were even subject to a lawsuit over their obstruction of Muslim individuals from practicing their faith in 2018-2019, and this continued discrimination shows one more instance where Glades persists in harming detained individuals.

According to CRCL’s mandate, allegations of discrimination based on race, ethnicity, national origin, religion, sex, sexual orientation, gender identity, or disability which occur in ICE custody must be investigated. These have clearly taken place in Glades.

Medical neglect, including violation of COVID-19 safety protocols

“If they aren’t going to treat us [for our medical issues], we want to be free. We have our families; we aren’t alone. I have my older children who can help me access care.”

Petrona Lopez, August 13, 2021

The women report a lack of medical care amounting to medical neglect: lack of basic COVID-19 precautions, lack of medical care for documented needs, and denial of medications and physical therapy. In some cases, they are even denied initial evaluations for severe medical issues because the medical department simply does not answer their sick calls.

Violation of COVID-19 precautions. The facility has recently received in-transfers of women from the Northeast, and as a result, the women’s pod, B1, is becoming overcrowded. Many of the women who were transferred to Glades have chronic medical conditions, yet ICE needlessly flew them to Florida when they should have released these women to their communities. Cells that previously had one or two people assigned to them now have at least four or five. The cells contain beds that are bolted to the floor, so the women can’t move them in order to better distance themselves. One woman notes that her sleeping area, which contains six beds, is full. There is another wing at Glades with additional dormitories, yet Glades has not opened it and spread people out to allow for social distancing. To make matters worse, there is no ventilation in the women’s pod, yet we know COVID-19 to be an airborne virus.

Furthermore, some women who were recently transferred into Glades report not even being tested for COVID-19 upon arrival to the facility. Women currently detained at Glades also report that the detention center is not implementing a standardized quarantine period for all new in-transfers. For example, three women each experienced different quarantine lengths after arriving at Glades. One woman who arrived at Glades in early July 2021 was quarantined for seven (7) days; another woman was in quarantine for three (3) days; and a third woman who arrived at Glades in mid-July 2021 was quarantined for just two (2) days.

These practices recklessly endanger the health of women at Glades, particularly considering Glades' documented mishandling of the COVID-19 pandemic (see, for example, our CRCL Complaint submitted February 22, case number 21-06-ICE-0274). During the COVID-19 pandemic, Glades has failed to provide adequate personal protective equipment (PPE), sanitation, soap and other hygiene products; has mixed people who have tested positive for COVID-19 or who have been exposed to the virus with people who had tested negative or had not yet been tested; has restricted access to COVID-19 testing; and has sprayed toxic chemicals in enclosed spaces, contributing to virus spread and harming detained people's health. Moreover, ICE has transferred people to Glades without implementing appropriate quarantine or medical screening.

This continual noncompliance with CDC guidance and ICE's own protocols has led to hospitalizations and at least one reported death, with other individuals reported to have been removed from the facility while urgently ill, with their welfare and whereabouts then unaccounted for by prior unit mates. The failure to test women for COVID-19 upon arrival or to appropriately quarantine or allow social distancing shows that the longstanding patterns of reckless endangerment continue, putting these women at imminent risk of becoming severely ill or dying from COVID-19.

Unaddressed medical need. Petrona Lopez, who was transferred from Maryland to Glades in May of this year, reports that she has diabetes, high blood pressure, and extreme back pain due to an operation for colon damage in 2019 for which she has not yet received the physical therapy recommended by physicians. In fact, Ms. Lopez was informed that the exact reason she was transferred to Glades approximately three months ago was to receive this physical therapy, yet over three months later she has not received any type of proper medical attention since she was transferred. Ms. Lopez was informed she would have a doctor's appointment on August 14, 2021 to address her medical concerns, but this appointment never took place.

Prior to surgery, Ms. Lopez used a wheelchair due to herniated disks that severely restricted her mobility. Shortly after surgery, she was taken into ICE custody and denied the follow-up care the surgeon ordered to prevent permanent disability. On November 13, 2020, Freedom for Immigrants filed a civil rights complaint on her behalf due to medical neglect in her prior facility, which likely precipitated the transfer. She continues to be denied the physical therapy she requires to regain her mobility and continues to experience significant pain in her left leg as well as numbness and tingling sensations. The only treatment Ms. Lopez is provided by the Glades medical staff is the occasional pain medication and the topical cream Bengay. Glades staff told her, "This is a jail and not a prison; we aren't going to give you therapy." In fact, she says warm water compresses have been helping her cope with the pain, but guards have been confiscating her warm water during inspections.

Ms. Lopez recently has been experiencing additional pain in her arm, knees, pain in her opposite leg, and fatigue. For example, she says it's hard to raise her arms in the morning due to this pain. Ms. Lopez put in a sick call request in an effort to speak to medical staff about her chronic pain and was told she is on a "wait list." However, she was also told the pain she feels "is normal for her age," dismissing her concerns.

These ongoing denials of physical therapy that Ms. Lopez is facing as well as her decreased mobility have taken a toll on her mental health. She feels extremely stressed and increasingly

depressed. She says, “Everyone is yelling. I don’t sleep. I feel so tired and stressed...If they aren’t going to treat us [for our medical issues], we want to be free. We have our families; we aren’t alone. I have my older children who can help me access care.”

Ms. Lopez also has diabetes, high blood pressure, and is elderly, all of which significantly elevate her risk of severe illness or death due to COVID-19 and are qualifying factors for release under *Frailhat*. However, her requests for release are repeatedly denied, despite the presence of four U.S. based children and a religious community willing to assume both financial and social responsibility for her well-being. This failure to release those medically vulnerable is a widespread pattern and practice inside of Glades which was raised to CRCL and ICE leaderships’ attention in the February 2021 complaint.

Denial of medications.

“My medications were taken away. After the fall I had, my head and ears are hurting. I suffer from vertigo, and they are not giving me my medications for this. My daughter had to call because they are not giving me anything. I have requested three sick calls since last week and it wasn’t until my daughter called that they brought me a form to fill it out and check if they can see me.” Anonymous, July 27, 2021

A woman who was transferred from York to Glades in early July 2021 describes how Glades abruptly took her off her prescribed psychiatric medication—trazadone (for depression and PTSD) - claiming they do not have it at the facility. Glades has only offered to prescribe her Remeron, yet she is allergic. In addition, the psychiatrist at Glades prescribed her a reduced dose of Vistaril, which she had been taking prior to her arrival at the jail to manage her anxiety, and she reports that the lower dosage, which is half of what she was previously prescribed, is not effective. She and others also report sexually inappropriate behavior from this psychiatrist and abuse of power in administration of their medication, which is detailed in the following section of this complaint. Finally, the medical staff provides her with Melatonin, but at inconsistent amounts; sometimes 3 mg and other times 6 mg. She also has experience with ADD and has been diagnosed in the past, but has been told that in detention, “they don’t treat that.”

As a result, she is suffering from symptoms of PTSD and increased anxiety. She is unable to sleep, experiencing nightmares, and waking up screaming at night. She finds herself to be more erratic when interacting with other women. She is also pacing and feeling exhausted due to the lack of sleep and worsened symptoms. Due to their refusal to recognize and treat her ADD, she is having trouble concentrating, completing tasks, and even responding to questions during phone calls. She explained the side effects of being taken off her psychiatric medications, “I’m up and down with my emotions. It’s not fair to my family who is worried about my well-being. My feelings of guilt and shame are coming back. There is only so much yoga I can do to manage my anxiety and depression.”

Beyond the issues with her mental health care, she has a number of chronic medical conditions, including but not limited to type 2 diabetes, tachycardia, high blood pressure, irritable bowel syndrome (IBS), chronic anemia, chronic kidney infections, and a recent bout with COVID-19 while in detention, for which she is still experiencing symptoms. She describes her fight to get the medical attention and medications she needs at Glades as an “uphill battle.”

For example, when we spoke to this woman on August 17, 2021, she explained that due to IBS constipation, she had gone five days without passing a bowel movement and was in pain. She explains, “It’s very uncomfortable. My other medications constipate me. If I don’t have bowel movements, my blood sugar goes up...I have chronic renal disease; I can’t have all these toxins in my body...I have tried to be released under *Fraiht* in York, and ICE denied me.” She noted that there is a medicine she uses to help with this, and although it was approved by the Glades doctor, the doctor then abruptly took her off the medication. Her potassium levels are also very high, yet the doctor is pushing for her to take a medication that does not correct her potassium levels. Although this medication for her bowel movements is considered a “maintenance medication,” the doctor is requiring the medication to be reapplied every two weeks, including subjecting her to new blood tests before approval. She explained that outside of detention blood work to check for any negative side effects of this medication would only be conducted every six months or once a year. She believes there is no medical reason for these frequent blood tests and that the medical staff is simply being unreasonable, saying, “It’s frustrating. In here you are treated like you are stupid. It’s very demeaning.”

Around the second week of August 2021, she went to an appointment in the Palm Beach area with an outside provider who stated that she needs to have an ultrasound within the next two weeks. The provider stated that they could do the ultrasound that same day, however, the officers that escorted her to the appointment claimed she would need authorization and took her back to Glades. Once at Glades, a nurse told her it could take up to six weeks for the ultrasound to be scheduled-- well beyond the recommended timeline the outside provider stated. As of August 17, 2021, she had no idea if the ultrasound was in the process of being approved and scheduled.

She has also received copies of her medical records from Glades and found errors in the documentation. She has type 2 diabetes and normally has her blood sugar taken twice a day, once in the morning and once at night. However, the medical staff has simply stopped testing her blood sugar after she was taken out of quarantine and moved to pod B1. Furthermore, the doctor never informed her that she would be taken off regular blood sugar checks. After reviewing her own medical records, she found that the medical staff wrote that she refused to have her blood sugar taken and that was the reason they were no longer regularly assessing her levels. This is not true; she has never refused and was never provided nor signed a refusal form. Just days ago, she almost fainted while working in laundry due to her blood sugar levels. She had to eat two sandwiches just to get back to normal levels.

In the pill line, she has noticed abnormal practices in the dispensing of people’s medications. She takes metformin as well as Vitamin D among other medications, and one day she was watching while the nurse dispensed these from the pill bottle. She noticed that a variety of different color pills were poured out of one bottle. The nurse said, “Ooops, I don’t think that’s supposed to be in there,” and put the various pills back in the bottle. In no circumstances should a pill bottle have a mix of pills. On another occasion, she was watching the nurse who was dispensing her medications to ensure she was given the correct ones, and the nurse yelled at her, “Don’t watch me, watch TV!”

This woman worked as a nurse prior to her detention and has a master's degree in nursing. She has also lived with these chronic medical conditions for years and is very knowledgeable of what she needs to maintain her health. Yet, the medical staff at Glades wrote to her that everything she says about her medical care and her medical needs is just her opinion; until she provides them with proof of her education, they won't believe her. She says, "What I know is that doctors can't take you off your medication like that; it's part of the ten patient's rights. You have the right to know what medication you are being provided; the right to know the names of your providers...all of that is being violated here."

Psychiatrist's sexual harassment and abuse of power. The woman highlighted in the example above reports experiencing sexual harassment and abuse of power from the Glades' psychiatrist, in addition to the harmful impact of being denied medication. At the start of August, when she first met with Dr. Rosen, a white man who is the only psychiatrist at the facility, as she entered the room wearing her mask he told her, "Take off your mask, so I can see what you look like." He proceeded to say to her, "I have a thing for Chinese women. I have a Chinese wife." Note that she is not Chinese. She then proceeded to ask him once again if she can be prescribed Trazadone, which is a medication that she has found effective in the past, and he denied her request. She also asked for her Vistaril prescription to be increased as the current amount isn't working for her; he said no. When she left her appointment, he said to her, "Wear something sexy next time I see you," and is requiring her to return in two weeks, which isn't normal for routine psychiatric visits unless someone is prescribed new medications, which she was not. The sexual harassment she is subjected to by the psychiatrist is inescapable as he is the only psychiatrist at the facility.

Marlissa Joseph also reports sexual harassment and abuse of power from this psychiatrist. Ms. Joseph has been subjected to sexually explicit, uncomfortable comments by this male psychiatrist who she is forced to meet with in order to request adjustments in her psychiatric medications. For example, he has said, "Your uniform is tight; wear a tighter one next time." She reports that he has made comments to other women like, "You remind me of my wife." Although a previous facility had prescribed her 45 mg of Remeron, at Glades, she's receiving a prescription of 15 mg of Remeron. This lower dosage is not enough for her, and it's not working. She has filled out two sick call requests regarding this medication, but she has not been able to see a doctor and her request has gone unanswered.

These two women have experienced abrupt changes in their psychiatric medications after arriving at Glades, which for at least one is causing significant withdrawal symptoms. The fact that they are now forced to meet with this psychiatrist again in order to request that their medications be returned to prior dosages, leaving them vulnerable to being subjected to further sexual harassment each appointment, indicates an intentional abuse of power may be taking place. This must be investigated immediately, and this medical professional held accountable for their abuse.

Denial of initial evaluations. After experiencing intense pain in her foot, a woman filed a request to be seen in medical, but one week lapsed and she was not called. On July 15, 2021, she wrote another sick call request, however, when she wrote her jail ID number down incorrectly on the form and wanted to correct it, the officer in the unit screamed at her and would not let her

submit the request. She has also spoken to three officers directly about needing medical attention but has been ignored.

Marlissa Joseph suffered a spider bite on July 27, 2021 that caused extreme swelling and pain in her leg, and Glades did not give her any medication or treatment until August 1. When she reported the bite to medical, the first question from the medical staffer was whether she shoots drugs. Though the swelling in her leg has since decreased, Ms. Joseph began to vomit from what she believes to be a side effect of the medications she was provided for the spider bite, which she originally was told were antibiotics. Once she began vomiting, Ms. Joseph made a complaint to the medical staff and inquired about what she had been prescribed and the adverse side effects it was causing. The nurse that attended to her claimed that she was never given antibiotics but was prescribed oral acne medication, which is not what Ms. Joseph was initially told. Ultimately, Ms. Joseph decided to refuse this medication because she remained unclear what she had been prescribed and why it was causing her to vomit.

Ms. Joseph also suffers from chronic asthma. On August 18, she reported that recently she began to experience chest pains and shortness of breath which she took as a sign of her asthma flaring up. She submitted a sick call and asked the attending doctor for an asthma pump. The doctor refused to prescribe her an inhaler, claiming Ms. Joseph does not have asthma, despite Ms. Joseph reporting her asthma at her initial medical intake. Instead, the doctor prescribed Ms. Joseph steroids, noting her chest pains are related to “frequent pneumonia.” As of August 18, 2021, Ms. Joseph says she has not seen a notable decrease in her chest pains after taking the steroids for about four days. The doctor also failed to take precautionary measures and administer a COVID-19 test to Ms. Joseph, despite chest pains and shortness of breath being potential symptoms of the virus. Ms. Josephs says, “When you tell the doctor your problems, she talks to you like you are dumb.”

Furthermore, Ms. Joseph was able to receive a copy of her medical records from the Glades medical department and she found numerous discrepancies, including that the medical staff did not note on her records that in her initial medical evaluation she reported that she has chronic asthma. She complained to an officer about the errors in her medical records, but to her knowledge, nothing has been done to correct them.

The standard of care under ICE’s 2019 National Detention Standards (NDS 2019) Section 4.3 entitles these women to “access to appropriate medical, dental, and mental health care, including emergency services.” Additionally, the women’s right to medical care is protected by the Eighth Amendment of the United States’ Constitution, which protects them from “deliberate indifference,” where facility staff (1) know about a serious condition that needs to be addressed and (2) fail to respond reasonably to it. The injuries and medical conditions listed here meet the Eighth Amendment’s threshold and constitute “serious medical need” eligible for care.

Physically Abusive behavior

On July 24, 2021, Petrona Lopez requested to be moved to a different dorm because her previous dorm was freezing, and it was exacerbating her pain. The officer had approved her request. When she asked the guard to make sure she was allowed to move she was told her request was

already in the system and approved. However, the person who was previously in her new place within the dorm was moved back that evening without notice or explanation. When Ms. Lopez asked the guard what was happening, he screamed at her to move back to her dorm and slammed the door in her face.

On August 5, 2021, Petrona Lopez reported one of the guards told her to return to her bed when she was supposed to be allowed out of her cell. She was insisting that she was supposed to be let out at that time. The guard yelled at her and violently slammed the door on her. She barely had time to move before the door hit her face. She reported being terrified of the aggression escalating and being hurt by this guard. Ms. Lopez reported the guards but has seen no action taken. She has been fearful of retaliation ever since.

On August 5, 2021, Iris Martinez Napper reported to Freedom for Immigrants' abuse reporting hotline that the first day that she arrived during the transfer process the guards put her ankle shackles on too tightly, and she could not walk correctly. They refused to loosen them. She felt herself losing her balance and she asked a guard if he could provide a hand to help her stay balanced. He refused and she fell on the ground, hard. She hit her knee, shoulder, and head hard against the wall. She was in a lot of pain that day and in the days following and she continuously requested medical attention and an X-ray. They did not provide her a doctor or an X-ray. Instead, they said she was lying about the incident. Eventually, she did get the chance to see a medic, and he confirmed the injury in her leg (it was swollen and purple still). The report was made a month after the incident, at which time her shoulder and head were still in a lot of pain, making her unable to sleep.

Unsanitary, unsafe living conditions and withholding of hygiene products

Unsanitary living conditions. The women report food and water are contaminated, and water is often inaccessible. Water is yellow, and the water cooler is contaminated with hair and little black stones. In the recreation area, there is a water jug but no cups. In the dorms, there is only one jug of water, and it is always empty. As a result, the women are forced to drink from the sink. Within the bathroom, blood, feces, and urine are everywhere, which women report creates an unsanitary and embarrassing living environment. Given that COVID-19 and other illnesses can be spread through human waste, these unsanitary living conditions are medically dangerous.

Marlissa Joseph recently found a fingernail in her food. Multiple women report pest infestations, with roaches on the tables and bugs—including maggots and worms—in the food. Another woman showed the officers food on her tray that had a bug in it, but they refused to give her a different tray. On or about August 12, 2021, one woman reportedly was eating and bit into a wing of an insect that was in her food. Some women wrote complaints to the officers after finding worms in the beans they were served, however, no one responded to their complaints. Officers sometimes spray for pests when the women complain but sometimes say they will and then do not follow through.



Worms on a plate of food at Glades, August 9, 2021

“The food they give us is as if they were feeding dogs. It doesn’t have any flavor, it’s all messed up, and it smells bad. Some of the women in here have found cockroaches in their food. The women that suffer from diabetes or thyroid problems are denied dietary options because they claim it’s too expensive.” Anonymous, July 24, 2021

“The food has bad odors – you put it near your mouth and smell it and think, ‘I can’t eat this.’ ...They know people don’t eat so why don’t they feed us something else? People are always giving their trays back. They are just putting the money [from ICE] in their pocket.” Petrona Lopez, August 13, 2021

Ms. Lopez has diabetes and must be on a diabetic diet, but the “diabetic tray” is essentially the same as the regular tray. She reports that they just change out an apple sometimes; she is often provided bread and pasta. She reports that some days she simply goes without food because there is not much she can buy at the commissary that she can eat either.

Lunise Clerveaux also reports that there are roaches on the tables and bugs in the food. She also saw a spider that she recognized as poisonous, having known someone that was bitten by that species of spider and had to be hospitalized. She made several complaints about the food but did not see any change while she was detained at Glades.

There is also visible mold in the bathroom ceilings and scum on the walls. Mattresses are cut up and dirty. Women have filed sick calls because of the bedbugs in the facility; however, the nurses have done nothing. There is also reportedly a rat in the facility. When a woman reported this at Glades, an officer informed her that the rat lives in the vending machine. It does not appear that the sheriff's office is taking steps to remove it.

Even the clothing at Glades is unsanitary because laundry is returned wet and moldy. One of the women we interviewed works in the laundry at Glades. Currently, there are only two detained individuals doing the laundry for the entire facility. She reports that the dryers are broken and not properly drying clothes, leaving people's uniforms and other items to be returned wet and musty. She reported the issue with the dryers to multiple staff at Glades, including the Commander and a mechanic, only to have the issue ignored.

A lot of the clothes have black stains on them, which is possible mold and may be due in part to the clothes not drying properly. Furthermore, the officers do not permit individuals to hang their clothes to dry by their beds; if the officers find clothes hanging in the cells, they will confiscate the item.

The individuals working in laundry are also forced to face unsanitary working conditions. For example, one woman found feces on some of the uniforms, and the officers have said that she must clean it off, place the feces in the garbage, and place the uniform in the washer. They are not permitted to throw that uniform away. This is unsafe and unsanitary as there may be blood in the feces or other viruses in the feces like Hepatitis A.

Multiple women report that nothing has come of filing grievances about the living conditions. For example, in response to a grievance Danielle Harris submitted, Glades staff told one woman that the facility has passed inspections, so she is lying about the conditions she experiences every day.

The 2019 Detention Standards "protects detainees... by maintaining high facility standards of cleanliness and sanitation," yet the facility at Glades is moldy, dirty, bug-infested, and unsafe. Far from being "protected," detained individuals at Glades are at risk of becoming ill because of the unsanitary living conditions.

Withholding of hygiene products. The women at Glades are at the mercy of the officers for toilet paper, tampons, and pads, and report verbally abusive behavior for requesting essential items needed for their physical well-being. One roll of toilet paper is supposed to last each woman a week. They must give the officer back the empty toilet paper roll before they can receive a new one. If they run out of toilet paper, an officer will search the person's bunk in and out before they are allowed to receive more. Many times, the women run out of toilet paper and are not provided with a new roll, despite their requests. They are forced to go without or borrow from others.

Oftentimes, the officers will promise to provide two to three rolls of toilet paper a week but will only give out one. Another woman reported that an officer swore at her bunkmate when she

requested more toilet paper after she had run out. When the officer refused to provide the woman with a new roll, she said, “How can I use the bathroom?” The officer responded, “I don’t fucking know,” and walked away. Furthermore, on August 12, 2021, a woman asked for additional sanitary pads and the officer responded by saying they didn’t have any.

Making matters worse, women report that it’s common for them to quickly get stomachaches after they eat the food that Glades provides. Women are running to the bathroom after meals, yet they don’t have enough toilet paper to clean themselves. Petrona Lopez even reported requesting additional toilet paper when she ran out of it, to which the response was, “Ask your neighbor.” She responded that her bunkmate was also out. The guard then told her to “go figure it out on your own.” This left her in the position of having to immediately shower after she passed a bowel movement because she did not have any toilet paper left, which is unsanitary, humiliating, and completely unacceptable.

“[The officer said] said, ‘It doesn’t matter if your grandma, you, or others complain. I’m going to give out toilet paper as I want.’” Petrona Lopez, August 13, 2021

Women in ICE custody at Glades are entitled to a safe, healthy living environment while they pursue their immigration case in court, yet at Glades they are subjected to toxic chemical spray, sexual misconduct, racist verbal abuse, medical neglect, unsanitary living conditions, and lack of access to sufficient hygiene products to maintain their health.

Recommendations & Conclusion:

1. ICE should terminate the Intergovernmental Services Agreement (IGSA) with Glades County

It is clear that Glades County has repeatedly demonstrated their unwillingness or inability to provide adequate care to those in their custody. We demand additional oversight measures take place immediately to prevent further harm to immigrants detained, given that prior calls for investigation and demands for intervention to ensure the safety and well-being have either been carried out ineffectively or largely dismissed. It is our understanding that nearly 30 civil rights complaints have been filed in the past two years alone by members of this coalition, including the multi-individual complaint submitted six months prior detailing many of the same egregious abuses highlighted within the body of this complaint. Members of congress have called for the closure of the facility. Yet no notable changes have been made in stopping outright abusive behavior, and the provision of critical medical care or COVID-19 safety protocols at Glades. The women bravely coming forward within this complaint mirror early concerns of life-threatening violations of their rights, while exposing additional rights violations in the form of sexual harassment and abuse of power creating conditions of confinement that are hostile and unsafe.

We therefore urge CRCL and OIG to recommend that Immigrations and Customs Enforcement terminates the Intergovernmental Services Agreement (IGSA) with Glades County. We further urge that the guaranteed minimum payment currently paid by ICE be terminated immediately given that taxpayers are paying for the care of 300 people at any given time, yet for many months there have been significantly less than this number of people detained. Our organizations

raise concerns about gross negligence and highly questionable financial mismanagement by Glades County, given something as simple as provision of essential supplies, such as toilet paper, feminine hygiene products, and unspoiled food, is being withheld from the women. Tax-payer dollars funneled through ICE should no longer be used to prop up this abusive and failing facility.

2. Immediate Investigation of Medical Practices and Sexual Misconduct:

While Immigration and Customs Enforcement considers termination of the contract with Glades County, we urge CRCL and OIG to immediately investigate the abuses raised within the body of this current complaint to prevent life-threatening medical neglect from claiming another life at Glades. Basic COVID-19 protocols must be followed to prevent further deaths, and appropriate medical care provided to address acute medical needs. Moreover, every person detained should be provided with an individualized assessment, under a presumption of release, prioritizing those most medically vulnerable to complications from COVID-19.

We also urge CRCL, OIG, and DHS PREA to immediately investigate the voyeurism and unannounced entry taking place at Glades, as well as the psychiatrist's sexual harassment and abuse of power. ICE detention facilities must adhere to a zero-tolerance policy for all forms of sexual abuse according to the 2019 National Detention Standards.

3. Immediate Halt of All Transfers into Glades:

Since the start of July 2021, ICE has transferred over 100 people into Glades from detention centers across the country, including Essex County Jail and York County Prison that recently terminated their contracts with ICE. Instead of responding to the calls of advocates and community members to release those who remained detained at these two detention centers, ICE abruptly transferred many of these individuals away from their families, communities, and attorneys to other facilities in the South, including Glades, where they have been met with hostile, abusive treatment by the guards and medical neglect.

Glades is a dangerous, unsanitary, and abusive environment for all people, not only women. Multiple prior complaints have demonstrated the serious rights violations and imminent harm immigrants detained, in general, are subjected to in Glades. We therefore urge CRCL and OIG to recommend an immediate halt of all further transfers into Glades.

Transfers, which happen without notice to the individual's attorneys of record, their loved ones, or the individual themselves, have serious implication for an immigrant's ability to access counsel, evidence, and witnesses for their cases, and to contact and be supported by their family and community members. During transfer, people are needlessly subjected to restraints for hours, even days, often leaving them bruised and sore. During the COVID-19 pandemic, transfers pose an added and avoidable danger to the health of people in detention and our communities, as transfers occur without proper PPE, social distancing, and inconsistent quarantine and testing protocols.

The practice of transferring our community members without notice to undisclosed locations is callous and unnecessary, especially when it's within ICE's power and discretion to release them instead. Ultimately, transfers are dangerous, dehumanizing and frightening, and we urge you to recommend an end to all transfers into Glades.

4. All Individuals Detained Should Be Immediately Released to the Community

Finally, we remain extremely concerned that the conditions inside Glades are dire, with ongoing inadequate and abysmal medical care including lack of basic COVID-19 precautions. Women are exposed to toxic chemical spray with likely long-term health consequences; and are subjected to voyeurism and racist verbal abuse by male guards, unsanitary living conditions, and lack of access to sufficient hygiene products. Their grievances are ignored, and Glades has a longstanding pattern of retaliating against those who report abuses. The reports in this complaint, including sexual voyeurism and unannounced entries violating PREA safety protocols, are even more alarming given Glades County Officials consideration of turning the jail into an all-women's facility, documented in publicly available records from a recent Glades County Commissioners meeting.⁷

Given the dangerous and unsanitary conditions at the facility, we demand the immediate release of all individuals from Glades County Detention Center's custody before further harm takes place.

We look forward to your prompt attention to this issue. Should you have any questions, please contact Jessica Schneider of Americans for Immigrant Justice at jschneider@aijustice.org, Wendy King of Immigrant Action Alliance at wendy@immigrantactionalliance.org, or Sofia Casini of Freedom for Immigrants at scasini@freedomforimmigrants.org.

Sincerely,

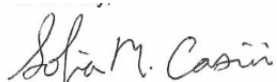


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⁷ See Audio Recording of the May 11, 2021 Meeting of the Glades County Board of County Commissioners in which one county official stated that the Glades County Detention Center's "claim to fame is our ability to hold females," and further stating that they plan to use the detention of women as a tool to keep the detention center funded and open.



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December 10, 2021

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Subject: Severe Carbon Monoxide Poisoning at Glades County Detention Center

On Tuesday, November 23, 2021, a carbon monoxide buildup in the kitchen at the Glades County Detention Center (“Glades”) resulted in the poisoning of nine people who were working in the kitchen: six detained individuals and three Glades staff members. Of these, four detained men and one female Glades staff member were hospitalized at Hendry Regional Medical Center, and two of the hospitalized men subsequently had to be airlifted from Hendry Regional Medical Center to AdventHealth hospital in Orlando because exposure to the gas caused such dire symptoms. The other two detained individuals and two Glades staff members who were exposed to the gas experienced symptoms of carbon monoxide poisoning, including headaches, dizziness, and shortness of breath, but were not taken to the hospital that day. They were administered supplemental oxygen by the medical staff at Glades. Their condition is serious and continues to be monitored. In fact, on December 3, one detained man who was affected was told by medical staff that he would soon be taken to the hospital to have the level of carbon monoxide in his blood checked through additional blood work, even though he had not been hospitalized on November 23rd.

The detained kitchen workers who were not taken to the hospital on November 23rd were forced to remain in the kitchen, where the poisonous gas was presumably still building up, until they had finished serving lunch for the facility. It was not until they were cleaning up that a lieutenant told them to stop everything and leave the area. When they were finally told to stop working, they were taken to medical, had their vitals checked, and received oxygen for about thirty minutes. After being permitted to rest briefly, the detained kitchen workers were sent back to the kitchen for their shift that evening, even though Duane Pottorff, chief deputy for the Glades County Sheriff's Office, says the area was not cleared by the fire marshal until the next day.¹ In fact, detained individuals say they never saw anyone from the fire department arrive at Glades, and were told that the Glades staff “sprayed something” to make the area safe.

Ramie Douglas (A#079 938 832) was working in the barbershop, which is near the kitchen, at the time of the incident and reported that he also experienced symptoms of carbon monoxide exposure, which included feeling light headed, dizzy, and nauseous. In response, the medical staff only provided him with ibuprofen, and about a week later, he was transferred to Krome Service Processing Center (“Krome”). He is now receiving breathing treatments and continues to feel nauseous weeks after the incident. Had the fumes spread further, the entire population of the jail—about 168 people at the time, including 84 in ICE custody—could have been at risk, as could the entire staff of the jail. Indeed, it is entirely possible that more people were affected at the time.

Two weeks after the carbon monoxide poisoning occurred, many of the affected individuals report continuing to experience symptoms of the poisoning and have received little to no medical treatment for these ongoing medical issues. Renardo Phipps (A#216 678 321), who is from Jamaica and has high blood pressure, was hospitalized at the Hendry Regional Medical Center and subsequently transferred to Krome on or about November 24, 2021. At Hendry Regional Medical Center, he was placed on supplemental oxygen for approximately six to seven hours. When he returned to Glades on November 23rd in the evening, he was forced to sleep in a cell in the processing area of the detention center. At about five a.m., Mr. Phipps was told he would be transferred to Krome. After he arrived at Krome, he was never placed in medical observation in the medical housing unit; officials simply sent him to general population. No bloodwork has been conducted since his hospitalization on November 23, 2021 to further monitor his progress after the carbon monoxide exposure. On December 6, 2021, he reported that he continues to have headaches, experience dizziness, and feel fatigued. He put in a sick call request on December 5th but had not been called to medical.

¹ Joshua Ceballos, *Detainees Hospitalized for Carbon Monoxide Poisoning at Glades Detention Center*, Miami New Times (Nov. 30, 2021), <https://www.miaminewtimes.com/news/glades-county-detention-center-carbon-monoxide-exposure-13425720>.

Rollin Manning (A#215 951 402), who is also from Jamaica and has chronic asthma, was airlifted to an Orlando area hospital after he fainted due to the carbon monoxide poisoning. Mr. Manning reported that he was washing trays when he began to feel nauseous and have a headache. He reported his symptoms to a kitchen staff member and an officer. As his symptoms worsened, he asked Glades staff to bring his inhaler. By the time he was brought the inhaler, Mr. Manning explains that it was too late – his heart was racing, he was sweating, his blood pressure was rising, and he could not breathe. He explains that he passed out and was taken to the jail’s medical unit. He was then taken in an ambulance to Hendry Regional Medical Center and subsequently airlifted to an Orlando area hospital. He remembers vomiting at the hospital, being placed on an IV, and being given supplemental oxygen. Once discharged from the hospital, he was taken to an ICE office in the Orlando area. He was then transferred to Krome where he arrived at about three in the morning on November 25, 2021. At Krome, he was placed in solitary confinement while the results of his COVID-19 test were pending and then assigned to a general population housing unit; Mr. Manning was never permitted to remain in medical observation despite his ongoing symptoms from the carbon monoxide poisoning.

Now detained at Krome, Mr. Manning is experiencing significant symptoms related to the exposure to carbon monoxide, including weakness, fatigue, nausea, constant headaches, dizziness, confusion and memory issues, and constant vomiting. Yet medical staff at Krome have only provided him with ibuprofen and have ignored his ongoing symptoms of the CO poisoning. We remain extremely concerned for his wellbeing and health, particularly given the ongoing medical neglect he is experiencing at Krome.

GCSO endangered these lives and failed to prevent the events of November 23rd when they neglected to install a carbon monoxide detector² in an area where the gas could easily build up. Reportedly, all it took to trigger this event was for a Glades County staff member to forget to turn on the ventilation system. Moreover, GCSO’s mishandling of the carbon monoxide buildup shows a complete disregard for detained individual’s lives and an utter lack of knowledge of safety protocols. It raises questions about whether appropriate evacuation protocols are in place in the facility and whether they would be followed properly in the event of other emergencies.

Despite these life-threatening events, ICE allows Glades to continue operating with very little oversight. This incident is merely the latest in a pattern of neglect, incompetence, abuse, and systemic inhumanity at Glades. If this pattern continues, it is only a matter of time before the next life-threatening event at Glades, yet ICE does little or nothing to intervene. As of December 6, no one from ICE had spoken to the detained men and women about the incident, nor were they given any paperwork such as an incident report. Moreover, ICE is not only continuing its contract with this unsafe facility, it has contracted with the GCSO to pay for a guaranteed minimum of 300 beds through March 2022, even though only around 60 people are currently in

² *Id.*

ICE custody there as of December 3. Taxpayers should not be paying for a facility that is at one-fifth capacity and that routinely endangers the lives of those detained there.

Therefore, the following organizations—Immigrant Action Alliance, Americans for Immigrant Justice, Doctors for Camp Closure, Freedom for Immigrants, Detention Watch Network, Southern Poverty Law Center, HOPE Community Center of Apopka, FL, and Borderless Existence Initiative—raise these issues for you to take immediate action.

We raise this to ICE and DHS leadership because ICE must continue to systematically evaluate the quality of care at each facility and move to terminate contracts with facilities that fail to meet basic standards of care. Glades stands out as such a facility. The 2019 National Detention Standards for Non-dedicated Facilities (“NDS”) protect “detainees, staff, volunteers, and contractors from injury and illness by maintaining high facility standards of cleanliness and sanitation, *safe work practices*, and control of hazardous substances and equipment.”³ Events such as those that occurred on November 23 show that the facility is incapable of maintaining a safe environment.

We also raise this to OSHA because the NDS stipulates that facilities like Glades will “operate in accordance with all applicable regulations and codes, such as those of the Occupational Safety and Health Administration (OSHA).” To prevent carbon monoxide poisoning, **OSHA states** that workplaces should install and regularly check ventilation systems, maintain potentially CO-producing equipment in good working order, and **“provide personal CO monitors with audible alarms if potential exposure to CO exists.”** No such audible alarm existed in the affected area until after the event. The equipment failure also calls into question the steps the facility is taking to follow safe practices for inspecting equipment and ventilation.

Furthermore, OSHA states that workers should be educated “about the sources and conditions that may result in CO poisoning as well as the symptoms and control of CO exposure.” As neither the detained kitchen workers nor the jail kitchen staff were aware that their symptoms could indicate carbon monoxide poisoning, it appears that an essential educational step was missing or grossly inadequate.⁴

Furthermore, Glades failed to follow proper evacuation procedures at the time of the event. Pursuant to 29 CFR Part 1917.24(a), “employees shall be removed from the enclosed space if the carbon monoxide concentration exceeds a ceiling of 100 ppm (0.01%).”⁵ The OSHA blog states

³ 2019 National Detention Standards for Non-Dedicated Facilities, U.S. Immigration and Customs Enforcement at 1.1 Section I, <https://www.ice.gov/doclib/detention-standards/2019/nds2019.pdf>.

⁴ *OSHA Fact Sheet, Carbon Monoxide Poisoning*, <https://www.osha.gov/sites/default/files/publications/carbonmonoxide-factsheet.pdf>

⁵ *OSHA Carbon Monoxide Standard, 29 CFR Part 1917.24(a)* <https://www.osha.gov/laws-regs/regulations/standardnumber/1917/1917.24>

that once “the level of carbon monoxide reaches 150-200 parts per million,” the gas “can cause serious complications including disorientation, unconsciousness, and death.”⁶ Although the carbon monoxide concentration at the time of the event is unknown, it is very likely that it reached or exceeded 150 ppm given that two people in the area were rendered unconscious. Yet rather than clearing all people from the enclosed space at that point, GSCO forced them to continue working. When they returned for the evening shift, they received no assurance or proof that carbon monoxide levels had abated. As stated above, Glades’ failure to appropriately move people from the affected area raises questions about whether appropriate evacuation protocols are in place in the facility and whether they would be followed properly in the event of other emergencies.

We also raise this to the Florida Department of Health and the Glades County Department of Health because of the lasting health consequences the events of November 23 will have for all who were impacted. It is unconscionable to continue operating a facility that has put people’s lives at risk in the manner described above, and to continue to imprison those whose health has been permanently harmed due to the negligence of the Glades County Detention Center and we urge you to recommend their immediate release.

Lastly, we raise this to the **Glades County Board of Commissioners** because it is in their power to end the ICE contract. Glades County is a party to the Intergovernmental Service Agreement with ICE, with the Sheriff signing the contract on the county’s behalf. The IGSA clearly states that the IGSA can be terminated in writing, by either party and that “either party must provide written notice of intentions to terminate the agreement, 60 days in advance of the effective date of formal termination.” The commissioners would be well advised to terminate this contract given that Glades County would be liable in the case of wrongful death suits and personal injury suits. The county continues to make this gamble in the face of continued injuries, illnesses, fatalities, and near fatalities at their county’s detention center—a questionable use of their constituents’ tax dollars and a stain on their beautiful county.

Because of this entirely preventable yet nearly fatal catastrophe at Glades, we urge you to:

- **End the contract** between ICE and Glades County immediately, if it is in your power to do so, or to do all you can to recommend the immediate closure of this dangerous facility.
- **Immediately release**—or recommend the release of— all six of the detained kitchen workers poisoned by carbon monoxide. Glades’s negligence has undoubtedly inflicted permanent health consequences on these six individuals. Even when it is not fatal, carbon monoxide inhalation can cause permanent brain damage and heart damage. Those exposed to the fumes will likely suffer severe health consequences for the rest of their

⁶ Bradley Stevens, *OSHA Guidelines Address Carbon Monoxide Exposure*, OSHA Regulations Blog (March 6, 2019), <https://osharegulationsblog.com/osha-guidelines-address-carbon-monoxide-exposure/>

lives due to the actions of the Glades County Sheriff's Office. In its failure to prevent this disaster, and in continuing to expose detained individuals to the deadly gas after they began showing symptoms, the Glades County Sheriff's Office recklessly endangered their lives.

We urge all those with oversight to take these actions immediately.

Sincerely,



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