



**Submission for the Third Universal Periodic Review Cycle:
United States of America**

Submitted by Seattle University International Human Rights Clinic
Filed jointly with Global Rights Advocacy, La Resistencia, and Columbia Legal Services

April 7, 2025

Global Rights Advocacy (GRA) is a non-profit organization with the mission to provide victims access to international human rights mechanisms through legal defense and advocacy strategies. GRA's project Migrants Redress Initiative, documents detention conditions at the Northwest ICE Processing Center in Washington. We work in partnership with La Resistencia, a grassroots organization led by undocumented immigrants and people of color, oppressed by the immigration enforcement system.

Seattle University International Human Rights Clinic represents clients who have suffered human rights abuses, collaborates with non-governmental organizations in advocacy projects, and provides technical assistance to inter-governmental organizations.

Columbia Legal Services advocates for laws that advance social, economic, and racial equity for people living in poverty.

II. Issues Presented

1. This submission details and substantiates human rights violations in the United States concerning the following up with the latest recommendations regarding: a) immigration detention and targeting of migrant defenders, and b) business and human rights.
2. Migrant detention and abuse have intensified. In the first months of Trump's second term, the administration has mounted an openly racist campaign that blocks asylum at the border, conducts mass raids inside the United States, strips migrants' legal protections, and even deports people to places like Guantánamo and El Salvador. Acting on direct presidential orders, immigration authorities are ignoring court rulings—creating a constitutional and democratic crisis marked by unprecedented executive overreach.
3. This submission provides evidence of the United States' failure to implement the fully supported 2020 UPR recommendations, along with new and rapidly evolving violations of its international human rights obligations. As for violations occasioned by business operations; no investigations have been undertaken, and no remedy has been provided after the 3rd UPR cycle regarding GEO corporation. This submission will use the situation at the Northwest Immigration and Customs Enforcement (ICE) Processing Center (NWIPC) also known as the Northwest Detention Center (NWDC) as an emblematic example.

II. Unacceptable Detention Conditions for Immigrants: Northwest Detention Center in Tacoma, Washington

Introduction: international recommendations to dismantle immigration detention

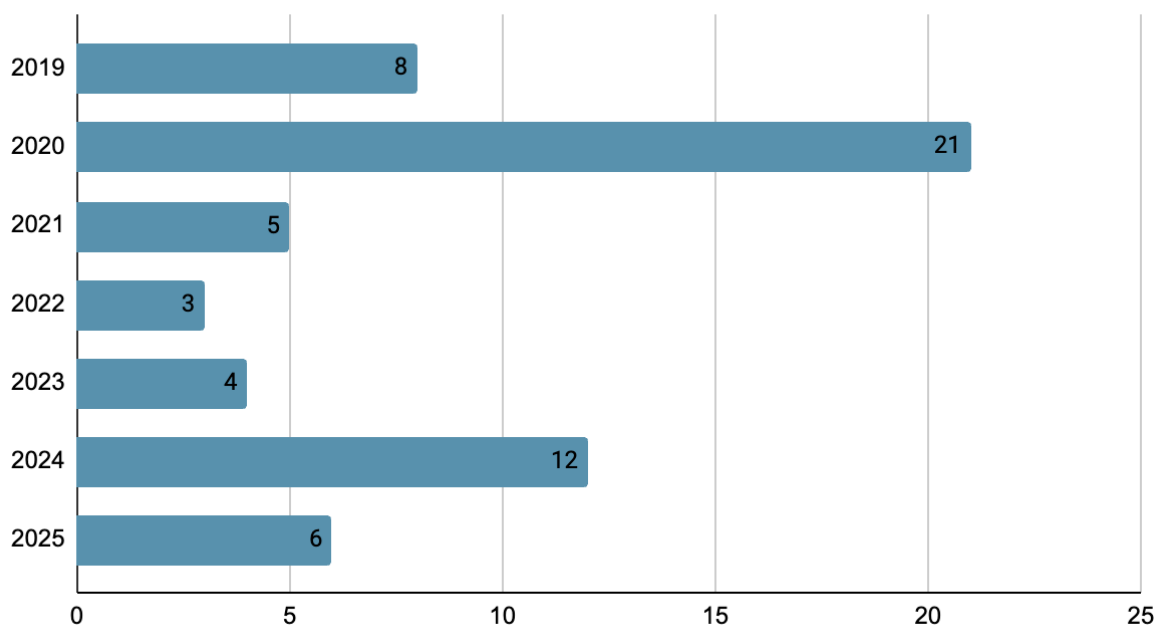
4. The United States has repeatedly defied international recommendations to avoid detention of migrants, end mandatory detention, allow for community based alternatives to detentionⁱ, and ensure that detention conditions comply with international standards.ⁱⁱ As of March 23rd, 2025, 47,892 immigrants are in civil detention, the highest number of people detained since October 2019,ⁱⁱⁱ and there is an expansion on the number beds through new contracts in the US and abroad. The US is trying to increase the budget for detention and deportation from \$9.1 billion to ICE for fiscal year 2024 to \$350 billion to be used to detain and deport families, asylum seekers, workers, and longtime residents and “would tear communities apart, leaving children without caregivers and exacerbating fear where parents are scared to send children to school.”^{iv} ICE continues to delegate the care of immigrants to private companies, who maximize profits, keep facilities lacking basic needs^v, unjustly enrich themselves, and perform forced labor.^{vi} The Senate budget resolution would give the Trump administration more than enough for the 100,000 detention beds.
5. The abuses and mistreatment of detainees are not isolated events but are systematic and pervasive of the entire US immigration detention system, without a redress despite several civil rights complaints around the country.^{vii} After the last review, the United States immigration detention system has been repeatedly scrutinized for criminalizing immigrants and for not respecting or protecting the human rights of immigrants. International human rights monitoring bodies, including the Inter-American Commission on Human Rights (IACHR) and the United Nations Working Group on Arbitrary Detention (UNWGAD) extensively challenged the legal framework and practices that allow for mass incarceration of immigrants in the US^{viii}, and their unacceptable detention conditions at immigration detention centers,^{ix} including the Northwest ICE Processing Center.^x These bodies recommended the United States move toward a humane immigration model that avoids detention, specifically calling for the United States to end mandatory immigration detention and allow for alternative forms of custody, such as “the case-management- based release of individuals into the custody of family members or other community sponsors, non-monetary parole and release on recognizance.”^{xi} Human rights bodies found many immigration policies in the United States arbitrary and unlawful.^{xii}

6. In April 2020, the Special Procedures issued a second urgent appeal requesting the United States to release immigrants held for processing, raising concerns about the failure to adequately address previous recommendations and sending also a communication to GEO, the private corporation running the Center.^{xiii} The SP also highlighted preoccupation regarding allegations of substandard health and hygienic conditions at the NWIPC, which worsened in the pandemic. Additionally, they urged the United States to **resort to non-custodial community-based alternatives to immigration detention**. Furthermore, in 2020 a Mexican immigrant who spent seven years at the NWIPC the UNWGAD found his detention to be arbitrary stating it violated the principle of proportionality.^{xiv} The Government had stated he posed a danger to the community and was considered a flight risk without offering any evidence to substantiate such claims.^{xv} The UNWGAD found that there were no alternatives to detention considered for Mr. Aguirre-Urbina,^{xvi} and that individual consideration for the reasonableness of his detention was not sufficiently provided. The UNWGAD found that his detention was discriminatory,^{xvii} that the government ignored mental health and other differentiating factors.^{xviii} The UNWGAD observed with concern that Mr. Aguirre Urbina was not appointed counsel for his proceedings until more than two years after he was found incompetent and six years after the government requested protection.^{xix} For years IACHR criticized the legal framework and practices that allow for mass incarceration of immigrants in the United States and raised concerns about the inhumane detention conditions that immigrants endure when in custody.^{xx} In August 2019, the IACHR conducted a visit to observe the situation of human rights at the Southern border. It expressed its concern about the “dramatic increase in the use of migrant detention, immediately and, in some cases, for long periods” and its effect of separating families and discouraging the pursuit of ongoing asylum proceedings,” as well as the existence of barriers to access to legal assistance and support for migrants.^{xxi}
7. Since July 27, 2020, the IACHR precautionary measures has urged the United States to protect migrants held at the Northwest ICE Processing Center by guaranteeing safe, humane detention conditions and giving them quick, easy access to legal remedies to review whether they should remain in custody, all in line with international standards.^{xxii} In 2021 the IACHR called on states to use other methods than detention to address migration.^{xxiii} In November 2023 the Human Rights Committee reviewed the United States and “expressed concerns regarding immigrants’ mandatory and prolonged detentions in which they are not given access to legal counsel. [...] Facilities are overcrowded, do not provide access for basic needs, and lead to instances of violence and even death [...] Victims should be provided with access to full reparations, assistance, and protection.”^{xxiv}

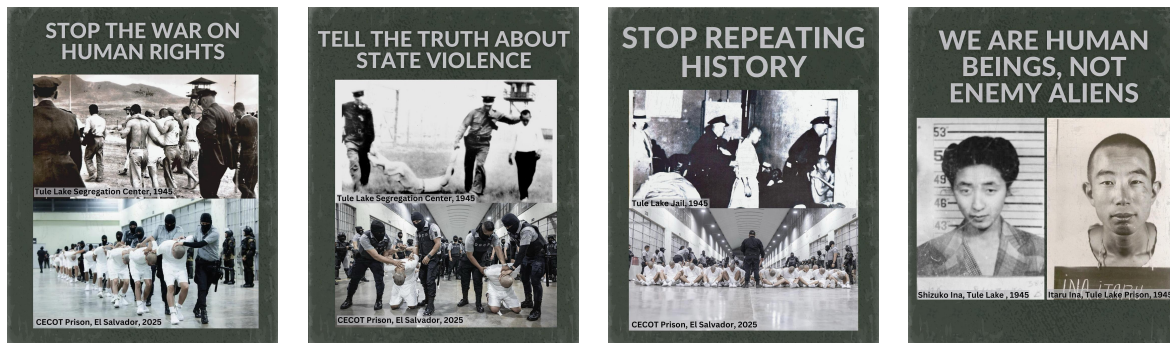
Deaths due to immigration detention conditions

8. Despite the UPR recommendations on the protection of migrants, since the last review: at least 51 immigrants held in ICE detention facilities have died since FY 2020.^{xxv} In Fiscal Year (FY) 2024 alone twelve deaths were registered, and detention conditions deterioration triggered a visit from the IACHR in October 2024 to follow up with [the precautionary measures issued regarding](#) the NWIPC. In FY 2025 already 6 deaths have occurred. At the NWDC an immigrant from Trinidad and Tobago died after being held in solitary confinement for more than 4 years. His death, was followed by multiple attempted suicides by other detainees at the NWDC.^{xxvi} On October 27, 2024, an immigrant from Mexico was left without proper health care in medical isolation, and died within the NWDC.^{xxvii} Families struggle to seek justice, as there are no independent investigations, and need [to sue ICE](#) to access information on their deaths.

Deaths in ICE Custody according to ICE records



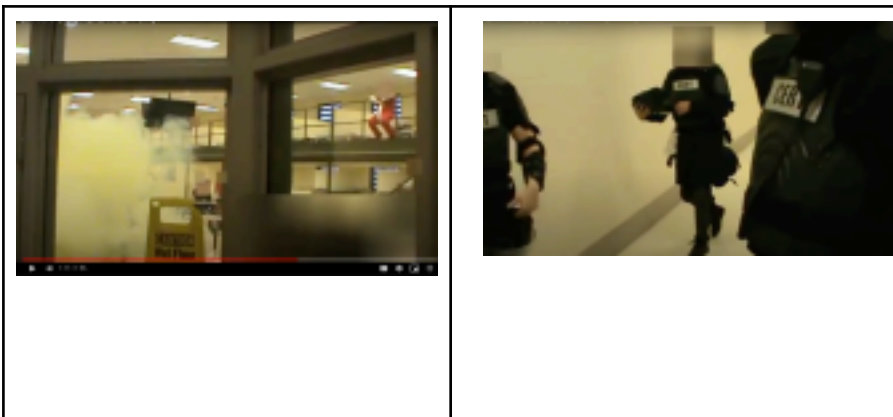
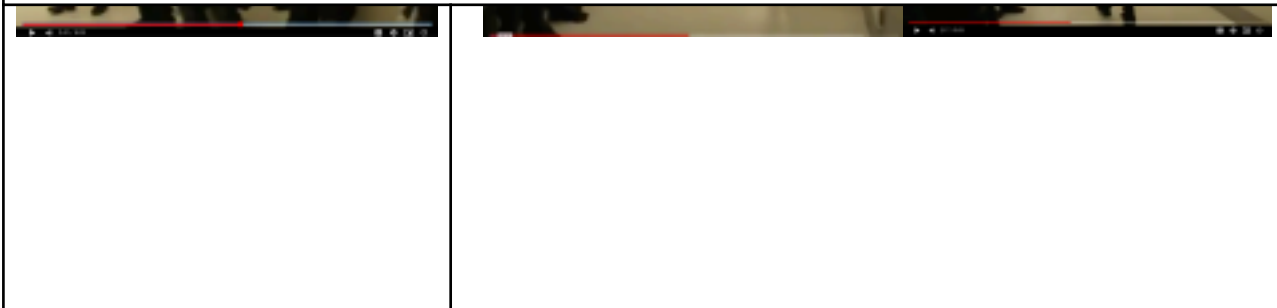
9. In October 2024, during its visit the [IACHR received complaints](#) about challenges related to the for-profit nature of the management of the NWIPC, including lower food quality, improper cleaning, insufficient access to medical care, and high commissary prices. The Commission took further note on allegations of excessive use of segregation and handcuffs, verbal aggression and racism from the center staff, retaliation on hunger strikers, among others.^{xxviii} Repeated calls for independent investigations on deaths in custody went unanswered. Even when ICE’s own death reviews expose serious rule violations, detention centers face little to no penalties.
10. Over the past months, immigrants have faced unprecedented violations of their constitutional rights. Plain-clothes officers have detained international students and arbitrarily cancelled visas; in February 2025 about 300 migrants were deported to third countries and confined in a hotel; and in March 2025 some 200 Venezuelans were forcibly disappeared for days, mislabeled as gang members because of their tattoos, and transferred to El Salvador’s notorious CECOT prison after the U-S Secretary of Security warned that would be migrants’ fate. All of these actions were justified under the 1798 Alien Enemies Act.. [Tsuru for solidarity denounced that the actions are with](#) “an intent to ethnically cleanse the nation of immigrants of color, invoking false narratives of ‘unassimilable aliens’ and “threats to national security”, the exact language used to target and dehumanize Japanese immigrants and citizens during WWII”. It is an “an attempt to drag us back to one of the darkest chapters of our history: the forced removal and mass incarceration of over 125,000 Japanese immigrants and U.S. citizens in U.S. concentration camps”. History has shown that when governments imprison people in places like the Tule Lake Segregation Center or Guantanamo, people are inevitably denied their rights and heinous crimes against humanity take place.



11. Community leaders are being held in immigration detention centers across the United States, including in the NWDC. The government is now terminating contracts with organizations providing legal services to immigrants, aggravating their defencelessness. Furthermore, recently DHS [shut down the office](#) of civil rights. The IACHR already criticized the detention and deportation of migrants under conditions contrary to international standards and new [policies that restrict access](#) to regular migration procedures and international protection mechanisms. Arrests and detention have not spared US permanent residents. On February 28th, 2025, a lab technician at the University of Washington and resident of the US for more than 50 years, was taken aside by US Custom and Border Protection at SeaTac Airport and later detained at NWDC. Her family was never provided with any reasons for her detention. She cannot secure a court date until July 2025 and risks losing her job.^{xxix}
12. The NWDC has recorded an increase in numbers, experiencing a reduction during the pandemic to the lowest number of only 200, to the current number of 1.400 almost reaching capacity of 1575. Due to inhumane conditions, repeated hunger strikes and protests are common. Recent preventable deaths have led to growing criticism of the facility.^{xxx} Detainees at the NWDC have staged hunger strikes^{xxxi} (14 in 2024 and at least 6 in 2025) to protest the conditions of their detention including overcrowding at the NWDC, lack of electricity and mattresses, poor food and sanitary conditions, frequent use of solitary confinement, and lack of opportunities to be released.^{xxxii} The NWDC detains people in solitary confinement, on average, more than any other ICE dedicated facility^{xxxiii} as punishment.^{xxxiv} Hunger strikers were either physically restrained or GEO staff used force and chemical agents including teargas to diffuse and constrain them.^{xxxv}
13. The University of Washington's Center for Human Rights and our visits to the center shows that conditions at the NWDC reveal alarming instances of use of force and the deployment of chemical agents against detainees by GEO agents.^{xxxvi} Detainees have reported the use of pepper spray causing respiratory distress, beatings, and sexual assault.^{xxxvii} This has included several reported instances of numerous GEO officers in SWAT gear conducting random searches and using chemicals to “extract” already vulnerable immigrants under their custody. Another instance was the use of gas by CERT guards in response to a hunger strike. On July 24, 2024, ten to fifteen CERT guards used chemical agents against hunger strikers. In these instances, detainees were denied medical treatment and attention.^{xxxviii} The use of force in detention centers has raised significant human rights concerns. This includes the unaddressed issue of the delegation of the use of force to private actors, such as GEO officers with little to no accountability for its use.
14. Immigrants are forced to buy necessities at exorbitant prices from the commissary and describe water as undrinkable. In July 2024, fifty detainees reported being forced to consume contaminated water for an entire week, leading to illness, including vomiting and diarrhea. It continued an alarming pattern of neglect.⁸ Detainees have complained about dwindling sizes of the portions served at the NWDC that are served cold, do not taste good and are served late (around 9:30 pm). The detainees who are mostly served beans with no vegetables or meat thus reducing the nutritional value of their meals,^{xxxix} have reported being served spoiled, uncooked food and at times food infested with worms.^{xl} The NWDC does not have adequate restrooms for the detainee population. 24 of them share one bathroom.

15. The NWDC continues to receive transfers from Montana and Idaho among other states. This has continued to strain the bed capacity of the facility. The NWDC lacks enough beds for every detainee with those reporting to the NWDC being the most affected.^{xli}
16. Further suicide attempts and heightened depression were reported on March 12, 2025, within the NWDC.^{xlii} Bedbug infestation and the general unhygienic conditions of their detention in particular the lack of toilet paper, towels, napkins and soap to facilitate effective hand washing are common. Their clothes are not thoroughly cleaned, and their bed covers are washed once every three months.^{xliii} Recreational has been arbitrarily reduced from 4 hours to 1 hour^{xliv} or not allowed, especially when the detainees are being counted. We documented instances of inability to use phones and/or communicate with anyone.^{xlv}
17. Michelle Brane, who served as the immigration detention ombudsman during the Biden administration said: "They're eliminating all the oversight bodies within the Department of Homeland Security at a time when they are being more aggressive than ever and making more mistakes than ever. **I think we'll see people die in custody as a result.**"^{xlvi}

Examples of Images of GEO's employees as CERT Team at the NWIPC Obtained by FOIA Litigation¹¹



Lack of access to justice for detention conditions

18. Since 2020, the U.S. has not addressed the lack of effective, independent and transparent mechanisms to oversee current conditions, and remedy harm. Existing immigration detention oversight within the Department of Homeland Security (DHS) are structurally limited and fail to protect detainees' human rights adequately. While the Office of the Immigration Detention Ombudsman (OIDO), the Office for Civil Rights and Civil Liberties (CRCL), and the Office of Inspector General conducted inspections and investigations at the Northwest ICE Processing Center, revealing numerous deficiencies, including sanitation issues, delayed

responses to detainee requests, lack of legal visitation processes, inadequate grievance responses, and medical staffing shortages, their findings are routinely ignored by detention authorities, undermining their ability to enforce meaningful change.

19. Since the last UPR review, at the NWDC, Global Rights, La Resistencia and Seattle University engaged with those offices through the follow-up process before the IACHR, immigrants filed complaints, and despite all our documentation through an international mechanism, those offices did not address the concerns or performed their task with meaningful interaction from us. For example, in 2022 the ICE Office of Detention Oversight (ICE ODO) found 25 deficiencies in areas such as environmental health and safety, facility security and control, staff-detainee communication, food service, hunger strikes, medical care, and significant self-harm and suicide prevention and intervention, without consequences or considering recommendations implemented with ease. In June 2023, the Office of the Immigration Detention Ombudsman (OIDO) carried out an unannounced inspection of the Northwest ICE Processing Center in Tacoma, Washington, without meaningful interaction with organizations documenting complaints. On November 20, 2024 OIDO published a report including 11 recommendations, and despite finding incidents of the use of force, including with chemical agents or weapons their findings point out to procedural requirements, such as the need to "document" the incidents, and not the need to limit the use of force by private actors. Additionally, OIDO expressed concern regarding the conditions and factors that contribute to repeated hunger strikes and the subsequent incidents of what is referred to as "calculated use of force," as well as their impact on the well-being of the detained population.^{xlvi} In its conclusion, OIDO directly addresses ICE, calling for urgent and serious action to address the issues at the facility that have drawn public scrutiny. While OIDO's report acknowledges that tackling these critical matters fell outside the scope of their inspection, its intent to "explore the root causes of the unrest" and "issue future recommendations if necessary" comes across as weak and unfeasible.^{xlvi}
20. On March 21, 2025, the Trump administration began staff cuts to eliminate the OIDO and the CRCL. The Executive Director of the American Immigration Lawyers Association (AILA) warned that these actions would lead to further abuses and unchecked power by the current administration. We call for the establishment of a truly independent oversight mechanism with enforcement powers to effectively address systemic abuses.^{xli}
21. ICE wields extraordinary authority to stop, arrest, and detain noncitizens throughout the country, and it is crucial to hold this powerful entity to a higher standard of oversight and accountability. The administration's commitment to conducting the "largest deportation program" in American history raises concerns. Furthermore, the use of federal law enforcement against student protesters indicates a disturbing trend towards oppression, alongside alarming reports of the retaliation against green card holders, as well as the mass transfer of individuals to an infamous prison in El Salvador known for its inhumane conditions. We demand the creation of a robust, independent oversight mechanism with the necessary authority to ensure accountability.

Deaths due to immigration detention conditions

22. Recent challenges during the Trump administration have led to a surge in legal efforts aimed at protecting immigrants from human rights abuses. However, these efforts are limited in scope and do not sufficiently address the troubling conditions in ICE detention facilities. The ability to safeguard constitutional rights is becoming increasingly uncertain due to the administration's disregard for the rule of law and for the power of the judiciary, as evidenced by its consistent refusal to comply with court orders. For example, in WA State on March 20, 2025 a [class action lawsuit](#) was filed on behalf of individuals in the U.S. District Court for the Western District of Washington, challenging the Tacoma Immigration Court's refusal to consider release on bond for persons who are charged with having entered the country

without being admitted. This includes people who have been living in Washington State for years and have established homes and families here. This lawsuit also challenges the prolonged delays that detained noncitizens face when appealing an immigration judge's decision denying release on bond to the Board of Immigration Appeals (BIA).

23. State legislative efforts are difficult and when successful, challenged in courts by the federal administration or GEO. Due to human rights concerns, the Washington State Legislature passed House Bill 1470 on May 10th 2023.^l The law required the Washington State Department of Health to adopt a range of health and safety rules and to regularly inspect facilities to ensure compliance with new health standards.^{li} It made compulsory for the Washington State's Department of Health (DOH) to conduct inspections of private detention centers.^{lii} Shortly after the passing of HB 1470, the GEO Group violated the bill by denying DOH inspectors' entry to its facility, due to guidance from ICE.^{liii} DOH received over two-hundred and eighty complaints of immigrants expressing how human rights abuses persisted,^{liv} including contaminated meals and lack of payment of Washington state Minimum wage labor laws. DOH and Department of Labor inspectors arrived at NWDC on several occasions, only to be rejected entry to inspect and to investigate these allegations^{lv}. Even though DOL inspectors were granted a warrant by the Pierce County Superior Court to legally enter and to fulfill their obligations of inspecting NWDC, the GEO group still did not allow them to inspect the conditions of NWDC.^{lvi} Then GEO filed a lawsuit against Washington state, seeking to find HB 1470 unconstitutional.^{lvii} According to news reports and court documents, claims that fully complying with the state law would put it in breach of its contract to operate the facility, raising the prospect of \$160 million in lost revenue. GEO also says that complying with HB 1470 would require building upgrades estimated to cost over \$3 million, including a complete redesign of the heating, cooling, and ventilation system at the detention center.^{lviii} **On March 11th, 2024**, a federal judge issued a preliminary injunction to temporarily block inspections by the State.^{lix} U.S. District Court Judge Benjamin Settle said the law *discriminates against GEO* as the only company operating a private detention facility in Washington and subjects GEO to "substantial economic burdens." Oversight, in the form of HB 1470 was blocked which prior to the ruling was the only domestic legislation providing oversight into the privately run detention facility. The fate of bill 1470 is still pending in courts. **In January 2025th**, a new state legislation led by La Resistencia was introduced, [bill HB1232](#), to strengthen the legal framework on inspection of private detention facilities. The bill is still under consideration.

Cruel deportation flights: resuming deportations through King County

24. **In April of 2019**, in response to numerous complaints regarding human rights abuses occurring on deportation flights, Dow Constantine, the King County Executive, issued an executive order that banned such flights out of King County.^{lx} After that, all deportation flights for Washington State were occurring from Yakima.^{lxi} ICE subcontracts with private airline charter companies, namely Swift Air, Western Atlantic Airlines, and GlobalX to carry out their deportation flights.^{lxii} **But in February of 2020**, the United States Justice Department sued King County, seeking to overturn the ban, claiming that such a ban "obstruct[s] and burden[s] federal activities."^{lxiii} **In March of 2023**, a federal court found that the ban "discriminates against the federal government because other users of the airport are not subject to the limitations found in the Executive Order."^{lxiv} The court order to reopen King County International Airport (also known as Boeing Field) did not reckon with the central concern for the ban being put in place which was to prevent human rights abuses that were ongoing in such deportation flights.
25. Abuse on these flights include: deportation without due process, with several detainees who were deported were in the middle of pending legal cases in U.S. courts^{lxv}; harassment, physical violence, and cruelty; use of a full-body restraint device known as "The Wrap"; disabled detainees being left without mobility assistance, for example a wheelchair user was not assisted into his seat on the flight and was forced to drag himself into the plane.^{lxvi} The WRAP, is used by ICE and other law enforcement agencies claiming it can restrain a person without restricting breathing. No testing requirements, safety guidelines or certifications exist in the US for full body restraint systems like the WRAP ^{lxvii} and community groups have filed

civil rights complaints to the Department of Homeland Security Office for Civil Rights and Civil liberties, calling the devices a form of torture that violates federal laws after their use in 2020 and 2021.^{lxxviii} The UW Center for Human Rights in FOIA litigation revealed that the WRAP has been used at least once to restrain a person with mental illness during ground transportation from Oregon to Tacoma for detention at the Northwest Detention Center.^{lxxix}

26. **On Tuesday, May 2, 2023**, the first deportation flight since the ban left Boeing Field.^{lxxx} ICE refuses to release head count or other passenger information regarding these flights through anything besides a Freedom of Information Act request.^{lxxxi} Further, when ICE does release video footage of detainees being placed on deportation flights, the camera is out of focus, making it impossible to tell what kinds of restraints are being used on the detainees.^{lxxxii} King County has opened a viewing area for volunteers to observe these flights to keep track of the numbers of people being deported and to record the tail numbers of the planes to keep records of which planes are used for such flights.^{lxxxiii} Further, ICE fails routinely to follow through on their own protocol for safety when boarding. Shackled detainees are supposed to be assisted up the stairs on such flights, but are regularly left to traverse the steps alone, leading to falls.^{lxxxiv} Two ambulances took detainees from NWDC due to suicidal attempts, making this the fourth or fifth time that such incident took place at NWDC.
27. **On March 12th, 2024**, it was observed that someone was transferred onto a deportation flight on a medical stretcher from the bus that transports individuals from the Northwest Processing Center. According to a piece on ProPublica, it is common for ICE to use 5-point restraints—wrists, ankles and in chains— even though ICE statistics show^{lxxxv} that less than half the people deported in 2023 have any kind of criminal conviction, or any serious felonies that could suggest a risk to others on board.^{lxxxvi}
28. Volunteer observers at King County Airport have documented an unscheduled ICE deportation-and-transfer flight **on February 2, 2025** that brought into the NWDC 110 detainees in handcuffs (the highest number since 2023). The Detainees did not have any appropriate clothing for the snowy and cold weather ^{lxxxvii} further jeopardizing their right to health.
29. In January 2025 to February 2025, the majority of military deportation flights were stationed at Joint Base Lewis-McChord (JBLM) in WA state.^{lxxxviii} On these flights legal representation and access to lawyers were also denied in addition to detainees being unable to notify their families^{lxxxix}. JBLM planes were used to transport detained immigrants to Guantanamo^{lxxx}. Reported human abuses on these flights included denial of passports, phones, legal representation, and movement^{lxxxi}.

Immigrants rights defenders

30. In 2020 the United States supported recommendations to address the need of protecting migrants rights defenders. One of the methods used by authoritarian governments to generate fear and silence protests to attack human rights defenders, using domestic laws to arbitrarily restrict their rights under the guise of law enforcement.^{lxxxii} International law forbids such infringements on freedom of speech, personal freedom and family protection.^{lxxxiii} The United States has continued to demonstrate this pattern of arrest, detention, deportation and threats of deportation against immigrant rights defenders for their activism on behalf of immigrants in the country. This pattern is evident in the case of students participating in protest and in the detention of leaders. The Human Rights Council should embrace recommendations to urge the United States **to adopt measures that ensure an environment in which human rights defenders can work freely, without threat of immigration detention and deportation**^{lxxxiv}.
31. Unfortunately, to censor migrant defenders, there has been harassment, surveillance, and lawsuits. During the first Trump administration in our 2018 report [Surveil, target and deport: defenders under attack](#), we documented a pattern of arrest, detention, deportation and threats of deportation against immigrant rights defenders for their activism on behalf of immigrants in the country. During an IACHR hearing, we showed 17 cases of activists being targeted across 11 States by the United States Department of Homeland Security, identified for their public advocacy work defending immigrants' rights and social justice. These incidents occurred under restrictive immigration policies—such as those promoted by President Trump—that the IACHR and the UN have already condemned as unlawful and arbitrary.^{lxxxv}

32. In the last few months of the second Trump administration, we have witnessed interference with the **work defending migrants detained at the NWIPC. We documented the desecration of a memorial** plaque dedicated to the memory a person who died at 61 while held in solitary confinement. The plaque read: “Held in solitary confinement at the NW Detention Center for four years despite suffering from mental illness. NWDC holds people in solitary confinement longer than any other ICE facility in the U.S.” Its theft was likely premeditated, requiring tools and the collaboration of multiple individuals. Additionally, all the flowers placed at the site were thrown against the fence. La Resistencia has [condemned](#) the act, calling it “a horrible insult to people who have lost their lives inside NWDC at the hands of GEO Group.” While observing deportation flights from King County Airport, La Resistencia [reported](#) harassment by right-wing supporters opposing their activism and filming them. Furthermore, the “toxic tour” is no longer permitted, impeding visits to these contaminated areas by the addition of a sign.
33. UN experts have repeatedly called on the United States to safeguard immigrant-rights defenders—regardless of their immigration status—so they can fully enjoy freedoms of information, expression, association, and peaceful assembly.^{lxxxvi} These rights belong to all people, and there is no possible distinction-based on nationality or place of birth.
34. We observed an escalation in the persecution of human rights defenders advocating for immigrants in WA. This has posed imminent risks to their safety and hindered their ability to carry out their work effectively. More than 100 demonstrators gathered Tuesday afternoon in Ferndale to protest the detention of prominent young activist, a staunch advocate for the local immigrant community. He was detained by Immigration and Customs Enforcement on Tuesday morning. He helped found local farmworker union Familias Unidas por la Justicia, according to Whatcom Peace & Justice Center. Community to Community Development, where Juarez Zeferino is a volunteer, organized the rally. The organization advocates for farmworker rights among other causes. There are reports that he was “detained violently by ICE” while dropping his partner at work. Agents broke his car window “when he tried to exercise his rights,” the post continued, adding leaders believe the detention is “a targeted attack on Farmworker leadership.” Several other workers were taken into custody as well.

Business and Human Rights

35. The United Nations Guiding Principles on Business and Human Rights (UNGPs) were unanimously adopted by the Human Rights Council in 2011 signifying a uniform desire to hold businesses to account and ensure remedies for all business-related violations. The US has through ICE contracted GEO Group to operate the NWDC and thus bears the responsibility to protect detainees within NWDC from any violations even by GEO Group. In the event of any violations, both the US government and GEO are duty bound to remedy the violations. The conditions at the NWDC have been deplorable.^{lxxxvii}
36. The U.S. government has a duty to prevent and address human rights abuses by private companies, following the UN Guiding Principles on Business and Human Rights. However, despite ongoing complaints and protests about detention conditions at GEO Group facilities, there is no public evidence of investigations or corrective action. Violations persist, and remedies provided, if any, have failed to effectively resolve the issues.

Conclusion and Recommendations

37. The Northwest Detention Center is a clear example of the tragedy of immigration detention and demonstrates the need to shut down all immigrant jails. As a state party to the International Convention on Civil and Political Rights, the US is bound under Article 2 of the convention to ensure people within its jurisdiction enjoy the rights under the convention including the right to life. The right to life is greatly jeopardized by the risks in detention.
38. The U.S. continues to use detention in a punitive rather than administrative manner. The following recommendations are urged for the United States:

1. End immigration detention, shut down immigrant jails, including the Northwest Detention Center, end inhumane deportations and release all immigrants to their communities. Immediately stop the use of detention as a punitive measure and shift to administrative processes for immigration matters.
2. Develop and implement mechanisms for non-custodial alternatives for immigrants and asylum seekers and establish a mechanism for those unfairly deported with cases pending to return with their families in the United States if desired.
3. Establish a Commission of Truth and Remedies for Immigrants Affected by Detention.
4. Ensure access to simple and fast mechanisms to request release, obtain judicial review of the detention to avoid indefinite, arbitrary detention and denial of liberty, contrary to Article 9 of the International Covenant on Civil and Political Rights (ICCPR).
5. Accept international recommendations and the establishment of an urgent debate at the Human Rights Council on torture, inhumane conditions and deaths at immigration detention centers, accepting the request for establish a commission of inquiry.
6. Accept visits to detention centers by the UN Special Procedures, the Inter-American Commission of Human Rights, and other independent authorities, ensuring full access to the Northwest Detention Center and migrants held therein.
7. Establish a national human rights institution fully compliant with the Paris Principles, providing independent detention conditions oversight, with power to make enforceable recommendations.
8. Halt deportation and inhumane transportation practices, cease the use of Guantanamo, CECOT and other sites with reported abuses. Release accurate information about deportation flights, including passenger counts and flight details, and ensure transparency in recording and monitoring these flights.
9. Investigate and address reports of harassment, physical violence, and cruelty during deportation processes, including the use of restraints
10. Call on GEO Group to respect and uphold the United Nations Guiding Principles on Business and Human Rights and act with due diligence.
11. Call on the United States to cease its policy of retaliation against detained migrants on Hunger Strikes, and to cease its policy of solitary confinement as a retaliation mechanism.
12. Fund free legal aid for immigrants detained and reinstate federal contracts for legal providers.
13. Protect immigrant rights defenders. Adopt measures to ensure an environment in which immigrant rights defenders can work freely, without threat of immigration detention and deportation. Cease harassment, surveillance, and legal attacks against immigrant rights defenders.
14. End the contract with GEO and establish corporate accountability for human rights violations, particularly regarding private contractors like GEO Group. Conduct effective and impartial investigations into GEO Group's actions and omissions towards detainees at the NWDC. Put in place measures to address disclosed violations and stop further violations at the NWDC. Hold GEO Group and ICE responsible for all violations within the NWDC.

¹U.N. Hum. Rts. Comm., Concluding Observations on the Fifth Periodic Report of the United States of America, ¶¶ 6-7, U.N. Doc. CCPR/C/USA/CO/5 (Nov. 3, 2023) [hereinafter Concluding Observations Fifth Periodic Report]; and United Nations, Report of the Working Group on Arbitrary Detention on its visit to the United States of America,

A/HRC/36/37/Add.2 (July 17, 2017), para. 30.

ⁱⁱ IACHR, PM No. 265-20, Northwest Detention Center regarding the United States of America, Resolution 41/2020 (July 27, 2020). In this resolution, the IACHR stressed that the principle of exceptionality in immigration detention calls for the establishment of a presumption of liberty.

ⁱⁱⁱ Transactional Records Access Clearinghouse (TRAC): Reports: <https://tracreports.org/immigration/quickfacts/>

^{iv} National Immigration Justice Center: Press Release February 2025 [Congress Must Reject Disastrous Budget Proposals That Cut Vital Services for U.S. Communities to Fuel Mass Deportation Machine](#) | National Immigrant Justice Center

^v USA Today March 24, 2025: [Immigrant women describe 'hell on earth' in ICE detention](#)

^{vi} [GEO ordered to pay \\$23.2M in detainee minimum wage cases](#) | The Seattle Times: Nwauzor v. The GEO Group, Inc..

^{vii} Government Accountability Project. Complaint presented to the House Committee on Homeland Security and others detailing civil and human rights violations at Richwood Correctional Center. July 10, 2020; Project South. Complaint presented to the Office of Civil Rights and Civil Liberties and the Office of the Inspector General detailing civil and human rights violations at Irwin County Detention Center. September 2020; Robert F. Kennedy Center Human Rights and other organizations. Complaint presented to the Office of Civil Rights and Civil Liberties and the Office of the Inspector General detailing civil and human rights violations at the Pine Prairie ICE Processing Center. June 2021; Earth Justice and other organizations. Complaint presented to the Office of Civil Rights and Civil Liberties and the Office of the Inspector General detailing civil and human rights violations at Imperial Regional Detention Facility. January 25, 2022, and National Immigration Justice Center. Complaint presented to the Office of Civil Rights and Civil Liberties, the Office of the Inspector General and the Office of the Immigration Detention Ombudsman detailing civil and human rights violations at ICE detention centers. June 2, 2022.

^{viii} Human Rights Council, Report of the Working Group on the Universal Periodic Review- United States of America (Third Cycle), A/HRC/46/15 (Dec. 15, 2020); United Nations, Report of the Working Group on Arbitrary Detention on its visit to the United States of America, A/HRC/36/37/Add.2 (July 17, 2017); United Nations Committee against Torture, Concluding observations on the combined third to fifth periodic reports of the United States of America, CAT/C/USA/CO/3-5 (Dec. 19, 2014); United Nations Human Rights Committee, Concluding observations on the fourth periodic report of the United States of America, CCPR/C/USA/CO/4 (April 23, 2014); Human Right Council, Report of the Working Group on the Universal Periodic Review- United States of America (First Cycle), UN Doc. A/HRC/16/11 (Jan. 4, 2011); ; Inter-American Commission on Human Rights, Report on immigration in the United States: Detention and Due Process, OEA/Ser.L/V/II. 78/10 (Dec. 10, 2010); IACHR, Human Rights Situation of Refugee and Migrant Families and Unaccompanied Children in the United States of America, OAS/Ser.L/V/II. 155 (July 24, 2015); Inter-American Commission on Human Rights, IACHR Expresses Concern over Executive Orders on Immigration and Refugees in the United States (February 2017).

^{ix} United Nations, Mandates of the Special Rapporteur on the human rights of migrants; the Working Group on Arbitrary Detention; the Working Group on the issue of human rights and transnational corporations and other business enterprises, and others: Communication of January 2021, concerning detention conditions at the Irwin County Detention Center (ICDC), Reference: UA USA 34/2020.

^x United Nations, Mandates of the Special Rapporteur on the human rights of migrants; the Working Group on the issue of human rights and transnational corporations and other business enterprises; and others: Communication of April 20, 2020 concerning the lack of necessary protection measures in light of COVID-19 pandemic for migrants in detention at NWPC, Reference: UA USA 7/2020; and Mandates of the Working Group on Arbitrary Detention; the Working Group on the issue of human rights and transnational corporations and other business enterprises; and others: Communication of February 8, 2018 concerning the initiation of deportation proceedings against Ms. Maru Mora Villalpando, allegedly in retaliation for her domestic and international activism as a human rights defender and alleged human rights abuses by the GEO group, Reference: UA USA 2/2018; IACHR, Precautionary measure No. 265-20, Northwest Detention Center regarding the United States of America, Resolution 41/2020 (July 27, 2020).

^{xi} United Nations, Report of the Working Group on Arbitrary Detention on its visit to the United States of America, A/HRC/36/37/Add.2 (July 17, 2017), para. 30.

^{xii} For example, in 2018, the former UN High Commissioner for Human Rights called US border policy of separating migrant children from parents “a cruel practice of government-sanctioned child abuse” (June 18, 2018). See also: OAS. Permanent Council, Resolution 1106 on the Impact on the human rights of migrants of the policy of the government of the United States of America of Separating Migrant Families. OEA/Ser.G CP/RES. 1106 (2168/18) rev. 1.

^{xiii} United Nations, Mandates of the Special Rapporteur on the human rights of migrants; the Working Group on the issue of human rights and transnational corporations and other business enterprises; and others, Communication of April 20, 2020 concerning the lack of necessary protection measures in light of COVID-19 pandemic for migrants in detention at NWPC, Reference: UA USA 7/2020.

^{xiv} United Nations, Opinion of the Working Group on Arbitrary Detention *Fernando Aguirre Urbina v. United States*, A/HRC/WGAD/2020/49, para. 4 (Sept. 22, 2020), at para. 46.

^{xv} *Id.*, at para. 22.

^{xvi} *Id.*, at para. 22.

^{xvii} *Id.*, at para. 74.

^{xviii} *Id.*, at para. 74.

^{xix} *Id.*, at para. 73.

^{xx} IACHR, Report on immigration in the United States: Detention and Due Process, OEA/Ser.L/V/II. 78/10 (Dec. 10, 2010). See also, IACHR, PM 505/18, Vilma Aracely López Juc de Coc and others regarding the United States of America, August 16, 2018; IACHR, PM 731/18, Migrant Children affected by the “Zero Tolerance” Policy regarding the United States of America, August 16, 2018. Also, IACHR, Press Release No. 130/18, IACHR Expresses Concern over Recent Migration and Asylum Policies and Measures in the United States, June 18, 2018; IACHR Expresses Concern over Recent Migration and Asylum Policies and Measures in the United States, June 18, 2018.

^{xxi} IACHR, “IACHR conducted visit to the United States Southern Border,” September 2019, available at: https://www.oas.org/en/iachr/media_center/PReleases/2019/228.asp. During the visit the IACHR also observed how the

right to asylum and international protection procedures were being implemented in the US; conditions of detention for migrants and the practices associated with such detention; migration and asylum procedures; and due process guarantees and judicial protection. The IACHR expressed its concern about the “dramatic increase in the use of migrant detention, “[...] and of migration to the United States more generally, and the implementation of fast-track deportations through procedures without due process guarantees.” It also manifested preoccupation about the existence of barriers to access to legal assistance and support for migrants and asylum-seekers at their credible fear interviews, court hearings, and administrative and judicial proceedings concerning their migrant status and the impact of judicial independence in the immigration court structure.”

^{xxii} IACHR, PM No. 265-20, Northwest Detention Center regarding the United States of America, [Resolution 41/2020](#) (July 27, 2020). In this resolution, the IACHR stressed that the principle of exceptionality in immigration detention calls for the establishment of a presumption of liberty, the contrary being incompatible with the object and purpose of Articles I and XXV of the American Declaration. It further emphasized that detention is only permissible when a case-specific evaluation considers that the measure is essential to serve a legitimate interest of the State.

^{xxiii} [IACHR Calls on States in the Americas to Adopt Migration and Border Management Policies That Incorporate a Human Rights Approach](#)

^{xxiv} U.N. Hum. Rts. Comm., Concluding Observations on the Fifth Periodic Report of the United States of America, ¶¶ 6-7, U.N. Doc. CCPR/C/USA/CO/5 (Nov. 3, 2023) [hereinafter Concluding Observations Fifth Periodic Report]. SUMMARY RECORD OF THE HUMAN RIGHTS COMMITTEE’S 5TH PERIODIC REVIEW OF UNITED STATES REPORT ON COMPLIANCE WITH THE INTERNATIONAL COVENANT ON CIVIL AND POLITICAL RIGHT, Sarah A. Dávila et al.

^{xxv} <https://www.ice.gov/detain/detainee-death-reporting>

^{xxvi} KNKX Public Radio, Lily Anna Fowler. [Activists monitor Tacoma ICE facility 24/7 after detainee death | KNKX Public Radio](#)

^{xxvii} La Resistencia, https://www.instagram.com/laresistencianw/p/DBuLs-PTVO8/?img_index=1

^{xxviii} IACHR Press Release, October 21, 2024: [IACHR Completes visit to Tacoma, United States, to Monitor Compliance with Precautionary Measures](#)

^{xxix} Nia Wong, Fox13., [UW lab technician detained at ICE Processing Center in Tacoma](#)

^{xxx} University of Washington, Center for Human Rights., [Conditions at the Northwest Detention Center - Center for Human Rights](#)

^{xxxi} Grace Deng, Washington Standard (November 17, 2023), [Immigrant detainees resort to hunger strikes in protest of conditions at Tacoma facility](#); Grace Deng, Oregon Capital Chronicle (November 29, 2023), [Nine detainees still refusing meals at Tacoma immigration facility as protest hits 18th day](#)

^{xxxii} El Tribuno del Pueblo [Immigrant Detainees at Northwest Detention Center on Fourth Hunger Strike Seventy-two People Demand Answers from ICE as Conditions Worsen | Tribuno del Pueblo](#)

^{xxxiii} See Note 1, *Supra*

^{xxxiv} The Trail of Puget Sound: Grace Farrell, Andrew Benoi, (February 29, 2024), [Combating Human Rights Violations at Tacoma's Northwest Detention Center - The Trail](#)

^{xxxv} University of Washington, Center for Human Rights., Conditions at the NWDC: Uses of force and Chemical Agents (August 14, 2023) <https://jsis.washington.edu/humanrights/2023/08/14/conditions-at-the-nwdc-uses-of-force-and-chemical-agents/>; Gustavo Sagrero Alvarez, Video shows heavily armed guards detaining hunger strikers at Tacoma ICE center after using tear gas (February 1, 2024), <https://www.kuow.org/stories/video-shows-heavily-armed-guards-detaining-hunger-strikers-at-tacoma-ice-center-after-using-tear-gas>

^{xxxvi} Grace Farrell, Andrew Benoi., Combating Human Rights Violations at Tacoma’s Northwest Detention Center (February 29, 2024), <https://trail.pugetsound.edu/?p=18636>

^{xxxvii} ICE Oversight Documents & Responses. Office of Inspector General, Department Of Homeland Security, *Results of an Unannounced Inspection of Northwest ICE Processing Center in Tacoma, Washington* (May 22, 2023), <https://www.oig.dhs.gov/sites/default/files/assets/2023-05/OIG-23-26-May23.pdf>.

^{xxxviii} *3 Videos of Extraction by CERT*, Obtained by FOIA Litigation (July 6, 2024).

^{xxxix} La Resistencia., <https://laresistencianw.org/freethemall/>; https://www.instagram.com/p/DGyWYUxRJRp/?img_index=1
^{xl} <https://washingtonstandard.com/2023/11/17/immigrant-detainees-resort-to-hunger-strikes-in-protest-of-conditions-at-tacoma-facility/>

^{xli} La Resistencia., <https://www.instagram.com/p/DHHRAauSL9d/>

^{xlii} La Resistencia., https://www.instagram.com/p/DHG_vApSEoc/?img_index=1

^{xliii} La Resistencia., https://www.instagram.com/p/DGIZ4PCPmfg/?img_index=1

^{xliv} La Resistencia, The People’s Tribune., Immigrants Begin 13th Hunger Strike This Year at Tacoma Detention Center (December 7, 2024), [Immigrants Begin 13th Hunger Strike This Year at Tacoma Detention Center - People's Tribune](#)

^{xlv} La Resistencia., https://www.instagram.com/p/DGbNE2iyYMb/?img_index=1

^{xlvi} Meyer, Josh. [Trump slashes homeland security civil rights jobs in Black Friday cuts](#)

^{xlvii} U.S. Department of Homeland Security, Office of the Immigration Detention Ombudsman, OIDO Inspection of Northwest ICE Processing Center, OIDO-24-007, November 20, 2024, 31, https://www.dhs.gov/sites/default/files/2024-12/24_1120_oido_inspection-report-northwest-ice-processing-center.pdf

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^{xliv} Tzamaras, George. “AILA Executive Director Warns of Due Process and Rights Abuses with Trump Gutting of Oversight Agencies.” AILA Doc. No. 25040103, April 1st 2024, <https://www.aila.org/library/aila-executive-director-warns-of-due-process-and-rights-abuses-with-trump-gutting-of-oversight-agencies>

^{li} [UW Report: State and Local Authority to Regulate the Northwest Detention Center](#)

^{li} Joya, Annabell. “Media Release: Governor Inslee Signs Bill Protecting People in for-Profit Detention - Columbia Legal Services.” *Columbia Legal Services - Seeking Justice Together.*, 12 May 2023, columbialegal.org/media-release-governor-inslee-signs-bill-protecting-people-in-for-profit-detention/

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- liv Deng, Grace. "State Inspectors Denied Entry to Privately-Run Immigration Detention Center in Tacoma. Washington State Standard." *Washington State Standard*, 25 Jan. 2024, [washingtonstatestandard.com/2024/01/24/state-inspectors-denied-entry-to-privately-run-immigration-detention-center-in-tacoma/](https://www.washingtonstatestandard.com/2024/01/24/state-inspectors-denied-entry-to-privately-run-immigration-detention-center-in-tacoma/).
- lv *Idem*.
- lvi *Idem*.
- lvii *Idem*.
- lviii GEO Group v. Inslee Case NO. C23-5626 BHS, available at [The GEO Grp. v. Inslee, C23-5626 BHS | Casetext Search + Citator: State inspectors denied entry to privately-run immigration detention center in Tacoma | The Spokesman-Review](#)
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- lx [King County International Airport - Prohibition on Immigrant Deportations](#)
- lxi [Justice department sues King County over ban at Boeing Field | AP News](#)
- lxii Exporting COVID-19: ICE Air Conducted Deportation Flights to 11 LAC Countries, Flight Data Shows - Center for Economic and Policy Research; At Seattle's Boeing Field, Real-Time Video Offers a Rare Glimpse of America's Troubled Deportation Flights
- lxiii Justice department sues King County over ban at Boeing Field | AP News
- lxiv <https://apnews.com/article/ice-deportation-flights-washington-da6db4222ceb42e234408d559c566204>
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- lxvi ICE Air Flights Resume at Boeing Field - Center for Human Rights
- lxvii Safety claims for body restraint used by US authorities based on disputed study | US news | The Guardian
- lxviii Complaint Regarding ICE's Use of The WRAP as a Restraint Device
- lxix What's ICE Hiding? A look inside UWCHR's lawsuit - Center for Human Rights
- lxx ICE Air deportation flights resume at Boeing Field in Seattle - Center for Human Rights OPINION | King County, Port of Seattle Must Demand Humane Conditions for ICE Deportation Flights
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- lxxiv *Id.*
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- lxxvii Jake Goldstein-Street & Jacquelyn Jimenez Romero., *Feds fly 110 detained immigrants to Washington State, advocacy group says*, <https://oregoncapitalchronicle.com/2025/02/04/feds-fly-110-detained-migrants-to-washington-state-advocacy-group-says/>
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- lxxxii IACHR, *Criminalization of the Work of Human Rights Defenders*, OEA/Ser.L/V/II, Doc. 49/15, December 31, 2015. Available at <http://www.oas.org/en/iachr/reports/pdfs/Criminalization2016.pdf>
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- lxxxv IACHR, *Human Rights Situation of Detained and Deported Migrants along the Southern Border of the U.S.*, March 27, 2012 at https://www.youtube.com/watch?v=sSWFb3_MKLM (minute 15:50); IACHR, *Refugees and Migrants in the United States: families and unaccompanied children*, 24 July 2015, OAS/Ser.L/V/II. 155. Human Rights Council, Report of the Working Group on Arbitrary Detention on its visit to the United States of America, Un. Doc. A/HRC/36/37/Add.2, 17 July 2017, Human Rights Committee noted in its concluding observations on the fourth periodic report of the United States that "mandatory detention of immigrants for prolonged periods of time without regard to the individual case may raise issues under article 9 of the Covenant." Concluding observations on the fourth periodic report of the United States of America, CCPR/C/USA/CO/4, 23 April 2014, par. 15. Among the recommendations issued by the UPR to the United States Government in the second cycle, the following are worth mentioning: "Put an end to unlawful practices which violate human rights, including... arbitrary detention, and close any arbitrary detention centers... Prevent torture and ill-treatment in places of detention... seek alternatives to detention and end use of detention for reason of deterrence... Consider alternatives to the detention of migrants." Report of the Working Group on the Universal Periodic Review, United States of America, A/HRC/30/12, 20 July 2015, par. 176.203, 176.213, 176.252, 176.253. UN Working Group on Arbitrary Detention, Opinion No. 18/2004, Communication addressed to the United States of America on 07 May 2004; Opinion No. 32/1999, Communication addressed to the United States of America on 04 May 1998; Opinion No. 72/2018 concerning Marcos Antonio Aguilar-Rodriguez (United States of America), A/HRC/WGAD/2017/72, 28 December 2017
- lxxxvi See Exhibit A: Testimonies from family members.
- lxxxvii See previous joint submission of the International Human Rights Clinic of Seattle University School of Law and Global Rights Advocacy for the 3rd UPR cycle dated September 23, 2019.