

[REDACTED]

**From:** [REDACTED]  
**Sent:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: URGENT [REDACTED] Request to REMAIN at Krome and RETURN to the Behavioral Health Unit

**[EXTERNAL EMAIL]** This message is from an EXTERNAL source. Please do not click on any links or open any attachments associated with this email unless it comes from a trusted source AND you were expecting to receive this information.

Good morning Ms. [REDACTED],

Mr. [REDACTED] was transferred yesterday, [REDACTED] 2020, and is currently detained at the Caroline Detention Facility. I have Cc'd DOs [REDACTED] and [REDACTED] on this email as they are now deportation officers assigned to Mr. [REDACTED]'s case.

Thank you,

[REDACTED]  
[REDACTED]  
Deportation Officer  
DHS/ICE/ERO  
[REDACTED]  
[REDACTED]  
[REDACTED]

---

**From:** [REDACTED] <[REDACTED].[REDACTED]@caircoalition.org>  
**Sent:** [REDACTED]  
**To:** [REDACTED]@ice.dhs.gov>  
**Cc:** [REDACTED], [REDACTED] A <[REDACTED]@ice.dhs.gov>; [REDACTED]  
[REDACTED]@ice.dhs.gov>  
**Subject:** RE: URGENT [REDACTED] Request to REMAIN at Krome and RETURN to the Behavioral Health Unit

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Good afternoon Officer [REDACTED],

I am the Qualified Representative for Mr. [REDACTED]. I am writing to follow up on my urgent request that Mr. [REDACTED] not be transferred from Krome until after at least [REDACTED], 2020 in order to enable his individual final asylum hearing to go forward on that date. As described further below, it is clearly in the interest of DHS, the Immigration Court, and my client for there to be no disruption to his placement until after his court hearing.

If Mr. [REDACTED] were transferred, a disruption in his individual final asylum hearing would be highly likely due to a combination of factors including the situation of COVID-19 disruptions in the Virginia detention facilities, recent technical problems at the Arlington Immigration Court which have required the rescheduling of VTC hearings from Farmville, the closure of government offices and courts on [REDACTED] in observance of Independence Day, and the difficulty of arranging private attorney-client trial preparation calls without advance notice. **On the other hand, the risk**

**of delay is minimal if my client stays at Krome.** My client is currently in protective custody at Krome and I have been assured he is in an appropriate placement to reduce COVID-19 risks as much as possible, the Immigration Court and the Office of the Chief Counsel and the Krome Detention Facility have been working together to make all tech arrangements for Monday, and I continue to have direct access to my client for the purpose of private calls.

I additionally would like to reiterate my request that Mr. [REDACTED] be returned to the Krome Behavioral Health Unit and not moved to any facility in light of COVID-19 concerns. My client has several underlying medical and mental health conditions that makes him particularly vulnerable to developing a serious COVID-19 infection, and the safest thing for his health right now is for him to be at the Behavioral Health Unit where he can best receive treatment.

However, at a minimum, I would like assurance that he will not be moved until his individual hearing is completed. I believe that given these extraordinary circumstances we are all living through, delay of my client's transfer is warranted.

Thank you, and I look forward to hearing from you. I can be reached at [REDACTED].

Sincerely,

[REDACTED]

[REDACTED] [REDACTED], Staff Attorney  
Capital Area Immigrants' Rights (CAIR) Coalition  
1612 K Street NW, Washington, DC 20006

[REDACTED]  
Catalogue For Philanthropy, "One of the Best"

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**From:** [REDACTED] [REDACTED]

**Sent:** [REDACTED]

**To:** [REDACTED], [REDACTED]@ice.dhs.gov' [REDACTED]@ice.dhs.gov>

**Subject:** RE: URGENT [REDACTED] [REDACTED] [REDACTED] Request to REMAIN at Krome and RETURN to the Behavioral Health Unit

Hello Officer [REDACTED],

I hope you are well. I just left a message with you and I wanted to ask for the opportunity to speak with you as soon as possible regarding Mr. [REDACTED]. This is particularly urgent because Mr. [REDACTED] has his final individual hearing already scheduled, with technical arrangements made for VTC from Krome on Monday [REDACTED].

**I would respectfully request that all transfer plans of him from Krome be postponed until after [REDACTED], 2020 at the very earliest.**

As some more background, Mr. [REDACTED]'s His hearing was continued from [REDACTED], 2020 because of technical difficulties with both the VTC and phone system at Arlington Immigration Court and so we did not have the opportunity to

complete the trial as anticipated. I am concerned that if he is transferred at this point, especially given the upcoming holiday weekend, it will be difficult to ensure that technical arrangements for his hearing can be made, and that I can schedule appropriate private attorney preparation calls with Mr. [REDACTED].

**I also request that he not be transferred until all testing and appropriate quarantine has been completed for all transfers in and out of Farmville and other Virginia facilities.**

Mr. [REDACTED] has serious underlying medical health conditions, in addition to his mental health concerns, and so I continue to be very worried about his health and safety. I would appreciate a call at your earliest convenience, or direction about other avenues for resolving this issue.

Thank you,

[REDACTED]

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**From:** [REDACTED] [REDACTED]

**Sent:** [REDACTED]

**To:** [REDACTED]@ice.dhs.gov

**Cc:** [REDACTED]@ice.dhs.gov>; [REDACTED]@ice.dhs.gov; [REDACTED]

[REDACTED]@ice.dhs.gov>

**Subject:** RE: URGENT [REDACTED] [REDACTED] [REDACTED] [REDACTED] Request to REMAIN at Krome and RETURN to the Behavioral Health Unit

Hello Officer [REDACTED],

I wanted to reach out to you regarding my concerns regarding Mr. [REDACTED]. I had the opportunity to speak with Officer [REDACTED] regarding this situation and he informed me that you are now the point of contact for him regarding placement, and that that you are working on a transfer.

I would like to again reiterate my concern, as described below, that Mr. [REDACTED] not be transferred from Krome at this time due to grave concerns about COVID-19 and the risk that the outbreak at Farmville and many other detention facilities around the country presents to his health, safety, and life. Mr. [REDACTED] has several underlying medical conditions that have been identified by the CDC as making individuals particularly vulnerable to developing serious COVID-19 infections.

**Additionally, I wanted to highlight that Mr. [REDACTED] has his final individual merits hearing in his asylum case on [REDACTED], 2020.** If he is transferred at this time, there is a very significant risk that his trial will not be able to go forward as scheduled. However, if he is able to remain at Krome until after [REDACTED], this will ensure that his underlying initial legal case can be resolved without delay, which would be of benefit to all parties.

I would appreciate the opportunity to speak with you about this situation at your earliest convenience. I can be reached at [REDACTED] at any time.

Thank you in advance, and I look forward to speaking with you,

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] Esq. | Staff Attorney

Pronouns: She/Her/Hers

Capital Area Immigrants' Rights (CAIR) Coalition

1612 K Street NW, Washington, DC 20006

[REDACTED]@caircoalition.org | [www.caircoalition.org](http://www.caircoalition.org)

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**Sent:** [REDACTED]  
**To:** [REDACTED]@ice.dhs.gov  
**Cc:** [REDACTED]@ice.dhs.gov>; [REDACTED]@ice.dhs.gov; [REDACTED]@caircoalition.org>  
**Subject:** URGENT [REDACTED] [REDACTED] [REDACTED] Request to REMAIN at Krome and RETURN to the Behavioral Health Unit

Good Afternoon Officers,

I have very much appreciated the ability to keep in good contact with my client during the time he has been at Krome. It has been extremely helpful as we move towards resolution of his case and on several occasions he has expressed his appreciation for the mental health care he is now receiving. However, I am now writing with serious concerns about his medical and physical health.

**I REQUEST THAT MR. [REDACTED] NOT BE TRANSFERRED FROM KROME TO ANY OTHER IMMIGRATION DETENTION FACILITY UNTIL FURTHER NOTICE**

I am writing to ask that he NOT be removed from Krome and returned to Farmville or elsewhere due to the alarming outbreak of COVID-19 this week at Farmville. From June 16 until today, the number of cases at Farmville has risen from 11 to 50 confirmed cases according to ICE statistics, and I anticipate this number to increase significantly as new testing is completed.

Mr. [REDACTED] has several underlying medical and mental health conditions which put him at particular vulnerability for a particularly serious COVID-19 infection, and a transfer at this time may be very harmful to his health.

Additionally, Mr. [REDACTED] has been detained since [REDACTED] 2019, and on [REDACTED], 2020, he has his final individual asylum hearing scheduled. If he were to be moved from Krome now, it is almost certain that his individual asylum hearing would have to be postponed, as he might, in the best circumstances, be subject to a quarantine that would impact his ability to appear and to prepare for his trial with me. As a reminder, I serve as a Qualified Representative for Mr. [REDACTED] because he has been incompetent to stand trial by an immigration judge under Matter of M-A-M-.

**I REQUEST THAT MR. [REDACTED] BE GIVEN THE CLOTHING HE NEEDS TO NOT BE COLD AND TRANSFERRED BACK TO THE KROME BEHAVIORAL HEALTH UNIT**

Second, I am writing to request reasonable accommodations so that can continue to participate in the behavioral health program. However, he informed me that he is often extremely cold in this part of the facility and that this is causing significant pain in his bones such that it makes it hard for him to participate in the classes and sessions of the program. He believes that if he has full access to his heavier jackets and his sweatshirts and an additional blanket, he can fully participate in the program and would very much like to do so. He informed me that he has been prevented by facility staff from having adequate clothing to protect him from the cold (which causes unusual pain due to his physical disabilities).

He informed me that he was discharged from the behavioral health unit into the regular population of Krome and no longer has access to the same mental health resources as a result. He would like to be transferred back, and to have access to proper clothing and blankets so that he can continue to participate in this program. I believe that ensuring this small accommodation would be the best resolution to this problem.

Please feel free to call me at [REDACTED] with any questions.

Thank you in advance,  
[REDACTED]

[REDACTED] M. [REDACTED], Esq. | Staff Attorney

Pronouns: She/Her/Hers

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