

## **Affidavit Regarding Gerardo Corrales (A#205464990)**

I, Christina Fialho, am an attorney licensed in the State of California, and I am the co-founder/executive director of Community Initiatives for Visiting Immigrants in Confinement (CIVIC). CIVIC is a national nonprofit working to end the isolation and abuse of people in U.S. immigration detention through visitation, independent monitoring, storytelling, and advocacy. We support a network of community-based and volunteer-run visitation programs operating in 40 immigration detention facilities nationwide. We have been visiting at the Adelanto Detention Center in Adelanto, California, since 2012. This affidavit is in regards to Gerardo Corrales (A#205464990), who is currently detained at the Adelanto Detention Center.

I first visited Mr. Corrales on April 10, 2015, at the Adelanto Detention Center. Mr. Corrales is a 19 year old from Seaside, California, who has lived in the United States since he was two years old. Gerardo is paraplegic and uses a wheelchair. He became paralyzed after being the victim of a random shooting approximately one year ago, a few weeks before his high school graduation and was still early in his recovery when local police raided his family's home. The police pointed their guns at Gerardo's mother and eight-month pregnant sister. It is my understanding that he was arrested for possession of Xanax, an anti-anxiety medication, and handed over to U.S. Immigration & Customs Enforcement (ICE) who sent him to the Adelanto Detention Center. We believe Mr. Corrales has a strong U Visa case from the shooting that left him paralyzed, and we have been advocating with ICE for his immediate release so that his family can care for him and he can continue to heal and finish high school.

Mr. Corrales was detained in February at the Adelanto Detention Center. It is my understanding that he has not received physical therapy since he has been in detention. It also is my understanding that GEO Group, the prison corporation that owns and runs the Adelanto Detention Center, had refused to give Mr. Corrales sufficient catheter bags. This has forced Mr. Corrales to have to wash his catheter bags in the sink and reuse them. This led to a serious urinary tract infection, which ultimately required hospitalization on March 12, 2015, at an outside hospital. It is my understanding that the doctors at this outside hospital told Mr. Corrales that he was suffering from kidney failure and could have died. After he was brought back to the Adelanto Detention Center, GEO staff continued to refuse to provide him with ample catheter bags. Despite his requests for his medical record, it is my understanding that he has yet to receive his medical records. He also has not had any proper medical check-ups since he was hospitalized.

We first reached out to ICE's National Office and DHS's Office of Civil Rights & Civil Liberties on May 1, 2015, on behalf of Mr. Corrales. We informed them about the above medical neglect. Mr. Andrew Lorenzen-Strait of ICE responded on May 6, 2015: "I wanted to let you know that ICE is taking a thorough look at the concerns listed below to ensure appropriate care is given consistent with law and policy. Without a privacy waiver I am unable to share more." On the same day, May 6<sup>th</sup>, I responded by providing Mr. Lorenzen-Strait with my privacy waiver. Since he received my privacy waiver, Mr. Lorenzen-Strait has not responded to any of my emails or the emails written by Olga Tomchin, an attorney with the National Day Laborers Organizing Network (NDLON), on behalf of Mr. Corrales.

On May 6, 2015, we also informed ICE and CRCL that in addition to what we mentioned in previous emails, GEO Group and ICE do not assist him with his daily living, such as showering, changing his clothes, and picking him up when he falls from his wheelchair. In fact, the only assistance he receives at Adelanto is from the other men in immigration detention. We have received no response from ICE or CRCL.

I followed up again with ICE and CRCL on May 11, 2015, but received no response.

I have continued to provide Mr. Corrales and his family with support. On June 8, 2015, Mr. Corrales told me in a phone conversation that he has not experienced any change in his treatment at the facility, suggesting that neither ICE nor CRCL has taken any steps to address

our concerns. He also explained that two or three of the main screws in his current wheelchair had fallen off. It is our understanding that he only has one screw holding his entire chair together. He is very concerned that his chair is going to fall apart and he will be severely hurt. He has asked the GEO officers, the ICE officers at Adelanto, and the medical unit for a new wheelchair or for them to fix his current wheelchair. However, he was not provided with any support for his faulty wheelchair. I reached out to ICE and CRCL again on June 8, 2015, asking them to either replace his wheelchair or fix it. I have not received a response.

On June 13, 2015, Ms. Tomchin of NDLOM reached out to ICE and CRCL informing the agencies of their responsibility under section 504 of the Rehabilitation Act. Under this Act, ICE must make reasonable accommodations for people with disabilities. We informed ICE that we believe that ICE cannot safely keep Mr. Corrales in its custody, and therefore, ICE must release him in order to comply with federal law. Again, we have not received a response.

On June 11, 2015, I conducted an audio recording of Mr. Corrales over the phone so that he could provide oral testimony about his condition. Here is the recording: <https://soundcloud.com/endisolation/freegerardo/s-Oet3J>. In addition to my affidavit, I also have provided Congresswoman Judy Chu's office with the email strings between ICE/CRCL and Ms. Tomchin/me.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 22, 2015.

A handwritten signature in cursive script that reads "Christina M. Fialho". The signature is written in black ink and is positioned above a horizontal line.

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Christina M. Fialho