

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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ADHAM AMIN HASSOUN,

Petitioner,

Case No. 1:19-cv-370-EAW

v.

JEFFREY SEARLS, in his official capacity  
as Acting Assistant Field Office Director and  
Administrator, Buffalo Federal Detention  
Center,

Respondent.

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**DECLARATION OF CAPTAIN CARLOS M. QUINONES, M.D.**

Pursuant to 28 U.S.C. § 1746, I, Captain Carlos M. Quinones, M.D., hereby declare and state as follows:

1. I am a medical doctor with a Board Certification in Family Medicine. I make this declaration in response to the Court's order of April 9, 2020 (Dkt. 142). The information provided herein is based upon my personal knowledge, review of DHS records, and information provided to me by the U.S. Department of Justice.

2. I am employed by the U.S. Department of Homeland Security, Immigration and Customs Enforcement ("ICE"), and currently serve as Clinical Director. I have held this position since 2016. Previously, I served as Clinical Director for Immigration Health Service Corps since 1992 at Krome Detention Facility, Jena Louisiana GEO Detention Center, Houston Detention Center up to 2016.

3. My current duties include serving as Clinical Director. I provide direct care too patient and perform multiple administrative duties. My oversight includes the Buffalo Federal Detention Facility (“BFDF”).

4. BFDF has four confirmed cases of COVID-19.

5. The four confirmed cases are individuals who had previously been isolated with COVID-19 symptoms. That is, these four individuals are among the eight whom Captain Montalvo had indicated in his declaration from April 8, 2020, were isolated.

6. I do not know when any of these four individuals were last in contact with Petitioner Adham Hassoun. However, I do know that Mr. Hassoun has been in a single cell since March 18, 2020, making in-person contact extremely unlikely.

7. The four individuals confirmed to have COVID-19 are currently housed in the special housing unit. They are specifically located about 4 cells away—that is, at least 50 feet from—Mr. Hassoun’s cell. Mr. Hassoun does not need to interact with any of these individuals. He does not share any space with these four individuals, as he has his own assigned tablet and his own shower in the cell.

8. BFDF is undertaking additional mitigation efforts now that there are confirmed cases of detainees testing positive for COVID-19. Each of the four individuals was housed in B-2 Unit. That unit is cohorted for fourteen days, which mean they will be remained isolated from the rest of the population in order to be observed for 14 days since the index case (Case 0) was identified. Medical personal, when interacting with all detainees including Mr. Hassoun, are wearing face shields, face masks, gloves, and gowns. Officers are wearing face masks and gloves and are keeping a safe distance from all detainees. Upon request the facility can provide Mr. Hassoun with N95 or surgical masks.

I declare under penalty of perjury that the foregoing is true and correct based on my knowledge and belief.

Dated: April 9, 2020

A handwritten signature in black ink, consisting of a large, stylized loop followed by a series of smaller, overlapping strokes.

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CAPTAIN CARLOS M. QUINONES, M.D.