



**FREEDOM
FOR IMMIGRANTS**

SPLC



Southern Poverty Law Center

CREEC
CIVIL RIGHTS EDUCATION
AND ENFORCEMENT CENTER

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Via email

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**Re: Complaint for violations of civil, constitutional, and disability rights of
Anderson Avisai Gutierrez, A# 201-601-756**

I. Introduction

Civil Rights Education and Enforcement Center, Freedom for Immigrants, Louisiana Advocates for Immigrants in Detention, and the Southern Poverty Law Center submit this complaint regarding the inappropriate use of segregation and disability discrimination that Anderson Avisai Gutierrez (Mr. Gutierrez), a qualified individual with a disability incarcerated by ICE, has been subjected to at Richwood Correctional Center (Richwood) and LaSalle ICE Processing Center (LaSalle).

While in Immigration and Customs Enforcement (ICE) custody, Mr. Gutierrez has been placed in near-constant segregation on the basis of his disabilities and been denied necessary mental health care. As a direct consequence, Mr. Gutierrez's mental health condition has deteriorated to the point of suicidality. Despite being on notice of Mr. Gutierrez's condition and Richwood and LaSalle's inability to provide necessary care and reasonable accommodations, ICE has refused on multiple occasions to exercise its discretion and release Mr. Gutierrez to a less restrictive setting where he can obtain the care and accommodations he requires. Mr. Gutierrez is in immediate and dire need for adequate mental health and medical treatment and there are viable alternative placements in the community. The acute need for community placement is further evidenced by ICE and its contractors' failure to ensure that, while detained, Mr. Gutierrez is provided adequate mental health treatment and accommodations for his disabilities.

Mr. Gutierrez's continued confinement is in violation of ICE's own standards, his constitutional rights, and disability law. We request that Mr. Gutierrez be granted immediate release on

humanitarian parole so that he may receive appropriate medical and mental health care in an external, community-based setting.

We further request that the Department of Homeland Security Office of Civil Rights and Civil Liberties (CRCL) conduct a comprehensive investigation of conditions at Richwood and LaSalle in order to ensure that no other people with disabilities are subjected to the discrimination and harm that Mr. Gutierrez has suffered while detained at those facilities.

II. Factual Background

Mr. Gutierrez is an asylum seeker from Guatemala who fled to the United States to protect himself and his two minor nieces, of whom he has custody. His immigration case is currently pending before the Board of Immigration Appeals. Mr. Gutierrez is a Spanish speaker. He is a qualified person with a disability under Section 504 of the Rehabilitation Act and DHS/ICE regulations governing non-discriminatory treatment of people with disabilities on account of his mental health and physical disabilities. Mr. Gutierrez has mental health diagnoses of post-traumatic stress disorder and major depressive disorder with psychotic features. He also has a physical disability which interferes with his ability to breathe easily, causing him to breathe loudly while awake and snore while sleeping.

Mr. Gutierrez has been detained for over a year and has spent approximately eight months in segregation. From June 2019 until February 26, 2020, he was detained at Richwood Correctional Facility and was then transferred to the LaSalle

Richwood and LaSalle are located in remote and rural towns in Louisiana—in Monroe and in Jena respectively. The facilities are far from trained medical and mental health providers as well as immigration attorneys and interpreters. Medical providers who come to the facilities lack language skills to meaningfully communicate with detained individuals.

In June 2019, while at Richwood, Mr. Gutierrez was initially placed in segregation after requesting to be kept apart from other men who attempted to physically harm him. After being isolated for nearly two weeks, he was returned to the general population. Thereafter, he faced harassment and threats of sexual assault and rape from other men on account of his snoring due to a physical disability affecting his ability to breathe easily. These threats caused Mr. Gutierrez to suffer from trauma reactions related to past events in his life. Mr. Gutierrez asked to be placed in a cell by himself in the general population, but the facility denied this accommodation.

Instead, staff placed Mr. Gutierrez in segregation for the remainder of his detention at Richwood—approximately eight months. While in segregation, Mr. Gutierrez was only allowed outside for an hour a day. Some days Mr. Gutierrez was denied consistent access to a shower and to three meals a day—in fact, there were full days when no food was provided to him in segregation.¹ Equally concerning is the fact that Mr. Gutierrez was harassed and physically harmed by guards at Richwood. He has described regular verbal taunting by guards and an

¹ PBNDs 2011, 2.1 Special Management Units (requiring that individuals in SMU be provided three meals a day and given the opportunity to shower *at least* three times a week).

incident in which five guards woke him in the middle of the night when he was sleeping naked, threw him against the wall and beat him, leaving him spitting up blood.

Prolonged segregation has gravely and detrimentally impacted Mr. Gutierrez's physical and mental health. He has felt disoriented, lost track of time and place, lost memory, had severe panic attacks involving difficulty breathing and vomiting, and had verbal and visual hallucinations. He has experienced heightened anxiety, difficulty sleeping, and fear that he would die if he has to endure more confinement in isolation. He has also suffered from suicidal ideation.

Due to Mr. Gutierrez's worsening mental health conditions, Ms. Perez McGill, his immigration attorney, arranged for independent psychological assessments. Dr. Kristin Velasquez Kenefick evaluated Mr. Gutierrez on September 6, 2019 and again on November 21, 2019. Dr. Kenefick determined that Mr. Gutierrez met the criteria for post-traumatic stress disorder (PTSD); major depressive disorder, severe, with psychotic features; and that his mental health conditions are impacted by the poor treatment he has received while in detention. Her report outlines that if Mr. Gutierrez continues to go untreated, these conditions will worsen. Dr. Kenefick also notes that a mental health provider who does not speak Spanish had seen Mr. Gutierrez at the facility and simply dispensed sleeping pills. Concerningly, the facility doctor found nothing wrong with Mr. Gutierrez—in spite of the host of symptoms that he exhibited, including repeated complaints of memory loss, disorientation, panic attacks, nausea and anxiety.

On October 16, 2019, Ms. Perez McGill filed an emergency parole request for release based on Mr. Gutierrez's mental health and need for proper treatment. She attached Dr. Kenefick's report detailing Mr. Gutierrez's mental health disabilities and inadequate treatment at the facility. The request for parole was denied on November 27, 2019.

In November 2019, while still housed in segregation at Richwood, Mr. Gutierrez's medication was reduced within one week from five to two pills without warning or tapering. On December 17, 2019, only a few weeks after his medication was reduced, Mr. Gutierrez attempted suicide by cutting himself on his left forearm. After receiving six stitches, he was released from the hospital within hours and—remarkably—returned to the same segregation unit.

On December 18, 2019, following Mr. Gutierrez's suicide attempt, Ms. Perez McGill filed another emergency parole request. The request included a report from psychiatrist Annalise Keen recommending that Mr. Gutierrez be admitted immediately to a community-based psychiatric inpatient unit. The request for parole was denied, and Mr. Gutierrez therefore remained in near-constant isolation in Richwood's segregation.

On February 26, 2020, Mr. Gutierrez was transferred to LaSalle. He was immediately placed in disciplinary confinement and warned to behave, despite not having any contemporaneous disciplinary infractions. After suffering severe panic attacks, Mr. Gutierrez was moved to medical segregation where the conditions of confinement were indistinguishable from disciplinary segregation. At LaSalle, Mr. Gutierrez was handcuffed by his waist, ankles, and wrists when leaving his cell, including for recreation, showers, and medical appointments. On March 4, 2020, Mr. Gutierrez was moved to the general population to a cell he is sharing with another detained person. Mr. Gutierrez has not received the accommodation of a single person

cell that he requested. Because Mr. Gutierrez's physical disability subjects him to a risk of harm and violence, sharing a cell is not an adequate accommodation.

At both Richwood and LaSalle, Mr. Gutierrez has also been denied adequate mental health care notwithstanding his acute needs. While in Richwood, he had only sporadic video and teleconference therapy visits with a provider who did not speak Spanish. Adequate care continued to be denied even following his suicide attempt. At LaSalle, Mr. Gutierrez continues to be denied access to adequate mental health care or access to a provider who can communicate with him in Spanish.

III. ICE and Its Contractors Have Violated Mr. Gutierrez's Rights Under Their Own Standards

Both ICE and its contractors at Richwood and LaSalle are obligated to follow ICE's Performance Based National Standards 2011 (PBNDS 2011). Yet, ICE and the facilities' conduct toward Mr. Gutierrez is in direct violation of the standards governing segregation² and those governing the housing and care of people with mental health disabilities.³

Contrary to its own standards, ICE and the facilities have failed to use reasonable efforts to provide Mr. Gutierrez with appropriate housing outside of segregation.⁴ Mr. Gutierrez suffers from a physical disability which interferes with his ability to breathe and sleep. His disability causes loud snoring, which led to cellmates verbally and physically threatening him. As an accommodation for his physical disability, Mr. Gutierrez requested to be placed in a cell by himself within the general population area. Both facilities refused to do so without providing justification for the denial.

Additionally, ICE and the facilities have failed to make any effort to place Mr. Gutierrez in a setting either inside or outside the facility where necessary and appropriate treatment can be provided.⁵ Mr. Gutierrez was placed in segregation for approximately eight months during which time his mental health has deteriorated to such an extreme that he has repeatedly reported memory loss, trouble sleeping and breathing, panic attacks, suicidal ideation, nausea and vomiting. Three different mental health providers have diagnosed him with PTSD and severe depressive disorder. Dr. Kenefick's report stated the need for immediate care in an off-site psychiatric facility. Yet, despite the mounting evidence, ICE and the facilities have refused to identify and transfer Mr. Gutierrez to a setting where he can receive adequate treatment. Instead, Richwood continued to segregate him in the same unit where he attempted suicide despite evidence that those very conditions of confinement are detrimentally impacting his mental and physical health. Then, when Mr. Gutierrez was transferred to LaSalle, he was placed in segregation once again, and he continues to be denied adequate mental health treatment even after his transfer to general population.

Finally, ICE and its contractors have violated ICE ERO Directive 11065.1, governing the use of segregation in ICE custody, for Mr. Gutierrez. Directives apply to all of ICE's detention facilities and its contractors. The segregation directive requires that placement of a person placed in

² PBNDS 2011, 2.1 Special Management Units.

³ PBNDS 2011, 4.6 Housing and Monitoring Special Management Units.

⁴ *Id.*, 2.1.

⁵ *Id.* 2.1 and 4.6

administrative segregation due to a special vulnerability “should be used only as a last resort and when no other viable housing options exist.”⁶ In contravention of this directive, Mr. Gutierrez was placed in administrative segregation, for months at a time, when other viable housing options were available.

As these facts show, ICE’s refusal to follow even its own standards has had devastating consequences for Mr. Gutierrez’s health and safety.

IV. ICE and Its Contractors Have Violated Mr. Gutierrez’s Constitutional Rights by Subjecting Him to Prolonged Segregation and Denying Him Access to Necessary Mental Health Care

The Constitution forbids government officials and their contractors from subjecting incarcerated individuals—including people in immigration prisons—to conditions exposing them to a substantial risk of serious harm.⁷ Numerous courts have recognized that placement in prolonged segregation not only exacerbates pre-existing mental illness but can actually contribute to mental illness, thereby exposing imprisoned persons to a constitutionally intolerable risk of harm.⁸ Further, ICE is aware that such prolonged segregation can cause mental deterioration—even leading to suicide.⁹

Despite these well-known harms stemming from prolonged segregation, ICE and its contractors subjected Mr. Gutierrez—who they know has severe mental health disabilities—to segregation for approximately eight months. Unsurprisingly, Mr. Gutierrez’s mental health condition deteriorated rapidly, ultimately leading him to slit his wrist in an attempt to die by suicide. Remarkably, after his release from the hospital where he received stitches for his wounds, ICE immediately returned him to Richwood where he was placed in the same segregation unit that caused his deterioration and suicidality in the first place. Mr. Gutierrez was not transported to a psychiatric hospital to care for his mental health needs despite recommendations by a medical professional,¹⁰ nor was he provided any additional mental health care after his suicide attempt to ensure that he did not further deteriorate and attempt suicide once again. He was not even moved to a slightly less restrictive setting despite multiple requests by his immigration attorney explaining the continued risk of harm if segregation continued. Although Mr. Gutierrez has a continued need for mental health care since his transfer, he continues to be denied necessary care at LaSalle.

ICE and its contractors’ failure to provide adequate mental health care to Mr. Gutierrez—and their improper placement of him in prolonged segregation—follows the recent suicide of Roylan

⁶ Directive 11065.1 Review of the Use of Segregation for ICE Detainees, September 4, 2013.

⁷ See, e.g., *Farmer v. Brennan*, 511 U.S. 825, 838 (1994)

⁸ See *Disability Rts. Mont. Inc. v. Batista*, 930 F.3d 1090, 1098 (9th Cir. 2019) (holding that plaintiffs sufficiently pled factual allegations of deliberate indifference by describing that defendants: denied inmates adequate mental health treatment; had a pattern of placing mentally ill inmates in solitary confinement without significant mental health care; and their improper responses increased the risk of suicide); see also *Braggs v. Dunn*, 257 F.Supp. 3d 1171, 1192 (M.D. Ala. 2017) (citations omitted); see also *Finley v. Huss*, 723 Fed.Appx. 294, 298 (6th Cir. 2016).

⁹ Memorandum from Ellen Gallagher, Senior Policy Advisor, Civil Rights and Civil Liberties DHS to Deputy Secretary Mayorkas, DHS (July 23, 2014) at 3 (stating that individuals in ICE Custody in segregated settings with serious mental health conditions is non-therapeutic and such placements “imposes improper punitive conditions, and subject vulnerable detainees to physical and mental deterioration”).

¹⁰ See various reports from Annalise Keen, MD (Dec. 2019) (attached hereto).

Hernández Díaz at Richwood. Mr. Hernández Diaz had likewise been placed in segregation prior to his suicide—and hung himself in his cell six days after being placed in isolation. ICE and its contractors are therefore well aware of the risk of suicide and mental health deterioration for those who are subjected to segregation. These incidents represent a troubling pattern of ignoring the detrimental—and tragically fatal—consequences of subjecting people to segregation.

V. ICE and Its Contractors Have Discriminated Against Mr. Gutierrez Based On His Physical and Mental Health Disabilities by Denying Him Proper Treatment and Reasonable Accommodations

Federal law and ICE’s National Detention Standards prohibit disability discrimination. People with a disability must have “equal opportunity to participate in, access, and enjoy the benefits of the facility’s programs, services, and activities,”¹¹ and participation must be accomplished in the least restrictive and most integrated setting possible. Section 504 of the Rehabilitation Act prohibits disability discrimination by any program or activity conducted by an executive agency, including ICE. ICE has adopted binding regulations to ensure that Section 504 is implemented within the agency.¹²

As detailed above, Mr. Gutierrez is a person with a physical disability affecting his ability to breathe easily, as well as PTSD and major depressive disorder with psychotic features. ICE and its contractors are aware of Mr. Gutierrez’s physical and mental health disabilities. However, they discriminate against him by failing to reasonably accommodate his disabilities through proper support and treatment in violation of Section 504.

a. *ICE and Its Contractors Have Discriminated Against Mr. Gutierrez Based on His Mental Health Disabilities*

Mr. Gutierrez is being discriminated against on the basis of his mental health disability. Mr. Gutierrez is an asylum seeker and trauma survivor. ICE and its contractors have been on notice since at least September 2019 that Mr. Gutierrez has diagnoses of PTSD and major depressive disorder with psychotic features when his attorney requested his release on that basis. According to Mr. Gutierrez, instead of being offered treatment and support for his mental health disabilities, he initially only received sleeping pills dispensed by a mental health professional who did not speak Spanish and with whom Mr. Gutierrez could not communicate.

He was later given additional medications, although Mr. Gutierrez also reports that doctors at the facility have minimized and been dismissive of his reported symptoms, including memory loss, panic attacks and anxiety. Richwood did not provide any additional treatment -- such as adequate, language appropriate, and confidential individual or group therapy-- to Mr. Gutierrez even though his mental health has continued to deteriorate while in detention. In November 2019, Mr. Gutierrez was abruptly cut off from several of his medications—a dangerous practice that is not consistent with standards of care. Shortly thereafter, he began expressing suicidality, culminating in an attempted suicide by cutting his forearm. At LaSalle, he was placed into disciplinary segregation and told by staff that it was because he did not behave at Richwood. He

¹¹ 2011 Performance-Based National Detention Standards (PBNDS) 4.8 at 345; *see also* 28 C.F.R. § 35.152(b)(2).

¹² *See generally* 6 C.F.R. § 15.

did not receive any additional treatment to help treat his debilitating panic attacks. To this date, Mr. Gutierrez continues to be denied appropriate mental health treatment and care.

b. ICE and Its Contractor Have Discriminated Against Mr. Gutierrez Based on His Physical Disability

As with his mental health disability, Mr. Gutierrez is being discriminated against on the basis of his physical disability. Since his initial detention, authorities at both Richwood and LaSalle have known that Mr. Gutierrez has a physical disability affecting his ability to breathe easily and causing him to snore while sleeping. Although Mr. Gutierrez has repeatedly brought his condition to the facilities' attention, they have provided no treatment or accommodation. Instead of providing him with a specialty care appointment to treat his condition, officials at Richwood bullied and abused Mr. Gutierrez and allowed other detained people to mistreat him as well. For example, after receiving physical and sexual threats from a cellmate due to the snoring produced by his respiratory condition, Mr. Gutierrez reported the incident to facility staff. Rather than accommodating this disability, facility staff placed Mr. Gutierrez in near-constant isolation in a segregation unit. Mr. Gutierrez has repeatedly requested the accommodation of a single cell in general population. These requests have gone unheeded. These actions constitute illegal discrimination and a failure to accommodate his physical disability.

VI. ICE and Its Contractor Have Discriminated Against Mr. Gutierrez Based on His Physical and Mental Health Disabilities by Segregating Him on the Basis of His Disabilities

Section 504 of the Rehabilitation Act and Supreme Court precedent¹³ establish that placing a person with a disability in a restrictive environment due to their disability constitutes discrimination. Although ICE and its contractors are aware of Mr. Gutierrez's multiple disabilities, they have continuously segregated him from the general population and into a more restrictive setting instead of accommodating his medical and mental health needs.

As detailed herein, while at Richwood, Mr. Gutierrez was placed in segregation as a result of his physical disability that impacts his breathing. While in segregation, he was denied access to the facility's programs, services, and activities, such as recreation, showers, the law library, and consistent access to meals.

When he was transferred to LaSalle in February 2020, Mr. Gutierrez was immediately placed in disciplinary segregation, and then medical segregation. Mr. Gutierrez was held in complete isolation inside his cell. While in the segregation units at LaSalle, he was handcuffed by his waist, ankles, and wrists every time he left his cell, including for showers, medical visits, and recreation. Mr. Gutierrez was only allowed to shower every other day, despite asking guards to shower daily.

In the past, Mr. Gutierrez has requested a reasonable accommodation for his physical disability affecting his ability to breathe easily, such as a single cell in general population. ICE and its contractors have failed to provide any reasonable accommodations for Mr. Gutierrez, choosing instead to unconstitutionally segregate him based on his physical disability. On March 2, 2020, when Mr. Gutierrez was finally placed with the general population at LaSalle, he was provided

¹³ See *Olmstead v. L.C.*, 527 U.S. 581 (1999).

an inadequate accommodation by sharing a cell—despite the fact that he has been threatened and harassed in the past for his loud breathing and his specific request for a single-occupant cell.

ICE and its contractors continued to segregate Mr. Gutierrez due to his mental health disabilities, even as his mental health deteriorated to the point of attempting suicide after five months in segregation. After returning from the community hospital that treated Mr. Gutierrez for his suicide attempt, ICE and its contractors, once more, placed him in segregation. Placing someone with mental health disabilities in segregation because of his disability also constitutes a violation of Section 504 and its implementing regulations, as well as Supreme Court law.¹⁴

While Mr. Gutierrez was placed in segregation, he did not receive mental healthcare in the least and most integrated setting possible. In fact, ICE and its contractors placed Mr. Gutierrez in segregation despite medical recommendations for Mr. Gutierrez to receive on-going treatment at a community psychiatric hospital.¹⁵ This constitutes a violation of the Supreme Court decision in *Olmstead*, which requires that community based treatment be provided where the person's treatment professionals have determined that is appropriate to do so.

As a person with physical and mental health disabilities, Mr. Gutierrez has a right to access and participate in the facility's programs and to receive medical and mental healthcare in the least restrictive placement. ICE's continued and prolonged placement of Mr. Gutierrez in segregation is discriminatory and a violation of federal law and ICE's own detention standards.

VII. Requested Responses to ICE and its Contractor's Unlawful and Inhumane Treatment of Mr. Gutierrez and Others at Richwood

As described herein, Mr. Gutierrez has been subjected to brutal and discriminatory conditions of confinement—including prolonged segregation— while imprisoned at Richwood and LaSalle. Specifically, the conditions at Richwood not only caused Mr. Gutierrez's mental health to deteriorate but also ultimately led to his suicide attempt. The recent death by suicide of Roylan Hernández Díaz at Richwood tragically demonstrates that Mr. Gutierrez's experience is far from anomalous. Rather, it is part of a troubling pattern of oversight failures and misconduct by ICE and its contractors. Absent swift and meaningful intervention by CRCL, Mr. Gutierrez and other people with disabilities face a substantial likelihood of serious harm and disability discrimination while imprisoned at Richwood and LaSalle. For that reason, we request the following:

- 1) In light of his mental health and physical disabilities, and the failure of ICE and its contractors to reasonably accommodate them, Mr. Gutierrez should immediately be released on humanitarian grounds to his family in California pending adjudication of his immigration case, as his immigration attorney has repeatedly requested from ICE;
- 2) If ICE refuses to exercise its discretion to release Mr. Gutierrez, then Mr. Gutierrez should be removed from LaSalle, and transferred to a facility in the Houston area near his immigration lawyer or the Los Angeles area near his family;
- 3) While Mr. Gutierrez remains detained, at LaSalle or any other facility, he must receive appropriate mental health and medical care; accommodations for his disability needs; and not be subjected to segregation;

¹⁴ Id.

¹⁵ See various reports from Annalise Keen, MD (Dec. 2019) (attached hereto).

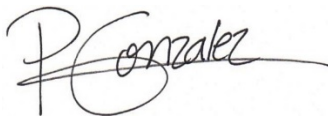
- 4) All mental health and medical appointments must be provided in Spanish, Mr. Gutierrez's native language. If a Spanish-speaking provider is not available, Mr. Gutierrez must be provided with an interpreter who is not a part of the facility's security staff (e.g., a guard);
- 5) CRCL should conduct an independent and comprehensive evaluation of conditions at Richwood and LaSalle. This evaluation should include but not be limited to an evaluation of medical and mental health care, tracking and accommodation of disabilities, abuse or harassment by guards, and overuse of shackling or other restraints. CRCL should bring in independent subject matter experts to support such an investigation.
- 6) CRCL should conduct an independent and comprehensive investigation into the use of segregation (both administrative and disciplinary) at Richwood and LaSalle. This investigation should investigate facility practices regarding the purpose and duration of segregation, and practices for medical and mental health assessments, access to recreation, visitation, facility staff, and other activities of life for individuals in segregation.
- 7) CRCL should also ensure that staff at Richwood and LaSalle receive proper training with respect to the issues underlying the investigation and the accommodation of people with disabilities.

The punitive and abusive behavior Mr. Gutierrez was subjected to, refusal to explore safer and less restrictive alternatives, and deliberate indifference to his serious medical needs, are not only in violation of the 2011 PBNDS, disability law, and the constitution, but can be deemed directly responsible for Mr. Gutierrez's increasingly fragile mental state. We urge CRCL to take immediate action to ensure the safety of Mr. Gutierrez and of other individuals that may be subjected to Richwood and LaSalle's abusive and neglectful practices.

Thank you for your urgent attention to these critical matters. Please do not hesitate to contact us for additional information.

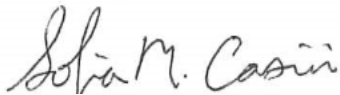


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