

SENT AWAY AND SILENCED

The Human Toll of ICE's Unprecedented
Transfers to the Anchorage Correctional
Complex



ACLU
Alaska



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CONTENTS

<u>Executive Summary</u>	3
<u>Introduction</u>	7
<u>Methodology</u>	7
<u>The June 2025 Detention of Immigrants at the Anchorage Correctional Complex</u> ...	9
I. <u>Civil Immigration Detention Inside a Criminal Jail</u>	9
II. <u>Chaotic and Traumatizing Flight to Alaska</u>	11
III. <u>Arrival at ACC: Strip Searched and Isolated in Restrictive Housing</u>	14
IV. <u>Punitive Conditions and Deteriorating Health</u>	15
V. <u>Pepper Sprayed When Asking for Their Personal Property</u>	20
VI. <u>Lack of Access to Counsel and Harm to Legal Cases</u>	23
A. <u>Sudden Transfers Interfered With Legal Representation</u>	23
B. <u>Lack of Phone Access and Ability to Contact Loved Ones and Counsel</u>	24
C. <u>Barriers to Confidential Legal Calls and Visits</u>	25
D. <u>Denial of Tools to Self-Represent and Litigate Cases, Including Law Libraries and Legal Material</u>	27
E. <u>Damage to Immigrants’ Cases</u>	29
VII. <u>Flight Out of Anchorage and Lasting Damage</u>	30
<u>Conclusion</u>	32
<u>Recommendations</u>	33
<u>Appendices</u>	36
Appendix A: <u>Supporting Declarations from Immigrants Detained at ACC</u>	36
Appendix B: <u>Supporting Declarations from Attorneys</u>	36
Appendix C: <u>Supporting Documents Obtained Through Public Sources and Record Requests</u>	36
<u>Endnotes</u>	37

EXECUTIVE SUMMARY

In June 2025, Immigration and Customs Enforcement (“ICE”) transferred a group of forty-one immigrants (“June 2025 transfer group”) from the Lower 48 to Alaska to be held at the Anchorage Correctional Complex (“ACC”), a criminal jail, under federal civil immigration authority. Most of these individuals were held at ACC for 23 days. As documented through ACLU of Alaska interviews and sworn declarations from the impacted immigrants and their attorneys, as well as information obtained through public record requests, the experience of these individuals in ICE custody at ACC shows what happens when a civil legal process is routed through a punitive, opaque, and dangerous carceral system.

This group, all men, included both asylum-seekers who had recently come to the United States seeking humanitarian protection and immigrants who, for decades, had authorization to remain in the country. Without notice, they were transferred from an ICE facility in Tacoma, Washington, nearly 1,500 miles away to Anchorage, Alaska. They were isolated from their loved ones and attorneys; processed through jail practices that collapse any meaningful distinction between civil administrative custody and criminal incarceration; and held in conditions that denied them due process and predictably harmed their physical and mental health and dignity.

The Alaska Department of Corrections (“DOC”), which operates ACC, accepted these ICE detainees without any notice to state or local elected officials or the public, and treated the

decision as one it could make unilaterally under a longstanding intergovernmental service agreement. This approach effectively bypassed democratic oversight, and left Alaskans learning about the operation only after people were already in ACC custody.

The record shows that DOC was not prepared for what the June 2025 transfer group’s arrival would require, and struggled to meet the logistical demands of receiving a group of immigrants in the midst of active immigration proceedings, from twenty-two countries, speaking more than a dozen different languages, and some with serious health conditions that required special diets and medical follow-up.

Many of the detainees scrambled to contact their family and attorneys before being transferred from Washington but were unsuccessful. They were shackled at the hands, feet, and waist and loaded onto a military cargo plane. This plane did not have traditional seats, and the men were forced to urinate in bags while still shackled for the duration of the 4-to-5-hour flight. Once at ACC, they were strip-searched, isolated, and given no information about the new facility or how long they would be there. No interpretation services were provided for individuals who did not speak English. Some were forced to sleep on mattresses on the floor next to dirty toilets. They were locked down in their cells most of the time, unable to access the limited phone services in the jail dayroom.

Immigration attorneys who represented members of the June 2025 transfer group prior to their

abrupt move to Alaska struggled to find their clients and subsequently faced significant barriers trying to arrange legal calls or visits. Alaskan attorneys, after hearing about the transfers, requested legal visits with the detained immigrants. For about a one-week period, ACC staff denied legal visitation requests from attorneys, wrongfully claiming they had to be approved by ICE. Once attorneys were allowed to meet with this population, ACC policies made it impossible to use telephonic interpretation to communicate with individuals. The deprivation of access to counsel had devastating consequences: as proceedings and policies shifted in real time, some immigrants missed critical filing deadlines, others were not meaningfully advised of their rights or options, and some essentially lost the ability to seek release from detention or pursue claims to remain in the United States.

The June 2025 transfer group also experienced a disturbing use-of-force incident. Upon their arrival, ACC delayed providing the detained men with their personal property. Multiple people requested access to their property, and about a week into their detention in ACC, when one detainee specifically requested to speak with a supervisor about needing to access the phone number for his consulate, DOC officers responded by pepper spraying the entire unit and then reportedly locking the immigrants in their cells without adequate ventilation, showers, a change of clothes, or medical follow-up. This was a violation of federal and state law and standards.

The experience of the June 2025 transfer group at ACC is not an isolated incident. Across the

nation, mandatory detention and the deliberate use of rapid, far-flung transfers by ICE function as a coercive tool: they disrupt attorney-client contact, disorient people in custody, and delay or derail pending litigation. The conditions in carceral settings predictably coerce detainees to abandon legal claims just to escape confinement. In this environment, the government's efforts to obtain "voluntary" removals are not meaningfully voluntary; they are the foreseeable product of isolation, confusion, and the practical impossibility of exercising the right to counsel and the right to participate in judicial and administrative proceedings.

Indeed, many of the immigrants detained at ACC opted for or seriously considered self-deportation due to the conditions they experienced. "This is not life," one person told his attorney. Others report still having lasting trauma from their time at ACC. At the time of the publication of this report, at least three men from the June 2025 transfer group have chosen voluntary departure, one writing in a letter sent to the ACLU of Alaska, "I requested deportation because I realized I would not be able to complete the process psychologically due to the pressure that ICE officers put on me, especially during the time I spent in [ACC]."

This report underscores that the answer to preventing this harm from happening in the future cannot be to further expand detention capacity in Alaska—whether through an open-ended state-federal arrangement or a rumored new federal facility¹—but to stop the state of Alaska's collaboration with ICE and the construction of facilities to warehouse immigrants.

To the extent that Alaska state officials insist on collaborating with the Trump Administration's deportation agenda by incarcerating immigrants, existing federal and state constitutions and statutes mandate transparency, meaningful notice and oversight, humane conditions, reliable access to counsel and interpretation, appropriate access to law libraries, transfer limits that protect pending cases and medically vulnerable people, and the practical use of alternatives to detention so outcomes of immigration proceedings turn on the merits rather than isolation, logistics, and trauma.



INTRODUCTION & METHODOLOGY

On June 8, 2025, forty-one immigrants were abruptly transferred from the Northwest ICE Processing Center in Tacoma, Washington (“Tacoma”) to the Anchorage Correctional Complex (“ACC”)—a medium-security jail and prison run by the Alaska Department of Corrections (“DOC”). Their transfer and confinement at ACC placed civil immigration detainees inside a carceral setting, far from family and existing counsel in the Lower 48.

This report reconstructs what happened before, during, and after the June 2025 transfer group’s confinement at ACC through a detailed chronology of the decisions, conditions, and incidents that, taken together, departed from ICE detention standards and violated federal and state law. It centers the accounts of the people who lived it, including sworn declarations from fourteen people who were locked in the jail, and situates their experiences within the broader structural issues they expose. Their accounts illustrate the need for transparency and public oversight of Alaska’s role in federal immigration detention; the problems associated with use of a criminal jail to confine civil detainees; and the significant barriers rapid transfers, isolation from attorneys and loved ones, and unreliable communication create for access to counsel and the vindication of legal claims.

Although this group was later transferred out of Alaska— six within the first few days and the remaining thirty-five people on June 30, 2025—the harms described here did not end with their departure.

The lasting damage to health and pending cases, coupled with the continued use of ACC as a holding facility for non-citizens detained in Alaska prior to transfer to out-of-state ICE facilities,² makes these findings urgently relevant to Alaska’s ongoing place in the national detention system. The report concludes with recommendations for policymakers and stakeholders to strengthen accountability and transparency and to prevent recurrence through enforceable safeguards and alternatives to detention.

METHODOLOGY

This report draws primarily on firsthand accounts from the immigrants detained at ACC in June 2025. Volunteer attorneys organized by the ACLU of Alaska interviewed these individuals both while they were incarcerated at ACC and after they were transferred to other ICE detention facilities. Where people were willing to speak publicly, the report incorporates sworn declarations describing their experiences, attached in **Appendix A**.

The ACLU of Alaska and Rosen Bien Galvan & Grunfeld LLP (“RBGG”) also closely collaborated with attorneys working with the people, several of whom also submitted declarations, attached in **Appendix B**.

METHODOLOGY *continued*

In addition, this report draws on publicly available sources, including testimony and material from a legislative hearing and local news reporting that documented key events and the community impact. The ACLU of Alaska and RBGG also obtained records through Alaska Public Record Act requests and federal Freedom of Information Act requests, including corroborating medical records and a use-of-force report. The most pertinent of these documents are attached in **Appendix C**. Finally, this report relies on relevant written policies and guidance issued by DOC and ICE to assess how official procedures aligned or diverged from reported on-the-ground practices.

THE JUNE 2025 DETENTION OF IMMIGRANTS AT THE ANCHORAGE CORRECTIONAL COMPLEX

I. Civil Immigration Detention Inside a Criminal Jail

Immigration detention is a form of civil, not criminal, confinement for a reason: it is not supposed to be punishment.³ People in removal proceedings have not been convicted of a crime by virtue of their immigration status. The legal premise of civil detention is administrative custody to ensure someone's appearance at future immigration proceedings or to prepare them for removal.⁴ As ICE has reported, detained immigrants are "motivated by the desire for repatriation or relief," "exercise exceptional restraint," and "relatively few" file grievances or get into fights.⁵ Their civil confinement must be paired with due process, access to counsel, language access, and conditions that are non-punitive.⁶ When civil detention is conducted inside a carceral system, the line blurs fast: the architecture, staffing patterns, rules, and security-first defaults of a jail tend to reproduce jail conditions—even when people being held are not in the criminal process.

This context matters because the June 2025 transfers to ACC were not routine. Jen Winkelman, DOC Commissioner, testified in an emergency fact-finding hearing called by the Alaska House Judiciary Committee that

this was the first time the state agreed to hold a large group of people transferred from the Lower 48 for longer-term ICE detention.⁷

She testified that, on June 4, 2025, an ICE agent contacted leadership at ACC seeking overflow capacity to reduce overcrowding in Tacoma. After assessing bedspace, the superintendent of ACC agreed to accept up to fifty-nine detainees, which he believed ACC could house "safely."⁸ On June 8, 2025, a plane carrying forty-one adult male immigrants from Tacoma, shackled and terrified, touched down in Anchorage. These men spoke approximately fourteen different languages, represented twenty-two different countries,⁹ and were confused about why they were suddenly sent to Alaska, far from their counsel and family.

The DOC Commissioner claimed that the department was authorized to move quickly because DOC has an existing, longstanding contract with the U.S. Marshals Service to house federal detainees, including individuals charged with federal offenses and awaiting trial and individuals awaiting a hearing on their immigration status or deportation.¹⁰ The current contract, known as an intergovernmental service agreement ("IGSA"), has been in place since 2013 and allows the DOC to accept "federal prisoners" and bill a per-diem reimbursement at \$223.70 per person per day.¹¹

ICE had also previously certified ACC as a facility that could hold detained immigrants for longer than seventy-two hours, known as a “non-dedicated IGSA facility.”¹² In other words, ICE and DOC used a preexisting federal detainee contracting pathway as a fast lane, with no notice to the public or elected officials and little transparency until people were already inside the jail.¹³

News of the transfers triggered a rapid, after-the-fact scramble by local and state elected officials and the community to understand what happened and what standards applied.¹⁴ Alaska lawmakers and attorneys warned that Alaska facilities were not designed, and staff were not trained, for immigration detention, and that the state could face liability if civil detainees are treated punitively.¹⁵ There was already a spotlight on DOC for alleged failures to provide humane treatment to others in its care. A month prior, the ACLU of Alaska and the ACLU National Prison Project filed a federal class action lawsuit against the state alleging that DOC’s healthcare was so deficient that it violated incarcerated people’s constitutional rights and caused needless suffering.¹⁶ ACC specifically is “the busiest facility in the state,”¹⁷ yet one of the most short-staffed,¹⁸ and had multiple inmate deaths in the last two years linked to murder, suicide, and inadequate care.¹⁹

The DOC Commissioner admitted to the Legislature that this mass transfer of people in ICE custody “stresses the system” and “there were bumps in the road.”²⁰ She testified that ICE’s certification of ACC expressly refers to the ICE National Detention Standards (“NDS”), but

she admitted she was not knowledgeable about what those standards entailed, or how conditions at ACC compared to the Tacoma ICE facility.²¹

Instead, when a state representative pressed further and directly asked her if DOC was using federal ICE detention standards for these detainees, the DOC Commissioner stated, bluntly: “We are using our own set of State of Alaska standards.”²² She could not confirm if ACC staff received any recent additional training before receiving this large number of ICE detainees.²³ Concern over whether the DOC was prepared to house civil immigration detainees and what liability the state might incur for mistreatment led one state representative to ask “Why are we doing this at all?”²⁴

This unprecedented mass transfer to ACC is inseparable from the broader national picture. There has been a major expansion in immigration enforcement and detention under the Trump Administration, including sharply increased detention levels and massive new federal spending on enforcement operations. In practice, this has pushed ICE to look for beds wherever it can find them, including local jails and state prisons.²⁵ President Trump’s “mastermind” and “architect” of immigration policies, Stephen Miller, has repeatedly called for the mass deportation of millions of law-abiding immigrants, and has imposed a daily arrest quota with bonuses for ICE agents.²⁶

The Trump Administration has pushed for mandatory detention, even for long-term residents who have strong community ties and

are unlikely to abscond,²⁷ while at the same time firing immigration judges and worsening court backlogs.²⁸ That approach has gone hand-in-hand with a refusal to invest in, expand, or meaningfully use alternatives to detention that would allow release from ICE custody while immigration cases proceed, such as release on recognizance, community support, or bond, as well as formal community-based monitoring programs that have proven to be effective and far less costly than institutional detention.²⁹ In the current political environment, the coercive force of detention is not accidental, it is a leverage point. The prospect of prolonged detention, compounded by transfers, harsh conditions, and disrupted attorney contact, predictably pushes people to abandon even meritorious claims to stay in the United States.³⁰

When ICE came to Anchorage seeking detention space, Alaska's already strained jail and prison system became part of that national detention web overnight, with limited insight and public accountability for what was about to happen inside ACC.

II. Chaotic and Traumatizing Flight to Alaska

On the evening of Saturday, June 7, 2025, forty-one men detained across different units in the Northwest ICE Processing Center in Tacoma, Washington, were told to pack up their belongings. They were being transferred. Despite ICE standards requiring detainees to be notified of an upcoming transfer,³¹ nobody had warned

them ahead of time or explained why it was happening. They were surprised and frightened, and some tried to reach their families and attorneys in the limited time they had before they were moved to another part of the facility to be processed – in most cases to no avail.³² Some did not know where they were being sent; others, who understood the destination was Alaska, questioned why they were being transferred approximately 1,500 miles away.

The DOC Commissioner later testified to the Legislature that DOC had no control over the selection of which immigrants came to ACC.³³ Some were relatively recent arrivals seeking safety from threats in their home countries;³⁴ some had lived in the United States for decades and had U.S. citizen spouses and children.³⁵ They were in many different stages of their proceedings. At least two had won their immigration cases: Kareem fled political violence in his home country after his father was tortured and died, and Kareem faced the same treatment.³⁶ An immigration judge granted him relief under the Convention Against Torture (“CAT”) after determining he would likely be persecuted or tortured if returned to his country of origin.³⁷ Kareem expected to be released to live lawfully in the United States, which is what usually happens for people with CAT protection, but instead he remained in detention and was transferred to ACC a few days later.³⁸ “I was shocked,” Kareem said.³⁹ Another person similarly won CAT relief and an immigration judge ordered that he could not be deported to his home country, but ICE kept him detained, telling his attorney that ICE planned instead to remove him to a different country—a so-called

“third-country removal” under the Trump Administration’s policy to send noncitizens to a country that is not their country of origin (such as El Salvador, Guatemala, and Rwanda).⁴⁰

Some of the immigrants chosen for transfer also had complex medical needs. Enrique was diagnosed with chronic gastritis and had severe stomach and gallbladder pain.⁴¹ He had suffered rapid weight loss in detention and Tacoma health care staff had placed him on a special diet.⁴²

Winston was diagnosed with Crohn’s disease and continued to suffer from symptoms related to the disease while detained, including nausea, vomiting, diarrhea, and fatigue.⁴³ His attorney advocated for him for over a year in order to secure his transfer to the Tacoma facility specifically so he could access medical treatment.⁴⁴ ICE had finally scheduled him for important testing in a Tacoma hospital.⁴⁵

Winston described how he felt upon hearing that he would be transferred in a matter of hours:

The transfer came as a surprise to me ... I was confused and frustrated, wondering why I was being transferred to Alaska having been transferred to Tacoma specifically to receive better medical care... I tried to explain multiple times that I had been transferred to [Tacoma] for medical reasons and would soon receive the care for which I was transferred. The officer did not care.⁴⁶

Winston missed the critical appointment due to his transfer.⁴⁷

Antonio is nearly 70 years old and has chronic interstitial cystitis, causing extreme bladder and pelvic pain and frequent, painful urination, and was diagnosed with bilateral hydrocele, which can cause painful swelling around the scrotum.⁴⁸

At the time of his transfer, he was under treatment from the University of Washington Medical Center for chronic obstructive pulmonary disease and was waiting for follow-up appointments.⁴⁹

Early in the morning on Sunday, June 8, 2025, the men were shackled and transported by bus to an airfield. They remained in handcuffs and ankle restraints affixed at the waist for the duration of their long journey, including between 4-5 hours on the plane.⁵⁰ They were loaded onto an old military cargo aircraft without traditional seats or seatbelts.⁵¹ The men sat on what appeared to be some type of rope net or plastic straw.⁵²

There were no toilets available to the immigrants on board the cargo plane. If people needed to urinate, the federal officers in charge gave them small bags.⁵³ One person described it as “dehumanizing” to try to urinate into a bag, and he got urine on himself because the handcuffs made it difficult to move his hands more than a few inches.⁵⁴ The lack of toilet access caused a considerable amount of gastrointestinal pain for Winston, who needs to relieve himself more often than the average person because of his Crohn’s disease.⁵⁵ Adam, who suffers from prostate problems, recalls that the “lack of restroom caused [him] significant pain and stomach inflammation.”⁵⁶ Antonio described the flight as “torture.”⁵⁷ His medical conditions cause him to often feel an urgent need to urinate, and he asked to use the bathroom several times.⁵⁸

As he described his experience:

“I was only allowed to urinate once, while on the plane standing in the corner and using a plastic bag. It was really painful when I finally urinated because I had held my pee for so long. It was also humiliating to urinate in front of everyone else and to be denied permission so many times when I asked to pee. On a scale of 1-10, my pain on the airplane was more than a 10.... I suffered a lot of anxiety on the plane about being able to hold my urine in and the pain it caused my bladder. I felt like my body was attacking itself.”⁵⁹

The aircraft’s engine was also extremely loud, and the plane encountered significant turbulence; some people feared they would crash and others felt nauseated during the 4-to-5-hour flight, with at least one person vomiting.⁶⁰ Several people reported that officers gave them small earplugs, but they did not help. Officers themselves had large earmuffs.⁶¹ Malik’s earplugs fell to the floor but he could not reach them because he was shackled, and the officers refused to get them for him.⁶² Several people reported that their ears hurt and continued ringing even after the flight.⁶³ As Kofi described, “If you wanted to talk to someone, you had to scream,”⁶⁴ while Jamir recalls that “there was no way to talk with the person next to me unless we were very close, but close distance between inmates was no[t] allowed.”⁶⁵

The conditions of their air transportation to Anchorage violated ICE’s policies to provide safe and humane transportation, with reasonable disability accommodations (federal law also requires such accommodations),⁶⁶ and caused lasting trauma for many of these men. Kofi, who originally came to the United States as a student, described:

“I think about the experience often and I do not want to go through it again. It’s something I constantly think about, the whole idea of being shackled like a prisoner and dumped in a cargo plane. It’s too much. It was not something I was ever expecting to happen. It was a hard and dehumanizing experience. It broke me down mentally.”⁶⁷

Nadir, who has spoken out about human rights abuses in his home country and is seeking humanitarian protection in the United States, reported he continues to have nightmares about the day of the flight.⁶⁸ In his dream, officers take him to another room to be transferred, and he says, “Oh no, no, no, not again!”⁶⁹

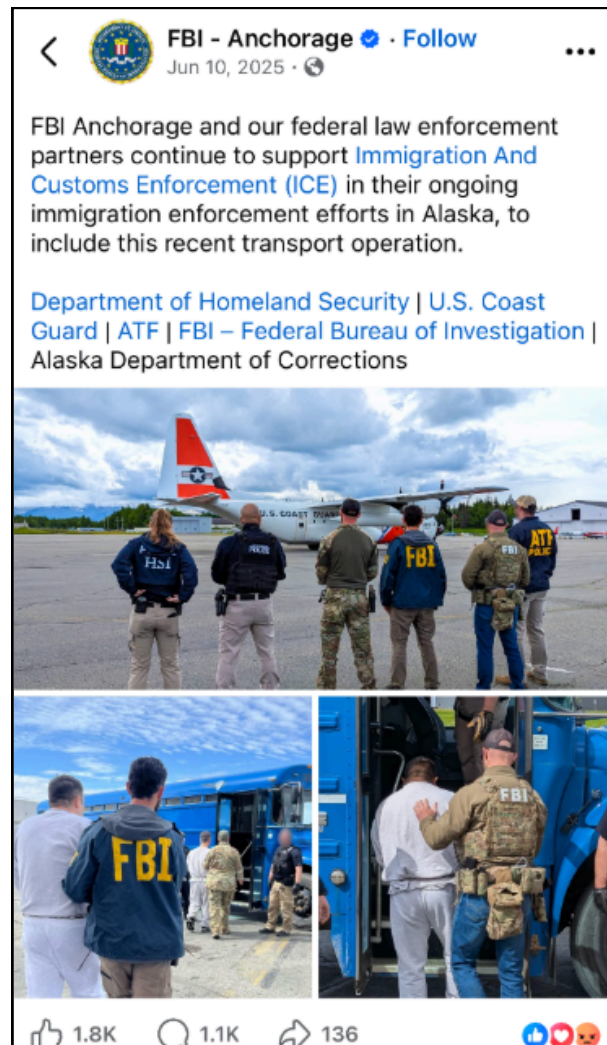
Similarly, Amir said the experience on the flight is “something that you can never forget. Thoughts of this experience still pop into my mind sometimes. No one can understand it unless you’ve experienced it yourself. It still messes with me.”⁷⁰

III. Arrival at ACC: Strip Searched and Isolated in Restrictive Housing

The dehumanization and abusive treatment did not end after the military plane landed at the Anchorage airport. The immigrants' first hours in Alaska were marked by spectacle and control. As one person described it, their arrival felt like "political theater"—an operation designed more to display federal officials' power or create social media posts than to ensure the immigrants' safety, dignity, and due process.⁷¹ They disembarked the airplane still shackled, surrounded by numerous armed law enforcement officers from various federal agencies.⁷² Some federal officers took photos of the men without their permission.⁷³ "It felt like a huge show," explained Kareem, "with a ton of agents and guards with guns."⁷⁴

Two days later, the FBI Anchorage office used its social media account to celebrate a "recent transport operation" connected to immigration enforcement, tagging the DOC, with photos showing a military airplane and men in restraints, as seen below.⁷⁵ The ACLU has been unable to independently verify whether the posts reference the transfer of the June 2025 transfer group from Tacoma, but the tone and timing is that of an image-first law enforcement narrative that obscures the human consequences.

Accounts from the early days at ACC describe an intake process that was disorienting, degrading, and inconsistent with civil detention. After a lengthy trip from the airport to ACC by bus, still in restraints, men reported lingering pain and visible marks when the restraints were finally removed at ACC.⁷⁶



Upon arrival at ACC, they were strip searched, in violation of ICE's standard that arriving detainees shall be searched "in the least intrusive manner as appropriate" and "shall not be strip searched" without an reasonable suspicion that they are concealing contraband.⁷⁷ It was highly unlikely that any of these men had concealed contraband, since they had been moved from a secure facility in Tacoma to ACC, all the while in restraints and under close supervision by ICE agents. Many of these men explained that they had never before been strip searched in Tacoma or with other transfers between ICE facilities, and the experience was "humiliating and shameful."⁷⁸

Amir felt “very violated” by the strip-searches and continues to suffer from memories of it—“It’s not something you’ll easily forget, I still think about it regularly because it was not right.”⁷⁹

Not a single interviewee reported receiving the ICE National Detention Handbook upon their arrival, as required by ICE standards, or adequate orientation or explanation of ACC’s rules, schedules, or how to access phones, legal materials, or grievances.⁸⁰ Nadir recounted asking a DOC staff member questions like whether he would have access to a law library, and the sergeant responded along the lines of “This is Alaska, we do things differently here” and “you guys are going to get what’s coming your way.”⁸¹ Ricardo recalls being told “the rules here are Alaskan” and not like other places.⁸² Those who spoke little or no English had difficulty understanding what officers were saying.⁸³

The June 2025 transfer group were given standard ACC jail uniforms and moved into what appeared to be a higher-security unit than what they were used to, because it had celled housing, unlike the lower security dorm housing they experienced in Tacoma where they had considerable freedom of movement.⁸⁴ They were ushered into their cells and locked inside. They were housed in a disused section of the jail, with up to three people in a two-person cell, such that one person had to sleep on the floor on a mattress next to the toilet.⁸⁵ They did not get access to a telephone during their admission or for almost a week afterward, contrary to ICE standards.⁸⁶

IV. Punitive Conditions and Deteriorating Health

Civil detainees are not to be held in punitive conditions of confinement. When civil detainees are “detained under conditions identical to, similar to, or more restrictive than those under which pretrial criminal detainees are held,” the law assumes they are being held in punitive conditions.⁸⁷ The DOC Commissioner testified to the Legislature that she applied the same Alaska DOC standards, meant for people charged with or convicted of crimes, to this group of detained immigrants.⁸⁸ Upon arrival, DOC officers also told detainees that they would be treated similarly to or worse than people in the Alaska prison and jail system.⁸⁹ Although these men were held on civil immigration charges, they faced harsh, degrading, and unsafe conditions throughout their detention at ACC, in violation of their rights.

Inside the housing unit, the immigrants experienced overcrowding and unsanitary living conditions. The DOC Commissioner confirmed that, in their initial days at ACC, some of these men were forced to house three to a cell that was only designed for two.⁹⁰ Two people would sleep in bunkbeds, while the third slept on a mattress on the floor, next to the toilet.⁹¹ Cellmates would share the same toilet, which could only be flushed once every 30 minutes.⁹² “The toilet was dirty as hell,” Kofi described,⁹³ while Amir felt “the toilet was designed for punishment.”⁹⁴

Despite ICE standards providing that DOC shall provide sanitary and hygienic living conditions,⁹⁵ multiple accounts describe the unit as old, dirty, and dusty—appearing to be an unused segregation unit that ACC had reopened with a fresh coat of paint that was still giving off strong chemical fumes, causing some to experience headaches, sneezing, and nausea.⁹⁶ The DOC Commissioner described the housing module to the Legislature as one that had a “recently completed facelift.”⁹⁷ Some described pest and vermin issues, including seeing live cockroaches in their cell.⁹⁸ “One night we discovered that there were a lot of spiders in a nest under the mattress on the floor,” reported Eliseo, who was brought to the United States when he was three years old.⁹⁹ The group was eventually given cleaning supplies to clean the unit’s cells, common room, and showers themselves.¹⁰⁰

Amir’s description of the conditions paints a startling picture:

“Nobody had taken the time to clean the Echo Unit before we got there. The showers were filthy and the place was just a mess. The tables in the day room were layered in dirt. You could see the buildup of scum on them. It was not livable. These were the tables we were expected to sit and eat at, but it was nothing but dirt. I wish someone could have seen what they looked like before we cleaned them. We asked for supplies to clean the area, and they brought out cleaning supplies from a closet.

Each table took at least 10-15 minutes of 2-3 people scrubbing hard with chemicals and soap to get it clean. You could see the dirt coming off.

I’ve never seen anything like that in my life. These conditions are not something you want to put anyone through.”¹⁰¹

The daily rhythm of confinement described by the detained immigrants also reflected a high-control, punitive environment that marked a stark shift from their prior relative freedom of movement within the Tacoma facility¹⁰²—even as Tacoma itself has long been the subject of scrutiny regarding inhumane conditions and rights violations.¹⁰³

Numerous people reported that they were on lockdown at ACC most of the time.¹⁰⁴ These extensive lockdowns isolated them in their cells for long stretches, which meant they could not shower or access the phones to call family, counsel, or anyone else on the outside.¹⁰⁵ They also describe “recreation” as rare and minimal—if not locked down, they got time outside just one hour a day, in a bleak, small concrete enclosure with what appeared to be fencing or wiring overhead covering the sky.¹⁰⁶ This isolation took a significant toll, as many of these immigrants reported feeling stressed, anxious, and despondent.¹⁰⁷ “I felt depressed,” reported Malik, “and constantly questioned why I was there and why I had to go through those difficult times.”¹⁰⁸ Ricardo also struggled, stating: “emotionally, it was hard to be locked up and so restricted all the time. Physically, I developed aches and pains because the beds were hard and we could not move around much.”¹⁰⁹ Amir, who is awaiting a hip replacement, recalled the pain in his hip from sitting for extended periods. Although he tried to walk around, “the cell was so small [he] could hardly move around.”¹¹⁰

ICE standards explain that “[g]ood hygiene is essential to the well-being of detainees,”¹¹¹ yet the immigrants detained at ACC consistently recounted that they were issued only one set of clothing, including underwear, at a time, which they would have to wear for at least three days.¹¹² As Jamir recalls,

“we did not have access to clean clothing or linens. We were given used, unwashed clothing, including underwear, and linens that were visibly stained and had human hair on them. It was highly unhygienic.”¹¹³

To Adam, receiving dirty and stained uniforms, including stained underwear, “felt particularly undignified.”¹¹⁴

This was in stark contrast with Tacoma, where they had multiple items of clothing that were laundered more than once a week.¹¹⁵ At ACC, requests for clean clothes, even during lockdowns when they could not shower for days at a time, were denied as a matter of “policy” (allegedly described by one DOC officer as the “Alaska standard”).¹¹⁶ ACC staff’s strict application of DOC practices to this group of civil detainees violated the legal requirement that they receive more considered treatment and violated ICE’s standard that undergarments should be exchanged daily.¹¹⁷

These civil detainees were also treated the same as the rest of the population in the jail by being handcuffed whenever they moved through the facility, including for medical appointments and legal visits.¹¹⁸ The constant use of restraints was a notable escalation from their previous

experiences, as they were never shackled when moving around the Tacoma facility.¹¹⁹ ICE standards provide that restraints cannot be used as a matter of course absent an immediate need to prevent harm to others or property.¹²⁰ Immigration attorney Nicolas Olano described how disturbed he was to see the state of his client and others during legal visits:

“I was struck by the unusually high level of security imposed on detainees at ACC. They were shackled at all times.... This is in stark contrast to immigration detention centers, where detainees are not shackled when transported for attorney meetings or while consulting with counsel. I was also disturbed by the lack of hygiene and detainees’ limited access to clean clothing at ACC. In every immigration detention center I have visited in over twenty years, detainees were consistently provided with multiple sets of clean uniforms. By contrast, at ACC, I personally observed [my client] and other detainees wearing visibly soiled and dirty uniforms.”¹²¹

Access to health care was minimal, violating detainees’ rights to adequate medical and mental health care.¹²² Some reported a cursory medical screening on arrival, with little meaningful follow-up, even when they disclosed serious needs, including mental health concerns.¹²³



In Tacoma, Kofi had a mental health treatment plan and individual therapy twice a month to work on anxiety. At his medical intake, which lasted just a few minutes, he informed staff that he would like to speak with a mental health counselor and told them about his ongoing treatment plan. However, nobody at ACC ever followed up with him. He submitted a form to talk to mental health practitioners, reporting that his anxiety was high and he needed to talk to someone; staff simply gave him an anxiety workbook. When mental health staff came to the unit to talk to another detainee in a possible mental health crisis, Kofi tried to talk to them about his anxiety problems and said he needed help, and they just told him to go through the workbook.¹²⁴

Amir also requested mental health support due to the trauma experienced at ACC from the conditions and the use of force incident. His consultation was not confidential. It was held in the dayroom where other detainees could hear.¹²⁵ The mental health provider told Amir “It happens, we’ll try to get you puzzles to play with.”¹²⁶ Amir was not provided with any puzzles or provided any follow up, and he also was teased by other detainees who had overheard him speaking with mental health staff.

Others reported barriers to timely access to their prescribed medications and medical devices.¹²⁷ Nadir’s knee brace for his torn meniscus was taken from him upon arrival at ACC, making basic mobility and climbing into his bunk painful and unsafe.¹²⁸ Amir, who is awaiting a hip replacement, has prescription shoes which help with his hip pain when walking. Despite having worn these shoes on the plane to Alaska, they were taken from him upon arrival and not returned to him for almost a week.¹²⁹

ACC staff also switched his pain medicine from topical to oral, which upset Amir’s stomach.¹³⁰ Some men also reported that they deferred or delayed requesting medical care because ACC charged a \$5 co-pay for each health care encounter, which violates ICE’s longstanding standards restricting such fees in immigration detention settings.¹³¹ Many who sought medical attention experienced delays and inadequate responses,¹³² including those who suffered from symptoms caused by the pepper spray utilized during the use of force event described in the next section.¹³³

ICE standards require that cooperating prisons and jails like ACC must provide ICE detainees special medical or religious diets.¹³⁴ Enrique repeatedly told ACC staff and clinicians that he was in severe stomach pain due to his chronic gastritis and needed a special diet, like the one he had in Tacoma that limited fatty foods. While in Tacoma, he would go to an outside hospital when his symptoms became extreme, but ACC denied his request to go to the hospital when he experienced a flare up, and never authorized him to receive special meals, causing his pain to increase.¹³⁵ Winston was also denied the special diet he needed and access to his prescribed medications to control the symptoms of his Crohn’s disease. Instead, ACC put him on Prednisone, which is not safe to take for extended periods of time and had caused Winston side effects in the past, which he was beginning to experience again, such as nausea, vomiting, diarrhea, and fatigue.¹³⁶

The men also were denied the ability to practice their religion.¹³⁷ DOC officers told them that they could not participate in any of ACC’s religious or education programming.¹³⁸ Muslim detainees reported delayed or denied access to their


Qurans, and that requests for prayer mats were denied.¹³⁹ They often could not pray together in a common area because they were locked down in their cells most of the time. The cramped and unsanitary cell environment made daily prayers difficult, as they could not properly clean themselves before prayer, and they could not pray in the proper direction toward Mecca because they would be facing the toilet, so they had to pray very close to the toilet in the opposite direction.¹⁴⁰ They were also denied Halal meals.¹⁴¹ Such denials of basic avenues to practice their sincerely held religious faith while detained at ACC were frustrating and deepened their isolation, and violated their constitutional rights and ICE standards for religious practices.¹⁴²

Taken together, conditions at ACC for these detained immigrants denied them the necessities of washing and changing clothes, freedom of movement, practicing their religion, maintaining their physical and mental health, contacting loved ones, and preparing for their legal cases. They consistently reported feeling unsafe at ACC and fearing retaliation from DOC officers.¹⁴³ As Adam summarized his experience at ACC:

“Overall, ACC felt markedly more dangerous and felt more like we were being intentionally punished than the Northwest ICE Processing Center or other facilities where I have been detained. At ACC, we were treated like criminal prisoners rather than immigration detainees. The frequent and collective lockdowns and punishments made me feel unsafe and made the whole experience feel unfair. The feeling was amplified given how hard it was to communicate with attorneys and loved ones.

I felt significantly more unsafe, anxious, and depressed at ACC than at other facilities.”¹⁴⁴

“It was really wrong for them to treat us this way,” states Roberto, who has lived in the United States for more than thirty years with his wife and three children who are all U.S. citizens, “We should not have been there.”¹⁴⁵



“...we were treated like criminal prisoners rather than immigration detainees.”

V. Pepper Sprayed When Asking for Their Personal Property

The June 2025 transfer group did not receive their personal property for several days, despite ICE standards requiring that their property must accompany them to their new facilities.¹⁴⁶ In their property were phone numbers for their family, attorneys, and consulates, as well as religious texts and legal documents.¹⁴⁷ During this time, many individuals repeatedly asked for their property, explaining that they desperately needed to contact their loved ones and attorneys to tell them where they were. Additionally, most needed to notify the immigration courts of their change of address or to work on their immigration cases.¹⁴⁸

DOC staff responded to their reasonable requests with an unreasonable use of force. On June 12, 2025, around lunchtime, the men were in their jail section's common area when one of the detainees asked an officer for access to his property, explaining he needed his phonebook so he could call his consulate.¹⁴⁹ Such a request is consistent with ICE Detention Standards and detainees' right to consular access under the Vienna Convention on Consular Relations of 1963.¹⁵⁰ Others started speaking up as well, expressing their growing frustration about the delay in access to their belongings.¹⁵¹ The DOC officer said he could not do anything to help them with their request, so eventually detainees began requesting that the officer contact the staff in charge of property or a superior officer.¹⁵² The officer refused, got angry, and yelled at everyone to go back into their cells to be locked down.¹⁵³

Some detainees tried to explain they just wanted to talk to a higher ranking officer, and did not understand why they needed to lock down, and continued to argue with the officer.¹⁵⁴

Then, as Winston recounts, “[i]nstead of making any effort to deescalate the situation, the officer yelled ‘rover, rover’ into his radio.”¹⁵⁵ Soon several other DOC officers appeared, at least one brandished a taser, and yelled at people to lock down.¹⁵⁶ According to Amir, “this was the strangest thing I’ve ever seen. There was no hostility, people were just trying to conversate.”¹⁵⁷ The immigrants responded that they just wanted to talk to a supervising DOC officer about their property.¹⁵⁸ Kofi described,

“We were trying to explain that we are immigrant detainees, that we are civil detainees. We said that they keep calling us prisoners, but we are not criminal prisoners.”¹⁵⁹

With no warning, DOC officers shot multiple rounds of pepper spray balls toward the men, hitting the ground close to where they were standing and sitting eating lunch.¹⁶⁰ People recount smoke filling the room and many people coughing and struggling to breathe.¹⁶¹ Many reported feeling like they were suffocating and had burning sensations in their eyes, nostrils, and lungs.¹⁶² Some started bleeding from their noses.¹⁶³ The DOC officers quickly locked them in their cells.¹⁶⁴ The officers were also coughing and left the unit to get fresh air.¹⁶⁵ People reported staying in lockdown for around two days, all the while DOC officers denied requests for showers and clean clothes.¹⁶⁶ ACC did not fully clean up the powder from the pepper balls. What remained on the floor would be stirred up if

anyone walked by.¹⁶⁷ As one person recalled, “ACC staff made no effort to ventilate the cells other than opening one door to the outside, for a few hours.”¹⁶⁸ The pepper powder continued to linger in the air, and people suffered from respiratory distress and nosebleeds for several days.¹⁶⁹ Medical staff did not check on them, and multiple detainees who were suffering from pepper-ball related symptoms did not ask to be seen by medical staff, because ACC required a \$5 co-pay that they could not afford.¹⁷⁰ It took a day or two before they were permitted to shower, and several days to receive a change of clothes.¹⁷¹

DOC has corroborated much of this egregious and excessive use of force. The DOC Commissioner confirmed to the Legislature that staff deployed pepper-balls to stop a “verbal demonstration” and to move the immigrants into their cell, after which they were locked down.¹⁷² An internal synopsis of the incident by a DOC staff sergeant, obtained through an Alaska Public Records Act request, confirmed that “Rovers” (and other officers, approximately seven total) were called into the unit around 11:30 a.m., where they found the ICE detainees in the dayroom. Some were speaking languages other than English, but “[w]hat could be clearly understood was, ‘we are not criminals’ ‘we are all not detainees,’ ‘we demand all of our property’ ‘get the warden here’....” One officer “arced his taser.” After the immigrants did not move and “several” were still “yelling,” the officers deployed a “couple” rounds of “PepperBall deployments” to try to get them “back to their cells.” There is no mention of any perceived threat to physical safety or damage to property or attempts to reach the warden or otherwise deescalate.

As for decontamination efforts, the DOC synopsis reported that staff opened a single door to assist with ventilation “due to the PAVA powder,”¹⁷³ ordered some mopping and sweeping, and that the unit “remains locked down”—there is no mention of offering showers or a change of clothes, or consulting with medical staff.¹⁷⁴

It is not reasonable or appropriate under ICE standards, Alaska law, regulations, and policies, or federal Constitutional law, to use this level of force and dangerous weaponry to respond to a “verbal demonstration.”¹⁷⁵ Rather, facilities must first attempt all reasonable efforts to gain cooperation, and only resort to force if there is an imminent threat.¹⁷⁶ According to Winston, “The pepper spray caught me by surprise because I never thought they would shoot pepper spray with no warning over a verbal disagreement.”¹⁷⁷ It was unlike anything he witnessed at the ICE facilities where he was housed previously, where the typical response even to physical fights “was to break it up and take the detainees involved out of the unit.”¹⁷⁸ It is unclear if ACC staff obtained the superintendent’s prior authorization before using chemical agents, as required by Alaska law.¹⁷⁹ ACC staff also failed to follow ICE guidance to consult with medical staff before using oleoresin capsicum (“OC,” commonly referred to as pepper spray or pepper powder), to determine if its use could seriously exacerbate a person’s medical condition.¹⁸⁰ If they had, clinicians should have at least identified Antonio’s borderline chronic obstructive pulmonary disease; for people with this disease, exposure to such an irritant could be deadly.



Antonio recounts:

“I didn’t really understand a lot about what happened. Some of the detainees were asking about their property because the facility took it when we got here and had not returned it.... I was not doing or saying anything during this time. It was shocking and scary. I am older and my body is more delicate these days. I was really scared and I started moving to my cell. I usually wear a face mask to protect my lungs, but I did not have one at that moment because we were eating lunch.

When the pepper spray hit me, I felt like I couldn’t breathe, it was such a struggle to keep breathing. I thought I was going to die.”¹⁸¹

ACC also failed to immediately provide medical assessment and care following the use of force, again in violation of ICE standards and Alaska regulations.¹⁸² Antonio requested a medical visit after he continued to have difficulty breathing but did not see a doctor for over a week. The doctor gave him an inhaler, which he says has helped a little but “[his] breathing is still not the same.”¹⁸³

For multiple people, including at least one who had past trauma from being assaulted, the experience caused their mental health to further deteriorate.¹⁸⁴ For Kofi, this experience was “really traumatizing,” while for Adam, “the experience left [him] with ongoing anxiety and psychological distress.”¹⁸⁵ This use of force “took an emotional toll on” Jamir, who was “deeply traumatized” and said that he was “depressed and cried privately in [his] cell” after the event.¹⁸⁶

VI. Lack of Access to Counsel and Harm to Legal Cases

People held in ICE custody retain core First Amendment protections. This includes freedom of expression, which encompasses “the right to communicate with persons outside prison walls”—most critically, the right to communicate with and retain counsel.¹⁸⁷ Attorneys likewise have First Amendment rights to free speech and association that protect their ability to communicate with incarcerated retained and prospective clients about their legal rights, maintain an attorney-client relationship, and represent those clients in court.¹⁸⁸

Against this legal backdrop, the barriers documented below—obstacles to locating and contacting detained clients; unreliable access to basic communication and case-support tools such as phones, legal material, and language interpretation; and practices that chill or burden in-person legal visits, including strip searching detainees after they meet with counsel—operate together to undermine access to counsel and meaningful participation in legal proceedings.

SUDDEN TRANSFERS INTERFERED WITH LEGAL REPRESENTATION

Several men had retained legal counsel, all based in the Lower 48, in their ongoing asylum and removal proceedings. ICE standards provide for confidential in-person visits with loved ones and counsel, as well as telephone calls and legal mail.¹⁸⁹ At the time of the transfer, many members of the June 2025 transfer group were working independently or with retained attorneys

and family members to gather evidence and develop their claims or to appeal removal orders.¹⁹⁰ But the “sudden and chaotic”¹⁹¹ transfer to ACC put these efforts in jeopardy.

Despite ICE standards providing for notice before transfers in most circumstances, ICE moved the June 2025 transfer group with no notice to their retained counsel.¹⁹² Attorneys for the men learned of the transfer only through frantic last-minute calls from clients,¹⁹³ through family members,¹⁹⁴ or by chance, such as when counsel checked the ICE Online Detainee Locator after requests to schedule client meetings in Tacoma went unanswered.¹⁹⁵

One Tacoma-based immigration attorney, Lynn Stopher, described this as the first time she encountered “a situation in which a client was transferred in the middle of the night on a Saturday with no prior notice to the client or counsel.”¹⁹⁶ She was only made aware of her client’s transfer after receiving voicemails from her client and a fellow detainee at the Tacoma ICE facility on the evening of June 7, saying that her client was told he would be transferred in a matter of hours to another state, but did not know which state.¹⁹⁷ Ms. Stopher explained that her client’s case was fast-moving and required consistent access to timely communications with counsel.¹⁹⁸

LACK OF PHONE ACCESS AND ABILITY TO CONTACT LOVED ONES AND COUNSEL

The immigrants and their attorneys faced extreme barriers to communicating after arriving at ACC. Their experience at ACC was in stark contrast to the Tacoma ICE facility, where they had access to tablets that provided essentially unlimited audio and video calls and text messaging at all times of day, even to family who lived abroad.¹⁹⁹

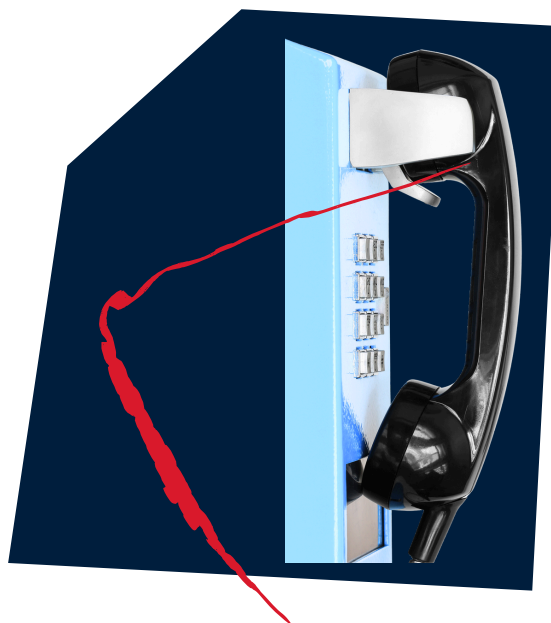
At ACC, telephone calls must be made through Securus Technologies, a for-profit contract provider for communication services throughout the DOC. To receive calls from detainees, individuals must create a Securus account and provide funds to their detained loved ones, or they must pay by credit card if receiving a call from a detainee without an account. At Tacoma, the men could call collect or pay for the call themselves, and they could call attorneys free of charge. When the June 2025 transfer group arrived at ACC, the phones in their housing unit were not functioning.²⁰⁰ As Eliseo explained, “At first the phones didn’t work ... it was only about five days later the phones started to work, and we could finally call our family.”²⁰¹

Even then, access was inadequate. Only three out of the four phones were working, and they had to be shared by all detainees.²⁰² Detainees struggled to place any calls—particularly sensitive legal calls—without being overheard.²⁰³ The shortage of phones also meant long, unpredictable waits to access a phone. Detainees described a first-come, first-served line and reported waiting 45 minutes to an hour for a turn—sometimes only to lose their opportunity when lockdowns began.²⁰⁴

Frequent lockdowns further reduced the limited telephone availability: “We were not allowed access to the phones during lockdowns,” Malik reported.²⁰⁵ “Sometimes, I would wait in line only to be placed in lockdown before my turn to use the phone,” he said.²⁰⁶ Some men begged DOC officers to unlock their cells so they could use the phone, to no avail.²⁰⁷

Phone access was also constrained by call restrictions and costs. Initially, the men received two free phone calls.²⁰⁸ These limits made it functionally impossible for attorneys to set up three-way calls with interpreters, which prevented the attorneys and detainees from having substantive conversations.

The men also learned that they could not make international calls, deepening their isolation.²⁰⁹ Kofi found it “impossible” to talk to his parents and siblings abroad because “the phone system said the number was not accepted.”²¹⁰ Jamir recalls being “barred” from making calls to his home country and pleading with his attorney to connect him with his uncle there so he “could tell him [he] was alive and trying to survive.”²¹¹



After the two free calls were exhausted, the immigrants could generally only place collect calls through the Securus platform.²¹² Several reported they could not independently set up nor add funds to their Securus accounts, and calls would connect only if the recipient accepted the call and entered debit or credit card information—often causing dropped calls if the recipient could not pay, did not know how to pay, or entered a digit incorrectly.²¹³ Nadir was completely unable to speak to his son while at ACC because “he could not take my calls because he is a teenager and does not have a credit card he could use to accept the call. . . . I was not able to talk to him and reassure him that I was still fighting.”²¹⁴ As Kareem described,

“No one knew I was in Alaska. I was not able to reach anyone.”²¹⁵



BARRIERS TO CONFIDENTIAL LEGAL CALLS AND VISITS

Out-of-state and local attorneys struggled to navigate ACC’s process for setting up confidential legal calls and visits. The DOC Commissioner confirmed in her legislative testimony that in the initial days, ACC had essentially prohibited all confidential legal visits with the immigrants. She explained that ACC staff misunderstood the rules for attorney visitation with ICE detainees, believing that ICE had to confirm their clearance, which is not the case. “I would be remiss if I didn’t say there were some bumps in the road,” she admitted.²¹⁶ What the DOC Commissioner minimized as a “learning curve”²¹⁷ demonstrated just how unprepared ACC was to house immigrants consistent with federal law and standards.²¹⁸

Attorneys reported that calls and emails to ACC routinely went unanswered, forcing them to rely on personal contacts simply to learn how to request legal calls.²¹⁹ One attorney called the number for ACC in the ICE Detainee Locator, was given an email address, and emailed repeatedly without a response; only after a colleague connected her to the ACLU of Alaska did she obtain the right email address and schedule a call—nearly a week after the transfer.²²⁰ As she explained, “It was extremely difficult to communicate with my client while he was at ACC ... He was unable to call me. I was unable to schedule a video call.”²²¹ Another California-based immigration attorney similarly described the process as “extremely difficult and chaotic,” reporting that she received no response through official channels and ultimately reached her client only after she was eventually put in touch with the ACLU of Alaska, who provided her with the correct information.²²²

At least one attorney was unable to contact his client “a single time” while the client was at ACC.²²³

Even when ACC confirmed the proper procedure for attorney visitation to ICE detainees, ACC required legal calls to be scheduled at least 24 hours in advance, making urgent communication effectively impossible.²²⁴ Nicolas Olano, an Anchorage-based attorney who was retained by one of the men in the June 2025 transfer group, said ACC also limited his client to just one confidential legal call a day, which “significantly hampers communication and the ability to work on [their] cases.”²²⁵ As another attorney observed, the lack of access “negatively impacted [the] attorney-client relationship and my ability to zealously represent [my client].”²²⁶ Overall, as one attorney summarized, “My experience attempting to represent [my client] at ACC was significantly more challenging than my experience at [the Tacoma ICE facility]... This is the first time in my ten years of practice that I have been unable to contact a client for weeks at a time.”²²⁷

These barriers to communication extended to onsite legal visits. Per DOC policy, attorneys and legal representatives “may visit a prisoner at the institution between 8 AM and 10 PM daily.”²²⁸ Policy also mandates that the institution must “ensure that the attorney or attorney’s representative can speak privately with the prisoner” in a “private and secure attorney-client interview space with adequate seating and a writing table or desk.”²²⁹ The civil detainees were not afforded these privileges.

After ACC’s effective ban on legal visits ended, attorneys still struggled to schedule and understand guidelines for visits.²³⁰

One challenge was language translation. Many members of the June 2025 transfer group spoke a language other than English, including Spanish, Uzbek, Farsi, Urdu, and Vietnamese.²³¹ Attorneys often rely on telephonic translation services to provide real-time interpretation during onsite meetings.²³² However, ACC policies and procedures generally failed to provide a landline phone for translation services, to allow attorneys to bring in and use their own phones for language translation, or otherwise arrange for interpretation.

Alaska attorney Maggie Massey, for example, met with two of the men to provide legal advice and potentially begin an attorney-client relationship. As neither of the two detainees spoke English as their primary language, she requested permission in advance to bring a cellphone into the onsite appointment so she could call in an interpreter. However, when she arrived, she was placed in a room with the detainee sitting on the other side of a glass partition, with a two-way telephone attached to the wall. DOC officers refused to allow her to be in the same room as her prospective client. In both interviews, Massey called a language line service on her cellphone, placed the call on speakerphone, and held the cellphone up to the wall-attached telephone, but the detainee could not hear the interpreter through the two-way phone no matter how she angled the speaker. She and the detainee could see each other clearly and tried to gesture to each other questions and yes/no answers, but it was impossible to ascertain important information. One of her prospective clients became visibly distressed as it became clear they could not communicate and started to cry as it was nearing time for him to return to his cell. Later in her second interview, the prospective client grew quiet and somber when

the translation failed. Massey herself felt helpless and frustrated, describing how she left ACC “and cried in my car because of how frustrating and sad the situation was.”²³³

Attorneys were also forced to give DOC officers legal documents and forms containing information relevant to their clients’ cases, thus risking loss of the attorney-client privilege and other confidentiality protections.²³⁴ Attorney Nicolas Olano stated that this procedure was unusual, and that “the justification [he was] offered for this procedure was to prevent the smuggling of drugs into ACC,” which he described as “nonsensical.”²³⁵ Mr. Olano had never seen such a procedure applied at an immigration detention center in his twenty years of practicing immigration law.²³⁶

ACC also regularly strip searched the men following “contact” onsite legal visits, where the attorney and client were in the same room, and not separated by glass.²³⁷ Amir described his experience:

“After the visit they took me to a holding cell and left me there alone for at least two hours. After two hours, they strip-searched me. There is a big window on the cell and a camera in the hallway that I think could see into the cell during the search. Anyone who walked by could have seen into the cell. They made me take off all my clothes and get naked. They told me to bend over and spread my butt cheeks.

I felt very violated because I knew immigration detainees were not supposed to be strip-searched, but there was nothing I could do. It really messed with me having to do that.”²³⁸

These “dehumanizing,” “humiliating,” and “embarrassing,” mandatory strip searches after attorney-client meetings imposed impermissible burdens on counsel visits, and clearly violated ICE’s standard that “[a] facility may only adopt a policy permitting strip searches after all contact visits in the absence of reasonable suspicion if detainees have the right to choose non-contact visitation instead”—and “[d]etainees must be fully informed” of this option to avoid being strip searched.²³⁹

DENIAL OF TOOLS TO SELF-REPRESENT AND LITIGATE CASES, INCLUDING LAW LIBRARIES AND LEGAL MATERIAL

Many men required access to the law library to work on their cases, especially for those who were representing themselves.²⁴⁰ ICE standards provide that facilities like ACC must have a law library with sufficient space and resources to facilitate detainees’ legal research and writing, including an adequate number of computers and the ability to print and make copies at no charge. Detainees must be permitted use of the law library for a minimum of five hours per week, and requests for additional time should be accommodated to the extent possible, with special priority to those with imminent court deadlines. Facilities must also provide detainees with limited English proficiency accommodations, like securing translation services, or otherwise need to contact ICE to determine how the facility should proceed.²⁴¹

Indeed, at the Tacoma ICE facility's law library, as described by one detainee:

"[W]e got an hour every day but we could get approved for an extra hour. For two to three months when I had a BIA [Board of Immigration Appeals] appeal, I got approved to have extra time so I had three hours at once in the law library. They also have all of the immigration and court forms you need at the law library in Tacoma. You can also print documents in Tacoma, and I have a flash drive where I save all my work."²⁴²

In stark contrast, at ACC it took around two weeks and "a lot" of requests before ACC granted the group any access to the law library.²⁴³ The men were only allowed access to the library for one hour, but the hour was often cancelled due to lockdowns.²⁴⁴ DOC officers let the men use the library in two shifts during the allotted hour, meaning that in practice, people only received half an hour of library time.²⁴⁵ The library had only four computers, which had inconsistent access to Lexis Nexis, a legal research database, and one digital typewriter for typing documents.²⁴⁶ The computers were slow and did not have access to relevant case law from the BIA, which several people needed as they pursued their appeals.²⁴⁷ The ACC law library also lacked the administrative forms and practice advisories available in the Tacoma library.²⁴⁸

The digital typewriter did not have the ability to save documents, meaning that the men could not save their work if they did not finish within the allotted time.²⁴⁹ The available printers "only worked half of the time."²⁵⁰

Instead the men often had to "take down the case number and send in a request to the officer to print it."²⁵¹ But staff charged to print cases, in violation of ICE's standard that "[d]etainees may not be charged for copying or printing a reasonable amount of legal material."²⁵²

As Amir describes, "I went to the law library at ACC twice and did not go back because it was pointless. You could not save your work and there was not enough time to work on anything significant. . .

It was damn near impossible to do anything useful at the law library."²⁵³

ICE standards also require facilities to provide indigent detainees with free envelopes and stamps for their legal mail, and must assist detainees who need certified mail or other services necessary to pursue a legal matter.²⁵⁴ To make copies of legal mail in the law library, the immigrants had to submit a written request form with a DOC officer. For the one individual who submitted a form, it went unanswered.²⁵⁵ The abrupt transfer to ACC also prevented the men from being able to update their mailing addresses with courts and administrative agencies, which disrupted communications essential to their pending cases.²⁵⁶



DAMAGE TO IMMIGRANTS' CASES

The barriers described above were especially damaging in fast-moving immigration matters, such as appeals, third-country removal challenges, and asylum-related claims, where immigrants must be able to work quickly on their cases and communicate with counsel, with interpretation, as necessary.²⁵⁷

Nadir has multiple legal cases in which he is representing himself, but his legal mail was sent to Tacoma while he was at ACC. This included a BIA decision on the appeal for his bond hearing for release from detention. By the time he returned to Tacoma from ACC, the 30-day deadline to appeal was almost expired, and there was not enough time to prepare his filing. “I lost my opportunity to appeal,” he explained,

“I lost the opportunity to challenge my continued detention.”²⁵⁸

Nadir was not alone in his struggle to keep his legal claims alive. Another immigrant, Malik, eventually received legal mail from the court while at ACC, after it was first sent to Tacoma. This re-routing caused such a substantial delay that the deadline to file the appeal had passed by the time he received notice of the court’s decision.²⁵⁹ Kareem also could not file an appeal to try to get released from detention because he could not reach counsel or access needed forms.²⁶⁰ Adam was in the midst of collecting letters in support of his bond request, but “after his transfer to Alaska, [he] could not access that mail for a time. . . which prevented [him] from filing for bond.”²⁶¹



In yet another case, attorney Lynn Stopher was fighting against third-country removal for her client, but after his transfer to ACC she could not promptly advise him about a June 23, 2025 Supreme Court ruling with direct relevance to the policies and procedures governing these removals. She was unable to work with him to assess his fear of persecution or torture if sent to any of an evolving list of nations agreeing to accept third-country removals.²⁶² “Such disruption is detrimental to his immigration case, his access to counsel, and his ability to remain informed about the swiftly changing legal landscape,” Stopher explained.²⁶³ And visiting her client in person “was not a possibility when [he] was being held thousands of miles away from me.”²⁶⁴

Later, as described below, at least three of these immigrants chose “voluntary” removal after they returned to the Tacoma ICE facility, rather than continued detention and potential future transfers to ACC or other facilities.

VII. Flight Out of Anchorage and Lasting Damage

On June 30, 2025, with almost no notice and not enough time to contact family and counsel, ICE transferred the remaining thirty-five men from ACC back to Tacoma.²⁶⁵ The immigrants report that the return flight was the “same misery”—strip searched before departure, restrained in handcuffs and ankle shackles, loaded back onto what they describe as an old military cargo plane, and shackled in rows without traditional seats or seatbelts.²⁶⁶ One person reported that he was forced to wear the same clothes for the return flight as he had flown in with and had previously urinated on when trying to use the bags, and “[t]hey smelled terrible.”²⁶⁷ A dark fluid, described by multiple people as resembling oil, dripped from the airplane’s ceiling onto some people, who were unable to wipe it off themselves due to the restraints.²⁶⁸ These individuals were again forced to urinate in bags, and when the bags ran out, federal officers allegedly ordered people not to urinate at all.²⁶⁹ The return flight caused Winston’s Crohn’s disease to again flare up.²⁷⁰

Upon returning to Tacoma, these men urgently sought to reconnect with loved ones, learn the status of their cases, and reschedule medical follow-ups disrupted by the transfer. In the days that followed, questions circulated about tuberculosis (“TB”) exposure tied to the Alaska transfer amid reports of a returning ACC detainee being rushed to the hospital for suspected TB. DOC officials have denied any documented active TB at ACC during the time the

June 2025 transfer group was detained there.²⁷¹ This crisis underscored how rapid ICE transfers can risk complicating the screening, tracking, and treatment of infectious diseases, with potential ripple effects for local hospitals, public health departments, and the surrounding communities.²⁷²

The treatment of these men detained at ACC not only violated laws and policies, but also broke people down. Yusuf, who was forced to flee his home country after being outed as gay in a country where homosexuality is criminalized and deeply stigmatized, continues to struggle to process what he endured at ACC:

“Each day, I am left wondering why I was treated so poorly. The uncertainty weighs heavily on me, and I feel increasingly discouraged.”²⁷³ I still have nightmares about going back there,” explained Nadir, “I hope they never take anyone else there, or that I go back there myself.”²⁷⁴

One high-profile detainee, Albert Khamitov, fled persecution in Russia for being gay and entered the U.S. after waiting for eight months in Mexico for an appointment with U.S. border officials. He won his asylum claim shortly after his return from ACC, released just in time to participate in the Seattle Pride Parade. “I still love the USA,” he said, as he continues to grapple with the memories of his prolonged black hole of immigration detention, during which he lost twenty-two pounds. “We sincerely couldn’t understand why this was happening to us,” he said, explaining the conditions he endured at

ACC were some of the worst he has experienced.²⁷⁵

The outcome for others has not been as successful. In their final days at ACC and upon their return to Tacoma, many men spoke openly about abandoning their cases, feeling pressure to relinquish their rights to end their suffering.²⁷⁶ “This is not life,” one person told his attorney, explaining he was thinking of giving up his claim for relief from removal because he was feeling frustrated and tired from the transfer, mistreatment and confusion.²⁷⁷

The ACLU of Alaska is aware of at least three people who chose to forgo their removal proceedings and elect “voluntary departure” soon after returning from ACC, which is consistent with how, nationwide, the choice to voluntarily depart has become coercion in the face of inhumane conditions of mandatory confinement.²⁷⁸

One of the men who chose to abandon his claim for protection, Jamir, wrote in a letter to the ACLU of Alaska,

“I requested deportation because I realized I would not be able to complete the process psychologically due to the pressure that ICE officers put on me, especially during the time I spent in prison,” referring to ACC.²⁷⁹ Jamir later said that he decided to accept voluntary departure during the transfer back to Tacoma, stating

“My experience at ACC was so traumatizing that [I] preferred to return to live freely, though in fear in [my home country.]”²⁸⁰

CONCLUSION

Transfers between ICE detention facilities are often described as simple logistical necessities, but as the experience of immigrants detained at ACC demonstrates, they can operate as a structural barrier to due process, and as a means to coerce individuals to abandon lawful claims for immigration relief. When the government can move people faster than lawyers can locate them, and when conditions are harsh and communication is unreliable, attorney-client relationships fracture, deadlines are missed, and the civil nature of immigration detention is rendered meaningless.

While no other large group of immigration detainees from the Lower 48 has been transferred to ACC at the time of this report's publication, the DOC Commissioner confirmed that DOC's contract with ICE will continue indefinitely until "changed in statute" and that DOC is committed to being a "good partner federally."²⁸¹ Absent significant, enforceable safeguards, future transfers of out-of-state ICE detainees into Alaska will continue to erode access to counsel and the courts, not because their claims lack merit, but because the system makes pursuing them practically impossible.

ACC's inability to house civil detainees humanely and distinctly from the general jail population also affects the growing number of Alaskans arrested by ICE locally and held at ACC prior to transfer to an out of state ICE detention facility—a moment when a person's ability to contact family and counsel, with interpretation where needed, is critical to their ability to request release from detention or immigration relief.²⁸²

In Alaska, the solution cannot be expanding detention capacity, whether through continued reliance on DOC's open-ended agreement with ICE or by opening a dedicated federal detention facility. Such a facility in Alaska would risk entrenching the isolation and logistical barriers that make "voluntary" departures more of a predictable product of pressure than a free and informed choice.²⁸³ Rather than treat detention as a default, Alaska and federal leaders should prioritize alternatives to detention, such as expanding community-based options. A system that depends on confusion, separation, and carceral conditions to function is not administering the law, it is evading it.

RECOMMENDATIONS

To prevent further harm and to bring the practices of Alaska and the federal government into alignment with federal law and fundamental civil confinement norms, we recommend the following:

STATE POLICYMAKERS

1. Enact independent oversight for all detainees held in state custody: The Alaska Legislature should enact legislation requiring independent, routine oversight of conditions for all individuals housed in DOC facilities. Oversight of civil immigration detainees specifically should include:

- Regular, unannounced inspections and public reporting;
- Access to civil immigration detainees for confidential interviews;
- Review of grievances, discipline, health care, language access, and attorney access; and
- Authority to require corrective action plans and timelines.

2. Establish minimum statutory protections for civil immigration detainees in DOC facilities: State law should set baseline protections that prevent civil immigration detainees from being treated as criminal detainees. Civil detainees should not be subjected to jail-like restrictions, disciplinary frameworks, extended lockdowns, or other deprivations of basic liberties.

3. Pass legislation that prohibits DOC from accepting and holding federal civil immigration detainees transferred from other states.

ALASKA DEPARTMENT OF CORRECTIONS

1. Pause all additional transfers of ICE detainees until civil detention standards can be met: DOC should refuse to accept any additional transfers of ICE detainees unless and until it can demonstrate—through written policy, staff training, and operational practice—that conditions comply with ICE’s National Detention Standards (“NDS”) and ICE’s Non-Dedicated Intergovernmental Service Agreement Standards (“IGSA Standards”).

This includes:

- a. Adopting and implementing distinct policies for civil detainees that reflect their non-criminal status, including:
 - No strip searching absent individualized, articulable suspicion and narrowly tailored circumstances;
 - No lockdowns or punitive restrictions imposed as routine facility management tools; and
 - Clear limits on discipline, segregation, and use of force.
- b. Providing qualified interpretation and translation services including:
 - Interpretation for medical and mental health care, grievance procedures, disciplinary interactions, and legal access; and
 - Translated materials for facility rules, detainee rights, requests for services, and complaint processes.

c. Updating legal resources and ensuring meaningful access to the law library, by:

- Modernizing and maintaining legal materials relevant to immigration proceedings and conditions-of-confinement claims;
- Providing functional and modern computers and supportive technology to allow detainees to complete legal research and produce litigation materials, such as printers, scanners, and the ability to save documents on CD-ROM or USB flash drive; and
- Ensuring access to law libraries is regular and timely, with interpretation services for persons with limited English proficiency.

d. Facilitating meaningful access to counsel and legal communication by:

- Ensuring reliable, private attorney calls and visits;
- Adopting adequate notice and scheduling procedures that do not impede representation; and
- Providing reasonable access to legal mail, document copying/scanning, and information-sharing, include access to free envelopes and stamps for indigent people.

2. Create a quality assurance and accountability process to ensure all staff are trained and held accountable for upholding these standards.

U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT

1. Evaluate ACC's compliance with federal detention standards: ICE should conduct a transparent compliance review of ACC's ability to house civil detainees consistent with federal standards. Where deficiencies exist, ICE must end its certification of ACC as a facility that may house civil immigration detainees for more than 72 hours.

2. Halt further transfers to Alaska until civil detention standards are ensured in practice: ICE should not transfer additional detainees to Alaska unless DOC can demonstrate they will be housed in conditions consistent with civil detention standards and ICE can verify ongoing compliance.

3. Provide adequate notice to counsel before transfers occur: ICE should ensure attorneys receive sufficient notice of impending transfers so that representation is not disrupted and legal deadlines are not missed.

4. Consider a person's health needs in deciding whether to transfer them: ICE should consult medical records and clinicians to review whether any detainee considered for transfer has serious disabilities, complex medical needs, or ongoing treatment needs that would make them unsuitable for transfer. ICE must also ensure any transfers comply with protections set out in Section 504 of the Rehabilitation Act, 29 U.S.C. §794.

5. Provide adequate notice to detainees

before transfers occur: ICE should ensure detainees are informed of transfers far enough in advance to notify loved ones and retained counsel, and safeguard property and legal materials.

6. Ensure humane, safe, and dignified

transportation: ICE must guarantee that transfers are conducted in a manner that is humane and medically appropriate, including by protecting against degrading treatment during transit and ensuring attention to health needs and access to medication.



APPENDIX A

[Click to access and download Appendix A: Supporting Immigrant Declarations](#)

APPENDIX B

[Click to access and download Appendix B: Supporting Attorney Declarations](#)

APPENDIX C

[Click to access and download Appendix C: Supporting Documents Obtained Through Public Sources and Record Requests](#)

ENDNOTES

1 See, e.g., Wil Courtney, Governor’s office says so-called ‘Bear Alcatraz’ rumors unfounded, ALASKA’S NEWS SOURCE (Jul. 9. 2025), <https://www.alaskasnewssource.com/2025/07/10/governors-office-says-so-called-bear-alcatraz-rumors-unfounded/>.

2 See, e.g., Michelle Theriault Boots, Alaska sees surge of ICE detentions amid national immigration crackdown, ANCHORAGE DAILY NEWS (Jan. 19, 2026), <https://www.adn.com/alaska-news/2026/01/19/alaska-sees-surge-of-ice-detentions-amid-national-crackdown/>; Michelle Theriault Boots, So far in 2026, ICE has arrested at least 47 people in Alaska. One was pregnant, ANCHORAGE DAILY NEWS (Apr. 23, 2026), <https://alaskapublic.org/news/2026-04-23/so-far-in-2026-ice-has-arrested-at-least-47-people-in-alaska-one-was-pregnant>.

3 See, e.g., *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001) (immigration detention is “civil, not criminal” and must be “nonpunitive in purpose and effect”); *Youngberg v. Romeo*, 457 U.S. 307, 322 (1982) (explaining civil detainees must receive “more considerate treatment and conditions of confinement” than those in criminal custody); *Jones v. Blanas*, 393 F.3d 918, 932 (9th Cir. 2004) (“civil detainees retain greater liberty protections than individuals detained under criminal process” and “cannot be subjected to conditions that ‘amount to punishment’”) (internal quotation marks omitted).

4 See Dora Schriro, Immigration Detention Overview and Recommendations, DHS-ICE at 2 (Oct. 6, 2009), <https://perma.cc/8JV2-T3SS>.

5 *Id.* at 21.

6 ICE’s National Detention Standards (“NDS”) apply to non-dedicated facilities that, like ACC, house both criminal incarcerated people and ICE detainees. See ICE, National Detention Standards at 2 (2025), <https://perma.cc/SZ48-QCFE>. In addition to the NDS, non-dedicated facilities must also comply with ICE’s Non-Dedicated Intergovernmental Service Agreement Standards (“IGSA Standards”). See ICE, Non-Dedicated Intergovernmental Service Agreement Standards at 1 (2025), <https://perma.cc/7JPL-X5DL>. Relatedly, while ICE’s Performance Based National Detention Standards (“PBNDS”) apply to facilities used only for ICE detention, they further demonstrate how conditions must be non-punitive. See ICE, Performance Based Nat’l Detention Standards 2011 (Rev. 2016), <https://perma.cc/S5UF-N54Y>.

7 The full video of the June 20, 2025 fact-finding hearing by the Alaska State Legislature’s House Judicial Committee is on the state website at <https://www.akleg.gov/basis/Meeting/Detail?Meeting=HJUD%202025-06-20%2013:00:00#tab3> 4 (hereinafter “June 20, 2025 Hearing”). This testimony from the Commissioner is at June 20, 2025 Hearing at 1:09 PM.

8 *Id.* at 1:15-1:17, 1:19 PM.

9 *Id.* at 1:26 PM.

10 *Id.* at 1:12 PM. Detention Services Intergovernmental Agreement between the U.S. Marshals Service and the State of Alaska Dep't of Corrections (effective date: Jan. 1, 2024), attached as Appendix C, Exhibit A.

11 June 20, 2025 Hearing, *supra* note 7 at 1:14, 1:23 PM. Modification of Intergovernmental Agreement between the U.S. Marshals Service and the State of Alaska Dep't of Corrections (effective date: May 1, 2025), attached as Appendix C, Exhibit B.

12 June 20, 2025 Hearing, *supra* note 7, at 1:15-1:16 PM.

13 *Id.* at 1:17-1:18 PM (confirming no public or legislative notification that the immigrants were arriving).

14 See Corinne Smith, Alaska detained 42 men arrested by ICE and flown in from out of state, amid federal crackdown, ALASKA BEACON (June 11, 2025), <https://alaskabeacon.com/2025/06/11/alaska-detained-42-men-arrested-by-ice-and-flown-in-from-out-of-state-amid-federal-crackdown>; Liz Ruskin, Alaska holds migrants in 'punitive conditions,' violating ICE standards, lawyers say, ALASKA PUBLIC MEDIA (June 23, 2025), <https://alaskapublic.org/news/politics/2025-06-23/alaska-holds-migrants-in-punitive-conditions-violating-ice-standards-lawyers-say>.

15 June 20, 2025 Hearing, *supra* note 7, at 1:06-1:07, 2:41-2:43 PM.

16 See ACLU of Alaska, Court Cases – Vail v. Dunleavy, <https://www.aclu.org/cases/vail-v-dunleavy> (describing *Vail v. Dunleavy*, et. al, Case No. 3-25-cv-00086-HRH, filed May 1, 2025).

17 Alaska Department of Corrections, Anchorage Correctional Complex, <https://doc.alaska.gov/institutions/anchorage> (last visited March 2, 2026); see also Michelle Theriault Boots, ICE detainees at Anchorage jail face communication barriers and harsh conditions, advocates say, ANCHORAGE DAILY NEWS (June 17, 2025), <https://www.adn.com/alaska-news/crime-courts/2025/06/17/advocates-say-ice-detainees-at-the-anchorage-jail-face-communication-barriers-harsh-conditions/> (DOC spokesperson commenting on denial of media visit to observe conditions for the immigrants by explaining staff are busy “not only with the day-to-day operations of our busiest facility, but also with the added demands and coordination involved in managing multiple requests related to the ICE detainees”).

18 See, e.g., Presentation from Department of Corrections to the Alaska Senate State Affairs Committee (Feb. 24, 2024), https://www.akleg.gov/basis/get_documents.asp?session=34&docid=10461; Lisa Kennedy, Alaska correctional officers union says system is in 'crisis' due to staffing shortages, ALASKA'S NEWS SOURCE (Dec. 27, 2019), <https://www.alaskasnewssource.com/content/news/Alaska-correctional-officers-union-says-system-is-in-crisis-due-to-staffing-shortages-566528561.html>; Lisa Demer Audit finds state prisons understaffed, ANCHORAGE DAILY NEWS (Jun. 2, 2010), <https://www.adn.com/alaska-news/article/audit-finds-state-prisons-understaffed/2010/06/03/>.

19 See, e.g., Chris Klint, Anchorage jail inmate dies after being restrained by guards, ALASKA PUBLIC MEDIA (July 14, 2025), <https://alaskapublic.org/news/public-safety/2025-07-14/anchorage-jail-inmate-dies-after-being-restrained-by-guards>; Corinne Smith, Alaska Department of Corrections reports three in-custody deaths in April so far, one a suicide, ALASKA BEACON (Apr. 24, 2025), <https://alaskabeacon.com/briefs/alaska-department-of-corrections-reports-three-in-custody-deaths-in-april-so-far-one-a-suicide/>; Zaz Hollander, 'Other people's beloveds': The decisions and delays that preceded a fatal beating at Anchorage's jail, ANCHORAGE DAILY NEWS (Mar. 15, 2025), <https://www.adn.com/alaska-news/crime-courts/2025/03/15/not-safe-the-decisions-and-delays-that-preceded-a-fatal-beating-at-anchorages-jail/>.

20 June 20, 2025 Hearing, *supra* note 7, at 1:26 PM; see also Jenna Kunze, Alaska corrections department head acknowledges 'bumps in the road' with ICE detainees, ANCHORAGE DAILY NEWS (June 21, 2025), <https://www.adn.com/alaska-news/2025/06/21/alaska-corrections-department-head-acknowledges-bumps-in-the-road-with-ice-detainees/>.

21 June 20, 2025 Hearing, *supra* note 7, 1:28-1:30 PM; see also NDS, *supra* note 6.

22 June 20, 2025 Hearing, *supra* note 7, 1:33 PM.

23 *Id.* at 1:25-1:27 PM.

24 *Id.* at 2:37 PM.

25 See, e.g., Julia Ainsley, et al., A sweeping new ICE operation shows how Trump's focus on immigration is reshaping federal law enforcement, NBC NEWS (June 4, 2025), <https://www.nbcnews.com/politics/justice-department/ice-operation-trump-focus-immigration-reshape-federal-law-enforcement-rcna193494>; José Olivares, Trump administration sets quota to arrest 3,000 people a day in anti-immigration agenda, THE GUARDIAN (May 29, 2025); <https://www.theguardian.com/us-news/2025/may/29/trump-ice-arrest-quota>; Julia Ainsley and Laura Strickler, Trump's immigration enforcement record so far: High arrests, low deportations, NBC NEWS (July 10, 2025), <https://www.nbcnews.com/politics/immigration/trumps-immigration-record-far-high-arrests-low-deportations-rcna217752/>.

26 See, e.g., Kristen Holmes and Priscilla Alvarez, How Stephen Miller micromanages Trump’s immigration policies, CNN (Jan. 29, 2026), <https://www.cnn.com/2026/01/29/politics/stephen-miller-trump-immigration-minneapolis>.

27 See, e.g., Carol D. Leonnig, ICE declares millions of undocumented immigrants ineligible for bond hearings, WASH. POST (Jul. 15, 2025), <https://www.washingtonpost.com/immigration/2025/07/14/ice-trump-undocumented-immigrants-bond-hearings/>; Camilo Montoya-Galvez, ICE says many in immigration detention no longer qualify for bond hearings, CBS NEWS (July 15, 2025), <https://www.cbsnews.com/news/ice-immigration-detention-bond-hearings/>.

28 See Geoff Bennet and Ali Schmitz, Ousted immigration judge describes deepening court backlog, PBS News (Nov. 12, 2025), <https://www.pbs.org/newshour/show/ousted-immigration-judge-describes-deepening-court-backlog>.

29 See, e.g., Alternatives to Immigration Detention: Less Costly and More Humane than Federal Lock-up, ACLU (Oct. 27, 2024), <https://www.aclu.org/documents/aclu-fact-sheet-alternatives-immigration-detention-atd>; The Real Alternatives to Detention, Women’s Refugee Commission (updated June 5, 2019), <https://www.womensrefugeecommission.org/research-resources/alternatives-to-detention/>.

30 See, e.g., Immigration Detention Expansion in Trump’s Second Term, American Immigration Counsel (Jan. 2026) at 4, <https://www.americanimmigrationcouncil.org/report/immigration-detention/> (“As this report reveals, rather than focusing on serious public safety threats and flight risks, the Trump administration is primarily using detention to pressure people into giving up their chance to remain in the United States.”); Steve Narnowski and Rebecca Boone, A judge orders DHS to give Minnesota detainees swift access to lawyers before transfers, AP NEWS (Feb. 12, 2026), <https://apnews.com/article/whipple-minnesota-detainees-attorneys-lawsuit-d2af86f555357badfb02b14953c02a08> (federal judge concluding, for quick transfers and conditions of confinement in a Minnesota facility, “All of these barriers make it difficult — if not impossible — for attorneys to effectively represent their clients.”); Yuqiing Liu, Susan Du, and Christopher Magan, How immigration detainees are moved around Minnesota and the nation, THE MINNESOTA STAR TRIBUNE (Jan. 27, 2026), <https://www.startribune.com/how-immigration-detainees-are-moved-around-minnesota-and-the-nation/601542372> (transfer of immigrant detainees to remote, inhospitable facilities “puts pressure on them to abandon viable claims for asylum and other legal statuses”); Graeme Blair and David Hausman, One Year of Immigration Enforcement Under the Second Trump Administration, UC Berkeley Deportation Data Project (Apr. 7, 2026) at 1, <https://deportationdata.org/analysis/immigration-enforcement-first-year.html> (“As the release rate decreased, the overall number of voluntary departures increased by 28 times.”).

31 IGSA Standards, *supra* note 6, at 3.

32 Eliseo Decl. ¶ 8; Roberto Decl. ¶ 5; Kofi Decl. ¶ 4; Nadir Decl. ¶ 5; Yusuf Decl. ¶ 4; Malik Decl. ¶ 4; Amir Decl. ¶ 3; Ricardo Decl. ¶ 7. For purposes of this report, all detainees are proceeding under pseudonym to protect against potential retaliation by ICE.

33 June 20, 2025 Hearing, *supra* note 7, at 1:20 PM.

34 Jamir Decl. ¶ 4; Nina Shapiro, How an immigrant's path through a detention black hole ended in WA, SEATTLE TIMES (July 13, 2025), <https://www.seattletimes.com/seattle-news/how-an-immigrants-path-through-a-detention-black-hole-ended-in-wa/> (reporting the experience of asylum seeker Albert Khamitov, who was part of the June 2025 transfer group of ACC detainees).

35 Eliseo Decl. ¶ 2; Roberto Decl. ¶ 3; Winston Decl. ¶ 2.

36 Kareem Decl. ¶ 3.

37 *Id.* at ¶ 6.

38 *Id.*

39 *Id.*

40 Stopher Decl., on file with authors, ¶¶ 4, 7.

41 Enrique Decl. ¶ 2.

42 *Id.* at ¶¶ 3, 5, 7.

43 Winston Decl. ¶¶ 4-5; Shugall Decl. ¶¶ 5, 7.

44 Shugall Decl. ¶¶ 8-9.

45 Winston Decl. ¶ 4; Shugall Decl. ¶ 9.

46 Winston Decl. ¶ 4.

47 *Id.* at ¶ 4; Shugall Decl. ¶¶ 9, 18.

48 Antonio Decl. ¶¶ 1, 5-7.

49 *Id.* at ¶¶ 6-7.

50 Eliseo Decl. ¶ 9; Kofi Decl. ¶ 5; Nadir Decl. ¶ 5; Winston Decl. ¶ 5; Yusuf Decl. ¶ 5; Malik Decl. ¶ 5; Kareem Decl. ¶ 8; Jamir Decl. ¶ 8; Amir Decl. ¶ 5; Ricardo Decl. ¶ 8.

51 Antonio Decl. ¶ 8; Kofi Decl. ¶ 6; Yusuf Decl. ¶ 5; Malik Decl. ¶ 6; Jamir Decl. ¶ 7; Amir Decl. ¶ 6; Ricardo Decl. ¶ 8; Adam Decl. ¶ 5; Winston Decl. ¶ 5.

52 Kofi Decl. ¶ 6; Winston Decl. ¶ 5; Amir Decl. ¶ 6; Jamir Decl. ¶ 7.

53 Kofi Decl. ¶ 6; Antonio Decl. ¶¶ 9-10; Nadir Decl. ¶ 10; Yusuf Decl. ¶ 5; Malik Decl. ¶ 7; Kareem Decl. ¶ 8; Amir Decl. ¶ 7; Ricardo Decl. ¶ 8; Adam Decl. ¶ 5; Winston Decl. ¶ 5.

54 Nadir Decl. ¶ 10.

55 Winston Decl. ¶ 5; Shugall Decl. ¶ 13.

56 Adam Decl. ¶ 5.

57 Antonio Decl. ¶ 8.

58 *Id.* at ¶ 9.

59 *Id.* at ¶¶ 9-10.

60 Eliseo Decl. ¶ 9; Kofi Decl. ¶¶ 8-9; Nadir Decl. ¶ 8; Winston Decl. ¶ 5; Yusuf Decl. ¶ 5; Malik Decl. ¶ 7; Ricardo Decl. ¶ 8; Adam Decl. ¶ 5; Amir Decl. ¶¶ 7-8; Jamir Decl. ¶¶ 9, 11.

61 Nadir Decl. ¶ 8; Eliseo Decl. ¶ 9; Yusuf Decl. ¶ 5.

62 Malik Decl. ¶ 7; Nadir Decl. ¶ 8.

63 Eliseo Decl. ¶ 9; Malik Decl. ¶ 7; Winston Decl. ¶ 5; Ricardo Decl. ¶ 8.

64 Kofi Decl. ¶ 8.

65 Jamir Decl. ¶ 9.

66 NDS, *supra* note 6 at Standard 1.2, p. 9 (providing “[d]etainees in transit from one facility to another institution or jurisdiction will be transported in a safe and humane manner,” and “[a]ccommodations shall be made” for detainees with disabilities and “other special needs in accordance with security and safety needs and all applicable laws and regulations”); PBNDS, *supra* note 6, at Standard 7.4, p. 457 (“Transfers of detainees shall be accomplished safely and securely.”); Section 504 of the Rehabilitation Act, 29 U.S.C. §794.

67 Kofi Decl. ¶ 9.

68 Nadir Decl. ¶¶ 2-3, 11.

69 *Id.* at ¶ 11.

70 Amir Decl. ¶ 8.

71 Nadir Decl. ¶ 9.

72 *Id.* at ¶ 9 (describing seeing agents who were marked as being from ICE, CBP, DHS, ATF); Kofi Decl. ¶ 10 (describing seeing agents who were marked as FBI and ATF agents)

73 Nadir Decl. ¶ 9.

74 Kareem Decl. ¶ 8.

75 FBI Anchorage, “FBI Anchorage and our federal law enforcement partners continue to support Immigration And Customs Enforcement (ICE) in their ongoing immigration enforcement efforts in Alaska, to include this recent transport operation....,” Facebook (June 10, 2025), <https://perma.cc/DHE6-H628>; see also FBI Anchorage (@fbianchorage), “FBI Anchorage and our federal law enforcement partners continue to support @icegov in their ongoing immigration enforcement efforts in Alaska, to include this recent transport operation,” Instagram (June 10 2025), <https://perma.cc/XFM2-EE6M>.

76 Kofi Decl. ¶¶ 7, 11.

77 IGSA Standards, *supra* note 6, at 2; Roberto Decl. ¶ 6; Nadir Decl. ¶ 13; Kareem Decl. ¶ 9; Winston Decl. ¶ 6; Malik Decl. ¶ 8; Yusuf Decl. ¶ 6; Jamir Decl. ¶ 12; Amir Decl. ¶ 11.

78 Roberto Decl. ¶ 6; see also Kofi Decl. ¶ 12; Nadir Decl. ¶ 13; Kareem Decl. ¶ 9; Malik Decl. ¶ 8; Jamir Decl. ¶ 12; Amir Decl. ¶ 11.

79 Amir Decl. ¶ 11.

80 IGSA Standards, *supra* note 6, at 2 (“Upon admission to the facility, each detainee shall be provided a copy of the *ICE National Detainee Handbook* and information (in a language and manner they understand) about detention facility policies, prohibited acts, rules, and procedures.”); Eliseo Decl. ¶ 10; Nadir Decl. ¶ 19; Antonio Decl. ¶ 12; Kareem Decl. ¶ 10; Winston Decl. ¶ 6; Amir Decl. ¶ 14; Adam Decl. ¶ 6; Ricardo Decl. ¶ 9; Jamir Decl. ¶ 12; Malik Decl. ¶ 8; Yusuf Decl. ¶ 6. Some people reported that later on they learned of a handbook attached to the wall in the dayroom, but it was only in English, and they could not read it when locked down in their cells. See, e.g., Nadir Decl. ¶ 20. Commissioner Winkelman testified to the Legislature that detainees received orientation materials but did not know whether this included the ICE National Detainee Handbook. She later confirmed that ICE reissued the ICE Detainee Handbook in Anchorage. See June 20, 2025 Hearing, *supra* note 7, at 1:31-1:32; 3:03 PM.

81 Nadir Decl. ¶ 12.

82 Ricardo Decl. ¶ 9.

83 *Id.* at Decl. ¶ 18; Roberto Decl. ¶ 7; Kareem Decl. ¶ 10; Antonio Decl. ¶ 12; Adam Decl. ¶ 22.

84 Kofi Decl. ¶ 31; Yusuf Decl. ¶ 17; Antonio Decl. ¶ 13; Jamir Decl. ¶ 14; Ricardo Decl. ¶ 15; Amir Decl. ¶ 27.

85 Eliseo Decl. ¶¶ 10-12; Kofi Decl. ¶ 15; Winston Decl. ¶ 6; Yusuf Decl. ¶ 7.

86 IGSA Standards, *supra* note 6, at 2; Amir Decl. ¶¶ 28-30; Adam Decl. ¶ 20.

87 *Jones v. Blanas*, 393 F.3d 918, 933-34 (9th Cir. 2004).

88 June 20, 2025 Hearing, *supra* note 7, 1:33 PM.

89 Kofi Decl. ¶ 49 (“When we got to ACC, the guards treated us like we were criminal detainees and told us we had to abide by all the rules for people detained on criminal charges.”); Nadir Decl. ¶ 49 (officer allegedly said “you guys are getting punished” and “There are your choices, not my choices.”); Amir Decl. ¶ 9 (Upon landing in Anchorage, the Sergeant said, “This is Alaska. Alaska is like a third world country; you only get what’s coming to you.”).

90 June 20, 2025 Hearing, *supra* note 7, at 2:51-2:54 PM.

91 Eliseo Decl. ¶ 11; Antonio Decl. ¶ 13; Kareem Decl. ¶ 13; Adam Decl. ¶ 11; Jamir Decl. ¶ 15.

92 Eliseo Decl. ¶ 12; Nadir Decl. ¶ 45; Yusuf Decl. ¶ 13; Jamir Decl. ¶ 16; Amir Decl. ¶ 23.

93 Kofi Decl. ¶ 22

94 Amir Decl. ¶ 23.

95 IGSA Standards, *supra* note 6, at 2.

96 Winston Decl. ¶ 10; Eliseo Decl. ¶ 13; Kofi Decl. ¶¶ 18, 25; Nadir Decl. ¶ 23; Amir Decl. ¶¶ 18-21.

97 June 20, 2025 Hearing, *supra* note 7, at 1:21 PM.

98 Eliseo Decl. ¶ 11; Kofi Decl. ¶ 18; Nadir Decl. ¶ 23; Kareem Decl. ¶ 12.

99 Eliseo Decl. ¶¶ 2, 11; see also Nadir Decl. ¶ 23.

100 Eliseo Decl. ¶ 13; Kofi Decl. ¶ 28; Kareem Decl. ¶ 12; Amir Decl. ¶ 20.

101 Amir Decl. ¶¶ 19-21.

102 Eliseo Decl. ¶ 27; Roberto Decl. ¶¶ 10, 15; Kofi Decl. ¶¶ 30, 60; Nadir Decl. ¶¶ 26, 41.

103 See, e.g., OIDO Inspection of the Northwest ICE Processing Center, INSPECTION OF THE NORTHWEST ICE PROCESSING CENTER, DHS Office of the Immigration Detention Ombudsman (Nov. 20, 2024), <https://perma.cc/X4RP-7KZ4>; Press Release, Ninth Circuit affirms for-profit operator of Northwest ICE Processing Center violated labor law, Washington State Attorney General (Jan. 16, 2025), <https://www.atg.wa.gov/news/news-releases/ninth-circuit-affirms-profit-operator-northwest-ice-processing-center-violated>; Sharon Yoo, Detainees sue GEO Group, allege sexual assaults, beatings and cover-ups at Tacoma ICE facility, KING5 (Feb. 5, 2026), <https://www.king5.com/article/news/politics/immigration-news/geo-group-lawsuit-northwest-ice-processing-center/281-a41284cb-4ca4-4cc2-8bda-69e94c952358>.

104 Eliseo Decl. ¶¶ 16, 20; Roberto Decl. ¶ 10; Kofi Decl. ¶¶ 45-46; Antonio Decl. ¶ 13; Winston Decl. ¶¶ 13-14; Yusuf Decl. ¶ 25; Adam Decl. ¶¶ 15, 18; Amir Decl. ¶ 26; Ricardo Decl. ¶¶ 13-14; Kareem Decl. ¶ 18.

105 Eliseo Decl. ¶ 20; Kofi Decl. ¶ 47; Kareem Decl. ¶ 18; Winston Decl. ¶¶ 10, 14; Yusuf Decl. ¶ 13; Malik Decl. ¶ 17; Adam Decl. ¶ 18.

106 Eliseo Decl. ¶ 15; Roberto Decl. ¶ 10; Kofi Decl. ¶ 30; Nadir Decl. ¶ 26; Kareem Decl. ¶ 20; Winston Decl. ¶ 13; Malik Decl. ¶ 18.

107 Eliseo Decl. ¶ 20 (“It was way more stressful when we were stuck in the small cell, and my anxiety was very high. I was frustrated by being locked in a small and crowded room. I felt depressed.”); Nadir Decl. ¶ 45 (“The lockdowns were very difficult.”); Kareem Decl. ¶ 18 (“During the lockdowns, there was nothing to do in the cell. I just had to lay on the bed and wait or read the Quran once I had it. I had a very hard time with this.”); Winston Decl. ¶ 14 (“The total isolation for no reason made me feel horrible. I had no idea how long each lockdown would last.”).

108 Malik Decl. ¶ 24.

109 Ricardo Decl. ¶¶ 14-15.

110 Amir Decl. ¶ 26.

111 NDS, *supra* note 6, at Standard 4.4, p.127.

112 Nadir Decl. ¶¶ 27-28; Eliseo Decl. ¶ 14; Kofi Decl. ¶ 34; Kareem Decl. ¶ 14; Winston Decl. ¶ 11; Yusuf Decl. ¶ 12; Malik Decl. ¶ 15; Adam Decl. ¶ 12; Jamir Decl. ¶ 17

113 Jamir Decl. ¶ 17.

114 Adam Decl. ¶ 12.

115 Kofi Decl. ¶ 35; Nadir Decl. ¶ 27; Winston Decl. ¶ 11.

116 Nadir Decl. ¶ 27; *see also* Eliseo Decl. ¶ 14; Kofi Decl. ¶ 47; Winston Decl. ¶ 14 (“During one three-day lockdown, we begged the officers to let us shower. The officers just said, ‘this is Alaska’ and that they were just following instructions.”).

117 NDS, *supra* note 6, at Standard 4.4, p.128.

118 Eliseo Decl. ¶ 16; Kofi Decl. ¶ 31; Winston Decl. ¶ 12; Yusuf Decl. ¶ 21; Malik Decl. ¶ 18; *see* June 20, 2025 Hearing, *supra* note 7, at 1:48-1:49 PM (Commissioner confirming handcuffs required when moving through facility).

119 Eliseo Decl. ¶ 16; Kofi Decl. ¶ 31; Yusuf Decl. ¶ 21.

120 NDS, *supra* note 6, at Standard 2.8, p.44.

121 Olano Decl. ¶¶ 5-8.

122 See *Doe v. Kelly*, 878 F.3d 710, 722 (9th Cir. 2017) (“There is no question that [ICE] detainees are entitled to adequate medical care.”); NDS, *supra* note 6, at Standard 4.3, p. 112 (facilities are required to provide “[m]edically necessary and appropriate medical, dental and mental health care and pharmaceutical services at no cost to the detainee”).

123 Kofi Decl. ¶ 13; Winston Decl. ¶ 6; Nadir Decl. ¶ 14; Kareem Decl. ¶ 11; Amir Decl. ¶ 13; Adam Decl. ¶ 19. See also *Coleman v. Wilson*, 912 F. Supp. 1282, 1298 n.10 (E.D. Cal. 1995) (constitutional obligations include “a systematic program for screening and evaluating inmates to identify those in need of mental health care”).

124 Kofi Decl. ¶¶ 13, 54-55; see also Nadir Decl. ¶¶ 63-65.

125 Amir Decl. ¶ 57.

126 *Id.* at ¶ 56.

127 Nadir Decl. ¶¶ 15, 60; Antonio Decl. ¶ 11.

128 Nadir Decl. ¶¶ 14, 25, 57-59.

129 Amir Decl. ¶ 49.

130 *Id.* at ¶ 51.

131 *Id.* at ¶ 52; Kofi Decl. ¶ 25; Nadir Decl. ¶ 61. See NDS, *supra* note 6, at Standard 4.3, p. 112; IGSA Standards, *supra* note 6, at 8.

132 Nadir Decl. ¶ 61 (submitted form with symptoms of feeling so sick with diarrhea and gas that he could not leave the unit to go to recreation; received a response that it sounded like a stomach bug, never seen by a clinician); Kofi Decl. ¶¶ 54-55 (given a workbook after submitting a form asking for help with high anxiety; never seen by a clinician); Enrique Decl. ¶¶ 11-12; Adam Decl. ¶ 19 (waited several days after reporting dental pain to be given over-the-counter pain reliever, while nobody on staff ever examined his teeth.)

133 Antonio Decl. ¶ 18 (a week delay to get medical attention for respiratory issues and only given an inhaler).

134 IGSA Standards, *supra* note 6, at 7.

135 Enrique Decl. ¶¶ 2, 5-14.

136 Winston Decl. ¶ 6; Shugall Decl. ¶ 14.

137 Kareem Decl. ¶¶ 15-17.

138 Nadir Decl. ¶ 31; *see also* Kareem Decl. ¶ 16.

139 Yusuf Decl. ¶ 9; Kareem Decl. ¶ 15; Malik Decl. ¶ 10.

140 Kareem Decl. ¶ 16; *see* Malik Decl. ¶¶ 14, 16.

141 Yusuf Decl. ¶ 19; Kofi Decl. ¶ 60; Kareem Decl. ¶ 17.

142 *See* NDS, *supra* note 6, at Standard 5.3, pp. 155-57; IGSA Standards, *supra* note 6, at 7, 10.

143 Kofi Decl. ¶ 60; Kareem Decl. ¶ 31; Malik Decl. ¶ 30; Eliseo Decl. ¶ 27; Winston Decl. ¶ 20.

144 Adam Decl. ¶ 31.

145 Roberto Decl. ¶¶ 3, 15.

146 IGSA Standards, *supra* note 6, at 3; June 20, 2025 Hearing, *supra* note 7, at 2:07 PM (Commissioner confirming delay in property); *see also* Malik Decl. ¶ 10; Jamir Decl. ¶ 13-14; Amir Decl. ¶ 16; Adam Decl. ¶ 6.

147 Winston Decl. ¶ 7; Nadir Decl. ¶ 21; Malik Decl. ¶ 10; Adam Decl. ¶ 9

148 Nadir Decl. ¶ 21.

149 *Id.* at ¶ 50; Eliseo Decl. ¶¶ 13, 21; Kofi Decl. ¶ 50; Malik Decl. ¶ 25; Yusuf Decl. ¶ 27; Winston Decl. ¶ 15; Amir Decl. ¶ 43; Adam Decl. ¶ 28; Ricardo Decl. ¶ 25.

150 NDS, *supra* note 6, at Standard 5.5 pp.163, 171; *see also* IGSA Standards, *supra* note 6, at 12. Even after this use of force event, Commissioner Winkelman testified to the Legislature that detainees could get assistance calling consulates if needed, and that she was not aware of any detainee requesting and being denied consular access. *See* June 20, 2025 Hearing, *supra* note 7, at 1:43, 1:46-1:47 PM. Vienna Convention on Consular Relations of 1963, 8 C.F.R. § 236.1(e).

151 Roberto Decl. ¶ 11; Antonio Decl. ¶ 15.

152 Roberto Decl. ¶ 11; Kofi Decl. ¶ 50; Nadir Decl. ¶¶ 51-52; Yusuf Decl. ¶ 27; Winston Decl. ¶ 15; Amir Decl. ¶ 44.

153 Roberto Decl. ¶ 11; Kofi Decl. ¶ 50; Malik Decl. ¶ 25; Winston Decl. ¶ 15; Antonio Decl. ¶ 15; Amir Decl. ¶ 45.

154 Kofi Decl. ¶ 50; Nadir Decl. ¶ 52.

155 Winston Decl. ¶ 16; see *a/so* Kofi Decl. ¶ 50.

156 Eliseo Decl. ¶ 21; Roberto Decl. ¶ 11; Malik Decl. ¶ 25; Yusuf Decl. ¶ 27; Winston Decl. ¶ 16; Kareem Decl. ¶ 26; Antonio Decl. ¶ 15.

157 Amir Decl. ¶ 46.

158 Kofi Decl. ¶ 50; Nadir Decl. ¶ 52.

159 Kofi Decl. ¶ 50.

160 *Id.*; Eliseo Decl. ¶ 21; Roberto Decl. ¶ 11; Nadir Decl. ¶ 53; Malik Decl. ¶ 25; Antonio Decl. ¶ 15; Amir Decl. ¶ 45; Adam Decl. ¶ 29; Ricardo Decl. ¶ 25.

161 Kofi Decl. ¶ 50; Eliseo Decl. ¶ 22; Nadir Decl. ¶ 54; Malik Decl. ¶ 25; Winston Decl. ¶ 17; Amir Decl. ¶ 47; Adam Decl. ¶ 29; Ricardo Decl. ¶ 25; Antonio Decl. ¶ 17.

162 Eliseo Decl. ¶ 22; Roberto Decl. ¶ 12; Yusuf Decl. ¶ 27; Kareem Decl. ¶ 27; Ricardo Decl. ¶ 25; Adam Decl. ¶ 29; Antonio Decl. ¶ 17; Winston Decl. ¶ 17; Jamir Decl. ¶ 20.

163 Kofi Decl. ¶ 50; Eliseo Decl. ¶ 23; Nadir Decl. ¶ 54; Jamir Decl. ¶ 20.

164 Kofi Decl. ¶ 51; Eliseo Decl. ¶ 23; Malik Decl. ¶ 25; Yusuf Decl. ¶ 27; Winston Decl. ¶ 17; Kareem Decl. ¶ 28; Jamir Decl. ¶ 21; Adam Decl. ¶ 30; Amir Decl. ¶ 47.

165 Kofi Decl. ¶ 51; Nadir Decl. ¶ 54; Jamir Decl. ¶ 21.

166 Kofi Decl. ¶ 51; Eliseo Decl. ¶¶ 23-24; Roberto Decl. ¶¶ 12-14; Nadir Decl. ¶ 56; Malik Decl. ¶ 26; Yusuf Decl. ¶ 27; Kareem Decl. ¶ 28; Jamir Decl. ¶ 21; Ricardo Decl. ¶ 26; Adam Decl. ¶ 30.

167 Kofi Decl. ¶ 51; Amir Decl. ¶ 48; Ricardo Decl. ¶ 26.

168 Winston Decl. ¶ 17.

169 *Id.*; Eliseo Decl. ¶ 24; Kareem Decl. ¶ 29; Amir Decl. ¶ 48.

170 Kofi Decl. ¶ 52; Eliseo Decl. ¶ 23; Roberto Decl. ¶ 12; Malik Decl. ¶ 27; Winston Decl. ¶ 17. ICE standards prohibit any co-pay for medical services. See IGSA Standards, *supra* note 6, at 8.

171 Malik Decl. ¶ 26; Winston Decl. ¶ 17; Kareem Decl. ¶ 28.

172 June 20, 2025 Hearing, *supra* note 7, at 1:49 PM.

173 PAVA (Pelargonic Acid Vanillylamide) is a synthetic compound derived from capsaicin, a compound found in chili peppers.

174 Appendix C, at Exhibit C, E-mail sent internally to Alaska Dep't of Corrections regarding use of force event (June 12, 2025, 1:37 PM AKDT)(received through Public Records Request).

175 NDS, *supra* note 6, at Standard 2.8, pp. 48-49 (the use of non-lethal weapons may be authorized “if a detainee: 1. Is armed and/or barricaded; or 2. Cannot be approached without danger to self or others; and 3. A delay in controlling the situation would seriously endanger the detainee or others, or would result in a major disturbance or serious property damage.”); IGSA Standards, *supra* note 6, at 6 (“The Service Provider shall ensure detention facility staff uses only the degree of force necessary and reasonable to gain control of a resistant ICE detainee, or to provide for self-defense or defense of a third person. Detention facility staff shall resolve the situation without resorting to force if the ICE detainee is in a location where there is no immediate threat to him/her or others.”); AK Stat § 11.81.410 (2025) (providing that nondeadly force may be used in a correctional facility only “to the extent reasonably necessary and appropriate to maintain order”); 22 AAC 05.060 (staff may not use chemical agents or other uses of force “except when necessary in self-defense, to protect a person from imminent physical harm, to enforce a lawful order of a staff member in the face of physical resistance by a prisoner, to carry out medical instructions, to prevent escape or serious damage to property. . . .”); *Kingsley v. Hendrickson*, 576 U.S. 389 (2015) (excessive force against person incarcerated in jail violates the Fourteenth Amendment’s Due Process Clause when the use of force was objectively unreasonable).

176 NDS, *supra* note 6, at Standard 2.8, pp. 45, 49; IGSA Standards, *supra* note 6, at 6.

177 Winston Decl. ¶ 17.

178 *Id.* at ¶ 16.

179 22 AAC 05.060(c).

180 NDS, *supra* note 6, at Standard 2.8, p. 49; see also Nadir Decl. ¶ 55 (explaining he filed a grievance about the failure to check their medical files for respiratory illness before officers used the spray); see June 20, 2025 Hearing, *supra* note 7, 1:53 PM (Commissioner unable to answer Representative Gray’s question of whether medical signed off before the pepper spray was used pursuant to ICE standards).

181 Antonio Decl. ¶¶ 15-17.

182 See IGSA Standards, *supra* note 6, at 6; 22 AAC 05.060(d) (“If a prisoner is exposed to a chemical agent, medical personnel shall examine the prisoner as soon as reasonably possible after the exposure.”).

183 Antonio Decl. ¶ 18.

184 Kofi Decl. ¶ 53; Adam Decl. ¶ 30; Jamir Decl. ¶¶ 21-22.

185 Kofi Decl. ¶ 53; Adam Decl. ¶ 30.

186 Jamir Decl. ¶¶ 21-22.

187 *Valdez v. Rosenbaum*, 302 F.3d 1039, 1048 (9th Cir. 2002); *see also, Procunier v. Martinez*, 416 U.S. 396, 419 (1974), overruled in part on other grounds by *Thornburgh v. Abbott*, 490 U.S. 401, 413 (1989) (“Regulations and practices that unjustifiably obstruct the availability of professional representation . . . are invalid.”).

188 See *In re Primus*, 436 U.S. 412, 423–24 (1978); *NAACP v. Button*, 371 U.S. 415, 428–29 (1963).

189 NDS, *supra* note 6, at Standards 5.1, 5.4-5.5, pp. 148-49, 158-61, 166-68, 170; IGSA Standards, *supra* note 6, at p. 11; *see also* PBNDS, *supra* note 6, at Standards 5.1, 5.6-5.7, pp. 360, 389-91, 398-401.

190 See, e.g., Nadir Decl. ¶ 3 (“I was ordered removed and appealed to the Board of Immigration Appeals. A three-member panel heard my case and two held that I was removable, one dissented. I appealed to the Third Circuit, and the appeal is pending. . . . I also applied for Convention Against Torture and withholding of removal, which are forms of humanitarian relief that might still be available to me even with my convictions.”); Kofi Decl. ¶ 2 (“I filed a claim under the Convention Against Torture. An immigration judge ruled against me and I now have a pending appeal before the Ninth Circuit and I am waiting for them to appoint counsel.”).

191 Stopher Decl., on file with authors, ¶ 13 (“[T]his transfer was more sudden and chaotic than other detention transfers of my clients.”); Boyd Decl. ¶¶ 8-9 (“This transfer was more chaotic than other transfers I have witnessed.”)

192 Argueta Decl. ¶ 6 (“I received no information from ICE about my client’s transfer to ACC.”).

193 See Stopher Decl., on file with authors, ¶¶ 10-11.

194 Boyd Decl. ¶ 8-9 (“I did not learn of [my client’s] transfer to ACC until after it had occurred, when I was informed by [my client’s] sister.”).

195 Argueta Decl. ¶ 6.

196 Stopher Decl., on file with authors, ¶ 13.

197 *Id.* at ¶ 10.

198 *Id.* at ¶ 9 (describing the rapidly changing law on third country removals and the need for “urgent and frequent communication” between counsel and detainees.).

199 Kofi Decl. ¶ 32; Olano Decl. ¶ 9; Nadir Decl. ¶ 33; Kareem Decl. ¶¶ 21, 25; Malik Decl. ¶¶ 20-21; Winston Decl. ¶ 8; Amir Decl. ¶¶ 32-33; Shugall Decl. ¶ 16; see *a/so* Stopher Decl., on file with authors, ¶ 26 (describing process for requesting legal calls at NWIPC).

200 Amir Decl. ¶ 29.

201 Eliseo Decl. ¶ 16.

202 Malik Decl. ¶ 21; Nadir Decl. ¶ 32 (“It was especially hard to make phone calls because my cell was on the top tier. So when they released us from lockdown and opened our cell doors, everyone else got to the phones first. Sometimes I had to beg the officer to unlock the top tier cells first.”); Boyd Decl. ¶ 15; Eliseo Decl. ¶ 18; Amir Decl. ¶ 30.

203 Adam Decl. ¶ 21 (“Calls were subject to recording, there was no meaningful privacy for attorney communications, and confidential attorney calls were not accommodated.”),

204 Malik Decl. ¶ 21; Eliseo Decl. ¶ 18; Amir Decl. ¶ 30.

205 Malik Decl. ¶ 20.

206 *Id.* at ¶ 21.

207 Nadir Decl. ¶ 32; Amir Decl. ¶ 30.

208 Stopher Decl., on file with authors, ¶ 17; Kareem Decl. ¶ 21; Eliseo ¶ 17; Jamir Decl. ¶ 19; Amir Decl. ¶ 31.

209 Kareem Decl. ¶ 21; Amir Decl. ¶ 33; Jamir Decl. ¶ 19.

210 Kofi Decl. ¶ 32.

211 Jamir Decl. ¶ 19.

212 Kareem Decl. ¶ 21; Eliseo Decl. ¶ 17.

213 Malik Decl. ¶ 20; Eliseo Decl. ¶ 17; Kofi Decl. ¶ 32; Kareem Decl. ¶ 21; Amir Decl. ¶ 31.

214 Nadir Decl. ¶ 33.

215 Kareem Decl. ¶ 24.

216 June 20, 2025 Hearing, *supra* note 7, at 1:35-1:38 PM; see Massey Decl. ¶ 6 (“ACLU attorney Cindy Woods told the volunteers that ACC officials had begun refusing to schedule attorney visits with this group of ICE detainees without prior authorization from ICE.”).

217 June 20, 2025 Hearing, *supra* note 7, at 2:29 PM.

218 NDS, *supra* note 6, at Standard 5.5, p. 167 (“Legal service providers need not complete a Form G-28 (stating that they are the legal representatives of the detainee) to meet with a detainee.”).

219 Massey Decl. ¶ 5; Argueta Decl. ¶¶ 7-8; Shugall Decl. ¶ 12, Stopher Decl., on file with authors, ¶¶ 14-19.

220 Argueta Decl. ¶¶ 7-8.

221 *Id.* at ¶ 8.

222 Shugall Decl. ¶ 12; see *also* Winston Decl. ¶ 8 (Shugall’s client, explaining “I was not able to contact my attorney, [Ilyce Shugall] of Oakland, California while at ACC. She was able to somehow to get in touch with me, although it was very difficult.”).

223 Boyd Decl. ¶ 11.

224 Stopher Decl., on file with authors, ¶ 26.

225 Olano Decl. ¶ 9.

226 Argueta Decl. ¶ 11.

227 Boyd Decl. ¶ 13; see *also* Stopher Decl., on file with authors, ¶ 26 (“My experience trying to work with [my client] while he was at ACC was far worse than my experience working with [my client] and other clients while they are detained at ICE’s NWIPC facility.”).

228 Alaska Dep't of Corr. Policy and Procedure Manual, Ch. 808.01VII (A).

229 *Id.*

230 See, e.g., Massey Decl. ¶¶ 7-8.

231 *Id.* at ¶ 8, Stopher Decl., on file with authors, ¶ 6.

232 Massey Decl. ¶ 8.

233 *Id.* at ¶¶ 8-30.

234 See Olano Decl. ¶ 6.

235 *Id.* at ¶¶ 6-7.

236 *Id.* at ¶¶ 3,7.

237 Nadir Decl. ¶ 47, Kofi Decl. ¶ 48, Winston Decl. ¶ 9.

238 Amir Decl. ¶ 41.

239 Nadir Decl. ¶ 47; Kofi Decl. ¶ 48; Winston Decl. ¶ 9; NDS, *supra* note 6, at Standard 5.5, p.165.

240 Kofi Decl. ¶¶ 37-44; Nadir Decl. ¶¶ 22, 34; Eliseo Decl. ¶ 19; Amir Decl. ¶ 35.

241 NDS, *supra* note 6, at Standard 6.3, pp.185-90.

242 Kofi Decl. ¶ 43; see *also* Malik Decl. ¶ 22 (“At NWIPC, I can sign up to access the law library on weekdays to make copies or ask a fellow resident with a library appointment to make copies for me.”).

243 Eliseo Decl. ¶ 19; see *also* Nadir Decl. ¶ 19 (stating that he submitted “several” Request for Interview and grievance forms requesting access to the law library).

244 Kofi Decl. ¶ 38.

245 *Id.*; Nadir Decl. ¶ 37; Amir Decl. ¶ 36.

246 Kofi Decl. ¶ 39; Eliseo Decl. ¶ 19; Amir Decl. ¶ 36.

247 Kofi Decl. ¶ 41; Amir Decl. ¶ 36.

248 Nadir Decl. ¶ 40; Kofi Decl. ¶ 41.

249 Eliseo Decl. ¶ 19; Kofi Decl. ¶ 39, Amir Decl. ¶ 36.

250 Eliseo Decl. ¶ 19, Kofi Decl. ¶ 39, Amir Decl. ¶ 36.

251 Kofi Decl. ¶ 40.

252 *Id.*, NDS, *supra* note 6, at Standard 6.3, p. 187.

253 Amir Decl. ¶¶ 34, 38.

254 NDS, *supra* note 6, at Standard 6.3, p.189.

255 Malik Decl. ¶ 22.

256 *Id.* at ¶ 23; *see also* Nadir Decl. ¶ 34.

257 Stopher Decl., on file with authors, ¶ 25 (“It is critical that I am able to reach [my client] quickly because his removal could happen quickly and also because the law applicable to third-country removals is changing rapidly.”); Argueta Decl. ¶ 11; Amir Decl. ¶ 35.

258 Nadir Decl. ¶ 22.

259 Malik Decl. ¶ 23; *see also* Nadir Decl. ¶ 34.

260 Kareem Decl. ¶¶ 6-7.

261 Adam Decl. ¶ 27.

262 Stopher Decl., on file with authors, ¶ 25.

263 *Id.* at ¶ 31.

264 *Id.* at ¶ 26.

265 Six of the original forty-one men transferred out by June 20, 2026. *See* June 20, 2025 Hearing, *supra* note 7, at 1:17 PM.

266 Winston Decl. ¶ 19; *see also* Eliseo Decl. ¶ 26; Kofi Decl. ¶ 56; Nadir Decl. ¶ 66; Yusuf Decl. ¶ 31; Malik Decl. ¶ 28; Ricardo Decl. ¶ 28.

267 Nadir Decl. ¶ 10.

268 Eliseo Decl. ¶ 26; Kofi Decl. ¶ 59; Malik Decl. ¶ 28; Jamir Decl. ¶ 23; Ricardo Decl. ¶ 28.

269 Kofi Decl. ¶ 56.

270 Winston Decl. ¶ 19.

271 See Wesley Early, Anchorage ICE detainee recently transferred to Tacoma hospitalized with tuberculosis ALASKA PUBLIC MEDIA (July 10, 2025), <https://alaskapublic.org/news/anchorage/2025-07-10/anchorage-ice-detainee-recently-transferred-to-tacoma-hospitalized-with-tuberculosis>; Augusta McDonnell, Alaska DOC denies claims ICE detainees contracted tuberculosis at Anchorage jail, ALASKA'S NEWS SOURCE (July 10, 2025), <https://www.alaskasnewsresource.com/2025/07/11/alaska-doc-denies-claims-ice-detainees-contracted-tuberculosis-anchorage-jail/>; Kristin Goodwillie, Seven suspected tuberculosis cases at Tacoma ICE processing facility, KING5 (July 31, 2025), <https://www.king5.com/article/news/investigations/investigators/seven-suspected-tuberculosis-cases-tacoma-ice-processing-facility/281-0479f854-14c3-413d-ac54-09bc28e80fb6>; see also Enrique Decl. ¶¶ 17-20; Amir Decl. ¶ 60.

272 For more on how communicable diseases thrive in carceral conditions and cross-institutions transfers can lead to preventable outbreaks, see Homer Venters, *Outbreak Behind Bars: Spider Bites, Human Rights, and the Unseen Danger to Public Health* (John Hopkins University Press, 2025).

273 Yusuf Decl. ¶¶ 2, 33.

274 Nadir Decl. ¶ 69; see also Kareem Decl. ¶ 31 (“Alaska was the toughest place to be held... I felt significantly more unsafe at ACC the entire time I was there. I am still detained at Tacoma now, and I am afraid that they will again transfer me to ACC.”).

275 Nina Shapiro, How an immigrant’s path through a detention black hole ended in SEATTLE TIMES (July 13, 2025), <https://www.seattletimes.com/seattle-news/how-an-immigrants-path-through-a-detention-black-hole-ended-in-wa/>; see also Nina Shapiro, Russian detainees in WA face no man’s land. Will Trump help or hurt?, SEATTLE TIMES (Mar. 13, 2025), <https://www.seattletimes.com/seattle-news/russian-detainees-in-wa-face-no-mans-land-will-trump-help-or-hurt/>.

276 Nadir Decl. ¶ 66 (“Some people were talking about giving up their appeals and letting ICE deport them. I told these guys that we can’t give up, because then they win.”).

277 Argueta Decl. ¶ 10.

278 See Graeme Blair and David Hausman, *supra* note 30 (explaining, “[p]erhaps because of the lower release rate, many more people chose to give up on their cases: voluntary departures and returns (which are rare compared to removals) increased by 28 times”); Augusta McDonnell, 23 Days: After detention in the Anchorage jail, former ICE detainee shares his story, ALASKA’S NEWS SOURCE (Aug. 6, 2025), <https://www.alaskasnewssource.com/2025/08/06/after-23-days-anchorage-jail-former-ice-detainee-shares-his-story/>.

279 See McDonnell, *supra* note 278.

280 Jamir Decl. ¶ 23.

281 June 20, 2025 Hearing, *supra* note 7, at 2:38 PM.

282 See Michelle Theriault Boots, *supra* note 2; see also Dietrich Knauth, ICE blocked detainees’ access to lawyers in Minnesota, judge finds, REUTERS (Feb. 12, 2026) <https://www.reuters.com/legal/government/ice-blocked-detainees-access-lawyers-minnesota-judge-finds-2026-02-13/> (reporting on a recent federal district court case in which the judge concluded that practices to detain and quickly move detainees out of Minnesota while depriving them of phone calls “all but extinguish a detainee’s access to counsel.”).

283 See June 20, 2025 Hearing, *supra* note 7, at 2:59-3:01 PM (elected representative reporting an unnamed source described plans to create a federal facility in Adak, and attorneys testifying about how the area is a legal desert that would make it difficult to get counsel).