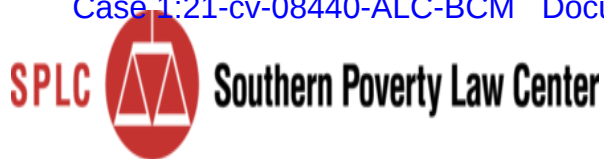


EXHIBIT F



October 7, 2020

Diane L. Witte
Acting Field Office Director
Immigration and Customs Enforcement (ICE)
Enforcement and Removal Operations (ERO)
New Orleans Field Office
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New Orleans, LA 70133
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Caridad Cephas-Kimbrough
Deputy Field Office Director
Immigration and Customs Enforcement (ICE)
Enforcement and Removal Operations (ERO)
New Orleans Field Office
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Patricia Nation
Officer for Civil Rights & Civil Liberties
Department of Homeland Security
245 Murray Lane, SW
Building 410, Mail Stop #0190
Washington, D.C. 20528
CRCLCompliance@hq.dhs.gov

The Honorable Joseph V. Cuffari
DHS Inspector General
Office of Inspector General/Mail Stop 0305
Attn: Office of Investigations - Hotline
U.S. Department of Homeland Security
245 Murray Lane SW Washington, DC 20528-0305
dhs-oig.officepublicaffairs@oig.dhs.gov

Re: Immigration and Customs Enforcement Officers' Use of Torture to Coerce Immigrants Into Signing Immigration Documents at Adams County Correctional Facility

Dear CRCL Officer Nation, DHS Inspector General Cuffari, Field Office Director DeWitte, and Deputy Field Office Director Cephas-Kimbrough:

Freedom for Immigrants, Southern Poverty Law Center, Louisiana Advocates for Immigrants in Detention, Natchez Network, Detention Watch Network, Cameroon American Council, Haitian Bridge Alliance, and Families for Freedom submit this complaint detailing civil and human rights

violations committed against Cameroonian individuals in the custody of U.S. Immigration and Customs Enforcement (ICE), at the Adams County Correctional Center. Specifically, we express serious concern regarding recent reports that U.S. Immigration and Customs Enforcement (“ICE”) officers in Adams County Correctional Center, along with the Facility Administrator and CoreCivic guards, have tortured Cameroonian individuals in their custody in attempts to coerce them to sign immigration documents through pressure, threats and—in several cases—excessive use of force, including physical abuse and pepper spray, resulting in severe injury. This pattern of coercion and unwarranted use of physical force by ICE officers is abusive, unlawful, and tantamount to torture. In addition to the unlawful gain of signatures for deportation documents, we are further concerned that “laissez-passe” travel documents issued to Cameroonians facing deportation may not be authentic or legally valid, given the Cameroonian embassy’s explicit statement to advocates that they have not issued any such documents.

As of this morning, October 7th at 7:15 AM, staff with Southern Poverty Law Center were informed that all 8 Cameroonian men who had legal calls scheduled for today and tomorrow had been released from the facility. This raises grave concerns they may be in route for deportation back to deadly circumstances using potentially falsified travel documents and forms which they allege they were forced to sign under duress. This urgent complaint focuses on these 8 Cameroonian individuals who have reported in detail their abuse at the Adams County Correctional Center, and face life-threatening consequences if deported based on the forced, potentially unlawful collection of signatures and travel documents. But, similar reports from other people detained throughout the New Orleans Field Office jurisdiction indicate many others may have experienced the same treatment in other ICE facilities. Given previous complaints submitted to the Office of Inspector General and Office of Civil Rights and Civil Liberties,¹ we are concerned that the New Orleans Field Office Jurisdiction’s use of force to compel detained people to sign deportation documents may be a growing practice with little to no oversight.

These actions reported by Cameroonian men detained in Adams County Correction Center to the named organizations are in violation of Mississippi state and federal law, the Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment, which the United States has ratified, and ICE’s own policies within the Performance Based National Standards 2011 which Adams County Correctional Facility is contracted to uphold.

We urge the office for Civil Rights and Civil Liberties (CRCL) at the Department of Homeland Security (DHS), pursuant to its authority under 6 U.S.C § 345, and the Office of the Inspector General to immediately investigate these complaints, to stop the imminent deportation of individuals whose signatures were obtained through coercion and violence, and to take immediate steps to ensure that these practices are halted within the Adams County Correctional Facility, and New Orleans Field Office Jurisdiction more largely. Most concerning, Families for Freedom, named on this complaint, report they have already made the New Orleans Field

¹<https://documentcloud.adobe.com/link/track?uri=urn:aaid:scds:US:da628099-4a7e-46af-8f61-a8228a2194f9>
<https://documentcloud.adobe.com/link/track?uri=urn:aaid:scds:US:edaed375-42ba-4520-ae0-2a0050e94e54>
<https://documentcloud.adobe.com/link/track?uri=urn:aaid:scds:US:3f2f8ac2-ad00-436f-9c8f-bc64d6b74b6f>

Office Director aware of allegations of excessive use of force towards Cameroonians in obtaining travel documents at Adams County Correctional Center in recent weeks. Their complaint went unanswered, and can be supplied upon request.

I. Adams County Correctional Facility ICE Officers' Excessive Use of Force:

In recent weeks, the national human-rights monitoring non-profits, community volunteers and immigration attorneys have all received reports that officials at the Adams County Correctional Facility used coercive tactics such as pressure and threats to obtain Cameroonian individuals' signatures on immigration documents. This multi-individual complaint summarizes the complaint that 8 men at Adams County Correctional Facility have lodged directly. As of this morning, October 7th at 7:15AM, staff with Southern Poverty Law Center were informed that all 8 men who had legal calls scheduled for today had been released from the facility, raising grave concerns they are in route to deportation.

Reports received from the 8 men include coercive tactics such as threats of violence and direct physical abuse to obtain submission, forced taking of fingerprints while individuals are in restraint, and the use of pepper spray against those who decline to sign these immigration documents, leading to hospitalization in at least one incident. These individuals were willing to report their allegations publicly to oversight bodies, congressional representatives, and the media. They have been granted pseudonyms for their protection, though additional details about each individual is available upon request for investigation.

- 1.) B.J.
- 2.) D.F.
- 3.) C.A.
- 4.) N.A.
- 5.) E.O.
- 6.) J.T.
- 7.) W.B.
- 8.) H.U.

Below are the details of some of these incidents of mistreatment and injury. Others impacted declined to report out of fear of retaliation.

ICE & CoreCivic Staff Torture Detainees to Coerce Them into Signing Removal Documents:

Immigrants rights organizations and attorneys have received reports by letter, on the phone and in person from the 8 detained immigrants from Cameroon corroborating multiple incidents involving physical and verbal abuse of ICE detainees related to the person's refusal to sign travel documents. The abuse at Adams County Correctional Facility was originally reported to community members with Louisiana Advocates for Immigrants in Detention, a volunteer run community organization which supports individuals detained in Louisiana and Mississippi. All accounts initially provided to Louisiana Advocates for Immigrants in Detention were then corroborated by Southern Poverty Law Center staff in the legal interviews which follow. The 8

men detained from Cameroon each reported independently a pattern of assaults initiated on Sunday, September 27th and Monday September 28th, 2020 in Adams Correctional Facility.

ICE officers handcuffed one man or several men, brought these men to the medical unit in attempts to force signatures, then brought them to a dorm named Zulu, which is known amongst the men as a place where those who are punished are taken. ICE officers and Security Officers employed by CoreCivic took turns beating up the men and forcing them to sign travel documents. If the men refused to sign, ICE officers would take their thumbprint as a signature after they were restrained. In some instances, individuals were physically forced to place their thumbprint on documents while handcuffed, despite their physical attempts to stop this from taking place. In one incident, a man reports his fingers were broken. Multiple individuals report that some of these incidents were filmed with a hand held camera.

Among the many incidents described by the named and anonymous complainants, acts of torture and coercion in order to force signatures for travel documents were described in great detail by each individual and corroborated by statements from other detained immigrants.

B.J. (Interview date: 09/30/2020)

On Sunday September 27, 2020 around midday, I was called from my job in the kitchen to the medical unit. I was asked to sign a document there. I saw about 3 others who were also called there and asked to sign. They separated us, so I don't know for sure what happened to the others. I refused to sign my document. The form was a deportation form with my picture. The ICE officer told me I would be sent back to my country. I said they will kill me if I go back and I couldn't sign. He said he would force me to sign. Then I was taken and locked in a room and handcuffed. The ICE officer called other officers to come to Adams. They work at Adams but were off-duty that day. He called them to come help him "do the job." Mr. Green was one person called from off-duty. When they arrived, they pepper sprayed me in the eyes and Mr. Green strangled me almost to the point of death. I kept telling him, "I can't breathe." I almost died. I was coughing so much after and my throat still hurts a lot. I can't see well still from the pepper spray. As a result of the physical violence, they were able to forcibly obtain my fingerprint on the document.

I was hospitalized after the incident but they didn't treat me at all. I tried to wash my eyes with toilet water. They did not even allow me to use a sink to wash out my eyes. I can't see well right now.

D.F. (Interview date: 10/02/2020)²

An ICE agent came to see me Sunday, September 27, 2020 to try to get me to sign a deportation document. I said I didn't want to sign a deportation order. I said I am afraid to go back to my country. He promised me he would torture me. Monday, September 28, 2020, he came again while I was outside to try to force me to sign, I refused to sign. He pressed my neck into the floor. I said, "Please, I can't breathe." I lost my blood circulation. Then they took me inside with my hands at my back where there were no cameras. After they tortured me then about four CoreCivic Officers and two ICE officers took me to Zulu. They continued to torture me

² Interview conducted in their native language French. French Interpreter ID: 23013

in Zulu. They put me on my knees where they were torturing me and they said they were going to kill me. They took my arm and twisted it. They were putting their feet on my neck. While in Zulu, they did get my fingerprint on my deportation document and took my picture.

At the end of the torture, I was out of breath and very tired--I couldn't stand up. They checked my blood pressure in Zulu which was elevated. I do not suffer from hypertension, but my blood pressure was high after that incident. After Zulu, they took me to another room in medical. When they told me they were going to kill me, I responded to them by saying, "Okay, I will kill myself." So that is why they took me to medical. They put me in medical isolation and took away my clothes and possessions. I am still there and have been there since Monday. I still have scars on my wrist where there were handcuffs on me. I have pain and bruises on my neck and ribs. They have given me only Ibuprofen. It's the only medical care I've received. I feel very weak. I have been unable to eat.

Oct 1, 2020: Information was also provided to Louisiana Advocates for Immigrants in Detention by a family member, who stated, "(D.F.) just called me now saying that ICE tortured him, beat him everywhere and put him in the cell. He can't breath. Please do something."

C.A. (Interview date: 10/01/2020)

I am currently in isolation. On Sunday, September 27, 2020, I was, like usual, working in the gym and in the yard. A man I didn't know came out to the yard with a form and asked me to sign. He worked for ICE. I asked him for time to talk with my attorney before signing. I thanked him for coming and for his time. He said I had to sign because my case was closed. He threatened force if I denied to sign. I said force is not necessary. I can talk to my attorney on Monday. He said he didn't have time for that. He left and said he would come back.

Around 1:30pm I was called to medical. I asked the lady who took me to medical why they brought me there. She said she just wanted to talk to me about some issues. Two leading administrators at Adams County, possibly wardens, were waiting for me at medical. As they walked in, they threatened to take me to Zulu. I know this to be a place where they take people who have committed crimes. It's a dorm here. I asked why I should go to Zulu because I said I don't know what I've done. They said I have to be transported to another facility. I said I haven't had the chance to talk to my attorney. I asked just for some time Monday to talk to him. They said no, they would force me to Zulu. Then an ICE officer walked in-- it was the same one from earlier who had come out to the yard. He told me I needed to be transferred to another facility because I would be deported next week. He said I should understand he is just doing his job. I responded that it was my right to talk to my attorney. He said I needed to go to Zulu right now. Six security officers came in and said they would take me to Zulu. I said I cannot go into Zulu without first talking to my attorney. There are no cameras in Zulu. I haven't committed any crime. The ICE officer said I needed to go to Zulu now.

There were multiple Cameroonians called to medical around the same time that day. We were all there together at an earlier moment, but at this point only a couple of us remained in medical because we were asking to talk to our attorneys.

Six security officers put on their gloves and there were also four ICE officers present. Officers grabbed me, forced me on the ground, and pepper sprayed my eyes. They handcuffed me, and

Mr. Green (security officer at Adams) broke my finger. I was crying, "I can't breathe" because they were forcefully on top of me pressing their body weight on top of me. My eyes were so hot. They dragged me outside by both hands. I was dragged across the ground. I was crying. My eyes were burning. They told me to keep moving. They were dragging me in all directions. I saw them dragging me and 2 others into Zulu. We three were forced into the shower with our clothes on. We had bruises on our bodies.

I was then forced into a chair in a room. It was a prison chair that was attached to the wall. Mr. Green and another officer forced my neck on the table. I was crying, "I need to talk to my attorney," and I said, "They are going to kill me". There was a lady known as Ms. Blanton that was taking video. The officers told me to open my eyes. I couldn't. My legs and hands were handcuffed. They forcefully opened my palm. Some of my fingers were broken. They forced my fingerprint onto the paper. Mr. Green forced me on the ground and dragged me with my chin on the ground. He forced my hands to pass through a small door on the larger metal door. This was very, very painful. I lay on the ground there all night and they took me in the morning to medical in a wheelchair.

They put chains on my hands and feet again. The medical unit said I was supposed to be placed on suicide watch. I was put in a room and they took all my clothes. There are no windows in that room. I was in there the whole day. I wasn't allowed to shower. I was only given bread and milk that day--two meals only. I said, "What have I done? They are going to kill me." I have complained to the nurses about my fingers being broken. Their weight on me was too much on my body and I was struggling to breathe.

Yesterday (09/30/2020), I got a chance to explain to nurses that I am not suicidal or homicidal. But I am still there in that room. Right now I am talking to you with chains on my hands. I have at least have clothes now. Officers have told me they will take me back to Zulu today. I don't know what is going to happen to me.

N.A. (Interview date: 10/01/2020)

On Sunday, September 27, 2020, an ICE officer came to my dorm and asked me to sign a document. I refused. I will try to find out his name, but right now I do not know it. It's hard because they don't display their names on their badges. When I refused to sign the document, he said I would be chained, handcuffed, and sent back to my country.

Around 1 pm, I was called to medical, and when I arrived I saw other Cameroonians already there. They took my vital signs and then separated me from the other Cameroonians. I was told by the ICE officer that he brought documents that I needed to sign for my deportation and that I would be sent to Zulu for refusing to sign. I asked why I should be sent to Zulu. Nurses told me they were instructed by ICE to send me to Zulu. I said it was uncalled for. Nurses said they couldn't do anything. I said I cannot sign any deportation documents. The reason why I am here is seeking protection. Officers threatened to send me to Zulu by force by handcuffing me and forcing me to sign. Two CoreCivic security officers took me and two other Cameroonian men to Zulu, but other Cameroonians who refused to have vital signs taken remained in the medical unit with other officers. I saw them later in Zulu. They had been pepper sprayed, handcuffed, and dragged into Zulu with the unit director and the Warden. When I was taken to Zulu, we were separated into different rooms. Officers asked me if I was ready to sign. I said no because I

feared for my life. I am still in Zulu and they haven't returned (as of 10/01/2020). Officers told me my flight was scheduled next week for Cameroon. I saw other officers harm my Cameroonian brothers that day.

E.O. (Interview date: 10/01/2020)

"It has not yet happened to me." There were 4 of us in a room. 3 were brutally assaulted and now in isolation. But me, I am still the last person waiting for this to happen to me. I cannot sleep because I don't know what will happen to me. The ICE officer told me on Sunday, September 27, 2020, that I needed to sign my deportation document. I said I didn't want to sign. He said when they get a flight for me, they will force me to fingerprint my document. I told him if he tries to force me, I will pee myself and I will die. The next day he forced 3 of my Cameroonian brothers to fingerprint. They were brutally assaulted and pepper sprayed. (C.A.) is really sick.

The next day after President Trump was acquitted, an ICE officer pushed me into a wall and took my picture and said I would be deported. I made a call to report his behavior with the DHS. I haven't gotten a response to my report.

I heard they may deport us to Nigeria.

I remain in the dorm as usual. I am afraid due to threats of violence and the threat of deportation.

I came here for safety. I never knew about this inhumane treatment happening here in the USA. Please help me get out. "I want out of here."

J.T. (Interview date: 10/01/2020)

On Sunday, September 27, 2020, in the morning, an ICE agent came to me to sign and put my fingerprint on deportation order. It's a must, the officer said. If I don't do so, they said they would force me. I said I couldn't sign any documents without talking first to my attorney. My case is pending with the 5th circuit. The ICE agent said they talked to the 5th circuit and the 5th circuit gave their approval for them to deport me.

I was called to medical later that day. Correctional officers said they needed to take me to Zulu because they are going to deport me. "What if I declined to go to Zulu?" I asked. They said it was a must. I went with them to Zulu. Once in Zulu, the next day, on Monday, September 28, 2020, ICE came to my room. There were about 8 ICE officers and some other correctional officers. They said I need to give fingerprints. I declined. They asked, "Do you want to fight?" I said I was a peaceful person and didn't want to fight. They came towards me with handcuffs and foot cuffs. Before they put them on me, I fingerprinted the document to avoid physical coercion. It was a deportation order document with my picture. I am still in Zulu today (10/01/2020).

On Sunday, while I was in Zulu, an hour or so after I was brought down, I saw ICE officers bringing other Cameroonians to Zulu forcefully with cuffs on their hands and legs. They were crying and screaming. They had been pepper sprayed in their eyes. Some were being dragged, others carried.

W.B. (Interview date: 10/01/2020)

On Sunday, September 27, 2020, in the morning, an ICE officer came to our dorm and brought my deportation document with my picture, asking me to sign. I have an appeal pending in the 5th circuit. I said I cannot sign because of my pending appeal and because I cannot return to my country. He said if I don't want to sign in peace, I will be forced to sign.

Later in the afternoon, they called me to medical. When I reached medical, they locked me in a cell, and they said someone would come speak to me. After about 45 min, they brought other Cameroonian men (about 7 of them) with Security Officers. They said they were sorry but they had to take us to Zulu. Then they took us to Zulu. Me and a couple others were taken first because we didn't resist. Once in Zulu I saw ICE officers and security officers bring the others down forcefully dragging and pushing them.

I think 3 of the men--(C.A, B.J., and D.F.) are under medical supervision now. They forcefully took their fingerprints.

Once I was in Zulu, officers said, "Are you going to sign or not?" I said no. And they haven't come back yet. I know they will come back.

I have never heard about them doing something like this before, forcing people to sign documents. I have fear in my heart right now. I am traumatized from what I saw.

H.U. (Interview date: 10/05/2020)

It was Sunday, September 27, 2020. An ICE officer came to me and told me to sign my deportation order and put my fingerprint on it. I said I could not do that. The ICE officer said if I didn't cooperate, they would use force on me. I repeated that I couldn't do this. I went inside the dorm.

About two hours later, they called me to go to medical. An ICE officer then said they were taking me to Zulu, not medical. They locked me in one room by myself. The following day, Monday, September 28, 2020, one female officer came to me and said I was not cooperating with my deportation. About 7 ICE Officers came to my cell and asked me if I would cooperate or if they would have to use force. They said just to fingerprint the document. I asked them where they got the paper and fingerprint that were already on the paper. They did not respond.

I said I had to refuse to put my fingerprint on the document until I could talk to my lawyer. I can't go home and that is why I cannot put my fingerprint on the document.

While in Zulu, I saw them bring down (D.F.) and other Cameroonians, beaten and in handcuffs. (N.A. and J.T.) were already in Zulu when I got here. I was so confused and horrified. They took (D.F) to the hospital. I saw that they took others to the hospital, too.

I still have not fingerprinted the document.

II. The Adams County Correctional Facility ICE officers' pattern and practice of physical and verbal coercion is unlawful, unacceptable, and tantamount to torture

The Adams County Correctional Facility ICE officers' pattern and practice of physical and verbal coercion, as well its abusive treatment of these 8 documented individuals and the others impacted, is unlawful, unacceptable, and tantamount to torture. Amongst other crimes, ICE officers' and CoreCivic guards' use of excessive force may qualify as assault and battery under Mississippi penal code sections regarding assault, battery, and battery with serious bodily injury. This conduct also may violate the federal prohibition on assault, 18 U.S. Code § 113, as well as 18 U.S.C. § 242, which makes it unlawful for federal officers to willfully deprive an individual of rights under color of law. In addition, Adams County Correctional Facility ICE officers' use of coercive tactics to get individuals to sign immigration documents appears to violate the Administrative Procedure Act, 5 U.S.C. § 551, the Immigration and Nationality Act, 8 U.S.C. § 1101, et. seq., and the Due Process Clause of the U.S. Constitution.³ People subject to civil immigration detention are guaranteed certain liberty interests such as reasonably safe conditions of confinement, freedom from unreasonable bodily restraint, and the right to food, clothing, medical care, and shelter.⁴ People subject to civil immigration detention are also entitled to be free of gross physical abuse by federal officials under the Due Process Clause of the Fifth Amendment.⁵

These acts are also in violation of the Convention Against Torture and Other Cruel⁶, Inhuman or Degrading Treatment, which the US has ratified. This United Nations Convention was designed to safeguard the human rights of citizens by protecting them from torture. Torture is defined within the convention as an act by which severe pain or suffering, whether physical or mental, is intentionally inflicted on a person for such purposes as obtaining from him or a third person information or a confession, punishing him for an act he or a third person has committed or is suspected of having committed, **or intimidating or coercing him or a third person, or for any reason based on discrimination of any kind, when such pain or suffering is inflicted by or at the instigation of or with the consent or acquiescence of a public official or other person acting in an official capacity.** In the reports above, this clearly took place.

The officers' use of force also violates the Performance-Based National Detention Standards 2011 ("PBNDS 2011") which states, "[u]sing force against a detainee offering no resistance" is "generally prohibited," Force may not be used as punishment, and use of force may only involve "the degree necessary and reasonable to gain control of a detainee or provide for self-defense or defense of a third person." Furthermore, "[p]hysical force shall only be used to the minimum extent necessary to restore order, protect safety and provide security." Finally, neck restraints are specifically prohibited unless deadly force would be authorized."⁷

On no occasion did the detained men demonstrate resistance to force, yet ICE used violent force against them to sign a deportation order. ICE clearly used excessive force given the detained protesters were unarmed and at most displaying non-violent disorderly conduct, understandable given their inhumane conditions of confinement for excessive amounts of time during an unprecedented, life-threatening pandemic.

³ See Complaint at 55-57, Lopez-Venegas v. Johnson, No. 13-03972(C.D. Cal. Oct. 2, 2013), ECF No. 1

⁴ Youngberg v. Romeo, 457 U.S. 307, 315-16 (1982)

⁵ Lynch v. Cannatella, 810 F.2d. 1363, 1374 (5th Cir. 1987)

⁶ <https://www.ohchr.org/en/professionalinterest/pages/cat.aspx>

⁷ § 2.15("Use of Force and Restraints") at 208, 210, 213, available at

http://www.ice.gov/doclib/detention-standards/2011/use_of_force_and_restraints.pdf

III. Validity of Travel Documents

The organizations submitting this complaint also wish to raise concern with the validity of travel documents that may be issued to facilitate the deportation of Cameroonian nationals. On September 16, ICE attempted to deport Pauline Binam via an Ethiopian Airlines commercial flight from Chicago O'Hare airport. Immediately prior to her attempted deportation, Binam had been detained at the Irwin County Detention Center in Ocilla, Georgia, where she reported that a doctor contracted by ICE removed her fallopian tube without her consent.⁸ ICE officials claimed that the decision to halt Binam's deportation was unrelated to the on-going investigations into forced hysterectomies and was the result of a "paperwork snafu." However, Binam reported that she refused to board the flight from Chicago O'Hare after ICE presented her with a "laissez-passer" as opposed to a valid Cameroonian passport. According to Binam, Ethiopian Airlines officials also refused to accept this document. The "laissez-passer" had been issued by Charles Green III, a Methodist minister in Houston listed as "Pending Honorary Consul of Cameroon" on the Texas secretary of state's website. However, Greene is not listed as a consul on the Embassy of Cameroon's website. Binam states that Greene never interviewed her before issuing the document. In 2013, Green had issued a Cameroonian "laissez-passer" to a man of Ivorian nationality to facilitate his deportation to Cameroon, despite the fact that man was not Cameroonian and over objections from a district judge.⁹ In a statement to *The Intercept*, a representative of the Cameroonian Embassy in Washington, D.C. stated that the laissez-passez issued by Greene is not a valid travel document and that "There's only one embassy, it's in Washington. There's no Charles Greene, there's no embassy in Texas."¹⁰

The groups submitting this complaint are receiving widespread reports of approximately 25-30 other Cameroonians currently being staged for deportation at the Alexandria Processing Facility in Louisiana and scheduled to leave this facility today to another staging area; destination currently unknown. Given what is known to have taken place with these 8 Cameroonian individuals at Adams County Correctional Center, grave concerns are being raised as to the manner in which all Cameroonians are being deported and the validity of their travel documents.

IV. Recommendations

We urge the Office of Civil Rights and Civil Liberties and the Office of the Inspector General to immediately take the following steps:

- 1) Open an emergency investigation into these allegations of physical assault and torture leading to coerced signatures of travel documents, and the legality of laissez-passe travel documents issued by Charles Greene.
- 2) Demand an immediate stay of deportation for the individuals named in this complaint until ICE's actions can be investigated by appropriate oversight bodies given that these

⁸ <https://theintercept.com/2020/10/02/ice-irwin-amin-obgyn-cameroon-women/>

⁹ <https://familiesforfreedom.org/sites/default/files/resources/Noah%20Story.pdf>

¹⁰ <https://theintercept.com/2020/10/02/ice-irwin-amin-obgyn-cameroon-women/>

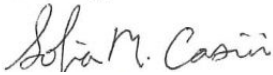
individuals' signatures were obtained unlawfully, and the concerns about the falsification of their travel documents.

- 3) If you find that these allegations of ICE officers' excessive use of force in violation of existing laws are founded, we urge you to immediately identify the reason that ICE failed to follow the law in these cases. In addition, please seek to identify why the New Orleans Field Office failed to investigate prior allegations and hold the officers perpetrating the violence accountable for their actions, once they were made aware of the abuse.
- 4) Finally, to facilitate the review of these allegations and their cases, we request copies of any use of force videos and reports or other reports generated in relation to the above-described incidents, as well as the forms they were being asked to sign, and the forms upon which their fingerprints were forcibly imprinted. To ensure the physical safety of these men, names and alien numbers will be provided only upon investigation.

We appreciate your attention to this important matter and look forward to hearing what steps ICE, CRCL and OIG will take to address these problems. We request a meeting with all parties addressed to discuss our concerns and the steps planned to address them. Please respond within 24 hours to establish a plan for this meeting. Should you have any questions, please contact Sofia Casini at scasini@freedomforimmigrants.org or 512-592-8008.

Thank you in advance for your attention to this urgent matter.

Sincerely,



Sofia Casini
Director of Visitation Advocacy Strategies
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