Complainant #1: "Jessica"¹ Jessica is a 29-year-old mother of two who fled Honduras after the M-18 gang targeted her as a woman living without a male protector. Jessica and her two children, ages 4 and 6, received the varicella vaccination approximately five days after arriving at Dilley. When Jessica advised medical staff that her children had already received the varicella vaccination in Honduras, she was told that everyone detained at the facility had to get the vaccination. On July 1 or 2, two officials woke Jessica and her young children at 4:30 am and told them to go to the chapel for a medical appointment at 5 am, where they waited for two hours before being seen. Jessica took her children's vaccination cards with her to show the officials that their vaccinations, although he did not specify which vaccinations needed to be administered. Shortly afterward, women wearing white gave Jessica's son and daughter vaccinations, but did not tell her which ones or provide any documentation containing that information. The next day, around 5:30 am, two officials woke the family and asked if the children had any fever or other problems. After Jessica indicated that the children were fine, the officials left.

When Jessica was forced to flee Honduras, she had been recently diagnosed with breast cancer. At Dilley, Jessica went to the clinic to try to speak to a doctor about her medical concerns. After waiting for five hours, in pain, in a cold room, clinic staff told Jessica that the doctors were there to see the children and there was nobody there to see her. She did not receive any pain medications. That night, a staff member told Jessica that a specialist would attend to her the next day. The following day, Jessica inquired at the medical clinic about the specialist, but an officer and a nurse confirmed that there was no specialist and sent her back to her room without any medicine. The next day Jessica had a headache so painful that she was vomiting, but having lost hope in the clinic, she decided not to return to attempt to seek treatment because she did not want to wait in the cold room and be turned away again. Jessica later suffered from vomiting for nine days, non-stop. When she first started vomiting, she waited to see the doctor for six hours without being seen. She returned, after seven days of vomiting, and waited seven hours to see the doctor. Jessica has lost thirteen pounds since being detained.

Complainant #2: "Mira." Mira is a 22-year-old Salvadoran woman detained with her three children, ages 6, 4, and 2. She is engaged to a U.S. citizen and had planned to enter the U.S. legally, but was forced to flee suddenly when gang members threatened her life in El Salvador. Before Mira even arrived at Dilley, she was held for a week by CBP and was sick, vomiting, and unable to eat, but refused medical care upon her request. At 5 am on June 30, CCA officials at Dilley woke Mira and informed her that her children had to go to a doctor's appointment. When Mira asked why, the officials did not respond, instead ordering her and her children to follow him. The official led them to a place outside the communal bathroom where more than 20 other mothers and children were gathered, having also just been woken up. The official then led the group to the chapel, which was filled with women and children. Mira learned from other women that the children were going to receive vaccinations. After they had waited for almost five hours, medical staff informed Mira and the other women that the vaccines were mandatory and handed them a list of vaccines the children would receive. When Mira informed medical staff that her children had already received all of the listed vaccines, the doctor told her that they would be administered again. Within two or three days, Mira's two-year-old child was vomiting, with a

¹ Pseudonyms are used to protect the identities of the mothers submitting this complaint. Full names and Alien registration numbers will be provided concurrently with this complaint to CRCL and OIG.

high fever and a terrible cough. Mira has tried three times to take him to the clinic, but has been repeatedly told that she could not see a doctor without an appointment and advised to return the next day.

Complainant #3: "Irena." Irena is a 27-year-old woman from El Salvador who fled after gang members threatened to cut out her tongue because they believed she was reporting their activities to the police. She and her two-year-old son Oscar are detained at Dilley. Officers woke Irena and Oscar at 5:30 am and ordered them to go to the medical clinic. There, Oscar received five vaccinations. Although Irena told the officer that her son was up to date on his vaccinations, the officer responded that there was no way to prove that and her son thus needed to get all of the vaccinations. A nurse roughly administered the vaccinations into Oscar's leg. After the vaccinations, he could not walk. That night, he spiked a high fever. Irena did not take him to the clinic because she had heard from other women that the clinic staff would not do anything for a child with a fever following vaccinations. After a few days, a nurse came early in the morning to see if any children had developed fevers following the vaccinations and indicated that the children had received an adult dose of one of the vaccines. Later that day, Oscar developed a problem with his eyes. He cried and rubbed his eyes, unable to sleep. When Irena took him to the clinic, the doctor said his eye problem was viral and had nothing to do with the vaccinations.

Complainant #4: "Lillian." Lillian fled Honduras after a gang beat her 10-year-old daughter and threatened both of their lives. She arrived at Dilley with ten-year-old Rosa on June 3, 2015. After a six-hour bus journey and waiting eleven hours to be showed to her room, Lillian got on her knees to pray, but around 8 pm she fainted. She awoke in a hospital, receiving intravenous fluids and oxygen. A cardiologist and neurologist examined her and she underwent various tests. Upon discharge from the hospital, Lillian received her medical records. Returning to Dilley at 4 am, she was transported directly to the medical clinic, where she handed over the papers she received at the hospital. Lillian was returned to her room with sleeping medication and woke up later that day to see the doctor. Lillian asked the doctor for her medical records and the doctor told her that she "did not need them" because the medical results were "fine."

On Thursday June 25, an official came to Lillian's room at 6am and woke her for a medical appointment at 9 am with a doctor. That day, Lillian and Rosa waited about 14 hours to see the doctor, with Rosa missing school. At 11 pm that night, Lillian told clinic officials that she needed to take Rosa, who had fallen asleep, to bed. She was told that her doctor's appointment would be rescheduled, but she never actually received another appointment. Lillian felt light headed and dizzy for the next five days until she fainted again on June 30. She awoke in the medical facility at Dilley, unable to speak or move. Lillian remembers medical personnel pounding her chest repeatedly and telling her to stay awake. For a week afterwards, Lillian's chest was swollen and bruised and ten-year-old Rosa applied cream to her mother's chest.

During this same incident on June 30, in an attempt to give Lillian intravenous fluids, two medical personnel pricked Lillian with a needle seven times and laughed each time they were unsuccessful locating a vein. Lillian cried out in pain for them to stop. Despite her request for them to stop, the women continued and found a vein in her other hand and inserted a tube with fluids. Lillian was then wheeled on a stretcher to an ambulance, where the EMT immediately took out the tube and showed Lillian that the needle was bent, saying "look what they did to you," telling her that the two women did not know how to insert the tube. At the hospital Lillian

again received treatment from a cardiologist and neurologist, underwent various tests, and received oxygen. At one point a nurse handed Lillian paperwork, explaining that the doctor at Dilley would explain the results to her. When Lillian was brought back to Dilley, she saw a doctor who asked for the hospital paperwork. The doctor threw the papers on top of a black bin on the floor by a desk. Lillian asked if she could keep the papers because she may need them and tried to pull the papers out of the bin. The doctor then seized the papers, placing them behind her computer out of Lillian's reach. Lillian explained to the doctor that she was still having severe headaches, the right side of her face would become swollen, her right eye red, her left arm felt like pins and needles, and her hand become pale with purple spots on the palm. The doctor told Lillian she needed to see a psychologist.

Lillian has seen a psychologist on four occasions since arriving at Dilley, each time for around only ten minutes and each time in the presence of her ten-year-old daughter. Lillian desperately wanted to share what she was feeling with the psychologist but felt inhibited by the presence of her daughter, who would cry if Lillian started to tell her story. Lillian asked if her daughter could play outside the consultation room but the psychologist told Lillian that she needed to stay in the room and gave Rosa some gum to try to calm her down.

Lillian's concerns for Rosa are mounting. Rosa has asked her mother why they cannot leave and asked "what if we die? Can we leave then?" Only ten years old, Rosa has told her mother that she will never forget this experience. Distraught and overwhelmed about the effects of detention on Rosa, Lillian went to the bathroom intending to slit her wrists with a razor. After this event, Lillian met for the fourth time with the psychologist. After disclosing her suicide attempt to the psychologist, Lillian and Rosa were held in isolation for three days. Rosa cried and begged to leave the room but the psychologist told her that she had to stay with her mother. Rosa was bored, angry, and sad in isolation and Lillian felt immense guilt for separating Rosa from the other residents in the facility because of her depression and suicide attempt.

A doctor visited Lillian when she was in isolation, telling her he wanted to talk to her about test results revealing a "black shadow" in the upper right side of her face, where her headaches originate. He explained that they wanted to do tests in the morning and would be drawing a lot of blood. Lillian asked why she needed tests when the other doctors had told her that the previous test results had been fine and the doctor said, "I don't know why they didn't explain the results earlier." The doctor examined Lillian and found extreme pain on the left side of her body, near her womb. He told Lillian that he would order a prescription for her and that the next day she would have blood drawn. No one showed up the next day to draw blood. A psychologist came the next day and inquired about the blood tests, and when the psychologist realized the tests had not occurred, she told Lillian the blood would be taken the next morning. Again, the next morning, no tests were performed.

Complainant #5: "Francisca." Francisca fled Guatemala after a gang threatened her and her daughter. While Francisca was detained at Dilley, she felt a sharp pain in her stomach and arrived at the medical clinic at around 3 am. She waited at the clinic for nearly six hours before finally being transferred, in extreme pain, to a hospital. At the hospital, the decision was made to immediately remove her appendix. Francisca knew her child was being cared for by an official, but was concerned about his welfare. Francisca's appendix was removed on June 14 and she was transferred back to Dilley the same day. Even immediately after this surgery, Francisca had to walk from her room to the medical clinic twice a day to receive her pain medications. Following

the surgery, she was running a high fever and constantly vomiting. She sought medical attention at the clinic, arriving at 9 am and was forced to wait for five hours to see a nurse, who told her to return to her room and drink water. The next day, Francisca felt even worse but had lost faith in the clinic, so did not return to the clinic for help because she knew she would not get any medical attention. Eventually, as her symptoms increased, she returned to the clinic and upon arrival fainted from exhaustion and sickness. She woke up in a bed and was told to go home and drink water.

Complainant #6: "Melinda." Melinda is a 20-year-old mother who fled a lifetime of abuse in El Salvador, beginning with rapes and physical abuse at the hands of her stepfather as a young girl, and then an abusive relationship that she entered into at age eleven with a partner who beat her so badly that she miscarried and used his connections to the gangs to intimidate and control her. Melinda arrived at Dilley with a broken hand after a gang kidnapped, raped, and beat her constantly for five days. She fled after the gang threatened to kill her after she sought treatment at the hospital. On arrival at Dilley Melinda showed officials her broken pinky finger, sticking out to the left of her hand. Officials told her that it did not matter, that nothing was wrong, and that she should drink some water. Melinda decided to see the doctor anyway. The doctor did not examine Melinda, but looked at her hand, told her nothing was wrong, and that she should drink water. Melinda continues to experience pain in her hand. She is unable to move two of her fingers and they are bent in the wrong direction. She has extreme pain in her wrist and hand and has trouble sleeping and writing. At one point, Melinda sought medical treatment for her son, who recently turned 4 in detention, who was vomiting with a fever. After six hours of waiting to see the doctor, the doctor told Melinda that her son should drink water and that he should see a psychologist, because there was nothing physically wrong with him. A second time, Melinda took her son, who again was vomiting with a fever, to the clinic. She was advised that she would have to wait for six hours, which she knew would only make her son sicker, so she left, after being forced to sign a form saying that she refused medical attention for her son. Melinda's son became so sick that he virtually stopped eating. She did not feel like she could take him to the clinic because she did not think she would get help and would only be told to have her son drink water. Her son wakes up from his sleep coughing. When she arrived at Dilley, her son weighed fifty pounds and now weighs only thirty-nine pounds.

Complainant #7: "Yaniret." Yaniret is a 24-year-old mother fleeing threats of death in her native Honduras. Yaniret was detained with her five-year-old daughter, Cecilia, at Karnes for fifty-two days. Yaniret and her daughter suffered with inadequate medical treatment and indignity at Karnes that left her feeling powerless, eventually resulting in self-harm. In early May, Yaniret took her daughter to the clinic at Karnes because she noticed her daughter had a strange vaginal secretion. The doctor at Karnes told Yaniret he would take a swab from the outer areas of little Cecilia's vaginal lips, but instead shoved a probe deep into her vagina. Cecilia screamed in pain. The same day, Yaniret and her daughter were taken to a clinic outside of the detention center. The doctor who examined Cecilia wrote a prescription for antibiotics for Cecilia's infection. Back at Karnes, however, Yaniret was never able to access these prescribed antibiotics for Cecilia. She felt very upset about how little power she had over the health of her daughter.

At the end of May, GEO staff members took Yaniret and Cecilia to a different outside doctor to examine her infection. Cecilia refused to be examined, crying and hysterical, because she was

traumatized from the first doctor's rough handling and shoving of a probe into her vagina. In the first week of June, Yaniret spoke with a woman from the Honduran consulate who later accompanied Yaniret and Cecilia to another outside clinic. The doctor confirmed that Cecilia needed medicine and wrote a second prescription. Back at Karnes, however, Cecilia never received the prescribed medication. Several times Cecilia was told that she would be able to leave without a bond and several times ICE or GEO officials rescinded this offer. When Yaniret spoke with a journalist and showed her a diaper of Cecilia's secretion that was untreated, GEO staff members denied her food. Yaniret also spoke out when Congressional officials visited Karnes. Soon after this, she was assigned to another ICE deportation officer and her bond was set at \$8500, an amount Yaniret was unable to pay. As her daughter suffered in detention, Yaniret felt that "ICE and GEO were taking away my ability to be a mother." She was unable to obtain a new pair of shoes for GEO when little Cecilia's shoes wore through at the sole, and was forced to send Cecilia to school in socks. At one point, GEO staff members threw food at Yaniret. Feeling powerless and depressed, Yaniret resorted to self-harm. She fainted and was put in isolation in the medical unit. She was stripped naked against her will, wearing only a heavy green jacket. Yaniret asked the doctor to speak to her attorney and he responded that she could not talk to anyone. Yaniret remained in isolation, but could hear her daughter crying from a room nearby. The same doctor later referenced Yaniret cutting herself in front of her five-year-old daughter, understandably not something that Yaniret wanted little Cecilia to know.

Complainant #8: "Maria." Maria arrived at the Berks family detention facility as a 19-year-old mother, fleeing severe domestic violence and gang violence in Honduras. She was detained for over 11 months with her toddler, Flor. Maria suffered from a heart condition, which manifested while in detention. Although there are at least two medically documented instances where she fell unresponsive and had to be revived in detention; she never had a formal diagnosis nor was she given medication. For a period of time, Maria was required to carry a heart monitor with her throughout the detention facility. She was regularly dizzy and suffered with blurry vision, chills, and losing consciousness. On one occasion, she collapsed in the bathroom and fell unconscious, resulting in a black eye, swollen cheek, and severe contusions on her arms. After coming to, she was simply told to lay down and drink water, rather than being sent for care or tests.

Flor also suffered from numerous illnesses in detention. After 10 months in detention, she started vomiting large amounts of blood. When Maria took Flor to the clinic, she was told that her daughter was fine, and simply to drink hot or cold water. Flor continued to vomit for three days, and was never taken for external medical care or hospitalized. Blood stained her clothing, bed, and the floor. Other mothers at the facility, terrified by this situation, attempted to reach out to local lawyers for help. It was not until Flor was struggling to walk and had not eaten to days that she was finally taken to the hospital. Although Maria had requested yogurt as something her daughter might eat, she was told that she would need a prescription for special food. Flor received no further testing or follow-up care after her hospitalization. A Berks physician also determined that she did not need the medication prescribed by a doctor outside the facility. Eventually, after Maria's lawyer notified an external pediatrician who, upon hearing the story and seeing photos of the bloodstained shirt, called the state child abuse hotline. After this, Flor received another doctor's appointment and an appointment with a specialist, scheduled for a month after her final court hearing. She was released from Berks – after 11 months detention – when she and her mother were granted relief. They are now receiving care outside the facility.

Complainant #9: "Iliana." Iliana was detained at Berks with her two-year-old daughter for over 9 months. After 4 months of detention she began to experience severe headaches and blackouts. She was brought to an eye doctor outside of the facility who determined she suffers from glaucoma and is legally blind and referred her for an MRI because the doctor sensed a more serious condition. It took several months and unexplained outside doctors' visits before she was finally given a diagnosis of Chiari malformation, a brain condition where the spinal cord does not full cover the brain tissue. Iliana had already been diagnosed with Post-traumatic Stress Disorder, both by the in-house social worker and an outside psychiatrist. Despite these severe mental and physical health conditions, ICE refused to parole her. She also had some dental issues and was taken on a 4-5 hour trip to Philadelphia because the staff insisted that five teeth had to be removed at once, and could only find a dentist in Philadelphia willing to do so. Her face was very swollen from the tooth removal, and she could not eat or talk. It was while she was in that condition that ICE ultimately decided to release Iliana and her two-year-old daughter immediately.

Complainant #10: "Jocelyn." Jocelyn fled from her native El Salvador when gangs targeted and threatened her. She was detained at Dilley with her two-year-old son, Luis, for more than 2 months. During her detention, Luis had diarrhea for 15 days that was not treated. Jocelyn sought medical attention for him for at least 7 straight days and each day she was turned away after a six or seven hour wait. She only saw a nurse once and was told just to have her son drink water. Her son also has ball of flesh on his arm which was bleeding and secreting puss and the doctors did not do anything about this. At Dilley, her son cried from the pain in his arm.