

Declaration of

J [REDACTED] I [REDACTED] I [REDACTED] Z [REDACTED], [REDACTED]

I, **J [REDACTED] I [REDACTED] I [REDACTED] Z [REDACTED], [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 [REDACTED]. I am 5-years old. I am from Honduras.
2. I left Honduras with my father because Honduras is a dangerous place to live. My father's name is **W [REDACTED] L [REDACTED]**. My mother already fled to the United States and is living in North Carolina. My mother's name is **E [REDACTED] Z [REDACTED]**.
3. I was apprehended with my father. The immigration agents separated me from my father right away. I was very frightened and scared. I cried. I have not seen my father again.
4. I was brought to this facility (Clint CBP).
5. I have been at this facility for several days.
6. I have not been told how long I have to stay here. I am frightened, scared, and sad.
7. I have had a cold and cough for several days. I have not seen a doctor and I have not been given any medicine.
8. It is cold at night when we sleep. I have shoes but no socks. Initially, I had to sleep on the floor, but now I have a bed.

I, **J [REDACTED] I [REDACTED] I [REDACTED] Z [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]

J [REDACTED] I [REDACTED] I [REDACTED] Z [REDACTED]

6-18-2019

Date

7-28798
Declaration of

I [REDACTED] G [REDACTED] L [REDACTED] L [REDACTED], [REDACTED]

I, L [REDACTED] G [REDACTED] L [REDACTED] L [REDACTED] ([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 [REDACTED] I am 12 years old and from Guatemala.
2. I was apprehended with my cousin, who is 11 years old. We were taken into custody by border patrol shortly after crossing into the United States on or about the evening of May 20, 2019. I don't exactly remember where we crossed into the United States but we crossed through a river. The officers had us take off and give them our shoelaces, belts and valuables.
3. We were then transported to a detention center where I was held for about eight days. There were many children there, perhaps about 200 or 300 kids. The lights were on all the time, including all night there. I was allowed to make one phone call while I was there. I called my 24 year old brother, who lives in California. At this detention center, I received meals three times a day: oatmeal for breakfast, soup for lunch, and a burrito for dinner. We also got cookies four times a day. We weren't given milk, fruit or vegetables. I was not allowed to bathe while I was there.
4. After 5 days, I was taken to second detention center where I was held for two days. Here I was also not allowed to bathe. It was very cold. I got sick because it was so cold. I had a fever, a headache, a throat ache, and aches all around my body. I told the guards I was sick and they let me see a doctor or a nurse, who took my temperature and gave me medicine. I was sick for a total of five days. Throughout that time, I was with all the other kids. No one took me to a separate place for sick kids. The guards at the second facility were mean and scary. They yelled at us. One day the guards demanded to know who had food. "Whoever has food will go to prison," they yelled. They wanted to know if anyone had snuck in food in the cell. They found one kid who was about 15 or 16 years old who had a burrito, pudding, and juice. The officials handcuffed his wrists. My cousin and I were very shocked and scared. They also made us clean our own sleeping area. Then my cousin was sent away to Casa Hogar. I felt very sad to be separated from him. I miss him. I have not been able to talk with him since we were separated.
5. While I still had a fever, I was transported here to the Clint Station. I have been at the Clint Station for about 17 days. In the place I am, there have been about 70 boys in my cell but now there are fewer boys, perhaps about 40 boys. They are mostly around 11 to 17 years old but there are younger kids too. There have been boys as young as 3 or 4 years old in the cell with me. The 3 year old had a brother with him. The 4 year old came to the United States with an uncle but they separated him so he has no one here. It is very sad here. We all want to leave.
6. Here at Clint, I've bathed 4 or 5 times for 2 or 3 minutes each time. There are bathrooms in my cell but there is no soap for washing our hands. There is disinfectant though.
7. We're sometimes allowed to make phone calls in the afternoon. However, it is not possible to eat your lunch and make a phone call. We have to choose between eating lunch and making a phone call. I don't

know why. But I miss my family so much. I have skipped lunch three times and I've made 3 calls here. Twice I called my brother, and once I called with my father. I wish I could talk with my loved ones for longer. I wish I did not have to choose between making calls and talking with my family.

- 8. I'm hungry here at Clint all the time. I'm so hungry that I've woken up in the middle of the night with hunger. Sometimes I wake up from hunger at 4 a.m., sometimes at other hours. I'm too scared to ask the officials here for any more food, even though there is not enough food here for me. In the morning we get oatmeal, pudding, and juice. In the afternoon we get soup, a cookie, and juice. For dinner we get a burrito, pudding, and juice. The burritos have beans and cheese. Occasionally we can get more food from the guards but it depends on which guards and how friendly they are. I saw a child ask for more food once and the guard told him "no, you've had your ration." Sometimes the younger kids get an extra chocolate pudding. I need more food too.
- 9. I haven't received any information about the process for leaving here or when I can leave here. I want to go live with my brother in California. His name is [REDACTED] His telephone number is [REDACTED] [REDACTED] He lives in California.
- 10. I love school. I want to continue working hard in school. I really enjoy studying.
- 11. I haven't received any information about my rights under Flores.

I, I [REDACTED] G [REDACTED] L [REDACTED] L [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]
I [REDACTED] G [REDACTED] L [REDACTED] L [REDACTED]

06/18/2019
Date

14. Since crossing the border, we have not had any opportunity to bathe. We have not had the opportunity to brush our teeth. We haven't had an opportunity to wash our clothes here either.
15. Our mother and father live in Massachusetts. My father has been here for about 4 years, and my mother has been here for about 2 years. I have other family members like aunts and uncles in Massachusetts. My sisters and I would like to be released to our parents. Yesterday, an officer told us that it would be 2-3 days until we were reunited with our mother. Later yesterday another official told us would be 15 days or 10 days until we are reunited with our mother.
16. Every night my sisters keep asking me, "When will our mommy come get us?" I don't know what to tell them. It's very hard for all of us to be here.
17. I have been able to make only one phone call since crossing the border, and it was to my mother today. She told me my grandmother is at another detention facility.
18. I am worried about the very young children here who do not know what country they are from and where they should go. I worry about the many children who do not have passports. There is one very young girl in my room, only six years old, who doesn't know where she is from or where she is supposed to go. I do not know what will happen to her. She arrived here five days ago. When we came here yesterday, I asked who she was with. She said she was with her father but they had been separated. The officials told her that her father would have to come to get her. I do not know if that will happen.
19. I have not received any information about the Flores Settlement or my right to be released from here.
20. I want to leave this place with my sisters as quickly as possible. Children should not be here.

I, M [REDACTED] F [REDACTED] M [REDACTED] - 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.

[REDACTED]

M [REDACTED] F [REDACTED] M [REDACTED] - O [REDACTED]

18/6/2019
June 18, 2019

**Declaration of M [REDACTED] Z [REDACTED]-L [REDACTED], [REDACTED] and
L [REDACTED] L [REDACTED]-O [REDACTED] (My Little Sister), [REDACTED]**

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

1. My little sister and I came from Honduras. She is six years old and I am eight years old. Our grandmother brought us to the United States so that we can live with our mother because it is not safe for us to stay in Honduras.
2. Our mother lives in Houston. Her name is J [REDACTED] G [REDACTED] L [REDACTED] O [REDACTED]. Her telephone number is [REDACTED]. Our grandmother put our mother's telephone number in my jacket so that we can call her, but we have only spoken to her once in three weeks. One time my sister asked an official if we could please call our mom. The official said we had to wait. We talked to her one week after we got in a truck with border officers. Our stepdad's telephone number is [REDACTED].
3. They took us away from our grandmother and now we are all alone. They have not given us to our mother. We have been here for a long time. I have to take care of my little sister. She is very sad because she misses our mother and grandmother very much.
4. My sister has been very sick. The doctor told her not to cry because if she cries she will get sicker.
5. One of the children in our cell is mean to us and tells us that we can't play and that we will be locked in a dark room here. I believe her and don't want to be locked in the dark room.
6. We sleep on a cement bench. There are two mats in the room, but the big kids sleep on the mats so we have to sleep on the cement bench. We have been sleeping on the cement bench ever since we came here, except when my sister got sick, she was quarantined and she got to sleep on a mat on the floor in another room.
7. We have only been allowed to go outside four times. I have only been allowed to bathe twice since we came here. My sister has only been allowed to bathe once. The water is very cold. Some kids don't mind the cold water, but I wish it is warm. We have only been allowed to brush our teeth twice here. There is no soap except when you take a bath. We have been wearing the same clothes the entire time we have been here and no one has washed them.
8. My sister and I hold a blanket up for one another so no one can see us when we go to the bathroom.

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

[REDACTED]

June 18, 2019

M [REDACTED] Z [REDACTED]-L [REDACTED]

Declaration of
W [REDACTED] A [REDACTED] S [REDACTED]-G [REDACTED], A [REDACTED]

I, W [REDACTED] A [REDACTED] S [REDACTED]-G [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 [REDACTED]. I am 12-years-old. I am from Guatemala. My brother C [REDACTED] N [REDACTED] S [REDACTED]-G [REDACTED], A [REDACTED], was born on [REDACTED]. He is 4-years-old.
2. My brother and I were living with my aunt and uncle. We left Guatemala with my uncle because we lived in a dangerous neighborhood filled with gangs and drug dealers. My father was violent and he abandoned us. My mother fled to the United States when my brother was about 9 months old. She lives in Miami, Florida.
3. When we arrived at the border with my uncle, he was separated from us. I do not know where he is. My brother and I were taken to a freezer box for about 10 hours where we were only given some cookies to eat. It was cold. My brother was given a blanket, but I was not given one. We were not allowed to bathe. All of our possessions were thrown away. We were then brought to the Clint CBP facility.
4. My brother and I have been at the Clint CBP facility for about 13 days. I was able to call my mother once.
5. I have not been told when or whether we will be released from custody. My brother has a learning disability. He cannot speak very clearly, but I understand him. I have taken care of him since he was a baby. He trusts me. He received some education, but it was not special. He knows how to count.
6. At Clint, we are housed in a room with dozens of other children—some as young as 2 years old. Many do not have their parents with them. I have to take care of many of the other children who are sad and cry. I do my best to help other children who are sad. My brother and I have not been given any new clothes. We have only bathed once. Our clothes are the same clothes that we had on when we arrived. We have not been given soap. We are not permitted to play outside on a regular basis. We were given tooth brushes, but my brother lost his and they will not replace it.

I, W [REDACTED] A [REDACTED] S [REDACTED]-G [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]
W [REDACTED] A [REDACTED] S [REDACTED]-G [REDACTED]

6-18-2019
Date

I, Dolly Lucio Sevier, MD, declare as follows:

1. This declaration is based on my personal knowledge, and medical reference, except as to those matters based on belief, which I believe to be true. If called to testify in this case I would testify competently about these facts.

2. My name is Dolly Lucio Sevier. I am a board certified pediatrician licensed to practice medicine by the Texas Medical Board. I have been practicing as a general pediatrician in Brownsville, Texas, since 2014 in the private practice, Brownsville Kiddie Health Center. I see both immigrant children and US citizen children in my practice. I graduated from UT Southwestern Medical School in 2011 and completed my residency at Children's Medical Center, a large tertiary care center and referral hospital for North Texas in Dallas, TX. I was asked by the Flores Agreement Settlement attorneys as an expert pediatrician last summer to tour the Office of Refugee Resettlement facility, Casa Rio Grande. I have made myself available to local non-profit organizations caring for newly released immigrant families from the CBP Processing Centers to assist them in answering urgent medical questions regarding infants and children in the area. I continue to be an active member of the American Academy of Pediatrics and the Texas Pediatric Society and advocate for quality care for immigrant infants and children crossing our southern border.

3. On June 15, 2019, I visited the Ursula Border Processing Center in McAllen, TX. I visited with 39 detainees (all minors except one) and performed a medical exam on 21 infants and children. My findings and grave concerns are listed below:

Ursula Border Processing Center

4. The 39 detainees that I interviewed had a time in custody ranging between 4 and 24 days, far longer than the 72 hours outlined in the Flores Settlement Agreement. The American Academy of Pediatrics Policy Statement on the Detention of Immigrant Children is quite clear that "it is never in the best interest for a child to be held in detention."⁴

5. Many of the detainees were teen mothers, already having been exposed to tremendous trauma in their home countries, on the journey north, and most certainly now in the conditions in which they are being held in custody of the US Customs and Border Protection Processing facility. The conditions within which they are held could be compared to torture facilities. That is, extreme cold temperatures, lights on 24 hours a day, no adequate access to medical care, basic sanitation, water, or adequate food.

6. All 39 detainees had no access to hand-washing during their entire time in custody, including no handwashing available after bathroom use. Adequate hand hygiene is a basic sanitary requirement for infection control, especially in crowded places. The WHO considers hand hygiene the most important measure to avoid the transmission of harmful germs.¹ In developing countries it has been shown that implementing basic hand hygiene reduces infant mortality from respiratory and diarrheal illnesses by 50%.² As such it can be assumed that denying detainees access to this basic sanitary measure only serves to significantly increase the risk of infection. As a processing center that is struggling with infectious outbreaks, supplying soap and water or hand sanitizer could significantly reduce the medical costs associated with illness in the facility. It is in the collective conscious that everyone must wash their hands after bathroom use. To deny or not supply this basic necessity is tantamount to intentionally causing the spread of disease. I question whether there are appropriate infection control measures in any of the CBP Processing Centers, and thus question whether this is an appropriate space to be holding any infants and children.

7. All parents of infants drinking formula from a bottle reported having no ability to wash bottles. One father reported trying to ask for a new bottle every 2-3 days. Re-feeding a child spoiled formula is a significant health hazard that can cause severe infectious diarrhea and death in this vulnerable population. All mothers have heightened concern for the hygiene surrounding bottle feedings. Many mothers regularly boil their infant's bottles to ensure there is no chance of their infant acquiring an infection. Realizing that all parents want the best health for their infants, to deny parents the ability to wash their infant's bottles is unconscionable and could be considered intentional mental and emotional abuse.

8. All 18 guardians that I interviewed reported infrequent access to bathing, between every 2 days and never in 21 days was reported. Once again, I question whether there is an infectious control system in place in these facilities.

9. There was no adequate nutrition available for infants 6-12 months old. The only foods available were infant formula, apple sauce and solid foods. Infants between 6-12 months should be fed pureed foods in addition to formula. Feeding a 6-12 month old breast milk or infant formula as the sole nutrition (including in addition to apple sauce), leaves a child at risk for developing nutritional deficiencies, including but not limited to iron deficiency anemia. This can cause serious health and developmental consequences given anemia in infancy is linked to

reduced standardized testing scores in school-aged children.³ In all other settings where children are held (daycare, school and ORR shelters) there are guidelines regarding the specific nutritional needs of these children. There is no reason why infants and children held in CBP custody should be any different.

10. Of the 21 infants examined, $\frac{2}{3}$ of them actively had a respiratory infection. 2 of them had acute respiratory distress, one of which had been denied all previous access to medical personnel.

11. Of the 21 infants and children examined, 6 were exclusively breast-fed. Only one of those 6 mothers felt she had adequate milk supply (her infant was 2 months old). The other 5 mothers (infants ranging in age from 5 to 9 months) reported concerns about low milk supply. All of these mothers reported drinking only 1.5L of water per day (offered at meals). All reported they would drink more if they had more access to water. All felt the water in the cells was undrinkable due to taste. Only one mother received extra fluids because she secretly made formula bottles for herself in an attempt to increase her milk production. All 5 infants of the mothers who reported low milk supply had been offered formula that they refused. An average-sized adult requires 2L of water per day to maintain adequate hydration. A breast-feeding woman requires at least 3L per day and extra caloric needs to maintain adequate hydration. Breast-feeding mothers should be offered special consideration and given extra bottled water and extra calories since they are producing the primary source of nutrition for their children.

Supplying breastfeeding mothers less than adequate supplies of fluids and nutrition is endangering the health of all of these infants. An infant without adequate nutrition is at risk of complications from even the most minor of illnesses. Intentionally denying the mothers and infants nutrition could lead to increased hospitalizations and complications from illnesses. We, as parents and pediatricians, provide additional fluids and nutrition to our own children and patients to ensure that they heal quickly.

12. The Coast Guard officer transporting children from daycare reported that lights are kept on 24 hrs in daycare just like the rest of the facility. This is a serious detriment to a child's developing brain, and given the lack of risk in turning the lights off in daycare, there is no reason to expose these specific children to this risk.

13. All children showed evidence of trauma, particularly the ones in day care. Two different daycare children were repetitively saying (during separate