

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
FORT MYERS DIVISION
Case No. 2:25-CV-00747-SPC-DNF

H.C.R., et al.,

Plaintiffs,

v.

MARKWAYNE MULLIN, et al.,

Defendants.

**NOTICE OF NON-COMPLIANCE
WITH COURT ORDER**

In advance of the status conference on April 13, 2026, Plaintiffs file this Notice to alert the Court to Defendants' non-compliance with the Court's Order. On March 27, 2026, the Court ordered, among other things, that Defendants: (1) provide detainees at South Florida Soft Sided Facility South ("SFSSFS") "with access to timely, free, confidential, unmonitored, unrecorded outgoing legal calls. They must provide at least one operable telephone for every 25 detainees"; (2) "update and document in writing all protocols for attorney-client communication in English, Spanish, and Haitian Creole, including but not limited to, the detainee handbook, legal visitation policies, and legal phone call policies. If any material changes to policies related to access to counsel are made, State Defendants and Federal Defendants shall promptly update those changes in writing and disseminate them to the public and the Detainee Class"; (3) "provide and post in locations accessible and visible to the

Detainee Class written information about protocols for attorney-client communication in English, Spanish, and Haitian Creole”; and (4) “maintain publicly available information regarding protocols for attorney-client communication via ICE and FDEM websites.” Dkt. No. 243 at 66–68. In addition, the Court credited “the testimony of Saunders and Lumm that the facility has provided unscheduled legal visits since late November 2025 and continues to do so when an attorney arrives at the facility unannounced and requests a visit with a detainee client.” *Id.* at 41. The Court stated that it would “hold Defendants accountable for Saunders’ and Lumm’s representations.” *Id.* at 43.

Defendants have not complied with the Court’s Order. First, security personnel at the entrance to the facility have informed attorneys that they need to pre-schedule legal visits to meet with clients. One attorney, F. Elizabeth Valentin, arrived on April 1, 2026 and was told that she could not meet with her client unless she had scheduled an appointment in advance. *See* Exh. 1, Decl. F. Elizabeth Valentin ¶ 3. The guard at the gate then advised her that she might be able to meet with her client that afternoon if slots were available, but she would need to complete an electronic version of the “South Detention Facility Legal Counsel Visitation Request Form,” which proved difficult given the lack of cell service in the area. *Id.* ¶¶ 3–4. Furthermore, the form asked her to attach copies of any legal documents that she intended to bring into the facility for approval, despite the fact that those documents are plainly protected by attorney-client privilege and/or attorney work-product privilege. *Id.* ¶ 4.

Second, Ms. Valentin’s client advised her that he has not seen any posters or notices in the facility regarding attorney access protocols or access to confidential, unmonitored legal calls. *Id.* ¶ 8.

Third, Defendants have failed to publicly post any information regarding attorney access protocols on either ICE or FDEM websites. *See* Exh. 2, Decl. Kyle Virgien ¶¶ 5, 10.

Finally, Katherine H. Blankenship, co-founder of organizational Plaintiff Sanctuary of the South (“SOS”), reports that two clients conveyed to her that the facility has been on lockdown all week due to several disturbances that were precipitated by the facility’s denial of phone access—including access to legal phone calls—for an entire day. The disturbances arose when facility staff retaliated against class members after they asked that phone access be restored. The retaliation included severe beatings of several detainees, including one of Ms. Blankenship’s clients, and the pepper spraying of numerous detainees. *Id.* ¶¶ 7–13; *see also* photos attached to Blankenship Declaration. Ms. Blankenship plans to attend the April 13, 2026 status conference and can provide further updates to the Court at that time.

Plaintiffs respectfully submit that the most efficient way to address Defendants’ noncompliance is for the Court to direct Defendants to file sworn declarations from the facility warden and others responsible for compliance with the Court’s Order confirming that the changes directed in the Preliminary Injunction have been made. Plaintiffs also reserve the right to move (1) to enforce the Court’s Order, including seeking an Order to Show Cause for contempt, if Defendants fail to expeditiously

remedy these violations, and (2) for an order from this Court prohibiting Defendants from retaliating against class members for seeking to enforce their rights under this Court's Order.

DATED this 10th day of April, 2026.

Respectfully submitted,

/s/ Carmen Iguina González
Carmen Iguina González*
AMERICAN CIVIL LIBERTIES
UNION FOUNDATION
915 15th St. N.W., 7th Floor
Washington, DC 20005
202-675-2317
ciguinagonzalez@aclu.org

Corene T. Kendrick*
Kyle Virgien*
Marisol Dominguez-Ruiz*
AMERICAN CIVIL LIBERTIES
UNION FOUNDATION
425 California St., Suite 700
San Francisco, CA 94104
(415) 343-0770
ckendrick@aclu.org
kvirgien@aclu.org
mdominguez-ruiz@aclu.org

Paul R. Chavez, Fla. Bar No. 1021395
Jennifer Smith, Fla. Bar No. 964514
Christina LaRocca, Fla. Bar No.
1025528
AMERICANS FOR IMMIGRANT
JUSTICE
2200 NW 72nd Ave.
P.O. Box No 520037
Miami, FL 33152
786-218-3381
pchavez@aijustice.org

jsmith@aijustice.org
clarocca@aijustice.org

Amy Godshall, Fla. Bar No. 1049803
Daniel Tilley, Fla. Bar No. 102882
Samuel Lester, Fla. Bar No. 1043063
AMERICAN CIVIL LIBERTIES
UNION FOUNDATION OF
FLORIDA
4343 West Flagler Street, Suite 400
Miami, FL 33134
786-363-2714
agodshall@aclufl.org
dtilley@aclufl.org
slester@aclufl.org

Counsel for Plaintiffs

** Admitted pro hac vice.*

EXHIBIT 1


DECLARATION OF F. ELIZABETH VALENTIN

I, F. Elizabeth Valentin, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. I am an attorney in good standing and a managing attorney at Disability Rights Florida. I currently represent an individual detained at South Florida Soft Sided Facility South (“SFSSFS”)—also known as “Alligator Alcatraz.”
2. On April 1, 2026, I went to SFSSFS to meet with my client and give him documents to sign. I did not preschedule the visit. I was aware of this Court’s March 27, 2026 Order, stating, “the facility has provided unscheduled legal visits since late November 2025 and continues to do so when an attorney arrives at the facility unannounced and requests a visit with a detainee client.” Dkt. No. 243 at 41.
3. I arrived at SFSSFS at around 1:00 p.m. When I arrived, the security guard at the entrance gate asked if I had scheduled an appointment. I advised that I had not, and he informed me that I had to schedule the legal visit through their scheduling department to see my client. The guard then advised me that I might be able to see my client that afternoon if slots were available. I briefly explained that the Court’s March 27, 2026 Order states that attorneys are allowed to make unscheduled visits, and I offered the security guard a physical copy of the Order. He declined to accept it.
4. The guard then had me scan a QR code that directed me to fill out an electronic copy of the “South Detention Facility Legal Counsel Visitation Request Form.” Because internet service was limited in the area, I was unable to submit the form from my phone and had to call a colleague to submit the form for me. The form included directions to “Attach copies of legal documents you intend to bring for approval.” I did not attach any legal documents because those documents are attorney work product and contain confidential information.
5. At 2:27 p.m., I received an email response stating, “Your visit is scheduled for 2:30 pm.” I was then escorted to the legal interview tent, which was about a 20-minute drive from the facility’s front entrance.
6. The legal interview tent had some soundproofing glued to the sides. Some of the soundproofing was falling off.
7. I was able to meet with my client around 3:00 p.m. His hands and feet remained shackled throughout the meeting. Approximately every 10 to 15 minutes, guards entered the interview tent room or peered through the clear door, forcing us to pause our meeting each time they entered.

8. During the meeting, my client advised me that he had not heard any information about the Court's order from either staff or other detainees. My client also reported that he had not seen any posters or notices anywhere in the facility regarding access to attorneys or unmonitored, confidential legal phone calls.
9. My client further indicated that it was his understanding that he could not receive or send out mail, including legal mail, from the facility.

Executed on the 10th day of April, 2026, in Miami, Florida.



F. Elizabeth Valentin, Esq.
FL Bar #: 1066079

EXHIBIT 2

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
FORT MYERS DIVISION**
Case No. 2:25-CV-00747-SPC-DNF

H.C.R., et al.,

Plaintiffs,

v.

MARKWAYNE MULLIN, et al.,

Defendants.

DECLARATION OF KYLE VIRGIEN






DECLARATION OF KYLE VIRGIEN

I, Kyle Virgien, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge.
2. I am Senior Staff Attorney with the American Civil Liberties Union (ACLU) Foundation, National Prison Project, admitted to practice and in good standing with the State Bar of California. I am admitted pro hac vice in this matter to represent Plaintiffs and the Plaintiff class.
3. As counsel of record in this matter, I am familiar with the Court's March 27, 2026 preliminary injunction order, including the requirement that "State Defendants and Federal Defendants shall, pending further Order of this Court, maintain publicly available information regarding protocols for attorney-client communication via ICE and FDEM websites." Doc. 243 at 68 (¶ 5.a.iv.).
4. The ICE Detention Facility website that lists information for protocols for visitation at detention facilities is available at <https://www.ice.gov/detention-facilities>. As seen in the screenshot below, members of the public can search for detention facility for information by either the "State" or "Field Office" drop down menus:


! Notice Regarding Visitation Hours
Visitation hours are subject to change due to COVID and other operational concerns that impact ICE detention. Visitors are recommended to contact the facility to confirm visitation hours and current restrictions (if any) in advance of their visit.

FILTER BY State Field Office Search by Facility Name... Apply

 <p>Adams County Correctional Center</p> <hr/> <p>New Orleans Field Office 20 Hobo Forks Road Natchez, MS 39120</p>	 <p>Adelanto ICE Processing Center</p> <hr/> <p>Los Angeles Field Office Adelanto East 10400 Rancho Road Adelanto West 10250 Rancho Road Adelanto, CA 92301</p>	 <p>Alamance County Detention Center</p> <hr/> <p>Atlanta Field Office 109 South Maple Street Graham, NC 27253</p>	 <p>Allen Parish Public Safety Complex</p> <hr/> <p>New Orleans Field Office 7340 Highway 26 W Oberlin, LA 70655</p> 
--	--	--	---

5. On April 9, 2026, at 7:36 pm Pacific I checked the website by searching for all facilities under the jurisdiction of the Miami Field Office. It listed seven facilities, but not the South Florida Soft-Sided Facility South (“SFSSFS”), also known as Alligator Alcatraz. Indeed, the page states in the bottom right corner “Updated 03/23/2026.”

FILTER BY State Miami Field Office Search by Facility Name...



Baker County Detention Center

Miami Field Office
1 Sheriff's Office Drive
MacClenny, FL 32063



Broward Transitional Center

Miami Field Office
3900 N. Powerline Road
Pompano Beach, FL 33073



FDC Miami

Miami Field Office
33 NE 4th Street
Miami, FL 33132



Glades County Detention Center

Miami Field Office
1297 East SR 78
Moore Haven, FL 33471




Krome North Service Processing Center

Miami Field Office
18201 SW 12th Street
Miami, FL 33194



Liberty County Sheriff's Office

Miami Field Office
12422 NW Revell Road
Bristol, FL 32321




Naval Station Guantanamo Bay (JTF Camp Six and Migrant Ops Center Main A)

Miami Field Office

Updated: 03/23/2026

6. I am also counsel of record in *Las Américas v. Noem*, No. 1:25-cv-00418 (D.D.C.), which involves, among other issues, claims related to access to counsel at the ICE detention facility at Naval Station Guantanamo Bay, seen listed above and below.



Naval Station Guantanamo Bay (JTF Camp Six and Migrant Ops Center Main A)

Miami Field Office

Updated: 03/23/2026

7. At the time that the *Las Américas* litigation was filed, ICE had no webpage listing protocols for attorney-client communication with immigrants held at the Guantanamo Bay facility. *See Las Américas*, Doc. 1 at 16 (¶ 49). Plaintiffs in that lawsuit sought, as part of their relief, an order requiring the government to publish these protocols. *Id.* at 26–27 (¶ 97). Plaintiffs sought a temporary restraining order, and the court set a hearing on that request for March 14, 2025.

8. Around March 4, 2025—after the close of briefing on Plaintiffs’ motion for a temporary restraining order but before the hearing on that motion—ICE added a webpage for its Guantanamo Bay facility providing information about attorney-client communication protocols. A version of this website captured on March 12, 2025 is available at <https://perma.cc/V3V2-Y4XP>. This version lists an “Updated” date of March 4, 2025.

9. The version of the page for the Guantanamo Bay facility captured on March 12, 2025, includes tabs for “Contacting a Detainee,” “Legal and Case Information,” “Hours of Visitation,” “Press & Media,” “FOIA,” and “Feedback and Complaints”—standard tabs often included on ICE’s similar web pages for its other facilities.



Naval Station Guantanamo Bay (JTF Camp Six and Migrant Ops Center Main A) Miami Field Office

Contacting a Detainee	Legal & Case Information	Hours of Visitation	Press & Media	FOIA	Feedback or Complaints
-----------------------	--------------------------	---------------------	---------------	------	------------------------

10. On April 9, 2026 at 8:00 pm Pacific, I also checked the Florida Division of Emergency Management (FDEM) website, at <https://www.floridadisaster.org/>. I used the Search function of the website and searched for “Soft-Sided,” “Detention Facility,” and “Alligator Alcatraz” and no results were found. I searched the “News & Media” section of the website, at <https://www.floridadisaster.org/news-media/>, which listed several press releases, the most recent from April 8, 2026, but there was nothing related to the Court’s Preliminary Injunction. I could find no other information on the FDEM website to show State Defendants’ compliance with this section of the Preliminary Injunction.

Executed on April 9, 2026 in Kensington, California.

/s/ Kyle Virgien
 Corene T. Kendrick*
 Kyle Virgien*
 Marisol Dominguez-Ruiz*
 ACLU FOUNDATION
 425 California St., Suite 700
 San Francisco, CA 94104
 (415) 343-0770
ckendrick@aclu.org
kvirgien@aclu.org
mdominguez-ruiz@aclu.org

Carmen Iguina González*
ACLU FOUNDATION
915 15th St. N.W., 7th Floor
Washington, DC 20005
202-548-6616
ciguinagonzalez@aclu.org

Amy Godshall, Fla. Bar No. 1049803
Samuel Lester, Fla. Bar No. 1043063
Daniel Tilley, Fla. Bar No. 102882
ACLU FOUNDATION OF FLORIDA
4343 West Flagler Street, Suite 400
Miami, FL 33134
786-363-2714
agodshall@aclufl.org
slester@aclufl.org
dtilley@aclufl.org

Paul R. Chavez, Fla. Bar No. 1021395
Jennifer Smith, Fla. Bar No. 964514
Christina LaRocca, Fla. Bar No. 1025528
AMERICANS FOR IMMIGRANT
JUSTICE
2200 NW 72nd Ave.
P.O. Box No 520037
Miami, FL 33152
786-218-3381
pchavez@aijustice.org
jsmith@aijustice.org
clarocca@aijustice.org

Counsel for All Plaintiffs and the Class

** Admitted pro hac vice.*

EXHIBIT 3

DECLARATION OF KATHERINE H. BLANKENSHIP

I, Katherine H. Blankenship, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. I am an attorney in good standing and co-founder of Sanctuary of the South, PLLC, (“SOS”), a legal services organization that is an organizational plaintiff in this matter. I currently represent people who are detained South Florida Soft Sided Facility South (“SFSSFS”)—also known as “Alligator Alcatraz.”
3. On April 8, 2026, and April 10, 2026, I spoke via videoconferencing with Raiko Lopez Morffi who is currently detained at SFSSFS. I requested this legal call with him.
4. On April 10, 2026, I also spoke via videoconference with Lazaro Hernandez Galban, who is also currently detained at the Facility. I had requested this legal call with him.
5. Mr. Morffi and Mr. Hernandez Galban are in the same housing cage at SFSSFS.
6. During these calls, Mr. Morffi and Mr. Hernandez Galban both reported that SFSSFS turned off all the phones in the housing units on Thursday, April 2, 2026, for the entire day. The facility did not give them any advanced warning of the phones being cut off, nor did they explain why the phones were cut off.
7. Mr. Morffi and Mr. Hernandez Galban both reported that, by the evening of April 2, 2026, after not having access to phone calls all day, people in their cages were getting frustrated with the situation, as these phones calls are the only way people can contact loved ones or speak with and secure an attorney. Detained individuals in Mr. Morffi and Mr. Hernandez Galban’s cage began complaining loudly about the phones not working.
8. Mr. Morffi and Mr. Hernandez Galban both reported that several guards who work for CRS came to the cage and were taunting the detained individuals inside. Detained individuals began raising their voices in protest. The guards got more aggressive and were yelling and threatening to enter the cage. Mr. Hernandez Galban went to the guards to try to de-escalate the situation and advised the guards not to enter the cage at that time, fearing that it would lead to violence.
9. Mr. Morffi and Mr. Hernandez Galban both reported that another detained individual then went up to the guards, and an officer punched that person. Then the officers targeted Mr. Morffi. Neither Mr. Morffi nor Mr. Hernandez Galban know why they targeted Mr. Morffi. The guards threw Mr. Morffi to the ground and severely beat him up. (see photos attached below).

10. An officer came in and punched Mr. Morffi in his right eye and began to beat him. He was taken out of the cage and thrown to the ground and beaten by multiple guards. He suffered injuries to his shoulder and arm and was kicked in the head. A guard placed their knee on his neck when the guard was trying to restrain him. I took pictures of Mr. Morffi during our April 8, 2026 video call (see below), which shows that his eye remained severely bruised six days afterwards and his arm remained injured. Mr. Morffi does not know which guards were involved, as they do not wear ID badges, but he believes he would recognize them.
11. The officers beat several people during this incident and broke another detained individual's wrist.
12. The officers then pepper sprayed everyone in the cage. A detained older gentleman passed out, as he could not breathe.
13. Detained individuals then barricaded the door to stop the officers from coming back in and beating them more. One of the officers who has a reputation of being slightly more reasonable then approached the cage and spoke with Mr. Hernandez Galban. This officer told Mr. Hernandez Galban that they needed to get in to see who needed medical attention. The detained individuals did not want to let them in, as they were afraid of being beaten further. This officer told them he gave his word that they would not beat them anymore, so they let him in.
14. At some point on April 3, 2026, the facility turned the phones back on. Staff never provided an explanation to the detainees for why the phones were cut off that whole day.
15. The denial of access to the telephones is a significant harm to detained individuals at the facility. Both of my clients—Mr. Morffi and Mr. Hernandez Galban—said that there is no other way for individuals inside to contact the outside world or have any ability to contact their legal counsel.
16. In addition, Mr. Hernandez Galban reports that individuals are systematically denied personal mail. He has had family members send him multiple pieces of mail that are never delivered. He also reports that detained individuals cannot send mail and that the facility denies them access to postage or envelopes. Mr. Hernandez Galban reports that the grievance system goes unmonitored and that detained individuals have no access to ICE. He reports that it is common for people to be denied access to the courts and miss immigration court hearings. The lack of all other means of communication makes the removal of telephone access all the more detrimental.
17. It further bears noting that my Zoom call with Mr. Hernandez Galban had been scheduled for 10:00 a.m. on April 10, 2026. But at 9:53 a.m., the facility emailed me informing me that Mr. Hernandez Galban "is refusing to attend his scheduled zoom call." (see email thread attached).

18. I emailed the facility back several times, informing them that I did not believe Mr. Hernandez Galban was in fact refusing legal counsel, as he had been adamant that he wanted to proceed with our conversation, but if he was refusing counsel, I needed to hear that directly from him, as it is a privileged conversation.

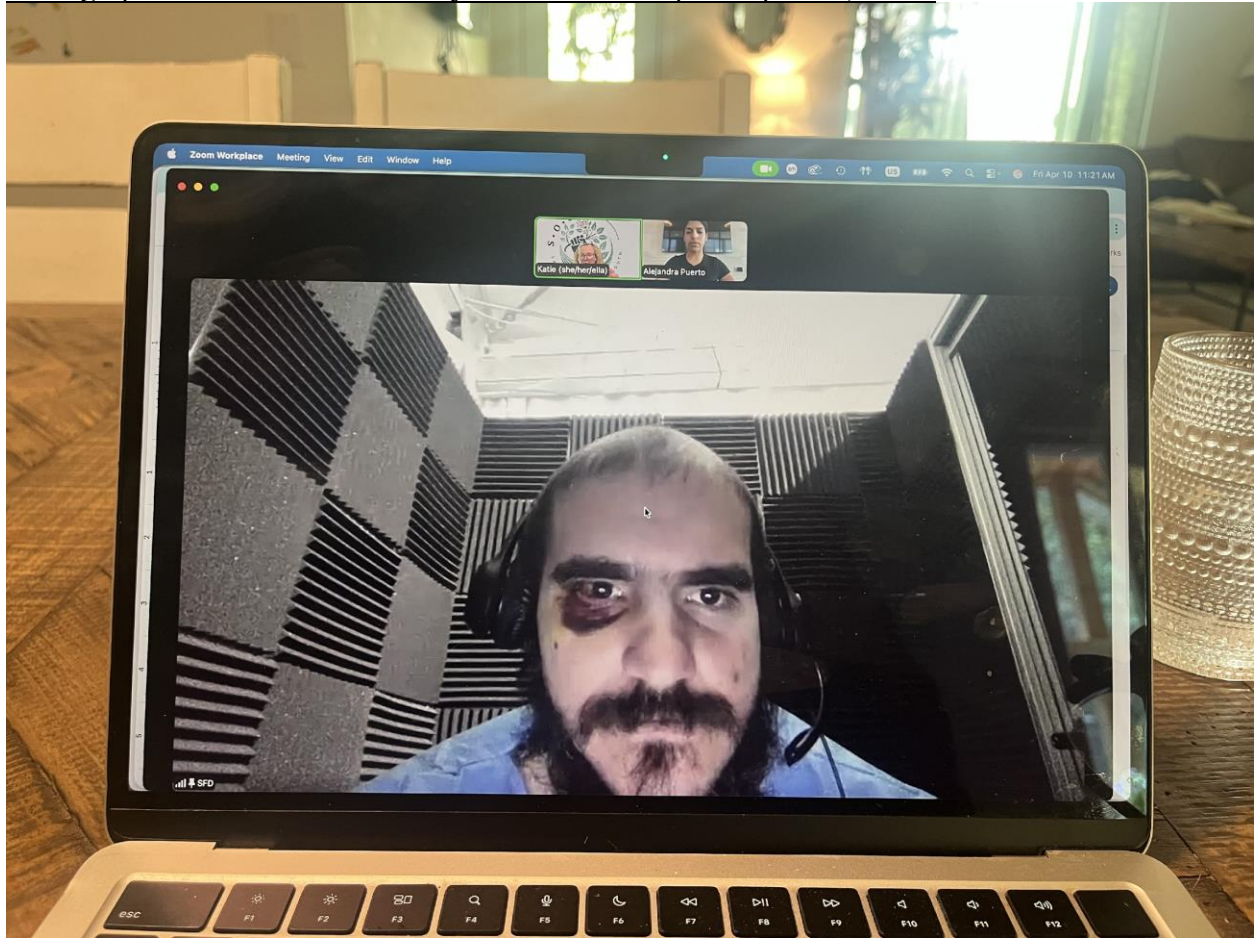
19. At 3:30 p.m. on April 10, 2026, I was finally able to meet with Mr. Hernandez Galban over Zoom. He informed me that he had finally been allowed to go to the law library that morning, which he had been denied access to over the past two weeks despite multiple requests, and that he needed to use the law library to access his legal documents. He was in the law library when I called, and he asked facility staff if he could call me back. They told him that would not be a problem. It was following this exchange with Mr. Hernandez Galban that the facility falsely told me that he was refusing to meet with me.

Executed on the 10th day of April, 2026, in Miami, Florida.

/s/ Katherine H. Blankenship

Katherine H. Blankenship, Esq.

Photographs of Mr. Morffi taken by Ms. Blankenship on April 10, 2026:





From: **Katie Blankenship** <katie@sanctuaryofthesouth.com>
Date: Fri, Apr 10, 2026 at 12:39 PM
Subject: Re: VAV Request—Lazaro Hernandez Galban A#024454165
To: <legal@privacy6.com>
Cc: Alejandra Puerto <alejandra@sanctuaryofthesouth.com>, Parra, Charles <charles.parra@ice.dhs.gov>, Bauza, Carisa <Carisa.Bauza@ice.dhs.gov>, Aguilar, Paola A <Paola.A.Aguilar@ice.dhs.gov>, Garcia, Georgie <Georgie.Garcia@ice.dhs.gov>, Almodovar, Bruce <Bruce.Almodovar@ice.dhs.gov>

Thank you, Officer. See below:

Katie is inviting you to a scheduled Zoom meeting.

Topic: Legal Call with Lazaro Hernandez Galban A#024454165
Time: Apr 10, 2026 01:00 PM Eastern Time (US and Canada)
Join Zoom Meeting
<https://us06web.zoom.us/j/83099661174?pwd=1E0cXManwsHOr7YUYDbvBJ7IDQiuYL.1>

Meeting ID: 830 9966 1174
Passcode: 824513

One tap mobile
+13017158592,,83099661174#,,,,*824513# US (Washington DC)
+13052241968,,83099661174#,,,,*824513# US

Join instructions
https://us06web.zoom.us/meetings/83099661174/invitations?signature=S2Zx9TwlQlpMGhKpmRiHHeLIsLEDaokx21Kal4a_Hdg

On Fri, Apr 10, 2026 at 12:17 PM SFDF - Legal <legal@privacy6.com> wrote:

Counsel,
Would you like to have the zoom visit with Lazaro Hernandez Galban A#024454165 at 1:00 p.m. Today ?

Respectfully,
Florida Detention Team

NOTICE: Legal Call Scheduling Policy

Legal video calls are intended solely for verified attorney-client communications. Use of the legal call process for personal or non-legal discussions is strictly prohibited. Calls determined to be non-legal or that have participants on the call that were not approved via this email account will be terminated, and scheduling privileges may be suspended. Continued misuse may result in permanent revocation of privileges and referral to the appropriate disciplinary authority.

Video visits will be limited to one hour in length, per each video call, unless the attorney has made prior arrangements via this email address (legal@privacy6.com). Attorneys may schedule additional visits at any time via the legal@privacy6.com email. These procedures are designed to ensure equitable access to all detainees and attorneys utilizing the legal visiting video system.

Thank you for your cooperation and professionalism in maintaining the integrity of this process.

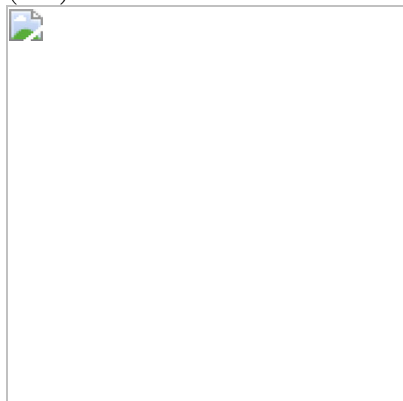
From: Alejandra Puerto <alejandra@sanctuaryofthesouth.com>
Sent: Friday, April 10, 2026 11:32 AM
To: Alejandra Puerto <alejandra@sanctuaryofthesouth.com>
Cc: Parra, Charles <charles.parra@ice.dhs.gov>; Katie Blankenship <katie@sanctuaryofthesouth.com>; SFDF - Legal <legal@privacy6.com>; Bauza, Carisa <Carisa.Bauza@ice.dhs.gov>; Aguilar, Paola A <Paola.A.Aguilar@ice.dhs.gov>; Garcia, Georgie <Georgie.Garcia@ice.dhs.gov>; Almodovar, Bruce <Bruce.Almodovar@ice.dhs.gov>
Subject: Re: VAV Request—Lazaro Hernandez Galban A#024454165

Hello,

Could you please confirm if it is possible to reschedule the call with our client, Lazaro Hernandez Galban (A#024454165), for today at 12:00 PM EST?

Respectfully,

Alejandra Puerto
Executive Assistant and Legal Administrator
Sanctuary of the South, PLLC. (SOS)
www.sanctuaryofthesouth.com
(786) 671-8133



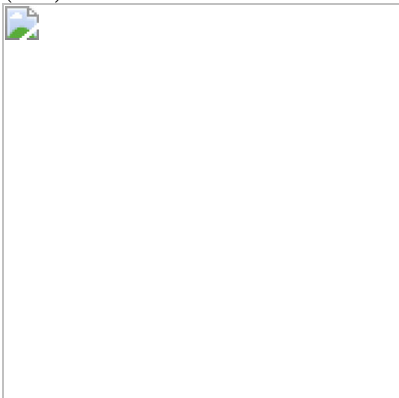
NOTICE: Until a lawyer-client agreement has been signed and legal fees received, the information contained in this email is not to be taken as legal advice.

NOTICE OF CONFIDENTIALITY: This email, and any attachments thereto, is intended for use only by the addressee(s) named herein and may contain confidential information, legally privileged information and attorney-client work product. If you are not the intended recipient of this email, you are hereby notified that any dissemination, distribution or copying of this email, and any attachments thereto, is strictly prohibited. If you have received this email in error, please notify the sender by email, telephone or fax, and permanently delete the original and any of any email and printout thereof. Thank you.

On Fri, Apr 10, 2026 at 11:16 AM Alejandra Puerto <alejandra@sanctuaryofthesouth.com> wrote:

Here is our new request for a call today at 12PM EST

Alejandra Puerto
Executive Assistant and Legal Administrator
Sanctuary of the South, PLLC. (SOS)
www.sanctuaryofthesouth.com
(786) 671-8133



NOTICE: Until a lawyer-client agreement has been signed and legal fees received, the information contained in this email is not to be taken as legal advice.

NOTICE OF CONFIDENTIALITY: This email, and any attachments thereto, is intended for use only by the addressee(s) named herein and may contain confidential information, legally privileged information and attorney-client work product. If you are not the intended recipient of this email, you are hereby notified that any dissemination, distribution or copying of this email, and any attachments thereto, is strictly prohibited. If you have received this email in error, please notify the sender by email, telephone or fax, and permanently delete the original and any of any email and printout thereof. Thank you.

On Fri, Apr 10, 2026 at 11:12 AM Parra, Charles <charles.parra@ice.dhs.gov> wrote:

Good morning Ms. Blankenship,

I have included the AA Management team, as I do not have oversight of the AA facility. AFOD Bruce Alomodovar, who is copied here, has oversight of that facility. His team will provide assistance and

follow up.

Respectfully,

Charles A. Parra
Assistant Field Office Director
Miami Field Office, Krome SPC
Enforcement and Removal Operations
U.S. Immigration and Customs Enforcement
Office: 305-207-2204 Cell: 786-299-8461

This communication is UNCLASSIFIED//FOROFFICIAL USE ONLY (U//FOUO). It contains information that may be exempt from public release under the Freedom of Information Act (5 U.S.C. 552). It is to be controlled, stored, handled, transmitted, distributed, and disposed of in accordance with DHS policy relating to FOUO information and is not to be released to the public or other personnel who do not have a valid "need-to-know" without prior approval of an authorized DHS official. No portion of this communication should be furnished to the media, either in written or verbal form.

From: Katie Blankenship <katie@sanctuaryofthesouth.com>
Sent: Friday, April 10, 2026 10:58 AM
To: Parra, Charles <charles.parra@ice.dhs.gov>
Cc: legal@privacy6.com; Alejandra Puerto <alejandra@sanctuaryofthesouth.com>; Bauza, Carisa <Carisa.Bauza@ice.dhs.gov>; Aguilar, Paola A <Paola.A.Aguilar@ice.dhs.gov>; Garcia, Georgie <Georgie.Garcia@ice.dhs.gov>; Almodovar, Bruce <Bruce.Almodovar@ice.dhs.gov>
Subject: Re: VAV Request—Lazaro Hernandez Galban A#024454165

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Please use the Cofense Report Phishing button to report. If the button is not present, click [here](#) and follow instructions.

Dear Officer Parra, thank you for your assistance. The staff at Everglades never produced my client. Can you please help to ensure that this call is rescheduled for later today so we can have access to our client? This is an urgent matter.

Thank you very much,

On Fri, Apr 10, 2026 at 10:37 AM Katie Blankenship <katie@sanctuaryofthesouth.com> wrote:

Thank you. I am still waiting on the Zoom to speak with my client.

On Fri, Apr 10, 2026 at 10:35 AM Parra, Charles <charles.parra@ice.dhs.gov> wrote:

Good morning,

I have copied the ERO Miami AA Management team for assistance.

AA please see below and follow up. Thank you.

Respectfully,

Charles A. Parra

2002

Assistant Field Office Director
Miami Field Office, Krome SPC
Enforcement and Removal Operations
U.S. Immigration and Customs Enforcement
Office: 305-207-2204

This communication is UNCLASSIFIED//FOR OFFICIAL USE ONLY (U//FOUO). It contains information that may be exempt from public release under the Freedom of Information Act (5 U.S.C. 552). It is to be controlled, stored, handled, transmitted, distributed, and disposed of in accordance with DHS policy relating to FOUO information and is not to be released to the public or other personnel who do not have a valid "need-to-know" without prior approval of an authorized DHS official. No portion of this communication should be furnished to the media, either in written or verbal form.

From: Katie Blankenship <katie@sanctuaryofthesouth.com>
Sent: Friday, April 10, 2026 10:17 AM
To: legal@privacy6.com
Cc: Alejandra Puerto <alejandra@sanctuaryofthesouth.com>; Parra, Charles <charles.parra@ice.dhs.gov>
Subject: Re: VAV Request—Lazaro Hernandez Galban A#024454165

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Please use the Cofense Report Phishing button to report. If the button is not present, click [here](#) and follow instructions.

We are still waiting to see our client. I need to hear directly from him if he no longer wants legal representation. We are currently speaking with him about abuses he's experienced at this facility, specifically the unlawful denial of access to counsel. If you refuse to bring him to this meeting, this refusal will be included in actions brought to the federal court to show failure to adhere to the preliminary injunction set forth in HCM v. Noem.

It is entirely inappropriate for the state to inform me that my client no longer wants legal representation. This is a privileged conversation I need to have with him directly. Furthermore, your statements this morning beggar belief, as we recently spoke with him and he was eager to engage in his legal representation and looking forward to this call.

We are waiting in the Zoom meeting. Please bring him immediately. I'm copying the Officer Charles Parra as well to ask for ICE assistance in securing access to my client.

On Fri, Apr 10, 2026 at 10:08 AM Katie Blankenship <katie@sanctuaryofthesouth.com> wrote:

Good morning,

Our client specifically requested this call and legal representation. I do not believe he is now refusing legal communication. Please advise him that his lawyer is currently on the Zoom meeting waiting to speak with him.

This is an urgent matter. If he wishes to decline to speak, please bring him to the meeting so he can tell me himself.

Thank you,

On Fri, Apr 10, 2026 at 9:53 AM SFDF - Legal <legal@privacy6.com> wrote:

Good morning,

Please be advised that detainee **Lazaro Hernandez Galban A#024454165** is refusing to attend his scheduled zoom call.

Respectfully,
Florida Detention Team

NOTICE: Legal Call Scheduling Policy

Legal video calls are intended solely for verified attorney-client communications. Use of the legal call process for personal or non-legal discussions is strictly prohibited. Calls determined to be non-legal or that have participants on the call that were not approved via this email account will be terminated, and scheduling privileges may be suspended. Continued misuse may result in permanent revocation of privileges and referral to the appropriate disciplinary authority.

Video visits will be limited to one hour in length, per each video call, unless the attorney has made prior arrangements via this email address (legal@privacy6.com). Attorneys may schedule additional visits at any time via the legal@privacy6.com email. These procedures are designed to ensure equitable access to all detainees and attorneys utilizing the legal visiting video system.

Thank you for your cooperation and professionalism in maintaining the integrity of this process.

From: SFDF - Legal <legal@privacy6.com>
Sent: Thursday, April 9, 2026 10:27 AM
To: Alejandra Puerto <alejandra@sanctuaryofthesouth.com>
Cc: Katie Blankenship <katie@sanctuaryofthesouth.com>
Subject: Re: VAV Request—Lazaro Hernandez Galban A#024454165

Counsel,
Please find the zoom link below.

Topic: Lazaro Hernandez Galban A#024454165
Time: Apr 10, 2026 10:00 AM Eastern Time (US and Canada)
Join Zoom Meeting
<https://zoom.us/j/95309750142?pwd=YbsobGfCWPs6fWtnhdRXQDMlu2Ibkb.1>

Meeting ID: 953 0975 0142
Passcode: 713224

Respectfully,
Florida Detention Team

NOTICE: Legal Call Scheduling Policy

Legal video calls are intended solely for verified attorney-client communications. Use of the legal call process for personal or non-legal discussions is strictly prohibited. Calls determined to be non-legal or that have participants on the call that were not approved via this email account will be terminated, and scheduling privileges may be suspended. Continued misuse may result in permanent revocation of privileges and referral to the appropriate disciplinary authority.

Video visits will be limited to one hour in length, per each video call, unless the attorney has made prior arrangements via this email address (legal@privacy6.com). Attorneys may schedule additional visits at any time via the legal@privacy6.com email. These procedures are designed to ensure equitable access to all detainees and attorneys utilizing the legal visiting video system.

Thank you for your cooperation and professionalism in maintaining the integrity of this process.

From: SFDF - Legal <legal@privacy6.com>

Sent: Thursday, April 9, 2026 10:17 AM

To: Alejandra Puerto <alejandra@sanctuaryofthesouth.com>

Cc: Katie Blankenship <katie@sanctuaryofthesouth.com>

Subject: Re: VAV Request—Lazaro Hernandez Galban A#024454165

Counsel,

Your Zoom call is scheduled for 4/10 at 10:00 a.m. You will receive a link to access the call.

Respectfully,
Florida Detention Team

NOTICE: Legal Call Scheduling Policy

Legal video calls are intended solely for verified attorney-client communications. Use of the legal call process for personal or non-legal discussions is strictly prohibited. Calls determined to be non-legal or that have participants on the call that were not approved via this email account will be terminated, and scheduling privileges may be suspended. Continued misuse may result in permanent revocation of privileges and referral to the appropriate disciplinary authority.

Video visits will be limited to one hour in length, per each video call, unless the attorney has made prior arrangements via this email address (legal@privacy6.com). Attorneys may schedule additional visits at any time via the legal@privacy6.com email. These procedures are designed to ensure equitable access to all detainees and attorneys utilizing the legal visiting video system.

Thank you for your cooperation and professionalism in maintaining the integrity of this process.

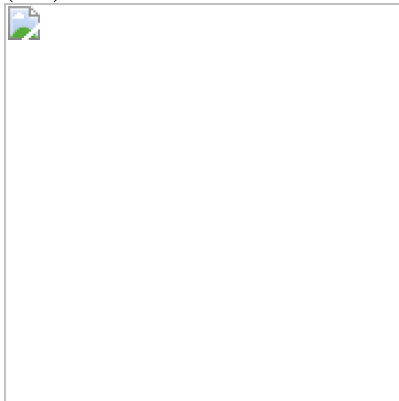
From: Alejandra Puerto <alejandra@sanctuaryofthesouth.com>
Sent: Thursday, April 9, 2026 10:06 AM
To: SFDF - Legal <legal@privacy6.com>
Cc: Katie Blankenship <katie@sanctuaryofthesouth.com>
Subject: VAV Request—Lazaro Hernandez Galban A#024454165

Hi Officer,

Can you set up an hour-long VAV for Lazaro Hernandez Galban A#024454165 with myself, Alejandra Puerto and Katherine Blankenship on Friday, April 9th at 10 AM EST? This is a pre-representation consultation, therefore we do not have a G-28 at this time. I have attached Katherine's bar card and ID below. Thank you for your assistance!

Kindly,

Alejandra Puerto
 Executive Assistant and Legal Administrator
 Sanctuary of the South, PLLC. (SOS)
www.sanctuaryofthesouth.com
 (786) 671-8133



NOTICE: Until a lawyer-client agreement has been signed and legal fees received, the information contained in this email is not to be taken as legal advice.

NOTICE OF CONFIDENTIALITY: This email, and any attachments thereto, is intended for use only by the addressee(s) named herein and may contain confidential information, legally privileged information and attorney-client work product. If you are not the intended recipient of this email, you are hereby notified that any dissemination, distribution or copying of this email, and any attachments thereto, is strictly prohibited. If you have received this email in error, please notify the sender by email, telephone or fax, and permanently delete the original and any of any email and printout thereof. Thank you.

This email has been scanned by Inbound Shield.

--

Katie Blankenship
Sanctuary of the South (SOS)
786-671-8133
www.sanctuaryofthesouth.com

--

Katie Blankenship
Sanctuary of the South (SOS)
786-671-8133
www.sanctuaryofthesouth.com

--

Katie Blankenship
Sanctuary of the South (SOS)
786-671-8133
www.sanctuaryofthesouth.com

--

Katie Blankenship
Sanctuary of the South (SOS)
786-671-8133
www.sanctuaryofthesouth.com

--

Katie Blankenship
Sanctuary of the South (SOS)
786-671-8133
www.sanctuaryofthesouth.com

--

Katie Blankenship
Sanctuary of the South (SOS)
786-671-8133
www.sanctuaryofthesouth.com