

CENTER FOR HUMAN RIGHTS & CONSTITUTIONAL LAW

Peter A. Schey (Cal. Bar No. 58232)
Carlos Holguín (Cal. Bar No. 90754)
256 South Occidental Boulevard
Los Angeles, CA 90057
Telephone: (213) 388-8693
Facsimile: (213) 386-9484
Email: crholguin@centerforhumanrights.org
pschey@centerforhumanrights.org

ORRICK, HERRINGTON & SUTCLIFFE LLP

Elena Garcia (Cal. Bar No. 299680)
777 South Figueroa Street, Suite 3200
Los Angeles, CA 90017
Telephone: (213) 629-2020
Email: egarcia@orrick.com

Attorneys for plaintiffs (listing continues on following page)

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

JENNY LISETTE FLORES, *et al.*,

Plaintiffs,

- vs -

JEFFERSON B. SESSIONS, ATTORNEY GENERAL
OF THE UNITED STATES, *et al.*,

Defendants.

) Case No. CV 85-4544 DMG (AGRx)
)
)
) EXHIBITS IN SUPPORT OF
) PLAINTIFFS' RESPONSE TO
) DEFENDANTS' FIRST JUVENILE
) COORDINATOR REPORTS
) VOLUME 3 OF 12 [REDACTED
) VERSION OF DOCUMENT
) PROPOSED TO BE FILED UNDER
SEAL]

[HON. DOLLY M. GEE]

Hearing: July 27, 2018
Time: 10 AM

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Plaintiffs' counsel, continued

LA RAZA CENTRO LEGAL, INC.
Michael S. Sorgen (Cal. Bar No. 43107)
474 Valencia Street, #295
San Francisco, CA 94103
Telephone: (415) 575-3500

THE LAW FOUNDATION OF SILICON VALLEY
LEGAL ADVOCATES FOR CHILDREN AND YOUTH
PUBLIC INTEREST LAW FIRM
Jennifer Kelleher Cloyd (Cal. Bar No. 197348)
Katherine H. Manning (Cal. Bar No. 229233)
Annette Kirkham (Cal. Bar No. 217958)
152 North Third Street, 3rd floor
San Jose, CA 95112
Telephone: (408) 280-2437
Facsimile: (408) 288-8850
Email: jenniferk@lawfoundation.org
kate.manning@lawfoundation.org
annettek@lawfoundation.org

Of counsel:

YOUTH LAW CENTER
Virginia Corrigan (Cal. Bar No. 292035)
832 Folsom Street, Suite 700
San Francisco, CA 94104
Telephone: (415) 543-3379

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Exhibit 12

Declaration of

CRISTOBAL R [REDACTED]

I, CRISTOBAL R [REDACTED], declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is 01/07/1988. My son's name is [REDACTED]. He is seven years old and he was born on 06/10/2011. My son and I are from Guatemala.
2. We left Guatemala because I was facing discrimination from the Spanish speakers. I was assaulted at gunpoint when driving a motorcycle taxi. My seven year old son was there. They asked me questions about my job and demanded half of my salary. I believe they were gang members. After that, they sent me threatening notes at my home. They physically attacked me but we were able to escape. They called me offensive names used to refer to people like me who do not speak Spanish as our first language.
3. We fled Guatemala in fear and were detained together at the border about six days ago near El Paso, Texas. I believe that it was on about 06/23/2018. We were taken to a facility nearby.
4. We were handed a two page document in Spanish and were told that we needed to sign them by an official who spoke only English. I signed because they made us sign, one by one. They gave us about five minutes to read it but I could not fully understand it because I have a limited education. We do not have a copy of this document. They only asked us for some information and locked us up. We were not provided a list of free legal services.
5. The officers at the facility did not speak any Spanish and they spoke to us only in English. I did not understand anything that they were saying except the word "Guatemala."
6. My son and I stayed together all the time, in the same cell with ten other people. We had a sink and toilet in the same room. We all had to share the same bathroom and use it in front of everyone. We had no privacy. The room was about two by three meters. We did not have access to a shower.
7. There was no water for us to drink. We were thirsty and we would ask for water and they would tell us to drink from the sink above the toilet. We did not get any clean water that entire time. My son only got one juice.
8. They did not give us food.
9. We could not shower. We were not given clean clothes.
10. The cell was very cold. The air conditioner was very strong so it was freezing in there.
11. We slept with aluminum blankets. We slept on the hard floor and did not have mattresses. There were some rooms with mattresses and some with mats. The officers would not turn off the lights. We did not have a sense of what time of day it was, whether it was daytime or nighttime. I felt very confused.

12. After about five hours, from 11PM to 4AM, my son and I were taken to another facility by bus. This happened on 06/24/2018. The trip was about twenty minutes. We were held for two days and two nights. My son and I were always together during this time.
13. I received two sheets of paper that had my legal rights and my son's legal rights. They were written in Spanish and they gave us time to read it and sign it. However they did not give us a copy of either of these papers. We were not provided a list of free legal services. They gave us two minutes to call my family to inform them that I had been detained.
14. The officials spoke English so I could not understand them.
15. The room that we were in had a toilet and a sink in it, similar to the first facility that we were at. There was very little privacy.
16. They did not give us water, so I had to drink water from the sink. They gave us two disposable cups that we had to use for the time we were there. I received two disposable cups and my son received two. The water tasted like it had a lot of bleach in it. It also smelled like bleach. I remember my son being very thirsty because he could not drink the water. He complained that it tasted too much like bleach to drink. I saw an official with pure water and my son and I begged him several times for water, but he refused and kept telling us to use the sink. My son is seven years old.
17. They gave us three meals, which consisted of whatever food was left over in the facility. Sometimes it was bags of fish and cookies, sometimes it was burritos. Some of the burritos they gave us were reheated and very dry. My son and the other children would not be able to eat this food and so they were always hungry. Some of the officials there would not feed the children if they were sleeping, so some children had to skip meals. This happened to my son and me. I tried to ask for his meal so that I could give it to him later, but the officer refused. My son did not get to eat that meal.
18. They did not let us shower for days. Before we were transferred to Berks, we were given five minutes to shower. We were not given clean clothes. Prior to this they took the toothpaste that I had from my journey and threw it in the trash. We could not brush our teeth.
19. This facility was also very cold, similar to the first place that we stayed.
20. They had two mats in the cell. The result of us had to sleep on the floor. We had aluminum blankets like the last place. My son slept on the floor with me. There were seven adults and seven children in the same cell. The size of the cell was about the same as the first one we were in, about two by three meters. They always had the lights on like the last place so it was very difficult to sleep and we could not tell what time of day it was. One official turned off the lights for one hour because the children were still awake and playing.
21. My son and I were taken out of that facility on approximately 06/26/2018 and were transported together to the Berks facility.
22. We received a written notice about our rights in Spanish but it was not explained to my son who is under 14. We did not receive any written notice about our right to a hearing before an immigration judge. We did not receive any information about a hearing for my son nor any information about any bond opportunities. We also were not told about any possibilities to be released on certain conditions. They

told us to sign a paper in Spanish that told us why we were being housed here but I do not have a copy of it.

23. While at the Berks Facility I have spoken with somebody from an organization that I do not remember. We spoke for about ten minutes about my fear to return to my country. The officials at the facility say that I need to wait until someone from immigration comes and I can talk to them more about my situation. I do not know when I will have my interview.

24. My son and I have been at the Berks facility for about three days. We are waiting to have our interview.

I, Cristobal R. [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

[REDACTED]

6-2-9-78
Date

I, Guadalupe Aguirre, certify that I am fluent in English and Spanish and that I read the above declaration to Cristobal R [REDACTED] in Spanish.



Guadalupe Aguirre
Empire Justice Center
30 South Broadway, 6th Fl.
Yonkers, NY 10701

06/29/2018

Date

Exhibit 13

Declaration of
Delmis V [REDACTED], A [REDACTED]

I, **Delmis V [REDACTED]** (A [REDACTED]), declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is February 12, 1993. My son's name is [REDACTED] and my daughter's name is [REDACTED]. My daughter is 9 year old and was born on April 19, 2009. My son [REDACTED] is 2 years old and was born on August 11, 2015. My children and I are from Honduras.
2. We all left Honduras because our lives are being threatened due to our political beliefs. I would participate in political protests which prompted life threatening messages sent to my home and being gassed on multiple occasions.
3. We presented ourselves at the border about June 6, 2018. We crossed the border and walked for about 10 minutes before the border patrol stopped us. We were taken to the "dog house" that same day. At the dog house, we were brought in soaking wet since we had just swum across river. When we walked into the dog house, it was awful. My daughter was crying because she was wet and freezing. We were given aluminum blankets but that was not enough to temper the cold air in the dog house. We wore the same wet clothing for two days. The cold was unbearable. My son is still suffering from a terrible cough and cold from how cold the dog house was those 4 nights.
4. It was impossible to sleep. The guard would come in and check on the people at all hours of the night. They never turned the lights off so it was impossible to get rest. The guards would come in every 1.5 hours. Some guards were better than others. Certain guards would yell at us and lose their patience because we could not understand them.
5. There were 8 women in my cage at the dog house. It was very tight quarters because all eight women had their children with them as well. The food was limited. The adults were given reheated burritos that tasted stale. I could barely eat the burrito. The kids were given chicken with some pasta. However, the worst thing was the water. I had to plug my nose to be able to drink it. It came out of the faucet and smelled terrible. I only drank a small amount of water when really thirsty because the water tasted very bad and the smell was terrible.
6. I was at the dog house for two days before they took us to another facility for a shower. That was the first time that we were offered clean clothes. We later returned back to the dog house. We spent a total of four days in the dog house. This has been the worst four days of my stay in the U.S..
7. I believe that it was on or about June 10, 2018, that we were transferred by bus to ICE facility in Dilley, Texas. The treatment at the ICE facility has been better than the treatment at the dog house. There was no medical attention available at the dog house. We did not see a doctor until we arrived at Dilley.

8. Upon arrival, we were given food and medical attention. However, the medical attention here is tough because it takes hours to get medication. They do not consider emergency situations over less urgent situations. My son has had a strong cold, including a fever and sometimes his fever spikes high and I am far down in the line. It takes up to two hours to get him medication.

9. I was not given any information about legal services until we arrived at Dilley


I, Delmis V [REDACTED], swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

[REDACTED]

6-29-18
Date

Certificate of Translation

I, Luisa Muskus, certify that I am fluent in English and Spanish and that I read the above declaration to Delmis V [REDACTED] in Spanish.



Luisa Muskus
Orrick, Herrington and Sutcliffe
609 Main St. Houston, Texas 77002

06/29/18
Date

Exhibit 14

Declaration of Justin L [REDACTED]

G [REDACTED]

I, Justin L [REDACTED] declare under penalty of perjury that the following is true and complete to the best of my knowledge and recollection:

1. My name is Justin L [REDACTED] [REDACTED]. My date of birth is May 18, 2005. I am 13 years old. I lived in Apopa, El Salvador, with my mother until May 30, 2018, when I left on my own for the United States. I am currently detained in CBP's Urcula detention center in McAllen, Texas.
3. I entered the United States by crossing the river on Wednesday, June 13, 2018. I do not remember the exact time, but it was in the evening. After I crossed, I went in search of US immigration police to turn myself in. I walked for about an hour and a half before I found an immigration patrol.

4. The immigration patrol searched me and put my belt and shoelaces in a plastic bag. They gave me a receipt for these belongings. Other than those things, the only other possessions I had were the clothes I was wearing. I had a copy of my birth certificate with me when I left El Salvador, but I lost it in Mexico.
5. The immigration police transferred me to a CBP holding cell in the same town where I am now. I think I may have arrived at 7:00pm, but I am not sure.
6. The police put me in a cell with a lot of other kids. It was very crowded and very dirty. There was trash on the ground. They kept calling people to leave and putting others in, so the number changed all the time, but sometimes I counted 40 other kids. Sometimes 32, and a few times fewer than that.

7. I did not receive a blanket. There were no mattresses. We slept directly on the floor. I am not used to this. The dirt from our clothes was on the floor, and it felt very uncomfortable to have to sit on the dirty ground.

8. It was cold, very cold. I only had a t-shirt, so I pulled my hands inside my shirt to try to keep warm.

9. There were two other 13-year-old boys in the cell with me at the start, but they left soon after. The other kids were all 15 and above.

10. I was in the cell for about 17 hours in all - I mean in the detention center where the cell was. We had to move to another cell twice for cleaning, and police came in four times to check names. All these checks along with the times they called people out or put more in meant that it was very difficult to sleep. I think I slept 3²³⁶ hours

in all out of the 17 hours I was there.

11. The food we received in that jail was a sandwich and a drink in a plastic bottle. They also gave us some crackers or cookies, but I didn't like them because they had peanuts. I didn't like the sandwich either, but I ate them. We only had food at certain times, and I was hungry in between meals, and there were ~~no~~ snacks in between meals.

12. There was water in the cell, in a large plastic Thermos. It tasted funny, like chlorine, like it came from a pool. I only drank from it twice because I didn't trust it. I don't think people really believed that water was clean. A lot of other boys didn't drink it. It made me feel funny in my stomach the times I drank it.

13. It was not possible to bathe or shower in that place. I tried to

rinse my face with water and wet my hair. I am really not used to going without bathing or combing my hair, so this was very strange and uncomfortable for me. They also did not give us toothbrushes or toothpaste, so we went the whole time without brushing until I came to the place I am now.

14. The toilet was in the cell with us separated by a little wall. I felt ashamed to use it because there was no privacy. It was uncomfortable to use the toilet with people just on the other side of the wall.

15. The immigration police never explained anything to me. I never knew when they would call me. When they finally called me last night to leave the cell, I thought maybe they were letting me out and I might see my family.

16. I haven't been able to call my father since I was locked up. I want to tell

him where I am, and I want to talk to him. Nobody from immigration has said anything to me about talking to my family. I'm afraid to ask because the officials aren't very nice.

17 Here is the place I am now it is a bit more comfortable because we have more space, we get blankets and mattresses, and the food is better. Here we get apples and better crackers and cookies, and instead of sandwiches we get tortillas wrapped around rice and beans. The toilets here are separate from the cages where we sleep. They still only have a ~~wall~~ ^{partial} wall, but at least we are not using the toilets right next to people who are sleeping.

18 The immigration police transferred me yesterday, June 14, 2018, in the evening to the place I am now. It was the first time I had seen the sky in 17 hours. I didn't know what time it was

until then, but I saw that the sky was dark, and I heard a woman say in English that it was 12:20, so it was just after midnight, on June 15. I don't know what time it is now, and I didn't even know ~~where~~ it is already morning until I asked the lawyer taking this statement because the lights here are always on.

I swear under penalty of perjury that the above declaration is true and complete to the best of my ability. I provided this declaration in Spanish, a language in which I am fluent, and I read it ~~back~~ while it was read to me in Spanish.



June 15, 2018
McAllen, Texas

Certificate of Translation

I, Michael Bochenek, certify that I am fluent in English and Spanish and that I read the attached

declaration to Justin L  Spanish.

Michael Bochenek

Michael Bochenek
Human Rights Watch
350 Fifth Avenue, 34th Floor
New York, New York 10118
(718) 724 9016

Dated: McAllen, Texas

June 15, 2018

Exhibit 15

Declaration of

Mayra S [REDACTED] A [REDACTED]

I, **Mayra S [REDACTED]** declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

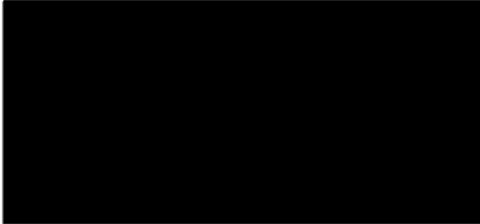
1. I was born on April 14, 1989 in Mexico. My son [REDACTED] was born on March 24, 2009. He is 9. My daughter [REDACTED] was born on October 10, 2015. She is 2. They were both born in Mexico.
2. I came to the United States because my family was threatened by gangs. I traveled alone with my children. I was also fleeing domestic violence.
3. On May 31, 2018 at 1pm, we crossed the bridge at Nogales and told the immigration officials that we were seeking asylum. They asked for my children's birth certificates and my identification. They took the information and directed me to an office. At the office, they took our belongings and searched us. There was a table with cups of water, cookies, and small boxes of cereal.
4. We were put in a small cell with ten other people, all women and children. There were three benches and no room to move around. There was a large trash can, but no toilet or sink. It was very cold and each of us only had an aluminum blanket. We went to get mats to sleep on, but there were not enough and I was only able to get mats for my children.
5. The officials allowed me to make a phone call. They gave me papers to sign but did not tell me what they were.
6. The officials woke me up at 2am to fingerprint me. I had to wake up my son as well to be fingerprinted.
7. The next morning at 10am we left the immigration office. It was a five-hour drive. My daughter asked the officer for water and he refused.
8. An hour later, we arrived at another office and were given water that smelled and tasted dirty. We did not drink it. We were taken to a room with an open toilet. There was a camera above it. My son used the toilet, but my daughter did not because she felt uncomfortable. The room was very dirty. We were there about an hour.

9. After a long drive, we were locked in another cell. I begged for water for my daughter but the officials would not give us any. My daughter started crying. The officers told me to shut her up. They gave us ham sandwiches that were bad, and a container of foul-tasting water.
10. The cell was extremely cold. We were each given thin mats and rough, dirty blankets. We were till freezing. The room had a bench and open toilet, which meant there was not enough room to sleep. I asked for water and explained that the water in the container tasted bad. The officer brought more water but it tasted the same.
11. I was menstruating and asked to shower alone, but the officer refused and forced us to shower together. There was some soap on the floor, but we were not given toothbrushes or toothpaste.
12. The morning of June 2, we were given sandwiches and nothing to drink. We went in a car to the airport and flew to Karnes. At the airport, they threw away all our clothing and personal belongings and gave us new clothes to wear.
13. When we arrived at Karnes, I was told that we have the right to a lawyer and given a list of lawyers. We were given a sandwich and water bottle. It was not enough water and we were very thirsty. It had a lot of chlorine.
14. My daughter was given pants which were too big for her. When I asked for a smaller size, the woman told me that they don't have tight pants here like in my country. She was very rude.
15. My son is badly traumatized. He has been wetting his bed and is fearful all the time. He saw someone bound with chains and asked me whether I would be chained in the same way. He also overheard a woman say that she had been separated from her children, and asked me whether we would be separated as well. He wonders when we will get to the United States. I do not tell him that we are already here. He wouldn't believe that the United States would treat us this way.
16. My son had the chance to talk to his uncle, who told him that there is a present waiting for him. When we were placed in deportation proceedings, I told my son that we were going back home. He is upset that he will not get to see his uncle and get his present.
17. He tells me not to cry and that things will be alright. He is trying to protect me and his sister while also experiencing his own psychological trauma. This entire experience and the push pull of the roles he has is sure to give him long-term psychological problems. After screening, he has qualified here for psychological services due to the extent of his trauma. He begins his treatment on Friday.

#18557

18. My daughter has serious trouble sleeping. They won't allow me to give her formula in a bottle, saying she is too old. She is accustomed to having a bottle at night which she sucks for comfort. She needs that more than ever. It might help her sleep as it is calming.

I, Mayra S [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.




06/26/18

Date

Certificate of Translation

I, Ana Bueno, certify that I am fluent in English and Spanish and that I read the above declaration in Spanish to Mayra S [REDACTED]



Ana Bueno

6/28/18

Date

Exhibit 16

Declaration of

RUTH M [REDACTED]

I, Ruth M [REDACTED] declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. I was born on December 25, 1989 in Honduras. My son is [REDACTED]. He was born on November 21, 2010 and is 7 years old.
2. We came to the United States due to violence. My stepfather is a gang and he and other gang members tried to rape me.
3. We entered the United States on June 4, 2018 at Hidalgo, TX. Immigration officers found us. They did not ask us anything or tell us any information. The first time I was called with my son was when we were at the station. They called us and asked us our name, date of birth, took our picture, and they took our fingerprints.
4. We were taken to a building where we stayed for three days. I was put in a room, and the officials took my son to another room. They told me he could not be with me. I told them he had a fever, but the officials told me that it was not really a sickness. They only wanted to know if he had something like high blood pressure.
5. They put me in a room that was freezing. It had a concrete floor and cement benches. There were around 30-40 women. Around half had their children with them. There was a baby who was only 1 year old. The women told me that children who are under around 6 stay with their parents.
6. The children in our room couldn't sleep because of the cold. They were crying the whole time. We got aluminum blankets but they didn't help much.
7. We received a sandwich three times a day, but the meat was bad and made the children's stomachs hurt. The children also got cookies and juice for snacks. We had a thermos of water, but it was bad quality and had too much chlorine. My son later told me that the water was nasty and he did not drink it. There was not enough water for all of us.

8. The children in the room got sick. They vomited, coughed, and had fevers. The women with children were not allowed to bathe them. The officials asked if the children needed medical attention, but told their mothers that coughs and fevers were not real sicknesses. They would not provide medicine. I was so afraid that my son, who already had a fever, would get sicker due to the cold.
9. They called me to talk to an official on the second day. He told me I would have a hearing, but did not tell me that I could have a lawyer or how to find a lawyer. He gave me a phone number and told me that I could call if I had been separated from my son. I got really scared that they might take my son and I wouldn't be able to find him.
10. I saw my son a couple times at a distance but I never got to speak to him. I was terrified. I did not know if they would hit my son. I worried that he would not be able to sleep without me there.
11. Later that day, I saw the officials leading my son somewhere. I asked where they were taking him, but they would not tell me. For 24 hours, I had no idea where he was or if he was ok. I was devastated.
12. On the fourth day, June 7, I was taken to court. They shackled my hands and feet and put me on a bus with 25 men and women who were all shackled. We were on a bus for two hours. I still did not know where my son was and was terrified.
13. At the court, they told me that I had the right to a hearing. I was assigned a lawyer for the first time. I only talked to the lawyer for about five minutes before the judge came. The judge told me that I could plead guilty or not guilty, but I would need evidence to show that I was not guilty. They said I was guilty if I crossed the river. I said that I had crossed the river, so I declared myself guilty. All the parents asked about their kids, but the judge said he was not there to handle the children. He was just there to sentence us for the crime of crossing the river. The judge declared us "not guilty" and I was returned to the perrera. Shortly after we got back, a nice official looked to see if my son was still in the perrera. After I found out he was there, he took me to see my son. He was in a cell with other children and he was crying. After that, they allowed me to stay in the same cell as [REDACTED]

14. I stayed in the perrera in the same cell during four days. He was given three meals a day. He was usually given a milk, fruit, juice and either a burrito or sandwich. He was also given a snack, usually a juice and a cookie. He ate all the food he was given. He was always hungry and this was not enough food for him. The aluminum blankets were not enough and he was still cold. They did not ask if he was sick nor did he get any medical attention. It was hard to sleep, we were always woken up throughout the day. It was always noisy. Either people were being yelled at or people were crying, especially children due to separation. The officials would also kick people if they did not wake up when they were called to go somewhere.
15. [REDACTED] was given a change of clothes and they washed his muddy clothes.
16. After the perrera, we were both transferred to Dilley and we have been here 20 days. She has seen CARA lawyers. I have asked for asylum but my case was denied and CARA lawyers appealed. My case was approved today, June 29th. Her aunt is her sponsor and she lives in Manchester, NH.

I, Ruth M [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

[REDACTED]

6/29/18
Date

Certificate of Translation

I, Yolanda Rodriguez, certify that I am fluent in English and Spanish and that I read the above declaration to Ruth M [REDACTED] in Spanish.


Yolanda Rodriguez

6/29/18
Date

Exhibit 18

Declaration of
BRIDIS F [REDACTED], A [REDACTED]

I, **BRIDIS F [REDACTED]** (A [REDACTED]), declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is December 8, 1994. My son's name is [REDACTED]. He is 4 years old and he was born on July 10, 2014. My son and I are from Honduras.
2. We left Honduras because my sons step-dad was part of the MARA 18 (gang) and I didn't know. He threatened to kill me and my son if I left him. He became physically and emotionally abusive.
3. We presented ourselves at the border about June 15, 2018. When I was apprehended by Border Patrol I was asked if anyone else was with us. We had walked hours trying to turn ourselves in. We were tired and thirsty. My baby was dehydrated. I begged for water and although the officer had some he denied me water. We sat down and waited for another officer to come. He had water and gave us a small cup of water but it wasn't enough.
4. After about an hour we were taken to the "Yelera". At the yelera I were asked questions and processed with fingerprints and pictures. I was not told my rights, not that I had a right to a lawyer or a phone call. They did provided us with juice only to drink and an alumn blanket, but no food at all. We were put in a small room with about 25 other mother and children. There was no space to sit or lay. The room had two toilet seats with no privacy and no sink. Around the wall there was like a cement bench where people could sit but they were full and crowded. The temperature was extremely cold. Children were crying at all times. A lot of children including mine were shivering. Human heat was not enough to warm the babies.
5. Hours later like at 8-9pm we were called and transported to the "perrera" in a mini-bus with about ten other people.
6. When we arrived I had an interview with an immigration officer who asked me questions like why did I leave my country. I told him why. I also told him that I that I had an accident where I hit my head that causes me headaches and short term memory. He then screamed at me and told me I was lying and that he was going to deport me immediately. I started to freak out. I didn't want to go back to my country. I was frighten. I was sent back to my cell where I was given two aluminum blankets and two mats. There was a lot of crying in there too. We were not given food. Restrooms were overflowed and smelled terrible. I was there 4 days and couldn't sleep with the cold temperatures. Officers also told us to not sleep profoundly. I once over slept and woke up late to get breakfast and was denied. Officer sent us back and told me to wake up on time next time.
7. Food was provided three times a day. Usually a nasty sandwich, water, and an apple. My son didn't eat much of it. The little he did it made him sick.
8. I was not told about my rights or rights to a lawyer or phone call. I asked if I could make a phone call but was denied. I was not allowed a shower until the day before we came to Dilley. I was given a toothbrush, toothpaste and towel for my son and I.

9. On the fourth day we were put in a big bus with about twenty other people. It was about four hours away.
10. The day we arrived at Dilley we were treated very nicely. We received new clothes, shoes, toothpaste, toothbrush, towels, combs, food, medical exams, and nice comfortable beds. We were allowed a shower and our rights were told our rights, told me I had a right to a lawyer and provided me with a list of many lawyers. We haven't gotten sick. We are treated well and my son seems comfortable. I just want to leave and feel free.

I, BRIDIS F [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

[REDACTED]

06 29 - 18
Date

Certificate of Translation

I, ANA BUENO, certify that I am fluent in English and Spanish and that I read the above declaration to BRIDIS F [REDACTED] in Spanish.



Ana Bueno

6/29/18

Date

Exhibit 19

Declaration of
LOURDES R [REDACTED] A NUMBER [REDACTED]

I, Lourdes R [REDACTED] (A number [REDACTED]), declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

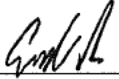
1. My date of birth is September 17, 1989. My daughter's name is [REDACTED]. She is 5 years old and he was born on January 9, 2013. My daughter and I are from Honduras.
2. I left my country of origin due to fear of violence against myself and my daughter by the Maras gang. I was once chased down and assaulted by the Maras (and was knocked unconscious) and my daughter suffered an attempted kidnapping on one occasion by the Maras.
3. We presented ourselves at the border in Reynosa, Mexico on or about May 4, 2018. We were taken to a facility known as the Perrera (Dog House). Conditions at this facility were deficient on various fronts; Food was scarce. We were fed a burrito, chips and one bottle of water for breakfast and lunch and one ham sandwich and a bottle of water for dinner. We were not fed anything else.
4. Hygiene at his facility was very poor. We were not allowed to shower except for once in six days and toilets were dirty and over flooding every day.
5. After six days in this facility, my daughter and I were taken to Dilley, where we have been held for 48 days. Medical conditions at Dilley are poor, as described below.
6. Medical care at Dilley are poor. Medical attention typically takes several hours. Lines to obtain medicine always take several hours. On one occasion, my daughter had fever and we visited the doctor's office. The first doctor that helped us said that Lourdes did not have a fever and dismissed us, but this finding was rejected by a second doctor that we saw on the same day. This doctor told me that Dilley does not prescribe antibiotics at the facility, so despite the fact that my daughter had an infection she was only prescribed ibuprofen to reduce the fever. After four days of having a fever, the doctors finally prescribed antibiotics. In my experience, other detainees has suffered from similar experiences.
7. During my stay at Dilley, I have not been allowed to call my family since I cannot pay for my calls. I have been told that I can ask for credit to make calls, but several other detainees have expressed that on several occasions the facility denies requests for calls.

I, Lourdes R [REDACTED], swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

[REDACTED]
28 de Junio 2018
June 28, 2018

Certificate of Translation

I, Emilio Grandio Urrea, certify that I am fluent in English and Spanish and that I read the above declaration to Lourdes R [REDACTED] in Spanish.



Emilio Grandio Urrea
Orrick, Herrington & Sutcliffe
609 Main St. floor 40, Houston, TX, 77002

6-28-2018

Date

Exhibit 20

**Declaration of
BLANCA M [REDACTED], A NUMBER [REDACTED]**

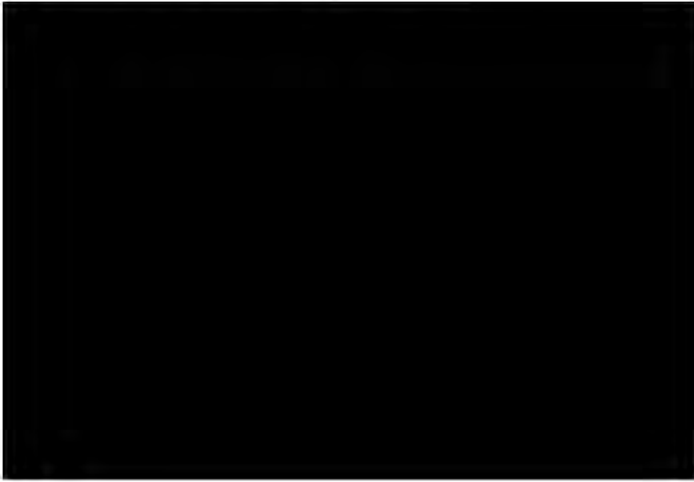
I, **BLANCA M [REDACTED]** declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is January 13, 1993. My daughter's name is Britney M [REDACTED]. She is 4 years old and was born on October 5, 2013. My daughter and I are from Guatemala, where we fled because of death threats and extreme violence.
2. To start, I was repeatedly physically abused and raped by my brother-in-law for the last six years. My sister does not know because he threatened me with a gun if I ever spoke of it. My brother-in-law is actually Britney's father and she is the product of his abuse. She does not know. He threatened to kill me if I told anyone. However, I cannot blame her for his violence towards me. I tried to tell the police about his abuse but they ignored my pleas. He owns a bar in town and even when the "dry" law is in place for Election Day, the police allow him to serve alcohol. I have seen him threaten people with his gun and hit them in the head with his pistol when they leave his bar too drunk. He is a very violent man who the police do not bother at all.
3. The event that finally triggered me leaving Guatemala was when the gangs came to our town and saw me with my daughter. The gangs asked me to join their band and when I refused, I was beaten and raped multiple times by these gang members which has left me in a state of anxiety and fear. Following those events, gang members repeatedly stalked and threatened me and my daughter. I was forced to flee. I have only spoken to my mother once since I left and she told me they are looking for me. I left a son in Guatemala; my mother cares for him. The gang members do not know that he is my son. They only threatened me and Britney.
4. We presented ourselves at the border about May 24, 2018. When I crossed the border, my daughter and I walked for about 45 minutes and a man stopped us and told us he would take us to safe place with food. We were taken to the Ice House. When we got there, they took our shoe laces, searched our hair and checked our entire bodies – backs and stomach. It was very uncomfortable for me particularly because I was searched by a man and I have suffered both physical and sexual abuse by men in the past. It was extremely crowded in the Ice House. There was about 35 women with children in one large room. I slept there for one night, sitting on the floor by the bathroom. It was very uncomfortable and extremely cold.
5. I believe that it was on or about May 25, 2018, that I was taken to the dog house. At the dog house, I was again searched by another official, which triggered much anxiety for me. I also asked for a phone call to tell my family where I was and that I was alive but the official would not let me. At the dog house, it was also very cold but at least here we had a mattress to lay on. However, the officials would get upset if we used more than 2 aluminum blankets. I started to get sick at the dog house. I experienced headaches, chills, bodyaches, and a fever. I asked for medication for my headaches, but the officials told me there was no doctor on site. I did not shower for 5 days. The only bathrooms were the small plastic bathrooms that do not flush. The officials told us that there were too many people and we could only

shower after we had been there for five days. I never showered at the ice house or the dog house. My daughter was also not permitted to shower. Both of us were covered in dirt and dust from our walk through the desert after we crossed the river.

6. Up to this point, I was not given any sort of legal notice. I was not informed of any legal resources or rights with respect to Britney either. Every night they would wake us up between 11 pm and 1 am for a roll call and call all of our names by country. We would have to wake up and say “present” at the both the ice house and the dog house.
7. Finally, I was taken to the ICE facility in Dilley, Texas. When I arrived, I was given medical attention. We were required to wait there all day. They had to confirm that Britney had all of her vaccines.
8. You see a lot of sick kids here at Dilley. You see kids with chicken pox and also some throwing up in the cafeteria. Britney caught a small cold after we arrived at Dilley. The conditions are better here than the dog house and ice house, however, it is hard to get medication. In Guatemala, I took sleeping medication and medication for my anxiety and depression, but here it has been hard to get. I stand in line for 1.5 to 2 hours each time I have to get my medicine.
9. When I arrived in Dilley, Texas, I was permitted a phone call of three minutes. I used it to call my friend who lives in the U.S. and he sent me a Western Union card to be able to buy more phone time. I have used the card to call my family. I also use it to go to the store but it is extremely expensive so I just eat what is given during the meal times. The food here is often heavily laden with condiments and upsets my stomach. Britney has lost her appetite a bit here – she is only eating fruits. She is nervous because the kids tell her that she may have to go back. She is terrified of her uncle – who she has no idea is actually her father.
10. Sometimes I am notified that I have an appointment with a lawyer and two hours later I am told it is cancelled. So far I have spent 30 days at the ICE facility in Dilley, Texas. It is not a bad place but my depression is getting bad because it feels like a prison. Britney asks me when we will be able to leave, but I do not have an answer for her. I know that we cannot leave until the judge hears my case. I have been allowed to talk to one lawyer from CARA since I have been here.
11. As far as legal rights, I do not understand the process completely. I know that if I am denied twice that I will have to go back to Guatemala. I do not know what will happen to Britney. They have not told me but I assume she will have to go with me. This all terrifies me and it keeps me from sleeping at night. I was interviewed by 3 ICE agents. I could not understand the first two very well and finally the third had a translator. However, I was so nervous that I was not able to speak clearly. I was told to sign some documents but they were all in English. I am not sure what I signed. I was given copies but they are all in English. I was asked to return on Monday to see the judge but I am not sure what to expect.

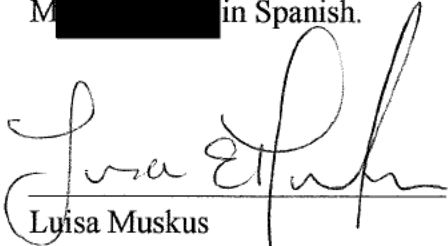
I, **BLANCA M** [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.



29-06-79
Date

Certificate of Translation

I, Luisa Muskus, certify that I am fluent in English and Spanish and that I read the above declaration to Blanca M [REDACTED] in Spanish.



Luisa Muskus
Orrick, Herrington and Sutcliffe
609 Main St. Houston, Texas 77002

6-29-2018
Date

Exhibit 21

Declaration of

BRANDON S [REDACTED]

I, **BRANDON S** [REDACTED] declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is August 1, 2003, I am 14. I am from Guastatoya, Guatemala.
2. My family left Guatemala because we feared for our lives. My father supported a local man who was running for sheriff. The man became sheriff and gave my father a job. My father did not like working for the sheriff, so he quit. Two weeks later, my father moved to the United States for a new job. The sheriff was upset that my dad quit and moved to the United States. Two or three months later, I was at home with my mother and brothers when someone shot five bullets at my house. The next day, my mom submitted an application for Mexican visas. We got the visas a couple of months later and left Guatemala a few weeks later once we finished the school year. We took the bus from Guatemala to Tijuana and stayed in Tijuana for one night before presenting ourselves at the border.
3. My mother, my two brothers and I presented ourselves at the border on July 4, 2018 around 3:00 in the afternoon. We were taken to the San Ysidro Facility. I was separated from my mother and youngest brother. The guards then placed in a room with my older brother and about seven (6) other young men, all under the age of eighteen. I was given a thin mattress and one blanket.
4. Around 3:30pm after I arrived, I was given a cheeseburger and some apple juice. I was given the same thing for dinner around 7:00pm. Around 11:00pm or 12:00am, I was given a bologna and cheese sandwich. We have access to water at all times. I am usually hungry between my meals, but I have not been given any snacks. I like meal time because that is the only time I get to see my mom and younger brother.
5. There is air conditioning in the room and it is very cold all day. I have to use my blanket all of the time. I would like another blanket, but I am not comfortable asking for one.
6. The lights in the room are very bright and are on all day and night. There are no windows to the outside, so I don't know what time it is. My brother and I talk about how frustrating it is. Since I arrived, I have not been able to shower or brush my teeth. There is no soap in my room and no towels. I had a toothbrush when I came here, but they took it away when I got to the facility. No one has allowed me to brush my teeth and no one has told me when I will be able to take a shower.

Certificate of Translation

I, HECTOR RIVERA, certify that I am fluent in English and Spanish and that I read the above declaration to BRANDON E [REDACTED] in Spanish.

[Handwritten Signature]

Name: HECTOR RIVERA

Organization:

Address:

JULY 5th, 2018

Date

I, BRANDON E [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

[REDACTED]

JULY 05-2018

Date

Exhibit 22

Declaration of

Fatima O [REDACTED]

I, Fatima O [REDACTED], declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is 26 Feb 1991. My daughter's name is [REDACTED]. She is 8 years old and was born on 2 April 2006. My daughter and I are from Honduras.
2. I left Honduras because my ex-husband was stalking me.
3. We presented ourselves at the border about May 15, 2018. I believe that it was on or about 12:00 PM. We were taken to the "dog cage" for five days. In the "dog cage," people were to sleep on mats that were two inches thick on the floor. Several babies were crying. There was no access to showers. The food was one burrito for breakfast, one burrito for lunch, and bread with a spread for dinner. On the second or third day there, my daughter soiled herself from peeing and pooping and wanted to wash her private parts. She was used to cleaning her private parts every day. I asked if I could clean her because her underwear were soiled. The guards said, "No." They said that they only have 10 showers. She remained in her dirty underwear until we arrived at Dilley several days later. We were not able to sleep at the "dog cage."
4. The food was one burrito for breakfast, one burrito for lunch, and bread with a spread for dinner. At the "cold place" there was only bread there for eating.
5. In both places it was very, very cold. It was extremely cold in the "cold place."
6. Lights were on all the time and were never turned off, even in the night. It made it very hard to sleep.
7. After 5 days, my daughter and I were taken to another place where we were held for 1 day.
8. In the "cold place" there was only white bread with spread to eat. There was again no access to showers. People had to sleep on the floor without anything underneath. For blankets we had aluminum blankets. It was very cold.
9. I did not have legal notice until arriving to facility in Dilley. On the first day arriving to Dilley my daughter had a very bad fever and I took her to get medical help. They said that I would have to come back the next day or day after and that I should just put a rag on her head and that they could not help me that day. The next day I was able to get her to the medical professionals.
10. My daughter and I were taken out of that facility on or around May 20, 2018.
11. My daughter and I have been at the Dilley location for about 38 days. We are planning to wait to see what happens with the attorney to see if we have to be deported back or not. We do not know what will happen. My daughter has had to talk a lot in the court but she does not like to and asks "Mom can I please stop?"

12. I am unaware of current status and keeps waiting to hear back about case status.

I, Fatima O [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.



28-06-18
Date

I, Amber Rieff, certify that I am fluent in English and Spanish and that I read the above declaration to Fatima C. [REDACTED] in Spanish.



Amber Rieff
Willamette University Clinical Law Program
245 Winter Street SE
Salem, OR 97302

6/28/18
Date

Exhibit 23

Declaration of
NoHEMI P [REDACTED]

I, NoHEMI P [REDACTED]

declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is July 27, 1999^{26 1996}. My daughter YESENTA G [REDACTED] was born July 11, 2015. We are from Guatemala.
2. I left Guatemala because I want a better life for me and my daughter. We are very poor and I have a hard time feeding and clothing my daughter. I also worry about the local criminals selling cocaine.
3. I signed papers put in front of me in English that I couldn't read. I was not given written notice of my child's legal rights. I was not provided a list of free legal services. I was not given access to a telephone to call a lawyer.
4. No soap has been provided to me. Neither myself or my daughter have been given an opportunity to shower. My daughter has a rash from not showering. No privacy has been afforded me or my daughter.
5. I feel my child needs medical attention. She is severely constipated and might be feverish, in addition to low cash.
6. My cell is overcrowded, with 13 people in all. There are two mattresses. There are also thick blankets.

I, NOHEMI P [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

[REDACTED]

June 27, 2018

I, ESTELLA GALVAN, certify that I am fluent in English and Spanish and that I read the above declaration to Noheми P [REDACTED] in Spanish

Name: ESTELLA GALVAN

Signature: Estelita Galvan

Date: 06-27-18

Exhibit 24

Declaration of

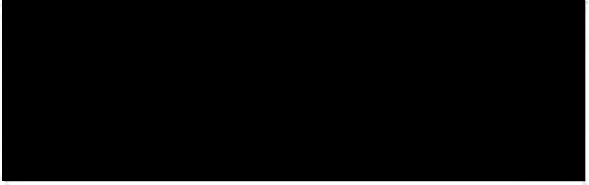
Doris M [REDACTED]

I, Doris M [REDACTED] declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is June 5th, 1976. My son's name is [REDACTED]. He is two and a half years old and was born on November 18th, 2015. My son and I are from Honduras.
2. We presented ourselves at the border about May 19, 2018. At first we stayed at the cold facility. We stayed there for 8 days. It was very cold like a freezer. My child and I had to sleep on the floor. We all had to sleep very close to each other and it was difficult to sleep. I was only able to take one shower with my son in the 8 days that we were there. They gave us toothbrushes and toothpaste.
3. At this place we were only given one sandwich for the morning, one for the middle of the day, and one at night. There was not regular water to drink.
4. It was very cold. It was like a freezer.
5. The lights were on all of the time. In the middle of the night the lights were kept on.
6. After 8 days, my son and I were taken to another place where we were held for 9 days in the place they call the dog cage.
7. They had bottles of water and burritos for the morning and middle of the day and a sandwich at night. It was very cold and they only gave us small blankets out of aluminum. We again had to sleep on the floor on very small mats. We both could not sleep because it was so cold. We had to keep moving our bodies. My son became very sick at this place and had a fever and was vomiting. He was vomiting for 4 days. In "La Perrera," they gave him medicine to stop the vomiting. After he took the medicine, he stopped vomiting.
8. My son and I were never given any documentation regarding the law or my legal rights. I was able to speak to a lawyer once I arrived to the place in Dilley.
9. My son and I were taken out of that facility on May 26, 2018.
10. My son and I have been at the current location in Dilley for about 32 days. I was told that I am not able to stay, but my son is able to stay. My plan is to wait longer to see if I can stay. I do not know what to do.
11. The lawyers tell me that for my case I can try to wait to see what happens. It is not certain if I will be able to stay.

#18586

I, Doris M. [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.



6-28-18

Date

Certificate of Translation

I, Amber Rieff, certify that I am fluent in English and Spanish and that I read the above declaration to Doris M. [REDACTED] in Spanish.



Amber Rieff
Willamette University
245 Winter Street SE
Salem, OR 97302

6/28/18

Date

Exhibit 25

No A#
Weslaco
station

Karen B [REDACTED] - No A#

My name is Karen B [REDACTED]
[REDACTED] I was born 6/22/98
in El Salvador. I am here with my
two sons Nehamias A [REDACTED]
[REDACTED] born 5/08/13 and
Nelson I [REDACTED] born
7-17-14. We came fleeing violence
& ~~persecution~~ threats in El Salvador.

There are really so many reasons
for coming. Life was unbearable
and dangerous. There is a big
gang problem. But that is not
all. The police are also involved.
They are corrupt. I was being
threatened and harassed by
gangs and police. The gangs
would just come in my house
& hang out. They would not
leave. They made threats & used
drugs in front of my children. We
would have to hide. I went to the
police. They would not even take
the complaint. This was not safe
for my sons. There was nothing
I could do to protect them.
As a mother I always try to stay
calm & strong for them but very

bad things were happening and I was afraid for all of us. I heard parents were being separated from their kids at the border but I just did not know what else to do. I had to try to get my children to a place where they have a chance for survival. So I came.

We came by bus + walking. We crossed the river + looked for border patrol. on the journey I ~~was~~ sometimes got help from strangers. Once we got a ride on a motorbike. I burned my leg badly but had to keep pressing on.

Here in CBP they have not told me anything - I hope I can stay together with my children + ask for asylum, for help. I know my children's aunt is in the US someplace + I hope she will help me.

at this facility it is very very cold. Especially when we were wet from the river. There were no clean

They gangster told me I had to do what they said or they would "disappear" me and my children. they stole from me + worse.

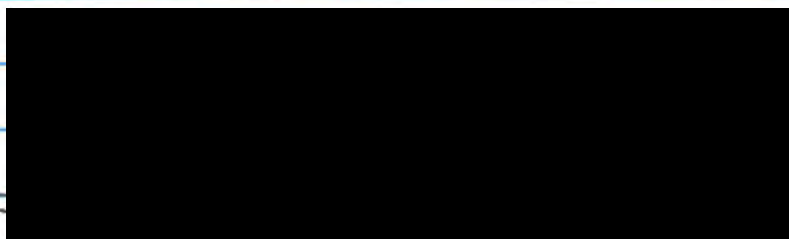
clothes or towels available.

I cannot sleep because I am so cold, I am in pain from the burn on my leg, my children cry from fear & from the cold.

I can ~~only~~ only hold one at a time to keep them warm. Whomever I am not holding, is cold.

The ground is hard & cold that is how we sleep. No mattress or bed for the children.

The food is bad & the children don't want to eat it but at least it is food.



16/14/18

Certificate of Translation

I, Michelle Brané, am fluent in the English and Spanish languages and I certify under penalty of perjury of the laws of the United States that I read the above statement back to Karen B [REDACTED] who verified that it was true and correct.



Michelle Brané
Women's Refugee Commission
1012 M Street, Suite 1100
Washington DC, 20005
(202) 750 – 8596

McAllen, Texas

Exhibit 26

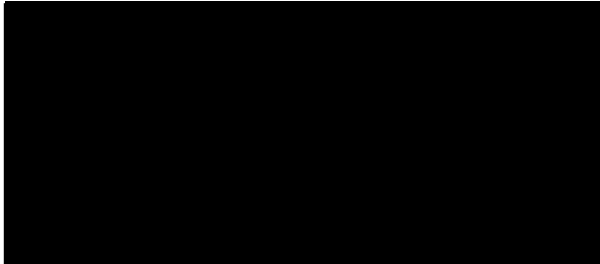
Declaration of

FLOR P [REDACTED], Mother of JEFFERSON A [REDACTED] A [REDACTED]

I, Flor P [REDACTED] declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is 11/27/1989. My son's name is Jefferson A [REDACTED] He is nine years old and he was born on 8/24/2008. My son and I are from Guatemala.
2. I left Guatemala because I am afraid to return to Guatemala due to violence by the father of my son and because I cannot survive economically in Guatemala without help from my son's father, which he doesn't provide.
3. We crossed the border on Sunday, June 10, 2018. It was about three days ago. I believe that it was somewhere in Arizona, but I don't know where exactly.
4. We were taken to a Border Patrol facility about one half hour away from where we had been picked up. It was very crowded in the cell where they put me with five other women and all their kids. Neither my son or I received any rights information or a list of free legal services. I was able to make a phone call to a friend, but was not informed of the right to call an attorney.
5. The food at the first place they took me was adequate.
6. The temperature in the first place was okay, not too cold, not too hot.
7. The lights were on the whole time we were there; it wasn't possible to know if it was day or night.
8. After one day my son and I were taken to another place where I am now, and we have been here since Monday in the afternoon and it is now Wednesday morning (1.5 days).
9. The food here is okay, but it's not enough to fill us up. They give us a burrito, crackers and juice, and it's the same thing, over and over.
10. It is extremely cold here. They gave us aluminum blankets that are like paper and they don't keep you warm
It was so cold that we were shivering.
11. Neither I nor my son have been given any rights notices or a list of attorneys. We want to talk to an asylum officer.

I, Flor P [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.



6.13.18
Date

Certificate of Translation

I, [NAME OF TRANSLATOR], certify that I am fluent in English and Spanish and that I read the above declaration to [NAME] in Spanish.



[NAME OF TRANSLATOR]

[ORGANIZATION]

[ADDRESS]

6-13-18

Date

Exhibit 27

Declaration of

DAISE M [REDACTED], A NUMBER [REDACTED]

I, DAISE M [REDACTED] (A number [REDACTED]), declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is December 3, 1979. My daughter's name is Keylin M [REDACTED], and her A number is [REDACTED]. She is sixteen years old, and she was born on December 19, 2001. My daughter and I are from Honduras.
2. I left my country, because my life had been threatened and I had been held up at gunpoint three times.
3. We presented ourselves at the border about eight days ago, June 21, 2018. We were taken to the Custom and Border Patrol Facility in McAllen, Texas, which we call the Ice Box.
4. The Ice Box was freezing, and my daughter and I were shivering the entire time. We were so cold that my daughter was miserable.
5. We were given food, but the food was frozen and not fit for consumption. It smelled so bad that we went hungry instead of eating it. My daughter and I were hungry the entire time we were at the Ice Box.
6. We were give a mylar blanket but no mattress pad.
7. After about one day, my daughter and I were taken to another facility, known as the Dog House, where we held for four days. We were immediately separated at the Dog House and stayed separated the entire time. We were allowed to talk to each other only once for ten minutes in the three days we were there.
8. My daughter was very frightened and depressed the entire time. She is still depressed and has nightmares and a lot of anxiety because of the separation.
9. The female guards yelled at my daughter a lot, called her names and made fun of her and the other children. The female guards would not let her sleep and kicked her to keep her awake. They also called the children filthy and told them not to throw anything on the floor the way they would at home in their country. The female guards made my daughter and the other girls strip naked in front of them and ogled the girls before their showers. My daughter was scared of the guards, because they were really angry all the time.
10. The Dog House is even colder than the Ice Box, and my daughter and I were shivering the entire time. My daughter was so cold that she had severe pain in her leg. The guards told her that if she was hurt she would have to stay in the Dog House longer, so her daughter did not ask for medical care. The guards also would not allow the daughter to have an additional mylar blanket, so her daughter had to hide an extra blanket that someone who was leaving gave her to try and warm up her leg. We were not given mattress pads to sleep on.

#18599

11. The food at the Dog House was the same as at the Ice House. It was frozen and smelled bad. We did not eat it and we went hungry the entire time we were there.
12. We did not have any toothpaste or a toothbrush the entire time we were at the Dog House.
13. The bathrooms at the Dog House were dirty and disgusting. We were told to continue to use them and not to make the bathrooms dirtier, even though the toilets were already overflowing.
14. We were muddy and wet when we were apprehended, but we were not allowed to shower or change for five days.
15. We were housed in dog cages and my daughter was constantly moved without telling me. This made me fearful for her safety and further traumatized my daughter.
16. After four days we were moved to another Ice Box, where we were reunited and where we stayed for one day. We were not given food or water the entire day.
17. My daughter acted very different when we were reunited. She was depressed and did not talk much.
18. After one day, we were moved to another Dog House that was different than the first one. We stayed at this Dog House for one day and night. We were separated again immediately when we arrived at the second Dog House.
19. The second Dog House had the same gross food as the first – frozen sandwiches that smelled bad. Again, we did not eat much and went hungry the entire time.
20. After the second Dog House, we were moved to the Dilley facility.
21. There are no current plans for our release.

I, Dasie M [REDACTED], swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

[REDACTED]

07/29/2018
Date

I, LAURA M. FLORES, certify that I am fluent in English and Spanish and that I read the above declaration to Dasie M. [REDACTED] in Spanish.



LAURA M. FLORES
RAICES
4092 TPC PARKWAY, APT 953
SAN ANTONIO, TX 78261

6-29-2018

Date

Exhibit 28

Declaration of

ALEJANDRA R [REDACTED]

I, Alejandra R [REDACTED] declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is April 24, 1987. My daughter's name is [REDACTED] She is 2 ½ years old and she was born on January 20, 2016. My daughter and I are from Mexico. I have three other children: [REDACTED] who was born on October 24, 2007, [REDACTED] who was born on September 28, 2006 and [REDACTED] who was born on December 7, 2004.

2. Describe Reason for leaving country of origin.

I heard reports in the newspapers about girls in the area have been kidnapped from middle schools. My daughter [REDACTED] is 13 and I had already kept her home from school for a year. I am worried that she would be kidnapped from school.

3. We presented ourselves at the border about 5 am yesterday, July 5, 2018 and we were not admitted to the facility until 2 pm. We were taken to the San Ysidro - Pedestrian West Facility.
4. The children were given food at about 3 pm. [REDACTED] was given chicken nuggets. The food was warm. She also received juice. Myself and my other children were provided no other food until 6:00 am the next morning. During this time, I was able to give [REDACTED] formula. In the morning, the children, including [REDACTED] were given cornflakes and milk. There was a meal again at noon. The children were given cold cheese sandwiches. The sandwich was only bread and cheese. They also received small bags of carrots and celery. They also received juice. In the time that we have been here, the children have received one hot meal.
5. There is formula for [REDACTED] at all times— you can make that with the water in the room. There is no hot water or soap to wash baby bottles. I am using a bottle that I brought with me.
6. The water in the room is drinkable and disposable cones to drink out of are provided.
7. I am staying in a room with my four children. There are two toilets and one special needs toilet in the room. There is toilet paper available and there are feminine hygiene products. We are able to use baby wipes and diapers but there is no baby powder or anything to treat diaper rash, if it happens. There are four sinks in the room – three of them are built into the toilets and one is separate. There is no soap and no paper towels. No toothbrushes and no toothpaste. There is no door on the toilet and people in the room can see the person on the toilet. There are half walls between.
8. The temperature in the facility is comfortable and it is clean. The lights are on all of the time, including at night.
9. We did not receive a mat for sleeping when we arrived. When we arrived there were approximately 50 people in the room and there was not any additional room for more mats. The room was very crowded. We have all received one blanket, including all of the children. It is very crowded in the room. On the

#18603

first night, my daughter [REDACTED] wet herself while she was sleeping because there were so many people on the floor that you would have to walk over people to get to the toilet. She couldn't step over everyone. The next day some people were removed and it seems like it will be more comfortable.

10. When I arrived at the facility I was not told anything about the legal rights of my children. There is no ability to use a telephone and there is nothing posted in the facility that I can see about getting help from attorneys.

11. I am trying to take my children to my son's godmother in California. I have provided her phone number to the customs officers but I do not know if they have called her.


I, Alejandra R [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided by me in Spanish, a language in which I am fluent, translated and written into English, a language in which I am not fluent and was read back to me in Spanish.

[REDACTED]

7/6/18

Date

I, Robert Perez, certify that I am fluent in English and Spanish and that I read the above declaration to Alejandra R [REDACTED] in Spanish.



Robert Perez
Orrick, Herrington & Sutcliffe
405 Howard Street
San Francisco, CA 94015



Date

Exhibit 29

dad = Rigoberto

A# [REDACTED]

Dinora C [REDACTED]

I am from Honduras, born 11-19-2000.

Have nothing in Honduras. Father first refused to acknowledge baby. But then he started asking for him he wanted to take the baby.

I am afraid of him. He drinks & is involved in drugs - uses.

No police or law enforcement in my town. He could take him & there would be nothing I could do so I came to join my sister Sister - Glenda E [REDACTED] 26²⁷ y.o. - She came because husband was abusing her & stalking her when she tried to leave.

~~They have not given me any information~~
I traveled from Honduras by train - on top of the train - with my 1-yr old. We slept out in the open, where we could. When we got to the border we crossed the river with a group of migrants I found on the way. I paid \$20 to get information on how to cross the river & which way to go to find border patrol.

I knew nothing about where or how to find a port of entry. We walked about 2 hrs after crossing the river looking for border patrol & it was very hot. When we saw border patrol we waived them down & waited for them to come to us. They took us to the bridge - where we had crossed & now there were people there. - Then they brought us all here.

They have treated us well. But there is no where to sleep. We sleep on the concrete floor. Me and my one-year-old. It is not good for the children. There is no food for my baby - only formula/milk. At home he ate beans, mashed potatoes, rice. Here he has not had anything except formula. It is cold. For me there is food.

They give me bread & juice for him but he only drinks the juice.

They have not told me anything about my rights or my child's rights. They have not given me any info.

There are diapers & now I know but at first no one told me & I did not know what to do.

They ~~was~~ asked me if I had a contact here and where I was headed.

I told them & they called my sister. They let me talk to my sister.

They asked for my sister's address + she gave it to them. I don't know what else they asked her.

They asked her for my info + whether she knew I was coming + whether she helped me to come. She knew I was coming ~~but~~ + helped me at home but I came on my own.

Here they have not told me anything about what will happen.



6-19-18 McAllen

Certificate of Translation

I, Michelle Brané, am fluent in the English and Spanish languages and I certify under penalty of perjury of the laws of the United States that I read the above statement back to Dinora C [REDACTED], who verified that it was true and correct.



Michelle Brané
Women's Refugee Commission
1012 M Street, Suite 1100
Washington DC, 20005
(202) 750 – 8596

McAllen, Texas

Exhibit 30

Declaration of
LEYDI X [REDACTED], A NUMBER [REDACTED]

I, Leydi X [REDACTED] (A number [REDACTED]), declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is October 27, 1985. My daughter's name is [REDACTED] (A number [REDACTED]). She is nine years old and she was born on January 14, 2009. My daughter and I are from Honduras. We left Honduras to escape death threats from gang members.
2. We crossed the border on June 2, 2018. We crossed the river with a large group in Arenosa and walked for two hours, and we finally saw some agents wearing green outfits. I think they were from immigration. They took our information but didn't ask whether we feared to return to Honduras or if we were seeking asylum. They took all of our shoelaces, hair ties, and our documents and put us in a bus. We drove for about half an hour and arrived at La Hielera ("The Icebox").
3. At La Hielera, we were put in a crowded cell with about 25 people. There wasn't enough room for everyone to lay down except when the officials would take some people out to take their fingerprints. Then we could take a turn to lay down. It was extremely cold. All we got was a thin metallic blanket. It was very hard to wrap the blanket around my daughter and myself to keep warm. Plus, we had to sit directly on the cement floor, which was very cold. Laying on the floor gave me a bruise. We didn't get any type of cushion to sit or lie on. We were barely able to sleep – I couldn't sleep at all, and my daughter only slept a little bit leaning up against my lap. The lights were on at all times.
4. There were two bathrooms in the cell, but they weren't private. There was only a waist high wall. Also, because the cell was so crowded there were people laying down in the bathroom area.
5. There was a thermos with water, but there was nothing in it when we got there. I asked for some more and they gave it to us. The water tasted like chemicals. It hurt my throat. For food, all we got was a sandwich with two pieces of bread and a little slice of meat, plus juice. The sandwich was frozen. When we first arrived all we got was a cookie and some juice. There wasn't enough food, so we were very hungry. I had to give my daughter my food so that she would have enough.
6. My daughter was sick with a fever, so we opened the door to get a little air circulation. The guard came by and slammed it shut, and we couldn't open the door again after that. No one asked if we needed medical assistance. We didn't get the chance to shower or change our clothes. My legs were wet and muddy from crossing the river, but I didn't get any dry clothes.
7. When I talked to the official, all he did was take my information and fingerprints. But no one gave me any papers or information about my daughter's rights.
8. The next day, June 3rd, 2018 at around 5 p.m. we were taken in a bus about 30 minutes away to La Perrera ("The Dog Cage"). When we arrived there were three completely full cells. They put us in the hallway to sleep. The next day there was enough room for us – there were about 30 or 35 people to a cell. In some cells there were just women, in others just children.

9. In La Perrera, I saw children crying in a cage. Their mothers were in one cage, and their children were in another, crying for their mothers. The youngest children were about five or seven years old. I saw a very young girl crying for her father. I'm not sure why I was not separated from my child when younger children were separated from their mothers. The mothers tried to reach their children, and I saw children pressing up against the fence of the cage to try to reach out. But officials pulled the children away and yelled at the mothers.
10. The officials were yelling at us all the time. They made us wake up three times in the night to make us line up and go through a list. In the middle of the night, they would kick us to wake us up. There were women who asked the officials not to be rude, but the officials said that it wasn't their problem. The only thing the officials said was that it wasn't their fault that we came to this country illegally. They said they were just following orders. They would get angry when people would share food.
11. I had a video interview. The man on the other side asked for my information, whether I had family here, and why I left Honduras. I told him that I left because of a death threat from a gang. The next day, an official came to my cell with my file. He told me that they were going to send me to another place because my case needed to be explained more. But I didn't get any papers with any information about my daughter's rights.
12. On the third day at La Perrera, my daughter and I were able to take a shower. Then on June 6, 2018, we were sent to Dilley, where we are currently being held.
13. At Dilley we are allowed to stay out only until 8 p.m. and then we have to go to our rooms. My daughter has a cough this morning and I haven't taken her to the doctor because I have seen that other children have gone and their coughs have not gotten better. If someone gets really sick, they have to take you to the hospital.
14. I had my credible fear interview on June 22, 2018 and received a positive determination the day before yesterday. Now my daughter and I are just waiting to be released to live with a friend who lives in Louisiana. I have been told how to find out when my court date is and I plan to find a lawyer and attend all of my immigration appointments so that my daughter and I can obtain asylum and be safe in the United States.

I, Leydi X [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

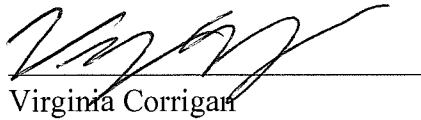
[REDACTED]

6/28/18

Date

Certificate of Translation

I, Virginia Corrigan, certify that I am fluent in English and Spanish and that I read the above declaration to Leydi X [REDACTED] in Spanish.



Virginia Corrigan
Youth Law Center
823 Folsom, Suite 700
San Francisco, CA 94107

6/28/18

Date

CERTIFICATE OF SERVICE

1 I, Peter Schey, declare and say as follows:

2
3 I am over the age of eighteen years of age and am a party to this action. I am
4 employed in the County of Los Angeles, State of California. My business address is
5 256 S. Occidental Blvd., Los Angeles, CA 90057, in said county and state.
6

7 On July 16, 2018, I electronically filed the following document(s):

- 8
- 9 • EXHIBITS IN SUPPORT OF PLAINTIFFS' RESPONSE TO DEFENDANTS'
10 THIRD JUVENILE COORDINATOR REPORTS VOLUME 3 OF 12
11 [REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED
12 UNDER SEAL]

13 with the United States District Court, Central District of California by using the
14 CM/ECF system.

15 On July 16, 2018, I also served true and correct copies of the above documents
16 to the interested parties by sending copies to the email address of Defendants' Counsel,
17 Sarah Fabian.

18 */s/ Peter Schey*
19 *Attorney for Plaintiffs*