



Ex officio public hearing “Border policies and protection of the human rights of people in human mobility” - Regional

October 26, 2022, 9:00 am EST
Civil Society Presentation Summary

Haitian Bridge Alliance
Cameroon Advocacy Network
Robert F. Kennedy Human Rights

Organizational Background

Haitian Bridge Alliance (HBA) is a grassroots, non-profit community organization that advocates for fair and humane immigration policies and provides migrants with humanitarian, legal, and social services, with a particular focus on Black people. Since 2015, HBA has provided services to asylum seekers and other migrants at the US-Mexico border, in US detention, and during US immigration proceedings.

The Cameroon Advocacy Network (CAN) is a coalition of directly-impacted Cameroonian immigrants that advocates for the human rights of Black immigrants throughout the Americas.

Robert F. Kennedy Human Rights (RFK) is a non-profit that has worked in partnership with movement leaders and community organizations to realize Robert F. Kennedy’s dream of a more just world since 1968. Through on-the-ground human rights documentation and strategic litigation, RFK works to challenge racial injustice and human rights abuses at the intersection of the criminal legal and immigration systems.

Presentation Summary

Daniel Tse will present his migration experience to illustrate how United States border policies like detention and pandemic expulsions violate non-refoulement and Articles 5, 7, 22, and 24 of the ACHR. Tse is a Cameroonian native who journeyed on foot from South America to the US to request asylum. After surviving the Darien Gap crossing, he was held in US immigration detention for over one year before winning asylum pro se. We will present statistics and documentation of systemic human rights abuses on three topics: (1) US border policies like Title 42 and expedited removal that create a racial double standard; (2) the militarization of the US-Mexico border; and (3) the detention to deportation pipeline. We will also describe how these policies disproportionately harm Black migrants.

- 1. United States border policies operate to create a racial double standard, subjecting Black asylum seekers to mass expulsions while providing favorable treatment to asylum seekers from non-majority Black countries like Ukraine.**

United States border control policies like Title 42 and expedited removal violate international human rights norms, with a disproportionate effect on Black migrants, refugees, and asylum seekers. These policies are selectively implemented at the discretion of US authorities to prevent Black people eligible for humanitarian protection from seeking or receiving asylum in the US. They also violate *non-refoulement jus cogens* obligations by pushing back Black people across the US border with Mexico and summarily expelling them to countries from which they are seeking asylum.

Since the onset of the Covid-19 pandemic in March 2020 the United States has used a public health law located at Title 42 of the United States Code to target Black migrants and asylum seekers for summary expulsion and pushbacks across the US-Mexico border. The law, last invoked in the 1920s to bar entrance of ships where there was evidence of a meningitis outbreak, has now been manipulated to justify a ban on entry to asylum seekers under pretense that it promotes public health by permitting the suspension of the introduction of non-citizens where there is “the existence of any communicable disease in a foreign country” and “there is serious danger of the introduction of such disease into the United States.”¹ In reality, the Title 42 policy violates US immigration statutes that guarantee the right to seek asylum and the jus cogens obligations of *non-refoulement* by expelling non-citizens attempting to seek asylum to countries where they cannot be safely returned.²

Moreover, Title 42 is selectively enforced against Black migrants. Since 2020, thousands of Haitians have been disproportionately targeted for Title 42 expulsion, forcibly returned to deepening insecurity and humanitarian crisis in Haiti without an opportunity to apply for asylum protection. In May 2022, for example, “Haitians represented about 6% of the migrants crossing the border with Mexico but occupied 60% of expulsion flights.”³ US government data shows that Title 42 has been employed to expel at least 22,000 Haitians.⁴

In stark contrast to the treatment of Haitian asylum seekers, the US government provided near universal exceptions to Title 42 for white Ukrainians. Between March and May 2022, the US processed more than 98.9 % of the more than 23,000 Ukrainians who arrived at the southern US border at ports of entry. Nearly all were permitted entry to the United States through a grant of “parole” under US immigration laws, which permitted them to enter the US without being placed in deportation proceedings, as is standard for asylum seekers.⁵ Only 0.6% of Ukrainians were subjected to Title 42.⁶ In comparison, 23.5% of the 18,000 Haitians encountered along the southern border in that same period were processed for entry and placed into deportation proceedings and 26.3% were subjected to Title 42,⁷ a rate more than 40 times higher than Ukrainians.

In addition to the extraordinary use of Title 42, standard US border processing laws also disproportionately target Black people for deportation and denial of humanitarian protection. Under the expedited removal process,⁸ US immigration officers are empowered to order the deportation of non-citizens seeking entry without any type of hearing before an immigration judge. Standard border processing laws require that non-citizens who profess a fear of persecution be referred for a “credible fear interview” with a border agent. Only if the interview result is positive are non-citizens referred to an immigration court hearing for adjudication of an asylum application. Congress intended for credible fear interviews to apply “a low screening standard,”⁹ to ensure that people seeking humanitarian protection in the US have an opportunity to apply for asylum and are not summarily deported to persecution or torture. However, these screenings are inherently flawed, in ways that disproportionately affect Black asylum

¹ Order Suspending the Right to Introduce Certain Persons from Countries where a Quarantinable Communicable Disease Exists, 85 Fed. Reg. 65,806 (Oct. 13, 2020).

² See, e.g., Lucas Guttentag, *Coronavirus Border Expulsions: CDC’s Assault on Asylum Seekers and Unaccompanied Minors*, Just Security (Apr. 13, 2020),

<https://www.justsecurity.org/69640/coronavirus-border-expulsions-cdcs-assault-on-asylum-seekers-and-unaccompanied-minors/> (concluding that summary expulsion of asylum seekers “attempts to erect a shadow immigration system devoid of constitutional protections that erases fundamental statutory safeguards implementing refugee protection obligations”).

³ Eileen Sullivan, *US Accelerated Expulsions of Haitian Migrants in May*, The New York Times (June 9, 2022), <https://www.nytimes.com/2022/06/09/us/politics/haiti-migrants-biden.html>.

⁴ US Customs and Border Protection, “Nationwide Encounters,” <https://www.cbp.gov/newsroom/stats/nationwide-encounters>. This data does not capture, however, the full number of expulsions of individuals to Haiti given children born to Haitian parents in third countries are likely not counted as Haitian for purposes of Title 42 expulsions; Nacho Vega, *Crisis migratoria: EE. UU. Deporta a 30 niños brasileños a Haití*, Noticias RGV (Sept. 28, 2021),

<https://noticiasrtv.com/crisis-migratoria-ee-uu-deporta-a-30-ninos-brasilenos-a-haiti/> (noting at least 30 Brazilian children and 182 Chilean children were expelled with their parents to Haiti on expulsion flights in September 2021).

⁵ Syracuse University Transactional Records Access Clearing House, *Ukrainians at the US-Mexico Border: Seeking Admission at US Ports of Entry by Nationality*, (May 17, 2022), <https://trac.syr.edu/immigration/reports/683/>.

⁶ US Customs and Border Protection, “Nationwide Encounters,” <https://www.cbp.gov/newsroom/stats/nationwide-encounters>.

⁷ *Id.*

⁸ See 8 USC § 1225 (codifying the procedure for expedited removal).

⁹ 142 Cong. Rec. 136, at S11491-S11492 (Sept. 27, 1996).

seekers.¹⁰ For example, the US government fails to provide language interpretation for asylum seekers who speak a so-called “rare language,” a policy that disparately impacts people from African countries.¹¹ And when officials return erroneous negative determinations of credible fear, individuals who qualify for refugee protection under international law are summarily deported without access to the asylum process.¹²

The racially disparate, exclusionary impact of these US border policies has resulted in the forced return of Black migrants to deadly conditions. For example, Haitians are deported to a country plagued by gang violence, lack of food, water, fuel, and medical supplies, ineffective undemocratic leadership, and now a cholera epidemic. The deportation of persons with criminal records has reached a crisis point: Haiti has resumed its practice of detaining individuals with criminal records who have been returned in the Haitian National Penitentiary and other jails.¹³ The Haitian justice system is at a halt and because the courts are not hearing cases, the pretrial detention rate of people not convicted is 83%.¹⁴ Due to the unprecedented challenges in the delivery of services and resources, detained people are dying from lack of food and water, compromised sanitation and security conditions, overcrowding, and cholera. Reports have indicated at least 21 deaths and 147 hospitalizations from October 4 to 11, 2022.¹⁵

Many Black migrants have been trapped for years in the US-Mexico border region. In Mexico, they face pervasive anti-Black discrimination, residing in dangerous, cartel-controlled territories. Unable to seek asylum in the United States, unable to return to their home countries due to persecution and other life-threatening conditions, and unable to firmly settle elsewhere in the Americas because of discriminatory policies and treatment, US border policies extract a terrible toll on Black asylum seekers.

2. The US militarizes the US-Mexico border, using state violence to violate the human rights of Black migrants.

The United States uses border militarization and state violence to deter Black migrants from seeking asylum, reflective of the systemic discrimination that Black people face within the country. The humanitarian crisis in Del Rio, Texas in 2021 is one example of this tactic. From approximately September 9 to 25, 2021, at least 15,000 Haitians and hundreds of other nationals, mostly Black, were held by US border officials in a makeshift encampment near the Del Rio International Bridge in Texas after crossing

¹⁰ See, e.g., US Commission on International Religious Freedom, *Barriers to Protection: The Treatment of Asylum Seekers in Expedited Removal* (2016), <https://www.uscirf.gov/sites/default/files/Barriers%20To%20Protection.pdf> (outlining concerns about border officers' expedited removal interviewing practices and the reliability of the records they create, including flawed internal guidance that conflates border officers' roles with those of officials responsible for adjudicating asylum applications; certain border officers' outright skepticism, if not hostility, toward asylum claims; and inadequate quality assurance procedures).

¹¹ See *Grievance Letter to USCIS, ICE, EOIR Re: "Detained Asylum Seekers Deprived of Due Process in Expedited Removal Process"* (June 30, 2021), https://www.splcenter.org/sites/default/files/detained_asylum_seeker_grievance_letter_30_june_2021.pdf; Human Rights First, *'I'm a Prisoner Here': Biden Administration Policies Lock Up Asylum Seekers* (April 2022), <https://www.humanrightsfirst.org/sites/default/files/1%27maPrisonerHere.pdf>, pp. 35, 37 - 38 (documenting flawed credible fear interviews with inadequate interpretation resulting in negative determinations for Angolan, Guinean, Ivorian, and Somali asylum seekers); Frances Madeson, *US Officials Outrageously Claim Black Men Fleeing Slavery Lack "Credible Fear,"* Truthout (Nov. 17, 2021), <https://truthout.org/articles/us-officials-outrageously-claim-black-men-fleeing-slavery-lack-credible-fear/>; see also Human Rights Watch, *'How Can You Throw Us Back?' Asylum Seekers Abused in the US and Deported to Harm in Cameroon*, (Feb. 2022), https://www.hrw.org/sites/default/files/media_2022/03/us_cameroon0222_web.pdf, pp.103 - 07 (identifying lack of interpretation as contributing to erroneous negative fear determinations and deportations of Cameroonian asylum seekers).

¹² See, e.g., Frances Madeson, *A Persecuted Father Deported to Haiti Fights to Reunite With His Family in US*, Truthout (Feb. 18, 2022), <https://truthout.org/articles/a-persecuted-father-deported-to-haiti-fights-to-reunite-with-his-family-in-us/> (documenting Haitian political activist deported after flawed expedited removal to Haiti where he suffered further brutal violence).

¹³ On October 10, 2022, Roody Fogg, 40, a deported individual with a criminal conviction, died while illegally held in a Haitian prison after he suffered diarrhea and vomiting until he felt he could not stand anymore. His cellmates report that they called for help, but he never saw a doctor or received medication. Fogg entered the U.S. at age 12 and was a green card holder. He was deported by the U.S. on April 5, 2022 and immediately imprisoned. Fogg was one of 30 people who have recently been detained at the National Penitentiary in Port-au-Prince. See Hannan Adely, “‘They threw him in a corner’: After cholera outbreak, one deportee is dead, two others ill in Haiti prison,” *Northjersey.com* (Oct. 15, 2022) <https://www.northjersey.com/story/news/2022/10/15/haitian-deportees-dying-after-cholera-outbreak-in-prison/69559393007/>.

¹⁴ Danica Coto, “Concerns grow as cholera spreads through Haiti’s prisons,” AP News (October 11, 2020) <https://apnews.com/article/health-prisons-caribbean-united-nations-port-au-prince-daa0ad4ba882fc67c7e5b1c4fa75cd68>.

¹⁵ Hannan Adely, “‘They threw him in a corner’: After cholera outbreak, one deportee is dead, two others ill in Haiti prison,” *Northjersey.com* (Oct. 15, 2022) <https://www.northjersey.com/story/news/2022/10/15/haitian-deportees-dying-after-cholera-outbreak-in-prison/69559393007/>.

the US-Mexico border. The large number of migrants had been penned into Del Rio by US border policy, which had closed most other US ports of entry due to the Title 42 policy discussed above. As captured by photographs that shocked the national and international consciousness,¹⁶ heavily armed and mounted US border patrol agents subjected migrants in the Del Rio encampment —overwhelmingly Black Haitian people— to physical violence, verbal threats, and other acts of intimidation. The US government used militarized force to impose restrictions on movement within and out of the encampment, surrounding it on all sides by shoulder-height fences and barriers guarded by armed border agents who threatened and attacked migrants attempting to cross the Rio Grande River. Texas state police troopers were stationed across the Rio Grande’s northern bank while Mexican state police and officers from Mexico’s National Migration Institute lined the southern bank. Because the US government effectively prevented people from leaving the encampment, it rendered them unable to care for themselves. As a result, people trapped in the encampment were subjected to extreme hunger, dehydration, medical neglect, and other inhumane conditions.

Advocates and attorneys from Haitian Bridge Alliance and RFK Human Rights, including Sarah Decker, were on the ground in Del Rio and witnessed mass human rights abuses committed against the migrants trapped in the encampment. These findings are detailed in a joint report that describes abuses based on the testimonies of 43 survivors and legal screenings of approximately 300 Haitians in migrant shelters in Acuña, Mexico and approximately 800 migrants released to the Val Verde Border Humanitarian Coalition respite center.¹⁷ For example, Decker interviewed one Haitian man who brought his eight-year-old son to the riverbank to bathe when mounted officers chased down a group of migrants gathered by the river.¹⁸ As his son attempted to run away from the border patrol officers on horseback, he fell, was nearly trampled by the horse, and suffered cuts and bruises to his eye and legs. The man described the “moment of terror” when he saw his young son fall to the ground: “I thought my son would be killed, right there in front of me.”

Many witnesses crucial to an investigation of the US border patrol’s conduct at Del Rio were immediately expelled by DHS to Haiti under Title 42. To expel many of the nearly 15,000 Haitian migrants from the Del Rio camp, the US government authorized a first-of-its-kind “emergency” contract with a private prison company for deportation flights to Haiti. The contract was authorized to be entered into without full and fair competition and ultimately cost nearly 1900% more per flight than the average cost of a deportation flight.¹⁹ To date, there has been no accountability for the human rights abuses and state violence perpetrated by the militarization of the US border against Haitians at Del Rio. Ten months after the events at Del Rio, on July 8, 2022, US Customs and Border Patrol released the findings of its investigation on its treatment of Haitian and other Black migrants at the Del Rio encampment. In 511 pages, the report described only 30 minutes of the events in Del Rio, ignoring the humanitarian crisis that occurred over the span of at least 16 days.²⁰ The report’s authors interviewed journalists and law enforcement, but not a single Haitian migrant, though legal counsel for several Haitians offered their testimony.

3. The US uses a detention to deportation pipeline to punish and deter asylum seekers arriving at its borders and to prejudice the outcome of asylum claims.

In order to punish and deter arriving asylum seekers, especially those from majority Black countries, the US government uses harsh detention at the US-Mexico border followed by transfers into detention in the interior of the country. Customs and Border Patrol (CBP), Immigration and Customs

¹⁶ Eileen Sullivan & Zolan Kanno-Youngs, *Images of Border Patrol’s Treatment of Haitian Migrants Prompt Outrage*, The New York Times (Sept. 21, 2021), <https://www.nytimes.com/2021/09/21/us/politics/haitians-border-patrolphotos.html> (capturing US CBP agents on horseback using whips against unarmed Haitian asylum seekers to force them back to Mexico).

¹⁷ Sarah Decker et. al, *Beyond the Bridge: Documented Human Rights Abuses and Civil Rights Violations against Haitian Migrants in the Del Rio, Texas Encampment* (2022), <https://rfkh.imgix.net/asset/Del-Rio-Report.pdf>.

¹⁸ *Id.*

¹⁹ Haitian Bridge Alliance, et al., United States of America Shadow Report to the Committee on the Elimination of Racial Discrimination (CERD) 107th Session (08 – 30 August 2022), *Anti-Black discrimination against non-citizens and ongoing violations of international protections for migrants, refugees, and asylum seekers of African descent* (2022), https://tbinternet.ohchr.org/Treaties/CERD/Shared%20Documents/USA/INT_CERD_NGO_USA_49305_E.pdf.

²⁰ Customs and Border Protection, Office of Professional Responsibility, *Report of Investigation 202112280 2* (2022), <https://www.cbp.gov/sites/default/files/assets/documents/2022-Jul/202112280-cbp-closing-report-public-redacted-final.pdf>.

Enforcement (ICE), and private prison companies jointly operate a national network of detention facilities with carceral conditions identical to US prisons and jails. Indeed, many of these facilities are former criminal jails repurposed for holding immigrants awaiting civil proceedings. Black migrants have also been forcibly detained in open-air pens at the US-Mexico border, as exemplified by the crisis at the Del Rio encampment.

Individuals who are forcibly held in CBP jails at the border are typically awaiting either summary expulsion under Title 42 or expedited removal or transfer to a detention center in the interior of the country. Haitian asylum seekers have been held in CBP jails for up to 11 days without access to running water, medical care, or sufficient food, before being deported without due process via expedited removal.²¹ Those who are granted the opportunity to apply for asylum before an immigration judge are often held in CBP jails for over a week before their transfer to longer term ICE detention centers in remote areas in the interior of the US. In rural ICE detention, individuals are isolated from legal resources and community support from loved ones in the US. As a consequence, detained individuals have less access to opportunities to secure resources like legal representation, language interpretation, and legal education, resulting in a decreased chance of winning asylum in US immigration courts.²²

Black migrants and immigrants detained by ICE face the harshest conditions for the longest periods of time. In 2019, the average migrant in US ICE custody spent 55 days in detention,²³ evidence suggests that Black migrants are held for significantly longer. For instance, Human Rights Watch interviewed 41 Cameroonian asylum seekers who had been deported between 2018 and 2020, and found that all but one were detained for prolonged periods ranging from one to three years.²⁴ Immigration Judges and ICE each have legal authority to permit release from ICE detention. But they wield this authority to disproportionately deny Black immigrants release or to condition release on payment of cash bond amounts that are higher than those set for immigrants of other races. The Southern Poverty Law Center (SPLC) found that Cameroonians are two-and-a-half times more likely “to have their paroles denied by the New Orleans ICE Field Office than similarly situated applicants from non-African countries.”²⁵ Similarly, when comparing release requests from detained Cubans, Venezuelans, Cameroonians, and Eritreans, SPLC found that “non-Africans had grant rates roughly twice as high.”²⁶ When Black migrants are offered bonds, they often must pay higher rates. For example, based on data collected by Refugee and Immigrant Center for Education and Legal Studies, the average bond paid across all nationalities between June 2018 and June 2020, was \$10,500. Haitian asylum seekers, however, were issued bonds at an average of \$16,700 (54% higher).²⁷

In addition, Black people in ICE and CBP detention facilities are subjected to racist excessive force, abuse, and retaliation. Black immigrants are six times more likely to be sent to solitary confinement than other detained populations, according to a study that analyzed the use of solitary confinement in immigration detention from 2013 to 2017.²⁸ Solitary confinement is often weaponized against Black

²¹ Sarah Decker et. al, *Beyond the Bridge: Documented Human Rights Abuses and Civil Rights Violations against Haitian Migrants in the Del Rio, Texas Encampment* (2022), <https://rfkhr.imgix.net/asset/Del-Rio-Report.pdf>.

²² Kate Morrissey, “Who gets asylum? Even before Trump, system was riddled with bias and disparities,” Los Angeles Times (August 24, 2020) (“Nationwide, asylum seekers who remained in custody were ordered deported at a higher rate — in 74% of cases — compared with 44% for those who were never detained. Those who were initially detained and then released were ordered deported in 37% of cases.”).

²³ American Immigration Council, *Immigration Detention in The United States By Agency* (Jan. 2020), <https://www.americanimmigrationcouncil.org/research/immigration-detention-united-states-agency>.

²⁴ Human Rights Watch, ‘How Can You Throw Us Back?’ Asylum Seekers Abused in the US and Deported to Harm in Cameroon, (Feb. 2022), https://www.hrw.org/sites/default/files/media_2022/03/us_cameroon0222_web.pdf.

²⁵ Letter from Cameroon American Council, Freedom for Immigrants, ISLA, and Southern Poverty Law Center, to Joseph V. Cuffari, Inspector General, US Dep’t Homeland Sec., and Cameron Quinn, Officer, Civ. Rts. & Civ. Lib., US Dep’t Homeland Sec. (Aug. 26, 2020), https://www.splcenter.org/sites/default/files/8.26.20_crcl_letter.pdf.

²⁶ Molly O’Toole & Andrea Castillo, ‘Betrayed’ Black asylum seekers say Trump administration is ramping up deportations by force and fraud, Los Angeles Times (Nov. 27, 2020), <https://www.latimes.com/politics/story/2020-11-27/black-asylum-seekers-trump-officials-push-deportations>.

²⁷ RAICES, *Black Immigrant Lives are Under Attack* (July 22, 2020), https://www.raicestexas.org/2020/07/22/black-immigrant-lives-are-under-attack/?ms=em20220426_rollout_video_bidenvtx&emci=254fb2d4-a0c5-ec11-997e-281878b83d8a&emdi=8325dfb9-a2c5-ec11-997e-281878b83d8a.

²⁸ Konrad Franco, Caitlin Patler, & Keramet Reiter, *Punishing Status and the Punishment Status Quo: Solitary Confinement in US Immigration Prisons, 2013-2017*, SocArXiv (April 2020), <https://osf.io/preprints/socarxiv/zdy7f/>.

detained immigrants as retaliation for self-advocacy and peaceful protest. For example, in August 2020 at Pine Prairie ICE Processing Center in Louisiana, a group of Black asylum seekers participated in a peaceful hunger strike.²⁹ ICE officers in full riot gear then rounded up all 45 hunger strikers and took them to the solitary confinement unit, where they faced severely punitive conditions, including limited access to showers and hygiene materials, limited access to potable water, and limited legal call access. In October and November 2020, advocates documented multiple facilities in Louisiana and Mississippi where ICE and facility officials used physical abuse and torture to coerce dozens of Cameroonians into signing stipulated orders of removal, leading to their deportation.³⁰

Conclusion

The United States government has implemented a series of policies at the border, including Title 42 and expedited removal, with devastating and disparate impact on Black migrants, refugees, and asylum seekers. These policies have resulted in myriad human rights violations, have prevented many people eligible for refugee protection from seeking or receiving asylum in the US, and have been used to carry out summary pushbacks and expulsions of asylum seekers, in direct violation of non-refoulement jus cogens obligations. The United States also uses militarized violence and inhumane detention to punish and deter asylum seekers and to prejudice their claims for protection, in violation of Articles 5, 7, 22, and 24 of the ACHR. In line with the United States' long history of exclusionary and discriminatory immigration policy, these current border policies are selectively wielded against Black immigrants, who suffer the harshest treatment in immigration detention centers and higher rates of denials of claims for humanitarian protection.

As a survivor of these cruel and inhumane policies, Daniel Tse's migration story is emblematic of a system that operates to exclude and punish Black people seeking protection in the United States. Through our work with Black people at the border and in ICE detention centers across the US, Haitian Bridge Alliance, RFK Human Rights, and Cameroon Advocacy Network have witnessed these human rights abuses and the systemic, discriminatory effect of current US border policies.

²⁹ Robert F. Kennedy Human Rights et al., *Complaint Re: Call for Immediate Investigation into Immigration and Customs Enforcement Officers' Use of Punitive Solitary Confinement as a Response to the COVID-19 Pandemic and Other Public Health Crises* at 12–13, 21 (June 21, 2021),

<https://rfkhumanrights.org/assets/documents/RFK-Human-Rights-Pine-Prairie-DHS-Complaint.pdf>.

³⁰ Southern Poverty Law Center et. al, *Complaint Re: Immigration and Customs Enforcement Officers' Use of Torture to Coerce Immigrants Into Signing Immigration Documents at Adams County Correctional Facility* (Oct. 7, 2020),

<https://static1.squarespace.com/static/5a33042eb078691c386e7bce/t/5f7f17f39e044f47175204fb/1602164723244/Re+CRCL+Complaint+ICE%27s+Use+of+Torture+to+Coerce+Immigrants+to+Sign+Immigration+Documents+at+Adams+County+Correctional+Facility.pdf>; Freedom for Immigrants et al., *Complaint Re: U.S. Immigration and Customs Enforcement (ICE)'s Pattern of Torture in Signing of Deportation Documents for Cameroonian Migrants* (Nov. 5, 2020),

https://www.splcenter.org/sites/default/files/crcl_complaint_ice_s_pattern_of_torture_in_signing_of_deportation_documents_for_cameroonian_migrants.pdf; Freedom for Immigrants et al., *Complaint Re: U.S. Immigration and Customs Enforcement Torture in Signing of Deportation Documents for Cameroonian Migrants at Winn Correctional Center, Louisiana* (Feb. 1, 2021),

https://static1.squarespace.com/static/5a33042eb078691c386e7bce/t/6019dd452f75af0a17bec824/1612307782021/R%20edacted_CRCL_Complaint_Winn.pdf.