

June 2018 TRO Exhibits

Exhibit No.	Exhibit Title	Description
1.	Declaration of E., June 11, 2019	child
2.	Declaration of C., September 21, 2018	child
3.	Declaration of J., June 18, 2019	child
4.	Declaration of J., and J. (an infant), June 18, 2019	children
5.	Declaration of K., June 18, 2019	child
6.	Declaration of K., June 18, 2019	child
7.	Declaration of L., June 18, 2019	child
8.	Declaration of L., June 18, 2019	child
9.	Declaration of M., June 18, 2019	child
10.	Declaration of M., and L., June 18, 2019	children
11.	Declaration of U., June 18, 2019	child
12.	Declaration of W., June 18, 2019	child
13.	Declaration of Dolly Lucio Sevier, MD and record of physical exams on 21 infants at the Ursula Border Processing Center, June 18, 2019	professional
14.	Declaration of K., T., and B., June 19, 2019	children
15.	Declaration of Elora Mukherjee, Esq. regarding LRC taking care of X., June 18, 2019	professional
16.	Declaration of A., June 11, 2019	child
17.	Declaration of B., June 11, 2019	child
18.	Declaration of C., June 12, 2019	child

19.	Declaration of C., June 12, 2019	age redacted
20.	Declaration of Amy J. Cohen, M.D., June 14, 2019	professional
21.	Declaration of Genevieve Grabman, Attorney, June 14, 2019	professional
22.	Declaration of Toby Elizabeth Hoover Gialluca, June 14, 2019	professional
23.	Declaration of E., June 12, 2019	child
24.	Declaration of Dr. Nancy Ewen Wang, June 14, 2019	professional
25.	Declaration of K., June 12, 2019	child
26.	Declaration of K., June 12, 2019	child
27.	Declaration of K., June 12, 2019	child
28.	Declaration of K., June 11, 2019	child
29.	Declaration of L., June 10, 2019	child
30.	Declaration of M., June 11, 2019	age redacted
31.	Declaration of M., June 12, 2019	child
32.	Declaration of M., June 11, 2019	child
33.	Declaration of O., June 12, 2019	child
34.	Declaration of S., June 15, 2019	child
35.	Declaration of W., June 15, 2019	age redacted
36.	Declaration of Y., June 6, 2019	age redacted
37.	Ursula Children Visit	other
38.	Declaration of E., June 12, 2019	child

39.	Declaration of N., June 12, 2019	age redacted
40.	Declaration of A., June 17, 2019	child
41.	Declaration of A., June 19, 2019	child
42.	Declaration of A., June 19, 2019	child
43.	Declaration of A., June 18, 2019	child
44.	Declaration of A., June 19, 2019	child
45.	Declaration of C., June 18, 2019	age redacted
46.	Declaration of C., June 20, 2019	child
47.	Declaration of E., June 19, 2019	age redacted - with family
48.	Declaration of E., June 19, 2019	child
49.	Declaration of E., June 17, 2019	child
50.	Declaration of G., June 19, 2019	child
51.	Declaration of G., June 20, 2019	child
52.	Declaration of G. and F., June 17, 2019	child
53.	Declaration of J.V., June 17, 2019	child
54.	Declaration of K., June 17, 2019	child
55.	Declaration of K., June 19, 2019	child
56.	Declaration of L., on behalf of N., June 19, 2019	age redacted
57.	Declaration of M., June 17, 2019	child
58.	Declaration of M., June 17, 2019	child
59.	Declaration of M., June 19, 2019	child

60.	Declaration of N., June 19, 2019	child
61.	Declaration of S., June 19, 2019	child
62.	Declaration of Y., June 19, 2019	child
63.	Declaration of Elora Mukherjee, Esq., June 26, 2019	professional
64.	Declaration of K., June 18, 2019	child
65.	Declaration of M., June 19, 2019	child
66.	Declaration of S., June 17, 2019	child
67.	Declaration of Kathleen O’Gorman, June 25, 2019	professional

EXHIBIT 1

Declaration of**E [REDACTED] J [REDACTED], A [REDACTED] S [REDACTED]**

I, E [REDACTED] J [REDACTED], A [REDACTED] 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 [REDACTED] I am 17 years old. I am from Guatemala. I came with my nephew, [REDACTED] He is 8 years old. He was born on [REDACTED] He is also from Guatemala. We are both held together in the U.S.
2. My nephew and I came in a raft on June 10. We turned ourselves over to border patrol soon after. We got in a van and were taken to a place to be fingerprinted. We were given a ham sandwich. We were there for a couple of hours, and then were brought to Ursula Station in the evening of June 10, 2019.
3. When we arrived at Ursula Station, they gave us crackers and juice. In the morning we got a breakfast of a burrito and crackers and a bottle of water, and we got lunch about noon. We did not get any snacks between meals. I don't like the food, it doesn't taste good. [REDACTED] cannot eat the food so he is very hungry.
4. At Ursula, we are kept in a cage. It is very crowded, with about 50 boys and young men ranging in age from about 5 to 20 years old. There is no room to move without stepping over the others. We were not given a mat to sleep on, so we had to sleep on the cold, concrete floor. The lights are on all the time. We were both very cold last night. I did not get any sleep, I stayed up worried about my nephew and making sure he was safe.
5. At Ursula, we have not been able to shower. The toilet is in out in the open in the cage, there is no door for any privacy. There is water but no soap to wash our hands. There are no paper towels to dry our hands. We have not been given a toothbrush or toothpaste to brush our teeth. We have not been given a hairbrush for our hair.
6. It is always cold in the cage. They took my nephew's clothes when we arrived at Ursula because they were wet, and gave him a T-shirt, which is not enough to keep him warm.
7. My sister [REDACTED], is in Houston. She is [REDACTED] mom. We want to go live with her.
8. I have not been given any information about our legal rights as detainees. I have not been told how long we will be here.

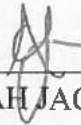
I, E [REDACTED] J [REDACTED], A [REDACTED] S [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

E [REDACTED] J [REDACTED], A [REDACTED] S [REDACTED]

6-11-19
Date

Certificate of Translation

I, ANAH JACOB certify that I am fluent in English and Spanish and that I read the above declaration to E [REDACTED] J [REDACTED], A [REDACTED] S [REDACTED] in Spanish. Executed this ___ of [MONTH] in McAllen, Texas.

 6/11/19

ANAH JACOB

EXHIBIT 2

Declaration of

C [REDACTED] A [REDACTED] H [REDACTED] H [REDACTED], [REDACTED]

I, C [REDACTED] A [REDACTED] H [REDACTED] H [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 8 years old. I am from Guatemala.
2. I was brought to the United States by my aunt who took care of me in Guatemala who was traveling with my cousin who is 4 years old. My parents live in the United States.
3. We took an airplane to the United States. After some hours (I slept in a chair, with some blankets, it wasn't too cold). I ate something there then they separated me from my aunt. I cried and they did not tell me where I was going.
4. I was taken to this place (Clint CBP) where I have been for 3 days. I have not showered or changed my clothes. I stay in a room with lots of children and beds. During the day we can play (ball, draw) inside but we only go outside to get water. The kids take care of each other. We eat three times a day. We eat cookies and juice in the morning, soup with noodles for lunch and a burrito and yogurt and cookies for dinner. There are always cookies but the food does not fill you up and I am hungry. I can go to the bathroom when I need to (it is in the room) and there is soap and water to wash my hands. I am not scared. No one scolds me or is mean here. It is ok but I want to see my parents.
5. I spoke with my mother once by telephone, but I do not know where she lives or when I will be able to see her. I haven't spoken to anyone else about how I will get to see her.

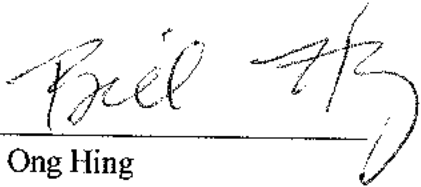
I, C [REDACTED] A [REDACTED] H [REDACTED] H [REDACTED], swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

[REDACTED]
C [REDACTED] A [REDACTED] H [REDACTED] H [REDACTED]

6-18-2019
Date

Certificate of Translation

I, Bill Ong Hing, certify that I am fluent in English and Spanish and that I read the above declaration to C [REDACTED] A [REDACTED] H [REDACTED] H [REDACTED] in Spanish. Executed this June 18, 2019, in Clint, Texas..



Bill Ong Hing
University of San Francisco School of Law
2199 Fulton Street
San Francisco, CA 94117

EXHIBIT 3

Declaration of

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

I, **J [REDACTED] I [REDACTED] L [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] L [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.

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

6-18-2019

Date

Certificate of Translation

I, Bill Ong Hing, certify that I am fluent in English and Spanish and that I read the above declaration to J [REDACTED] I [REDACTED] L [REDACTED] Z [REDACTED] in Spanish. Executed this June 18, 2019, in Clint, Texas..



Bill Ong Hing
University of San Francisco School of Law
2199 Fulton Street
San Francisco, CA 94117

EXHIBIT 4

**Declaration of J [REDACTED] O [REDACTED] A [REDACTED] M [REDACTED], [REDACTED] and
J [REDACTED] A [REDACTED] C [REDACTED] A [REDACTED] (An Infant) [REDACTED]**

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

1. I came from Moncagua in San Miguel, El Salvador. My birthday is [REDACTED]. I am 16 years old. I lived in my grandfather's home with my 20-years-old fiancé, J [REDACTED] A [REDACTED] C [REDACTED] M [REDACTED], my 20-year-old sister, L [REDACTED] A [REDACTED] A [REDACTED] R [REDACTED], and our one-year-old daughter, J [REDACTED] A [REDACTED] C [REDACTED] A [REDACTED]. Our daughter's date of birth is [REDACTED].
2. My fiancé, daughter, sister, and I had to leave El Salvador because our grandfather saw the gang kill our neighbor. They threatened to kill him and so we all had to leave. He is old so he went into hiding and we came to the United States because we have family here. My fiancé's uncle, D [REDACTED] C [REDACTED] M [REDACTED], lives in Virginia and wants to sponsor us. His telephone number is [REDACTED].
3. My fiancé and I crossed with our baby into the United States at Port Juarez and had to cross the river by foot. It was very deep so I held our baby and my fiancé held onto me to keep us above the water. Two hours after we crossed, we met Border Patrol and they took us to a very cold house. We slept on mats on the floor and gave us aluminum blankets. They took away our baby's diapers, baby formula, and all of our belongings. Our clothes were still wet and we were very cold and so we got sick. My fiancé, our daughter, and I got sick from being so cold. We were there for about ten hours.
4. After that they took us to a place with a tent. There was also a structure with a roof, but no walls. They put us in a cell together. Until this point, our family was kept together, but here they came and took our daughter and me out of the cell and separated my fiancé from us. We were all very upset. Our baby was crying. I was crying. My fiancé was crying. We asked the guards why they were taking our family apart and they yelled at us. They were very ugly and mean to us. They yelled at him in front of everyone to sit down and stop asking questions. We have not seen him since.
5. They made us all sit in lines and all face the same way. If we tried to shift positions or turn around and look the other way, they would yell at us and tell us not to turn around. There were about 30 children there. They also were made to sit on the ground lined up and all face the same way. They made us do that for like five hours. Our one-year-old tried to stand up and take some steps and the guards told me to make my baby sit down and stay still. They got mad at me because I was having trouble making my baby, who is a toddler, sit still for so long. My back was hurting me from sitting there on the ground with my legs folded and my baby in my lap trying to hold her still.

6. After that, they brought us here to Clint. It was about a 40-minute drive. We stay in a room with 45 other children. There are ten bunkbeds. We sleep two children per mattress so four children sleep in each bed. The other children sleep on thin mats on the concrete floor. The way the beds are assigned is that the child who leaves gives their bed to someone else. A girl left the facility and so she designated that bed for my daughter and me. Until then, my baby and I slept on a cement wall. There was no mat so my baby and I slept directly on the cement. We had two blankets (one each) and so I put one underneath us and the other one on top of us.
7. I have been in the U.S. for six days and I have never been offered a shower or been able to brush my teeth. There is no soap here and our clothes are dirty. They have never been washed. My daughter is sick and so am I.
8. In the morning, they give us Jello, oatmeal, and silver pouches of fruit punch. At lunch, they give us instant soup, another pouch of fruit punch, and a cookie. At dinner, they give us a bean burrito, Jello, and a silver pouch of fruit punch. There is nothing else in the burrito. No rice or cheese. They give my daughter formula, but otherwise we get no milk. We get no fruits or vegetables.
9. My baby asks for her dad all of the time. She frequently looks for him and wonders where her dad is. We both miss him very much and don't understand why they broke up our family.

I, J [REDACTED] O [REDACTED] A [REDACTED] 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]

June 18, 2019

J [REDACTED] O [REDACTED] A [REDACTED] M [REDACTED]

Certificate of Translation

I, Katherine Hagan, certify that I am fluent in English and Spanish and that I read the above declaration to J [REDACTED] O [REDACTED] A [REDACTED] M [REDACTED] in Spanish.



Katherine Hagan
1873 Columbia Alley
Eugene, Oregon 97403

June 18, 2019

EXHIBIT 5

Declaration of K [REDACTED] S [REDACTED] P [REDACTED] P [REDACTED], [REDACTED]

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

1. My two younger siblings and I came from Ecuador. I am eleven years old. My birthday is [REDACTED] My little brother is nine years old. His name is [REDACTED] [REDACTED] His birthday is [REDACTED] The roster says his [REDACTED] is [REDACTED] Our baby sister is [REDACTED] Her birthday is [REDACTED] She is seven years old. The roster says her [REDACTED] is [REDACTED] [REDACTED] We came to the United States with our father and a lady, but our father disappeared in Mexico and they separated us from the lady as soon as we got to America.
2. We have lots of family in America, including our mother, grandmother, and uncle. Our grandmother's name is [REDACTED] and she lives in [REDACTED] [REDACTED] Her telephone number is [REDACTED]
3. We eat, sleep, and live in Room 198. There are about 50 kids in there and 8 or 10 beds. There are no workers inside to take care of us so the kids try to take care of one another. When the workers come to clean our room, we get to go out in the hallway. We have only been outside twice.
4. We sleep on a mat on the floor. There are about 10 kids who sleep on our mat. There is another mat, too. Some children sleep directly on the floor. It is tile. We shared our mat with a teenage mom and her baby, but she left so now one of the kids who has been sleeping on the floor can now sleep on the mat with us.
5. My brother and I have had one shower since we came here, but they have not called [REDACTED] for any showers yet. We have only brushed our teeth once. We take a shower in a big truck with three showers inside.
6. The toilet is inside of the room where we sleep. There is no separate room, just two stalls with no doors. The older girls try to cover themselves with a blanket so we don't see them when they go to the bathroom. The bunkbeds are right in front of the toilet stalls and so the people from the top bunks can see the kids going to the bathroom, but they try to look away to give the person on the toilet privacy and the person using the toilet usually tries to cover themselves.
7. Nobody takes care of us here. I try to take care of my little brother and sister since no one will take care of them. There are little kids here who have no one to take care of them, not even a big brother or sister. Some kids are only two or three years old and they have no one to take care of them.

I, K [REDACTED] S [REDACTED] P [REDACTED] P [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.

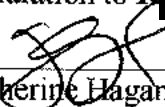
[REDACTED]

June 18, 2019

K [REDACTED] S [REDACTED] P [REDACTED] P [REDACTED]

Certificate of Translation

I, Katherine Hagan, certify that I am fluent in English and Spanish and that I read the above declaration to K [REDACTED] S [REDACTED] P [REDACTED] P [REDACTED] in Spanish.



Katherine Hagan, MS, MTS, CHI
1873 Columbia Alley
Eugene, Oregon 97403

June 18, 2019

EXHIBIT 6

Declaration of**K [REDACTED] M [REDACTED] C [REDACTED] T [REDACTED]**

I, K [REDACTED] M [REDACTED] C [REDACTED] T [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 16 years old. I came alone from Honduras.
2. I entered the United States at Ciudad Juarez and have been here 11 days.
3. When I was picked up by Border Patrol, they took me to a place that had tents, but I was taken into a building nearby that was freezing cold that was called the Ice Box. They checked our skin and looked at documents there. I got there around 4 in the afternoon, and at 2 in the morning they woke us up to move us to this place, the Clint Border Patrol Station.
4. In the Ice Box, they gave us yogurt, a hot dog, and water. I was with 7 other minors. We slept on the floor. It was freezing. When I asked for an extra blanket—a metallic one—they gave it to me.
5. I'm in an isolation room now because I have the flu. I wasn't sick when I arrived. I think everyone here has the flu. About 3 days ago a guard told me I was scheduled to go to a different place—a shelter—but when I told them I had a headache and they said I had a fever, they put me in this isolation room instead.
6. A medical person put something in my nose, because I also had a cold. They said I had the flu. They take my temperature 2 times every day. In the morning, they give me 5 pills. I think one is for infection, and the other 4 are chewable, but I don't know what they are for. At night they give me a pill to sleep.
7. I feel good now, and the last 3 times they checked me, they said I didn't have a fever. I want to leave this place, but I don't know when I will. They haven't said.
8. There are 7 of us in this room. Two of us are 16, one is 15, one is 17, and the others I'm not sure. There is a baby with its mother. The baby is sick, not the mother. There are 2 younger girls who don't speak Spanish, so I don't know anything about them. One is from Guatemala, but the other I have no idea. They don't talk to each other, so I don't think they speak the same language. I don't know how old they are, but they wear diapers. The older girls try to help take care of the littler girls. I clean them and help them get dressed. Another girl who is in here for the flu changes their diapers.
9. There is 1 bed in the room. The younger children share the bed. The others sleep on the floor. I'm always cold, because the air conditioning bothers me.
10. They always give us the same food: oatmeal, yogurt, and cookies in the morning; soup and fruit for lunch; and a burrito and juice for dinner. If we're hungry, we can have cookies or sweets.
11. I haven't had a shower the whole time I have been here. Two times I was allowed to brush my teeth, but the doctor took the toothbrush away after I used it.
12. They threw away all of my clothes except what I'm wearing when I got here.
13. I was able to talk to my uncle. He lives in Norfolk, VA.

14. Before they put me in this isolation room, I was in a room with more than 50 girls. We had to sleep on the floor. It was very crowded.

I, K [REDACTED] M [REDACTED] C [REDACTED] T [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 18, 2019

K [REDACTED] M [REDACTED] C [REDACTED] T [REDACTED]

Certificate of Translation

I, Kathleen O’Gorman, certify that I am fluent in English and Spanish and that I read the above declaration to K [REDACTED] M [REDACTED] C [REDACTED] T [REDACTED] in Spanish.



June 18, 2019

Kathleen O’Gorman
Illinois Wesleyan University
1312 Park Street
Bloomington, IL 61701

EXHIBIT 7

Declaration of

I [REDACTED] F [REDACTED] A [REDACTED]

I, I [REDACTED] F [REDACTED] A [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 17 years old. I am from Guatemala. I arrived in the United States on June 14, 2019, and turned myself in to the Border Patrol.
2. They took me to a place that was a tent. I was there about 1 hour. They gave me a burrito, juice, and a cookie. Then they took me to a place that was very cold that's called the Ice Box. I was there for an hour or two. Then they took me to Clint Border Patrol Station, the place I'm at now.
3. When I got here, I was allowed to take the only shower I have taken here. I was completely well and have had no medical problems. I do have my immunizations. I didn't get sick until I got here, but I was next to someone who was sick, and the next day, I got sick, too. A medical person checked me out, they put something in my nose and took my blood pressure. I had a fever at first and then got runny nose, and a cough, and vomited one time. They check my temperature and blood pressure every day and give me a medicine twice a day (Chewable) but no other medicines. I get the medicine twice a day. They say it is for fever, but I don't know what it is.
4. I am in an isolation room with 5 other boys. It is a room that will fit 11 people. There are 2 beds as well as beds of "concrete." The real beds have real blankets, 1 above and 1 below. The kids that sleep on the concrete beds have to sleep on their jackets. Although I have a bed now, first I was sleeping on the concrete bed and it was not very comfortable.
5. There are 5 boys in this room. The others are 8, 12, and 15, I think.
6. Since I have been here, I have had a regular meal plan. In the morning we eat cookies, juice and yogurt. For lunch we have a soup with juice and a cookie. For dinner we have burritos, yogurt, juice and cookies. But I don't eat the burrito because I don't like it. During the day there are some cookies for snacks. I am always hungry.
7. I have not showered again while here. I don't brush my teeth because I don't have any toothbrush. When I go to the bathroom, I try to wash. But there is no soap. There is some creamy stuff for cleaning our hands.
8. We are in the room all day. I would like to get some fresh air outside.
9. On arrival, I was able to speak with my father. He lives in Los Angeles. He is working on arrangements. They will let me out when I get better, but I don't know how they are deciding if I'm better.
10. I hope to get out to see my father.
11. There are many rooms here, there are at least 2 more rooms with girls. More than 10 of them. There are different rooms for those who are more and less sick.

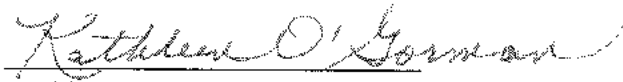
I, L [REDACTED] F [REDACTED] A [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

June 18, 2019

L [REDACTED] F [REDACTED] A [REDACTED]

Certificate of Translation

I, Kathleen O'Gorman, certify that I am fluent in English and Spanish and that I read the above declaration to L F A in Spanish.



June 18, 2019

Kathleen O'Gorman
Illinois Wesleyan University
1312 Park Street
Bloomington, IL 61701

EXHIBIT 8

Declaration of**I, G L,**

I, G L (), 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 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, L [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]
L [REDACTED] G [REDACTED] L [REDACTED] L [REDACTED]

06/18/2019
Date

Certificate of Translation

I, Elora Mukherjee, certify that I am fluent in English and Spanish and that I read the above declaration to L [REDACTED]
G [REDACTED] L [REDACTED] in Spanish. Executed this of in Clint, Texas.



Elora Mukherjee
Morningside Heights Legal Services, Inc.
Columbia Law School
435 W. 116th Street
New York, NY 10027

EXHIBIT 9

Declaration of

M [REDACTED] F [REDACTED] M [REDACTED]-O [REDACTED],
 K [REDACTED] M [REDACTED] M [REDACTED]-O [REDACTED],
 S [REDACTED] N [REDACTED] M [REDACTED]-O [REDACTED],

I, M [REDACTED] F [REDACTED] M [REDACTED]-O [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 name is M [REDACTED] F [REDACTED] M [REDACTED]-O [REDACTED] and I am twelve years old. My date of birth is [REDACTED]. I am currently detained here at the Clint CBP Station with my 8 year-old sister, K [REDACTED] M [REDACTED] M [REDACTED]-O [REDACTED] (A number [REDACTED]), who was born on [REDACTED], and my 4 year-old sister, S [REDACTED] N [REDACTED] M [REDACTED]-O [REDACTED] (A number [REDACTED]), who was born on [REDACTED]. We are from Ecuador.
2. The three of us crossed the border by land with our grandmother and a few other people on or about June 16, 2019. We were taken into custody by border patrol officers shortly after. The officers took everything from us except our documents. They even took our shoe laces. There was a mother in our group traveling with a very young baby. The officers took her diapers, baby formula, and nearly everything else she had and threw it away. They left her with just two shirts and one pair pants for the baby. The mother really wanted to keep the diapers because her baby was allergic to regular diapers but the officers didn't listen. Then the officers took my sisters, my grandmother, and me to a place where we were kept for one day. It was night by the time we got there.
3. This first facility where we were detained had both indoor and outdoor spaces. You could be inside or outside when you wanted. We stayed inside during the day because it was so hot outside. At night, the indoor part of the facility was extremely cold, so my youngest sister wanted to be outside. All the bathrooms were in the space outside. The toilets did not flush. There was no soap to wash our hands. We have not had a single opportunity to bathe or shower since we crossed the border.
4. We received two meals at the first facility. First we received a hamburger. The next day we were given a type of meat and apple juice. We also received an orange and an apple there. There was also powdered baby formula or milk and diapers for babies at this facilities. My sisters and I did not receive any milk or vegetables there.
5. It was very cold indoors when we arrived at the first facility. There were no mattresses and no mats. We only received sheets that were very thin and made of cloth. The lights were on the whole time. My sisters, our grandmother, and I all lay together on the floor. It was difficult to sleep.
6. At 3 AM the next day the officers told us that our grandmother would be taken away. My grandmother tried to show the officers a paper signed by my parents saying that my grandmother had been entrusted to take care of us. The officers rejected the paperwork saying that it had to be signed by a judge. Then the officers took my dear grandmother away. We have not seen her since that moment. I felt extremely sad when they separated us from our grandmother and I still feel sad that we are apart. Thinking about this makes me cry at times. The officers didn't give us any information about how we could reunite with

our grandmother. My sisters are still upset because they love her so much and want to be with her. Every night they cry for our grandmother and our mother.

7. Later in the morning, my sisters and I were taken to the Clint Station where we have been held for 2 days so far. I'm in a room with my sisters and many other girls. There are mats for me and my sisters but they are quite hard. Many of girls in my room have been there at least 8 – 10 days. There have also been little boys in our room. They have been there for shorter amounts of time, about 2 -3 days. There are children in my room who are older and younger than me. My little sister is the youngest one there. There are many young children there who don't have siblings to help care for them. It is a very sad situation.
8. I am always hungry here and I wish I had more food. My sisters are hungry too. The staff here feed us three times a day. For breakfast we get sweetened oatmeal and different types of juice. For lunch we receive food that can be cooked quickly. They cook the soup for three minutes and give it to us with a cookie. Then for dinner we get burritos. The burritos here are different from the kinds we used to buy in Mexico. Here all of the burritos have only beans and pico. We are used to eating burritos with meat. Everyone here is hungry because there is not sufficient food. I've never asked for more food here because everyone just here is only allowed to get one tray of food. I've talked with the other girls here and asked them if we can get more food. Basically the answer is no but you can trade parts of your meals with the other girls to try to get more of the food you like.
9. It's difficult for me to care for my sisters here. It's hard because they are very hungry and they don't like the food here. I also do not like the food here.
10. There are limited times for the girls to go outside and there are limited times for the boys to go outside. My youngest sister is used to playing outside all the time when she wants to, so for her it has been especially hard to not be able to go outside. When we go outside, my sisters try to play with the ball and run around but it's a very small space. There is not enough room for all the kids to play.
11. The water here is horrible. It tastes like chlorine. We can use cups to drink the water. But the water tastes awful and I don't like it at all. None of the kids here like the water.
12. The officials here are very bad to us. During the night when we're trying to sleep they come in and wake us up, yelling and scaring us. Sometimes children rise up in the night and officials yell at them to lay back down. The guards who are yelling don't speak much Spanish, so it's hard to understand what they're saying. My sisters and I are very scared when they yell at us and other children.
13. There a lot of girls at this place with the flu. There's a big room that's filled with the children that have the flu. There are a lot of big mosquitos here and maybe that is reason so many children have the flu here. Neither my sisters nor I have seen a doctor since we crossed the border. We saw doctors come to the Clint facility but they only met with the kids who were already sick. One child was here for 7 days and got sick and has now been here for a very long time. There is a girl here from El Salvador and a boy from Guatemala who have been here for almost a month. They both got infections in their lungs and have had to stay here. They cannot be released because they need to take pills for a month.

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.

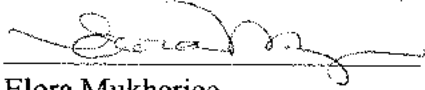
M [REDACTED] F [REDACTED] M [REDACTED] - O [REDACTED]

18/6/2019

June 18, 2019

Certificate of Translation

I, Elora Mukherjee, certify that I am fluent in English and Spanish and that I read the above declaration to M [REDACTED]
F [REDACTED] in Spanish. Executed this 18th of June in Clint, Texas.



Elora Mukherjee
Morningside Heights Legal Services, Inc.
Columbia Law School
435 W. 116th Street
New York, NY 10027

EXHIBIT 10

**Declaration of M[REDACTED] Z[REDACTED]-L[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]

Certificate of Translation

I, Katherine Hagan, certify that I am fluent in English and Spanish and that I read the above declaration to M [REDACTED] Z [REDACTED]-L [REDACTED] in Spanish.



Katherine Hagan, MS, MTS, CHI
1873 Columbia Alley
Eugene, Oregon 97403

June 18, 2019

EXHIBIT 11

Declaration of
U [REDACTED] E [REDACTED] P [REDACTED]-F [REDACTED], [REDACTED]

I, U [REDACTED] E [REDACTED] P [REDACTED]-F [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 from El Salvador.
2. I had to leave El Salvador because a gang in my neighborhood threatened to kill me if I did not give them money on a regular basis. One time I was beaten by five gang members. My mother said that I had to leave because she could not protect me. My father has been in the United States for fourteen years and lives in Maryland. I also have uncles in Maryland and in California. I fled El Salvador with another young man who was coming to the United States.
3. I was apprehended by with five others. We presented ourselves at the border on or about 20 days ago.
4. I was taken to a border station for about 30 minutes, then another teenager and I were brought to the Clint CBP facility.
5. I have been at the Clint CBP facility for about 19 days.
6. I have not been told about a release plan. At one point, I was told that the maximum time I would be here is 29 days.
7. The facility is locked. I cannot leave. I was warned that I would get in trouble. One of the other teen boys got into trouble, and we were told that he was taken to the freezer box, *hieleras*, as punishment.
8. I am in a room with dozens of other boys. Some have been as young as 3 or 4 years old. Some cry. Right now, there is a 12-year-old who cries a lot. Others try to comfort him. One of the officers makes fun of those who cry. It gets cold at night in our room. We spent pretty much the entire day in our room. The meals are the same everyday and there is not enough. I am often hungry. One time the food was so bad, it gave me a stomach ache.
9. I have not been offered any new clothing since I arrived. I have not been able to wash my clothes. After arriving, I got an ear infection. My right hear hurt a lot and was oozing yellow fluid. I had to wait all day long before I got to see a doctor. The doctor proscribed 10 day course of medicine; I am on day 7 of the medication right now.
10. I was allowed to speak to my father in Maryland one time.
11. I would like to be released as soon as possible.

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, U [REDACTED] E [REDACTED] P [REDACTED] 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]

U [REDACTED] E [REDACTED] P [REDACTED] F [REDACTED]

6-18-2019

Date

Certificate of Translation

I, Bill Ong Hing, certify that I am fluent in English and Spanish and that I read the above declaration to W [REDACTED]
A [REDACTED] S [REDACTED]-G [REDACTED] in Spanish. Executed this June 18, 2019, in Clint, Texas..

Bill Ong Hing
University of San Francisco School of Law
2199 Fulton Street
San Francisco, CA 94117

EXHIBIT 12

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.

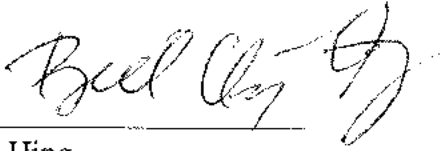
[REDACTED]
W [REDACTED] A [REDACTED] S [REDACTED]-G [REDACTED]

6-18-2019

Date

Certificate of Translation

I, Bill Ong Hing, certify that I am fluent in English and Spanish and that I read the above declaration to W [REDACTED]
A [REDACTED] S [REDACTED]-G [REDACTED] in Spanish. Executed this June 18, 2019, in Clint, Texas..



Bill Ong Hing
University of San Francisco School of Law
2199 Fulton Street
San Francisco, CA 94117

EXHIBIT 14

REDACTED VERSION OF DOCUMENT TO BE FILED UNDER SEAL

Declaration of

K [REDACTED] P [REDACTED] T [REDACTED] M [REDACTED],
R [REDACTED] A [REDACTED] T [REDACTED] P [REDACTED],
B [REDACTED] D [REDACTED] T [REDACTED] P [REDACTED],

We, K [REDACTED] P [REDACTED] T [REDACTED] M [REDACTED], R [REDACTED] A [REDACTED] T [REDACTED] P [REDACTED] ([REDACTED]), and B [REDACTED] D [REDACTED] T [REDACTED] P [REDACTED], declare under penalty of perjury that the following is true and correct to the best of our knowledge and recollection.

1. We are a family from Ecuador. R [REDACTED] and B [REDACTED] are siblings, and K [REDACTED] is our cousin. K [REDACTED] is sixteen-years old and was born on [REDACTED]. R [REDACTED] is sixteen-years old and was born on [REDACTED]. B [REDACTED] is fourteen-years old and was born on [REDACTED].
2. The three of us crossed into the United States by land about five days ago, on or about June 14, 2019. The immigration police found us and took our names, our ages, and our dates of birth. They told us that we could only have one layer of clothing, and they threw away the rest of our clothes in the garbage. They took our shoelaces, the drawstrings from K [REDACTED]'s pants, and all of our belongings. They took our money, wallets, and phones, and gave us a ticket so we could get it back some day.
3. The officers took us to a place called the *hielera*. It was extremely cold there. R [REDACTED] was separated from us, which made us all feel extremely sad and scared. We were put into very small rooms and detained there for about five hours. K [REDACTED] and B [REDACTED] were detained with boys, and R [REDACTED] was detained with girls. Then officers took the three of us to the place where are now.
4. We have been here at the Clint detention center for about five days. R [REDACTED] has been separated from us here, which makes us all so very sad. This morning, when the lawyer from the Flores team asked to meet with us, is the first time that the three of us have been together since we arrived here. We miss each other very much.
5. Since arriving at Clint, we have been detained in a space that is separated by a chain link fence. The girls are on one side of the chain link fence. The boys are on the other side. At first the officers tried to separate K [REDACTED] and B [REDACTED] but after we explained that we are cousins, they let us stay together. But they separated us from R [REDACTED]. We can see R [REDACTED] through the fence, and she can see us, but we are never permitted to hug each other or hold hands or even talk with each other. We are not permitted to go to near the fence. If any child goes near the fence, the guards yell at us. They scream, "You cannot be here." It is very scary when they yell. One time, when a boy approached the fence to talk with a girl, the guard screamed at him, "The next time you will have a problem." The guard grabbed the boy by the back of the neck and dragged him away. We have never seen this boy again. We do not know what happened to him. It is terrifying to be here.

REDACTED VERSION OF DOCUMENT TO BE FILED UNDER SEAL

6. When we first arrived here, there were too many children in the space where we are detained. Perhaps there were about 100 boys and dozens of girls there. It felt very crowded. Yesterday, the guards took away most of the boys and some of the girls. We think that there are about only 37 boys left. There are still many girls left in detention here. It is hard to know the number of girls because there are so many.
7. Some children are here for a very long time, such as 17 days. One boy begged the guards if he could please be deported because he could not bear to be here any longer. The guards told him no. The guards told him that he had to be detained here 15 days more.
8. There are very young children who are here all by themselves for many days. In the cell for boys, there is a four year old and his brother who is maybe seven or eight years old. They have been here for about 13 days. They do not have anyone to care for them. In the cell for girls, there are girls as young as three and four years old who do not have anyone to care for them.
9. Every day we are locked in the space nearly all day. The hours here feel eternal. There is nothing for us to do here. We can just sit on our mats. We are woken up at 5 a.m. each day. There is no television. We look at the computers that the guards have to watch the passing of the minutes. Sometimes we pray. Sometimes we think, "When will it be time to eat?"
10. We are hungry nearly every day. There is not enough food. We are given meals three times a day in the same detention space. We cannot eat at any other times. There are no snacks. For breakfast, we are given oatmeal, pudding, and juice. For lunch, we are given one cup of instant noodles that can be cooked in water for three minutes, plus juice. For dinner, we are given juice, a cookie, and one small burrito with beans and, sometimes, with meat. We do not know what would happen if we asked for more food. We are too scared to ask.
11. The only times when we can leave our cells is when we need to use the bathrooms or during a very limited outdoor time. There are nine toilets total for the girls and boys to use. The guards get mad if a child needs to use the toilets more than once in a short period of time. Instead of letting the child use the bathroom a second time, the guards just close the door. When the door is closed, no child is permitted to open it. All the time we must ask the guards for permission to open the door. They tell us it is the law.
12. There is time to go outside for about 30 minutes each day and children should be playing. But we do not play outside at those times. We are hungry and we need to conserve our energy to stay alive here.

REDACTED VERSION OF DOCUMENT TO BE FILED UNDER SEAL

13. During the day, our cells are too hot. The roof is made of tin metal. During the night, it is too cold. There is a large ventilator on one side of the cell. The ventilator produces water which leaks onto the floor. Sometimes there is a lot of water.
14. Since arriving, B [REDACTED] and K [REDACTED] have slept each night on a mat on the floor. When we first arrived, we had to share a mat because there were not sufficient mats for all the boys. There are triple bunk beds, but we do not want to sleep there because it is too cold on the beds at night. Most of the boys are sleeping on mats on the floor. Sometimes the water from the ventilator comes close to the mat where B [REDACTED] and K [REDACTED] sleep. At night, all three of us wake up repeatedly because we are cold and hungry and because guards come in the middle of the night and yell the names of children who need to be transferred.
15. R [REDACTED] has not had a single opportunity to bathe or shower since crossing the border. K [REDACTED] and B [REDACTED] were permitted to shower for five minutes yesterday and the day before yesterday. We are all wearing the same clothes since we crossed the border. R [REDACTED] has not had any opportunities to wash her clothes. K [REDACTED] and B [REDACTED] tried to wash their t-shirts during one of their showers. All of us were allowed to brush our teeth just two times since we crossed the border.
16. There are many sick children here. They take them away. We do not know where the sick children go.
17. When children ask officers if they can please be permitted to call their family members, the officers refuse. We were only permitted to call our family members twice since we arrived here. Our first call was just after we arrived. That time, we were only permitted to make an extremely short call to get our parents' addresses, and then the officer hung up the phone and did not let us speak with our parents. Our second phone call was yesterday and it was only five minutes long. This is not enough time to speak with our parents. We wish we could speak with our parents for longer times and more often.
18. Our parents all live in Brooklyn. K [REDACTED]'s father has been in the United States for seven or eight years. R [REDACTED] and B [REDACTED]'s father has been in the United States for about thirteen years and our mother has been here for seven or eight years. We want to live with our parents, and our parents want us with them. We do not understand why we are still here or the process for leaving this place. No one told us anything about when we can leave.
19. Some of the guards here are mean. We are scared of them. It is better to stay quiet with them and not get on their bad sides or make them angry.
20. There are a lot of mosquitos here. The mosquitos are big and they bite us all the time, even on our legs under our pants.

REDACTED VERSION OF DOCUMENT TO BE FILED UNDER SEAL

21. We do not know if there are any counselors, social workers, or mental health professionals here.
22. When we arrived here, we had to sign form in English. We could not read those forms. We do not know what the forms said.
23. We have not received an explanation of the rules here.
24. We have not received any information about our rights under the *Flores* settlement agreement.
25. K [REDACTED] has drawn a diagram of the space where we are detained. He has labeled where the boys are held, where the girls are held, and where the "regas" – the chain link fence is.

We, K [REDACTED] P [REDACTED] T [REDACTED] M [REDACTED] R [REDACTED] A [REDACTED] T [REDACTED] P [REDACTED] and E [REDACTED] D [REDACTED] T [REDACTED] P [REDACTED] swear under penalty of perjury that the above declaration is true and correct to the best of my abilities. This declaration was provided in English and was read back to us in Spanish, a language in which we are fluent.

[REDACTED]

K [REDACTED] P [REDACTED] T [REDACTED] M [REDACTED]

19/06/2019

Date

[REDACTED]

R [REDACTED] A [REDACTED] T [REDACTED] P [REDACTED]

19/06/2019

Date

[REDACTED]

B [REDACTED] D [REDACTED] T [REDACTED] P [REDACTED]

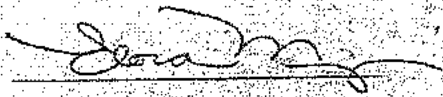
19/06/2019

Date

REDACTED VERSION OF DOCUMENT TO BE FILED UNDER SEAL

Certificate of Translation

I, Elora Mukherjee, certify that I am fluent in English and Spanish and that I read the
above declaration to K [REDACTED] P [REDACTED] T [REDACTED] M [REDACTED] R [REDACTED] A [REDACTED] T [REDACTED] P [REDACTED] and B [REDACTED]
D [REDACTED] T [REDACTED] P [REDACTED] in Spanish. Executed this 19th day of June in Clint, Texas.



Elora Mukherjee

Morningside Heights Legal Services, Inc.

Columbia Law School

435 W. 116th Street

New York, NY 10027

REDACTED VERSION OF DOCUMENT TO BE FILED UNDER SEAL

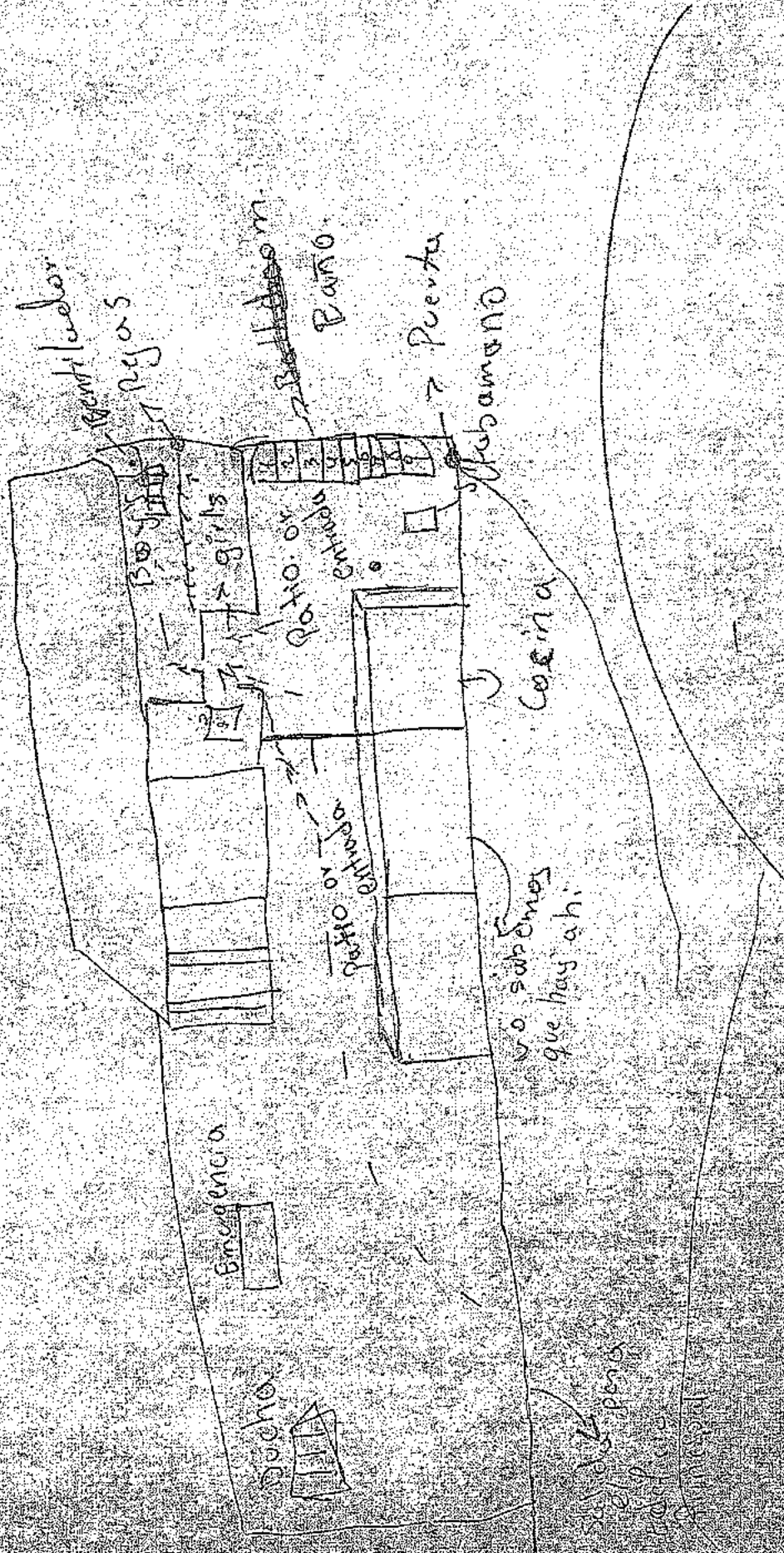


EXHIBIT 16

Declaration of A ■ I ■ V ■ F ■
■ ■ ■ ■ ■

I, A ■ I ■ V ■ F ■, declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. I am from Choluteca, Honduras. My date of birth is ■ ■ ■ ■ ■. I am 17 years old.
2. I am the mother of A ■ M ■ V ■ V ■, who was born ■ ■ ■ ■ ■.
3. I am the older sister of C ■ A ■ E ■ F ■, born on ■ ■ ■ ■ ■. She is eight years old.
4. I am currently detained at the Ursula Processing Center together with my three-month old daughter and sister C ■ ■ ■ ■.
5. I entered the United States with my daughter and sister by boat on June 3, 2019. We encountered immigration officers just after we crossed the river and were taken to a detention center. We stayed there most of the day. We were given a ham sandwich and juice. There was a jug of water, but the water tasted like dirt.
6. We were then taken to the Ursula processing center around 11 pm or midnight.
7. We have been detained at Ursula for eight days. I have not been told anything about what comes next.
8. I am a breastfeeding mom. Two days ago, I had a fever and sore throat. I didn't want to get my baby sick, so I tried giving her formula. The formula gave her diarrhea, so I have returned to breastfeeding.
9. We have been staying in different cages here in Ursula with other girls. We have thin mattresses put on the floor to sleep. I do not have a crib or separate area for my baby to sleep. We all sleep together on the mattress.
10. Yesterday, we were moved to a new area. My sister C ■ ■ ■ ■ somehow lost her shoes in the move. None of the officials seemed to notice. She was walking around in her bare feet yesterday and today until I met with the Flores lawyers, who asked the officers for shoes for her. The officers said they did not have shoes, but gave C ■ ■ ■ ■ socks.
11. We have only bathed once since being detained. On June 4th, we were taken to an area with about 28 showers. We bathed and brushed our teeth. Since then, however, we have not been able to bathe. I have not been able to wash and clean my baby since June 4th. We do not have toothbrushes or toothpaste or towels in the cages.
12. My daughter's onesie is very dirty. I have not been able to wash it since June 4th.

13. Officials was never told me about my rights under Flores.

I, A [REDACTED] V [REDACTED] 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.

June 11, 2019

A I V F

CERTIFICATE OF TRANSLATION

I, Elissa Steglich, certify that I am fluent in English and Spanish and that I read the above declaration to A [REDACTED] V [REDACTED] F [REDACTED] in Spanish.

Executed this 11th of June 2019 in McAllen, Texas.

est

Elissa Steglich
University of Texas School of Law
727 E Dean Keeton St
Austin TX 78705
(512) 232-1387

EXHIBIT 17

Declaration of

B [REDACTED] P [REDACTED] M [REDACTED] M [REDACTED] [REDACTED]

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

1. I, B [REDACTED] P [REDACTED] M [REDACTED] M [REDACTED] [REDACTED], was born on [REDACTED]. I am sixteen.
2. My daughter, M [REDACTED] J [REDACTED] J [REDACTED] M [REDACTED] [REDACTED], was born on [REDACTED], she is eight months old. We are from Honduras.
3. I was apprehended with my infant around May 28, 2019 in the afternoon. After crossing the river and walking for about a half an hour, Border Patrol apprehended us. The agents transported us to an immigration center in a bus. The trip was about an hour. When we arrived at the center I was given a bottle of water and a churro. They had no bottles, diapers or anything for my baby. We were there for a short time and then transported to the "Dog Pound". The trip took about 45 minutes.
4. We arrived at the "Dog Pound" around 6 P.M. When we arrived they took the clothes my baby was wearing and the backpack with all of her clothing, medicine and milk. We were not given any food or water or anything to drink.
5. We were put into a three sided cage with the fourth side open to the outside filled with loads of people. Too many to count. Children, pregnant mothers and mothers with babies. There was nowhere to sit there were so many people. We had to wait for someone to stand up and quickly take their place on the ground.
6. My baby was naked outside with no blanket for all four days we were there. We were freezing. My baby couldn't sleep because the ground was cement with rocks, and in some places only rocks, and everytime she moved the sharp ground would scratch her. There were many pregnant women who had to sleep on rocks and I felt very badly for them.
7. In the morning we tried again to sleep because it as a little warmer. They gave me a rotten sandwich that I could not eat. They gave me a little bit of milk and told me to mix it with water for the baby. The water was very bad. I did not eat for over two days and the baby only had a very little bit of milk. The water came from a jug, smelled bad, and people had to share cups. It was absolutely terrible and I could not drink it.
8. The baby had a cough and a cold when we arrived and after the first day the baby was much sicker. Her cough and cold were worse and she had a very high fever. There were no doctors or medicine. The guards told me that keeping my sick baby outside would be good for her. There were many, many sick children there. A lot with fevers.

9. When I would ask for diapers I often had to wait for a very long time and I was only given 2-3 baby wipes. I had to change the baby on the ground. Diapers were not given to children who were two years or older. The guards said they should not need them.
10. During the day it was incredibly hot and at night it was very cold. There was only a small roof area with shade and people would crowd there trying to get away from the sun. It was the same every day we were there and suffered every day.
11. Around 2 or 3 A.M. on the fifth day we were brought here, to the Ursula Processing Center. When we arrived they took the baby's temperature. She had a high fever and they gave her medicine, clothes and formula.
12. We were put into a cage inside a large building. There are a lot of other mothers with children. There are not many places to sit and we have to sleep on very small, thin mats on the floor. There are thin foil blankets only. It is very crowded and there is no room. The lights are very bright and on all the time and it is very noisy and impossible to sleep.
13. My baby was sleeping on a mat in the middle of the night and the guards made me wake her up to take her to a changing area.
14. There are 7 portable toilets near the cage but not inside. We have to get in line to go to the restroom. The toilets are extremely dirty. There's no water or soap to wash your hands.
15. In the cage there is a table with a jug of water and formula. The water is very bad. I use the bottled water from my meals to mix the formula for my baby. I only have one bottle to use over and over and no way to wash it.
16. The day after we arrived here, my baby began vomiting and having diarrhea. I asked to see a doctor and they did not take us. I asked again the next day and the guard said "She doesn't have the face of a sick baby. She doesn't need to see a doctor." My baby daughter has not had any medicine since we first arrived. She has a very bad cough, fever, and continues to vomit and have diarrhea.
17. We are only given baby food sometimes. But I am afraid to ask to often because the guards are very mean. In four days, they have only given us baby food once. Before we came here, my baby was eating baby food regularly during the day as well as eating some adult food. She can not eat the food here. It makes the adults sick and would be worse for a baby.
18. Since we arrived here my baby has lost a lot of weight. Her pants are very loose now. She is not sleeping because she is sick, and it is very loud. She cries a lot and is listless.

19. The food here is terrible, the bread is bitter. The water in the jug is bad and makes me feel sick and I use my bottled water to make the baby's bottles. When I ask for more water, the guards are very mean and tell me that the baby and I don't need it. I am not able to eat or drink much. My stomach hurts and I have a headache all the time. I have lost a lot of weight here too. And I am very scared and anxious. It makes me feel very bad the way they treat us. It is hard being so young and being a mother.

20. After eight days here at Ursula we were finally able to shower and I was given clean clothes.

21. I want to go to live with my father, S [REDACTED] R [REDACTED] M [REDACTED], who lives in North Carolina. His phone number is: [REDACTED].

22. I have not been told about our rights or what is going to happen to us.

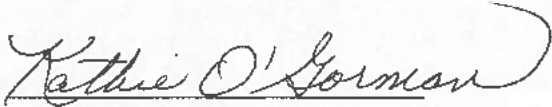
I, B [REDACTED] P [REDACTED] M [REDACTED] M [REDACTED] [REDACTED], swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was read back to me in Spanish, a language in which I am fluent.

B [REDACTED] P [REDACTED] M [REDACTED] M [REDACTED]

11 de Junio 2019
Date

Certificate of Translation

I, Kathie O’Gorman, certify that I am fluent in English and Spanish and that I read the above declaration to B ■■■ P ■■■ M ■■■ M ■■■ in Spanish. Executed this ___ of June in McAllen, TX.



Kathie O’Gorman

Center for Human Rights and Constitutional Law

EXHIBIT 18

Declaration of**C [REDACTED] G [REDACTED] G [REDACTED] P [REDACTED], [REDACTED]**

I, C [REDACTED] G [REDACTED] G [REDACTED] 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 [REDACTED]. I am 17 years old. I am from Honduras. I came with my daughter, A [REDACTED] G [REDACTED] M [REDACTED] G [REDACTED]. Her birthday is [REDACTED]. She is one year old. I also came with my baby's father, and we have been separated. His name is I [REDACTED] M [REDACTED] M [REDACTED]. He is 21 years old. At the moment, my daughter and I are detained together at Ursula Station.
2. We came to the United States 13 days ago on about May 29, 2019. We all crossed the river together in a raft. We came up the riverbank and were met by border patrol, and they brought me, my daughter and my baby's father to a place to be fingerprinted. We were there overnight. The next day, May 30, 2019, my daughter and I were brought to Ursula in a bus. The trip took about 15 minutes.
3. At the first facility, my daughter and I were put in a separate cell from my baby's father, where we could see, but not talk to, each other. It was so crowded that some people had to sleep sitting up. We were not given a mat to sleep on and had to sleep on a concrete floor. The next morning after we were given something to eat they brought me and my daughter to Ursula. My baby's father stayed behind.
4. At Ursula, we are fed three times each day at 7 am, noon, and the evening. We don't get anything to eat in between meals. We are sometimes given sandwiches that are cold and raw, and so we don't eat it. We get a water bottle at mealtime. If we run out of water, we are given cups to fill from a fountain, but the water tastes and smells like chlorine, and is dirty, so we don't drink it.
5. Here at Ursula, there is a table with diapers and wipes and feminine products and we have to ask permission to get them. Once, I needed clean clothes for my baby because she threw up, but when I asked for them I was told they didn't have any available. She is still in the same dirty clothes. I have not asked for anything since then.
6. The bathroom at Ursula has no paper towels to wash with or dry our hands. I have not been given a toothbrush or toothpaste to brush my teeth or my daughter's teeth. I have not been given hairbrush to brush my long hair. We were allowed to shower together once, the day after we arrived, but I have not showered since. That was 12 days ago. I would like to be able to take a shower me and my baby again, so that we could get clean.
7. At Ursula, we are in a fenced cage with other teenage moms with kids. Sometimes at night we are taken to a separate cage with only other 17 year old moms with their kids. It is very crowded. We got a mat to sleep on here. But the guards will take the mats in the early morning. Sometimes we each get a mat,

but other times we have to share a mat between four people. So then I have to sleep directly on the floor with my daughter in my arms. We have only one thin mylar blanket to share. The lights are always on.

8. I last saw my baby's father about 8 days ago. I saw him in a nearby cage, and he told me they were going to deport him. I am very sad because I want our family to be together.
9. On Mondays, they give us a phone call. I call my Dad who lives in Maryland. My daughter and I hope to live with him. I also have aunts and uncles living in the U.S.
10. I have not been given any information about our legal rights as detainees. I have not been told how long we will be here.

I, C [REDACTED] G [REDACTED] G [REDACTED] 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.

C [REDACTED] G [REDACTED] G [REDACTED] P [REDACTED]

6/12/19
Date

Certificate of Translation

I, ANAH JACOB certify that I am fluent in English and Spanish and that I read the above declaration to C [REDACTED] G [REDACTED] G [REDACTED] P [REDACTED] in Spanish. Executed this 12 of JUNE in McAllen, Texas.



ANAH JACOB

6/12/19

Date

EXHIBIT 19

Declaration of C [REDACTED] C [REDACTED] L [REDACTED] G [REDACTED]
[REDACTED] mother of
J [REDACTED] M [REDACTED] C [REDACTED] L [REDACTED]
[REDACTED]

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

I was born on [REDACTED], in El Salvador. I traveled to the US with my son J [REDACTED] M [REDACTED] C [REDACTED] L [REDACTED] who was born on [REDACTED] in El Salvador.

We crossed the river four days ago and were apprehended immediately by immigration officer. We were taken to Ursula detention. We are held in a metal cage that is very crowded. It is very very cold. We sleep on the concrete floor without a mat with only aluminum blanket. The lights are also on all the time which is very disturbing and makes my son not know when it is day or night which is confusing for his body.

The staff is abusive so I am afraid to ask for anything. Yesterday my baby was crying because he was hungry and the staff said to me, "Hey take care of your baby, it's okay to have them but you have to take care of them." They didn't bring me any food for him.

J [REDACTED] can only eat a little of the food. He took formula in a bottle when we were in El Salvador. Here, I am given one meal and share it with him. He will eat potato chips and when there is a sandwich I take out the filling and give him the bread. When he tries to eat the burritos in the morning he gets sick after a few bites and refuses to eat anymore. My son is given something white to drink once, I don't know what it is, but he refused to drink it so I didn't get it again. My son is hungry all the time.

We entered the US by crossing the Rio Grande River on a raft that started to sink. I got wet up to my waist. I was wet when I got here and was placed in the cage without being given dry clothes. I am still wearing the clothes I came in with. When I was arrested they took my sweater and my baby's hat. I don't have a coat or a sweater. I only have the shirt that I am wearing.

I, C [REDACTED] C [REDACTED] L [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.

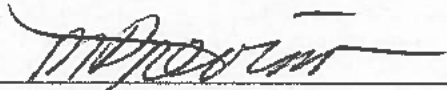
[REDACTED]

C [REDACTED] C [REDACTED] L [REDACTED] -G [REDACTED]

6-11-19
Date

Certificate of Translation

I, Merced Pérez Treviño, certify that I am fluent in English and Spanish and that I read the above declaration to C [REDACTED] C [REDACTED] L [REDACTED] G [REDACTED] in Spanish. Executed this June 11, 2019 in McAllen, Texas.



Merced Pérez Treviño
ACLU People Power
2418 Riverside Drive
Harlingen, TX 78550

EXHIBIT 23

Declaration of
E████ T████ P████ E████, ██████████

I, E████ T████ P████ E████, ██████████, 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 ██████████ I am 16 years old. I am from El Salvador. I came with my niece, M████ A████ R████ E████, ██████████ Her date of birth is ██████████ She is 2 years old. At the moment, we are detained together at Ursula Station.
2. We crossed the U.S. with 12 other people in a raft 16 days ago, on May 27, 2019. When we crossed we were met by border patrol. We were brought to Ursula Station and processed that day. After two days, on May 30, 2019, my niece got sick, so we were sent to a medical facility a half hour away. There, they told me she had a virus and gave her medicine. We were there for 6 days. On June 6, 2019, we were sent back to Ursula Station. We have been here since then.
3. When we first arrived at Ursula in the early morning, we got crackers and juice right away. My niece cannot drink the formula they offered. We are fed 3 times a day. We don't get any snacks between meals. Two of the meals are warm, but the evening meal is a very cold ham sandwich. It is hard to eat, and my niece does not eat much, only the apple and the chips.
4. When we arrived at the medical facility, we had to wait two hours before we got anything to eat. The water they gave us there was very cold, so I could not get rid of my cough. Being around other sick people did not help me get better, and now I feel more sick.
5. At Ursula, we are in a metal cage with more than 20 other teenagers with babies and young children. We have one mat we need to share with each other. It is very cold. We each got a mylar blanket, but it is not enough to warm us up. There are benches but we cannot sleep there. Sometimes it is so crowded we cannot find a place to sleep, so they allow a few of us to sleep outside the fenced area. The lights are on all the time.
6. We were allowed to shower when we arrived at Ursula. We showered again when they brought us back from the medical facility 5 days ago. We had only one soap, shampoo, and toothbrush to share. We have not been given a hairbrush. There is a place to wash our hands, but there is no soap. I have to ask for any diapers and wipes for my niece. Sometimes when other girls ask for things the guards yell at us and just throw them at us.
7. My niece got sick two days after we first arrived at Ursula. I told a guard she was feeling sick, and they took her to be checked out. Then they sent us to a medical facility where they told me she had a virus and gave her medicine. Since we got back to Ursula, my niece is still sick. She cries a lot. My niece spends much of the day sleeping on me, and she has very low energy. She wakes up for short periods at a time. She has a deep cough. She doesn't eat very much.

8. In the medical facility, we slept in a crowded room on the floor, with only aluminum blankets, and no mat to sleep on. It was very cold. When we arrived, it was so crowded there was no place to lay down on the floor so people had to sleep sitting up. We were fed 3 times a day. There was a bathroom inside the room. Everyone there was sick, both mothers and children. Being around so many sick people has made me sick.
9. Yesterday, we were taken to the consulate, who we were told wanted to see teens with children. At the consulate, we were told we have not been moved yet because there is not a group home open for teens and their children.
10. When I asked a guard at Ursula when we were leaving, they told me it was a process and to be patient because there are others who have been here longer than I have. We have been here a long time already and it makes me sad and worried.
11. Nobody had given me any information about our legal rights.
12. My sister, who is Ma [REDACTED] mother, lives in California. We are hoping to live with her.


I, E [REDACTED] T [REDACTED] P [REDACTED] 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.

E [REDACTED] T [REDACTED] P [REDACTED] E [REDACTED]

6/12/19
Date

Certificate of Translation

I, ANAH JACOB certify that I am fluent in English and Spanish and that I read the above declaration to NAME in Spanish. Executed this 12 of JUNE in McAllen, Texas..



ANAH JACOB

6/12/19

Date

EXHIBIT 25

Declaration of

K [REDACTED] J [REDACTED] H [REDACTED] ([REDACTED])

I, K [REDACTED] J [REDACTED] H [REDACTED] ([REDACTED]), declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. I, K [REDACTED] J [REDACTED] H [REDACTED] ([REDACTED]), was born on [REDACTED] I am sixteen.
2. My son, C [REDACTED] A [REDACTED] J [REDACTED] H [REDACTED] ([REDACTED]), was born on [REDACTED] he is one year old. We are from Guatemala.
3. I was apprehended with my infant around June 1, 2019 around 5 A.M. After crossing the river and walking for about an hour, Border Patrol apprehended us. The agents transported us to an immigration center by bus. The trip was about an hour. When we arrived at the center there were jugs of water but no food. They had no bottles or diapers for my baby. We were there for about three hours and then transported by bus here, to the Ursula Processing Center.
4. When we arrived we were given ham sandwiches. My baby was not able to eat his sandwich. He had juice and a cookie. Then we were put into a cage inside a large building. It is very crowded with many other mothers with children. There are only foil blankets and it is extremely cold. The lights are very bright and on all the time and it is very noisy. I am not able to sleep.
5. Before we came here my baby was eating solid food three times a day but now he is only getting breast milk and sometimes a cookie. I'm only making a little breast milk because I am not eating or drinking enough.
6. There are toilets near the cage but not inside. So we have to ask the guards to use the bathroom and they don't always let us use them. There is no water or soap to wash our hands or the baby. We have only been allowed to shower and brush our teeth one time since we arrived twelve days ago.
7. Six days after we arrived here, my baby got a cough and a cold. The guards told me that for a cough or a cold that my baby couldn't go to the doctor. I have a cough as well.
8. I am very scared and anxious. I worry about my baby because he is sick and I don't know what will happen to us.
9. I have not been told about our rights or what is going to happen to us.

I, K [REDACTED] J [REDACTED] H [REDACTED] ([REDACTED]), swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was read back to me in Spanish, a

language in which I am fluent.


K  J  H 

12 Junio 2019
Date

Certificate of Translation

I, Kathie O'Gorman, certify that I am fluent in English and Spanish and that I read the above declaration to K [REDACTED] J [REDACTED] J [REDACTED] H [REDACTED] in Spanish. Executed this __ of June in McAllen, TX.



Kathie O'Gorman

Center for Human Rights and Constitutional Law

EXHIBIT 26

Declaration of

K [REDACTED] L [REDACTED] R [REDACTED] L [REDACTED] ([REDACTED])

I, K [REDACTED] L [REDACTED] R [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. I, K [REDACTED] L [REDACTED] R [REDACTED] L [REDACTED] ([REDACTED]), was born on [REDACTED] I am sixteen.
2. My daughter, N [REDACTED] V [REDACTED] T [REDACTED] R [REDACTED] ([REDACTED]), was born on [REDACTED], she is one year old. We are from Honduras.
3. I was apprehended with my infant around June 4, 2019 in the afternoon. After crossing the river and walking for about an hour, Border Patrol apprehended us. The agents transported us to an immigration center in a car. The trip was about thirty minutes. When we arrived at the center I was given a cup of water. They had no bottles, diapers or anything for my baby. We were there awhile and then transported bus here, to the Ursula Processing Center.
4. When we arrived we were put into a cage inside a large building. There are a lot of other mothers with children and pregnant women. There are not many places to sit so I had to stand and hold my baby. At night we have to sleep on very small, thin mats on the floor but they take away in the morning. There are thin, foil blankets only. It is very crowded and it is extremely cold. The lights are very bright and it is very noisy and the baby cries all the time because she is sick so we are not able to sleep.
5. We were not given food when we arrived. It was not until the next morning when I was given a burrito, chips, and an apple. There was formula and cookies for the baby, but no solid food.
6. Before we came here my baby was eating regular food but now she is only getting formula. The sandwiches they give to us for lunch are frozen so I can't even give my baby food. The guards only let me give my baby 3 bottles of formula a day. Before we came here she had at least five. We are given one cookie in the morning and one cookie at night but no baby food.
7. There are toilets near the cage but not inside. Sometimes the guards get angry and will close them. Sometimes there is water and soap to wash your hands, but not now. We have only been allowed to shower and brush our teeth one time since we arrived nine days ago. A woman in my cell was here for twenty days and not allowed to shower.
8. Five days after we arrived here, my baby started coughing and having diarrhea. The guards told me that only the very sick babies can see doctors so my baby can't go although she has had a fever and was vomiting. She hasn't vomited for over a day but she still has a very bad cough, fever, and

continues to have diarrhea. There are many sick children and they are not being taken to the doctor.

9. I am very scared and anxious. I worry about my baby because she is sick and I don't know what will happen to us.

10. I have not been told about our rights or what is going to happen to us.

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

12 de Junio 2019
Date

K [REDACTED] L [REDACTED] R [REDACTED] - L [REDACTED]

Certificate of Translation

I, Kathie O'Gorman, certify that I am fluent in English and Spanish and that I read the above declaration to
K[REDACTED] L[REDACTED] R[REDACTED] in Spanish. Executed this ___ of June in McAllen, TX.



Kathie O'Gorman

Center for Human Rights and Constitutional Law

EXHIBIT 27

Declaration of

K [REDACTED] G [REDACTED] G [REDACTED] Q [REDACTED] ([REDACTED])

I, K [REDACTED] G [REDACTED] G [REDACTED] Q [REDACTED] ([REDACTED]), declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. I, K [REDACTED] G [REDACTED] G [REDACTED] Q [REDACTED] ([REDACTED]), was born on [REDACTED] I am sixteen.
2. My son, C [REDACTED] A [REDACTED] R [REDACTED] G [REDACTED] ([REDACTED]), was born on [REDACTED] he is two years, 10 months old. We are from El Salvador.
3. In El Salvador, I was studying for my bachelor's degree and was doing well. But my father and uncle were soldiers during El Salvador's civil war. They were threatened, and my baby and I were threatened, too. My sister, who is Hyattsville, Maryland, said it would be better to come to the United States to be safe.
4. We came to the United States on May 28 or 29, 2019. I crossed the river in a small boat (una balsa) at night. We continued walking and eventually encountered the Border Patrol, who stopped us. The Border Patrol then put us in a car and brought us to a location 10 minutes away to take our information. I did not tell the Border Patrol why I had come to the US.
5. At this first location, the Border Patrol offered us water. However, there was no food there, and the Border Patrol did not offer my baby food. There also were not diapers for my baby at this location. The guards took our clothes and personal items from us and gave us a ticket for those items.
6. We then were loaded into a bus for minors under 18 years old, and we were transported to Ursula. Upon arriving to Ursula, we were offered cookies, water, diapers (although my son did not need them). We were given aluminum blankets and directed to sleep on the floor. Later, around 11 pm or midnight, some sleeping mats arrived. These were clean but are very thin and not very comfortable. I slept and continue to sleep with my son.
7. The bathrooms at Ursula do not have water for handwashing. What little water we are given, we need to use to wash our hands. Sometimes, there is not enough water for drinking and handwashing, so we do not wash our hands.
8. Three days after our arrival at Ursula, we were permitted to shower. I was told to put my remaining clothes, including the ticket for my personal items that were registered by the Border Control (at the first location where I was detained) in a bag. When we left the showers, we were told that the Ursula guards had thrown away our bags of clothing and my ticket for personal items. The guards told me that I not could not get back my items.

9. We are permitted to shower only every five or six days.
10. It is very cold here. We have only an aluminum blanket for warmth, and this is not enough. We are always cold.
11. We cannot sleep. The guards never turn off the lights in the location where we are kept. We cannot sleep because of the light and the noise of everyone talking.
12. We receive food three times a day. The breakfasts and lunches are warmed food. However, my baby is not eating the food. He keeps refusing the food and has diarrhea.
13. We are given two bottles of water per meal. This water is clean because it is bottled.
14. My baby has not eaten a full meal in 15 days. I am very worried and don't know what to do. This makes me cry. I have not told the guards that my son is not eating, but I don't know how to make him eat. I have tried to give him the baby food for very little babies, and he will eat some of this.
15. I have asked for a doctor to see my baby because he has diarrhea and is coughing. Today, I was put in a long line to see the doctor. Then, it was time for the count of detainees, so we were told in English, "Sorry." I do not know when I will be able to consult a doctor for my son.
16. I want to go to live with my sister, who is in Hyattsville, Maryland. She is 27 years old. I have her telephone number, and I have called her to tell her that we are here. I have not asked the guards to let us leave to go to my sister. But, when I was first detained, I told the Border Patrol that I wanted to go to my sister.
17. I have not been told about the Flores agreement, our rights, or what is going to happen to us.

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

June 12, 2019
Date

Certificate of Translation

I, Genevieve Grabman, certify that I am fluent in English and Spanish and that I read the above declaration to K [REDACTED] G [REDACTED] G [REDACTED] Q [REDACTED] in Spanish. Executed this 12 of June in McAllen, TX.



Genevieve Grabman

Center for Human Rights and Constitutional Law

EXHIBIT 28

Declaration of K [REDACTED] B [REDACTED] A [REDACTED] J [REDACTED]

I, K [REDACTED] B [REDACTED] A [REDACTED] J [REDACTED] declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. I am from Chimaltenango, Guatemala. My date of birth is [REDACTED] I am 17 years old.
2. I am the mother of K [REDACTED] E [REDACTED] A [REDACTED], who was born [REDACTED] in Mexico. I gave birth in a hospital in Mexico. I had a cesarean. I had the stitches taken out and then came to the United States.
3. I am currently detained at the Ursula Processing Center together with my newborn daughter.

Medical Issues

4. I crossed the river into Texas with my newborn daughter on Tuesday, June 4, 2019. Two people carried me because I was having trouble walking. My left leg hurt a lot.
5. When we encountered Border Patrol, they had to help me up into the vehicle.
6. They took us to the perrera, the dog pound. My daughter and I were put in a pen with other moms and children. The mothers were older than 18.
7. I sat on a bench that was in the cage, but I could not sleep. My leg hurt me so much. I was kept in the perrera for four days (three nights). I did not sleep at all because I was in so much pain.
8. I asked to see a doctor and complained about the pain. The doctor said that the pain was normal and that I would be fine.
9. I was really worried about my baby. I was exhausted and could not hold her. Other mothers carried her for a time. I was afraid to fall asleep and have her drop. I ended up putting her on the bench so she could sleep.
10. The cage had a toilet and a sink with water but no soap. I could not wash my hands or my baby.
11. On Wednesday, June 5, I was trying to go to the bathroom but could not walk. An officer told me to wait. The officer was able to find a wheelchair, which I have used since then.
12. The guards only gave us juice and cookies the four days I was in the perrera. I was not producing a lot of milk because I was not getting water. Finally, the guards gave me two water bottles. Then, the milk started coming again.
13. At the perrera, the officers told me to throw away the backpack that had my baby daughter's clothes. The officers told me that I would be given clean clothes for my baby, but I have not received any.

Ursula

14. I was transferred to Ursula on Friday, June 7.
15. I am now in a cage with other girls. It's very crowded.

16. I am now in pain from the waist down. I am in such pain that I still can't sleep. The lights are on all night. I usually remain sitting in the wheelchair. I can not walk without falling. My left leg cannot support any weight. I just fall.
17. I have seen a doctor twice here at Ursula. They gave me a couple of pills that actually make the pain worse.
18. I have tried to lie down on the thin mattress officers give us for sleeping. It hurts more when I lie down than when I sit, so I remain in my chair.
19. It is very cold. My daughter is freezing. Her hands and feet are cold. She doesn't have clothes. My daughter and I are still in the clothes we traveled in. Another migrant lent me a sweatshirt for my daughter. I keep asking for new clothes for my daughter, but I have not received any yet.
20. I have not washed my baby because I don't have any clean or warm clothes for her.
21. My daughter is sick. She sneezes and has mucus running from her nose.
22. We do not have toothbrushes or toothpaste or towels.
23. I have not been able to shower or brush my teeth during the time I have been in detention. No one has helped me take a shower or otherwise bathe myself.
24. Officials was never told me about my rights under Flores.

I, K [REDACTED] B [REDACTED] A [REDACTED] J [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]
K [REDACTED] B [REDACTED] A [REDACTED] J [REDACTED]
June 11, 2019

CERTIFICATE OF TRANSLATION

I, Elissa Steglich, certify that I am fluent in English and Spanish and that I read the above declaration to K [REDACTED] B [REDACTED] A [REDACTED] J [REDACTED] in Spanish.

Executed this 11th of June 2019 in McAllen, Texas.



Elissa Steglich
University of Texas School of Law
727 E Dean Keeton St
Austin TX 78705
(512) 232-1387

EXHIBIT 29

Declaration of

L [REDACTED] L [REDACTED] M [REDACTED] G [REDACTED]

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

I was born on [REDACTED] and I'm 17. I am traveling with my son **D [REDACTED] C [REDACTED] M [REDACTED] G [REDACTED]** born [REDACTED]. We are from Honduras.

I came into the US at about 5pm. I walked for about two hours before I found an immigration agent. I was taken directly to the Ursula Processing Center where I have been held for 20 days today.

D [REDACTED] got sick with a fever and a cough after we were here for two days. I did not take him to the clinic because the other girls told me if I did I would stay longer. So I just put wet towels on his forehead. **D [REDACTED]** had gotten sick on the trip so I had medicine for him for fever, but when immigration grabbed me when I first came to the US they took it away.

I got the flu two days ago. I'm still a little sick. I didn't see the doctor.

I am held with my son in a cage. There about 60 people in my cages and more in some of the other cages. There are 6 cages in my area. They are all very very full.

There are narrow benches along three sides of the cages.. At the beginning they put all moms with children together, but now I'm with other girls who are 17 even if they don't have children. It's very crowded in the cage so much so that girls are lying down and the floor and there's not even enough room for the baby to crawl so I hold him all the time.

We sleep on the floor on a mat. I only have one mat. I only get one thin aluminum blanket for myself and my son. It's very cold all the time and I have trouble sleeping at night because of the cold. My son get so cold he feels frozen to the touch. The lights are on all the time. There is lots of noise all the time because they are girls and children who can't sleep and who cry a lot. We are all so sad to be held in a place like this.

When I got here, I got a ham sandwich. The ham was slimy. I got water. There is water in the cell but it tastes like bleach. I don't drink the water from the cooler because I'm afraid it will poison the baby because I'm still nursing. They give me a water in a bottle with each meal.

In the morning at 7 they give me something they call a burrito with rice and beans inside, an apple, a cookie and the water. They give me one jar of baby food for D[REDACTED]. I breast feed him. I don't make enough milk so I have to give him some powdered milk. It made him sick at first. He isn't getting enough to eat so I also feed him the rice from the burrito.

I don't get any snack and neither does the baby. The next time we eat is lunch at noon where we are given the same thing except the burrito has a little bit of chicken. Then we don't eat again until dinner at 4 when we get a sandwich with ham and lettuce, potato chips and an apple— every night the same. My son gets baby food. He also gets baby food at 7.

I get a cookie at 9. That's all the food until the morning.

The toilet and sink are outside the cell in another cage. The toilets are portable toilets. I do not have soap, towel or toothbrush. Every five days I get to shower. On that day, I get a toothbrush, but I can only use it then. I can only bathe the baby when I bathe.

In my cage there is a girl in a wheelchair. When she was in Mexico she got cramps and now she can't walk. No one is helping her. She's been here 4 days. An officer came and in front of all of us said it was a total lie that she was sick. Once when we were waiting to go into the shower, women officers came and told us that we got pregnant just to be able to come to the US and that we aren't worth anything.

No one has told me about my rights or about Flores. I have not talked with a lawyer or anyone else who can help me.

I, L [REDACTED] L [REDACTED] M [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]

L [REDACTED] L [REDACTED] M [REDACTED] G [REDACTED]

06/10/2019
Date

Certificate of Translation

I, Katherine Hagan, certify that I am fluent in English and Spanish and that I read the above declaration to L [REDACTED] L [REDACTED] M [REDACTED] in Spanish. Executed this 10 of June in McAllen, Texas.



Katherine Hagan

EXHIBIT 30

Declaration of

M■■■■ I■■■■ R■■■■-C■■■■ (■■■■■)

I, M■■■■ I■■■■ R■■■■-C■■■■ (■■■■■), declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My daughter, A■■■■ I■■■■ V■■■■-R■■■■ (■■■■■), was born on ■■■■■, she is one year old. We are from Honduras.
2. We were apprehended together, around June 8, 2019 after crossing the river at around 10 P.M. and walking for about two hours. They took us to Ursula Processing Station. The trip took about an hour and a half.
3. When we arrived here at the Ursula Processing Station, they took our extra clothes and belongings. We were wet, but we were not allowed to change before we were put into very cold cells. My baby has only been wearing a T-shirt, and diaper since we arrived. They have not given her pants or socks and she is extremely cold.
4. We were put in a small cell with many others and there was no room to sit. We were not able to sleep.
5. There was a jug of water in the cell but not enough cups so we had to share. There was no food for my baby.
6. They did not give me diapers for the baby until the next day. There is no sink or running water to wash the baby and we haven't been able to take a shower.
7. The day we arrived, my baby became sick. She she could not open her eyes and had a fever which got much worse during the day. I asked the guard for help and he told me to "just deal with it." I asked for help again, and was ignored. The third time I asked, I was crying because she was so much worse I was very worried for her. After two days, they took her to the doctor. They gave my baby acetaminophen and called in a prescription for an antibiotic. We didn't receive the amoxicillin until the next day.
8. Before we came here, my baby would eat several times a day, breast milk and solid food. Here she barely eats and only breast feeds in small amounts and is losing weight.
9. I am not able to eat or drink much of the food and water here and I can not sleep so I am not producing very much breast milk. I am very scared and anxious about my baby's health and safety and what will happen to us.
10. They have not let me call my husband who is in the U.S.
11. I have not been told about my rights or about what might happen to us.

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

[REDACTED]

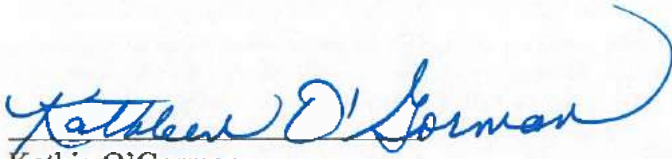
11/06/2019

M [REDACTED] I [REDACTED] R [REDACTED] -C [REDACTED]

Date

Certificate of Translation

I, Kathie O’Gorman, certify that I am fluent in English and Spanish and that I read the above declaration to T [REDACTED] V [REDACTED] L [REDACTED] in Spanish. Executed this ___ of June in McAllen, TX.



Kathie O’Gorman

Center for Human Rights and Constitutional Law

EXHIBIT 31

Declaration of

M [REDACTED] G [REDACTED] F [REDACTED] -B [REDACTED] ([REDACTED])

I, M [REDACTED] G [REDACTED] F [REDACTED] -B [REDACTED] ([REDACTED]), declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. I, M [REDACTED] G [REDACTED] F [REDACTED] -B [REDACTED] ([REDACTED]), was born on [REDACTED]. I am seventeen. I am also eight months pregnant. My due date is in July. I have been detained for 20 days now.
2. I am with my son, A [REDACTED] A [REDACTED] J [REDACTED] -F [REDACTED] ([REDACTED]), who was born on [REDACTED]. He is two years old.
3. My son and I are from Honduras. We left our country because my son's father, and the father of the baby boy I am carrying, abandoned me. My mother is in the United States, and I will need her help with my newborn baby and my toddler.
4. We came to the United States, on May 24, 2019. My baby and I crossed the river on a raft during the night. After crossing the river, we walked for a long time until we encountered an immigration post. We then turned ourselves into the immigration police.
5. The police did not offer us any food or drink; and, after an hour, they took us to another location with more detained people. There, we were offered food, water, and diapers for my baby. Then, after another hour, the immigration police took us to Ursula.
6. At Ursula, I was given water and diapers for my baby. At first, I was given a blanket and a mattress, but then, at 3:00 am, the guards took the blanket and mattress. My baby was left sleeping on the floor. In fact, almost every night, the guards wake us at 3:00 am and take away our sleeping mattresses and blankets. They leave babies, even little babies of two or three months, sleeping on the cold floor. For me, because I am so pregnant, sleeping on the floor is very painful for my back and hips. I think the guards act this way to punish us.
7. The temperature where we are kept is very, very cold. They raise the air conditioning at night. Without the blankets at night, the babies get sick.
8. The lights where we live and sleep are kept on all day and all night. We cannot sleep with the bright lights always shining.
9. In addition, there are many people crowded into the cell where we are kept. We are all packed together.

10. The bathrooms near us are very dirty. Sometimes, to punish us, the guards close the bathrooms and do not permit us to use the toilet. I am very pregnant, so I must urinate often. But when the bathrooms are closed, I just have to bear it.
11. In the twenty days my baby and I have been here, we have been permitted to shower only four times. We ask to shower more often, but we are told that we may not.
12. The food here is not appropriate for children, and it is making them sick. The food is of poor quality, of small quantity, and tastes very bad. I try to eat it so that my son will eat, but we both feel so sick from the food.
13. My baby has been sick here. One of the nicer guards let me take him to the doctor. The doctor gave my baby a flu test, and he tested positive. So the guards transferred us to another location one hour away, where there were only sick people. But that new detention site was even worse than Ursula because the food truly was bad there. I only spent one night there, thank God. I do not know why, but the guards then transferred us back to Ursula.
14. Although I am eight months pregnant, I have not seen a doctor here. I am worried because I do not want to get sick.
15. I also do not want to give birth here, because this place is not appropriate for a newborn. We would be crowded together with many other people, and it would not be clean. I am desperate to leave here. My baby is coming very soon.
16. I want to go to live with my mother, who is in New York. I called her several weeks ago, so she knows that I am here in the US and would like to live with her. But, when I have asked the guards here, they say that they do not know how I could leave to go to my mother. The guards just tell me that I must wait until my name appears on the list of people that may leave.
17. I have not been told about the Flores agreement or our rights. I have asked how I could leave from here, but the guards say that they do not know.

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

M [REDACTED] G [REDACTED] F [REDACTED] -B [REDACTED]

6/12/19
Date

Certificate of Translation

I, Genevieve Grabman, certify that I am fluent in English and Spanish and that I read the above declaration to M [REDACTED] G [REDACTED] F [REDACTED] E [REDACTED] in Spanish. Executed this 12 of June in McAllen, TX.



Genevieve Grabman

Center for Human Rights and Constitutional Law

EXHIBIT 32

Declaration of

M [REDACTED] S [REDACTED] T [REDACTED] P [REDACTED] ([REDACTED])

I, M [REDACTED] S [REDACTED] T [REDACTED] P [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 16 years old. I am from Ecuador. At the moment, I am detained at Ursula Station together with my daughter, J [REDACTED] S [REDACTED] A [REDACTED] T [REDACTED] ([REDACTED]). She is 8 months old. Her birthday is [REDACTED].
2. We came to the United States from Ecuador about June 4, 2019. When we got to Mexico, we took a car to Monterrey, and then a group of us crossed in a raft. We were stopped shortly after that by border patrol, and they took us to McAllen, where we were held for about 2 hours in a tent. We were brought to Ursula Station that same day, June 4, 2019.
3. When we got to McAllen I was hungry, and they gave me a salami sandwich, but no water. I was still hungry. I breastfeed my daughter. At McAllen, they gave me a diaper so that I could change her, but no diaper wipes.
4. When I arrived in Ursula, they took my fingerprints. I got a ham sandwich, and apple, and water. I was brought into a large fenced room, which is where we have been since then. We have not been allowed outside. In the room I am in there are about 12 other teenage mothers and their children. We were given one mat to sleep on the concrete floor, and 2 mylar blankets. My daughter sleeps on me. It's cold at night, noisy, and the lights are on all the time. It is very hard for us to sleep.
5. At Ursula, we are fed three times a day. For breakfast it's a tortilla with rice and beans, water, apple milk and chips. We don't get any snacks between meals. I get a bottle of water with meals but there is no other way to get water. I am often hungry.
6. At Ursula, I was able to shower the first day, and two days later. I have not showered in 4 days. My daughter and I showered together, so I have also not been able to wash my daughter in 4 days. I have been able to brush my teeth only once since I arrived, 7 days ago. I have not been given a hairbrush to brush my long hair. There is a sink but no soap or towels to dry my hands.
7. I have not been given any information about our legal rights as detainees. I have not been told how long we are here.
8. My older sister is in New Jersey. I would like to live with her.

I, M [REDACTED] S [REDACTED] T [REDACTED] 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]
M [REDACTED] S [REDACTED] T [REDACTED] P [REDACTED]

11/06/2019.

Date

Certificate of Translation

I, ANAH JACOB certify that I am fluent in English and Spanish and that I read the above declaration to M [REDACTED] S [REDACTED] T [REDACTED] P [REDACTED] in Spanish. Executed this ___ of June in McAllen, Texas.


ANAH JACOB 6/11/19

EXHIBIT 33

Declaration of
O [REDACTED] B [REDACTED] L [REDACTED] -V [REDACTED] ([REDACTED])

I, O [REDACTED] B [REDACTED] L [REDACTED] -V [REDACTED] ([REDACTED]), declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. I, O [REDACTED] B [REDACTED] L [REDACTED] -V [REDACTED] ([REDACTED]), was born on [REDACTED]. I am seventeen.
2. My son, M [REDACTED] O [REDACTED] V [REDACTED] -L [REDACTED] (no A#), was born on [REDACTED]. He is six months old. We are from Guatemala.
3. In Guatemala, I had lots of problems with my baby's father. He is an alcoholic, was very angry, and always would fight with me. When we would fight, I would cry, and my baby would get sick. I am all alone; my father is dead, and my mother married another person, so she cannot care for me. I couldn't stand that no one understands me and that my baby's father mistreats me. I worry for my baby, because I heard that the children of alcoholics die very young. So, I decided to leave.
4. We came to the United States on June 2, 2019. My baby and I crossed the river on a raft during the day. Fifteen minutes after we crossed, the police arrived in a truck. The police asked me where I was from, and I said, "Guatemala." They then took the clothes I was carrying and told me to climb into the truck.
5. The police took me to a location where there were other people who had crossed the border. The Border Patrol recorded my personal information. At this location, the Border Patrol offered us water. However, there were not diapers for my baby at this location.
6. Thirty minutes later, the Border Patrol bought my baby and me to Ursula in their patrol car. By now, it was night. We were not offered anything to eat or drink until the next morning. We were put in a cage with many other people, and we spent four nights there.
7. For our first four nights at Ursula, we were given only two aluminum blankets but no mattress. I had to sleep on the floor with my baby. It was very cold, and my baby got sick from the cold. He started to have green diarrhea.
8. After four nights, the guards at Ursula put me and my son in a cell for minor children. There, we were given a mattress.
9. The bathrooms here are very dirty because there are so many people using them. The toilets clog and cannot be used. And the smell goes everywhere, even to where we are sleeping.

10. Since the time my baby and I arrived, I have been permitted to shower only once, five days after I have arrived. I haven't had a shower since then, and it has been six days. The soap in the showers is for hands and not for hair, so my hair is itchy and dirty.
11. At night, our cell is very cold, and the lights are always left on. At least my baby sleeps, but I cannot. I noticed three days ago that my eyes have been affected by the lack of sleep. I can't see anything at a distance; everything looks fuzzy.
12. I am having trouble with the food. We often receive tacos of tortilla, beans, and rice. But the rice is partially raw and not fully cooked. This has made the rice hard to digest and has made me sick to my stomach.
13. We are given two bottles of water per meal. This water is clean because it is bottled.
14. My baby is sick. He is coughing, he is congested, and he has diarrhea.
15. I have asked for a doctor to see my baby. The doctor gave my baby medicine for his fever. The doctor said the baby has an ear infection and gave my baby antibiotics. But these antibiotics have also caused the baby to have diarrhea.
16. I want to go to live with my aunt, my mother's sister, who is New York City. I called her when I arrived at Ursula. She told me that I could come to her.
17. I have not been told about the Flores agreement or our rights. I have asked how I could leave from here, but the guards say that they do not know.

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

[REDACTED]
O [REDACTED] B [REDACTED] L [REDACTED] -V [REDACTED]

6/12/19
Date

Certificate of Translation

I, Genevieve Grabman, certify that I am fluent in English and Spanish and that I read the above declaration to C [REDACTED] B [REDACTED] L [REDACTED] -V [REDACTED] in Spanish. Executed this 12 of June in McAllen, TX.



Genevieve Grabman
Center for Human Rights and Constitutional Law

EXHIBIT 34

Declaration of

S [REDACTED] Y [REDACTED] M [REDACTED] C [REDACTED], [REDACTED]

I, S [REDACTED] Y [REDACTED] M [REDACTED] C [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 from Honduras.
2. I came to the United States with my son, C [REDACTED] A [REDACTED] V [REDACTED] - M [REDACTED] ([REDACTED]) on June 8, 2019. We have been in this facility (Ursula CPC) for 2 days. Before this we were in the "perrera" at the McAllen Border Station. I have been able to shower only two times. My baby got wet and I had to take his pants off two days ago and I have not been able to get any pants for him.
3. I have seen other teen mothers that have been here for more than 20 days.

I, S [REDACTED] Y [REDACTED] M [REDACTED] C [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.

6/15/19
Date

S [REDACTED] Y [REDACTED] M [REDACTED] C [REDACTED]

Certificate of Translation

I, Jodi Goodwin, certify that I am fluent in English and Spanish and that I read the above declaration to S [REDACTED] Y [REDACTED] M [REDACTED] C [REDACTED] in Spanish. Executed this 15th of June in McAllen, Texas.



Jodi Goodwin
Attorney

1221 East Harrison Avenue
Harlingen, Texas 78550

EXHIBIT 35

Declaration of
W [REDACTED] A [REDACTED] C [REDACTED] L [REDACTED], [REDACTED]

I, W [REDACTED] A [REDACTED] C [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 from Honduras.
2. I came to the United States with D [REDACTED] E [REDACTED] C [REDACTED] L [REDACTED] ([REDACTED]) and M [REDACTED] Y [REDACTED] C [REDACTED] L [REDACTED] ([REDACTED]) on May 26, 2019. We have been in this facility (Ursula CPC) for 21 days. I have seen other people that have been here for longer than me, but in the same cage where I am held the longest I have seen is 31 days here.
3. The temperature where I am at is ok during the day, but in the evening they put the temperature way down. I have to take my nephew and cuddle with his little body to keep him warm. There is another cage that is closest to the air conditioners and I feel bad for those children. They put the fathers with daughters in that cage and they are so freezing. I think it is as a way of punishing them and it makes me so sad.
4. There is no drinkable water available for me and the baby. The water that is in the jugs tastes awful like it is from a dirty well. The water available to wash or clean the baby smells like urine and I am not about to use that water to wash my baby. I have to wait until they give me water with a meal and I use a bit of that to clean him. I have also had to resort to stealing some wet wipes because they will not give them to me.
5. The food that we are getting here is not even suitable for dogs. The burritos they give us have rice and beans but the rice is not cooked. My baby cannot eat that. They give us a sandwich with lunchmeat that is not cooked and is just out of the freezer. It is not edible. I cannot give that to my baby. They give us two cookies each day, one for me and one for my baby, but I have to give both of them to the baby because he can't eat anything else they give us. Juice is not available and when I have asked for juice for the baby the officers have said NO. I have notice that the guards give the juice and snacks that are for the children to those that are "working" in the cages. So in order to get the food and drinks, the people detained with me have to "work" for food. It makes me sad because my baby has always been a very good eater. But since we have been here it has been very hard because he is hungry. The best I can do is give him another bottle to calm his hunger.
6. We only are given mats to sleep on about 9pm and they take them away from us at about 5am. We have been given two mylar blankets. The lights are on ALL the time and we can not sleep because every 15 to 20 minutes the guards are yelling something out. GET UP! COUNT TIME! GET UP.
7. The conditions are very crowded in the cage where I am at. There are about 75 people each night that I have been here. We sleep literally stacked on top of each other shoulder to shoulder. So many are sick.

On any given day there are at least 20 that are sick. They try to separate the ones that are sick, so that means that people come and go. But not everyone goes if they are sick.

8. I am very worried about my baby. He has not been seen by any medical professionals since I have been here. When I have asked about getting the baby seen, the officers come and touch him and say, he is just fine. Today was the first time that a doctor or any medical professional has seen him.
9. I have no place to wash the bottle that my baby uses. Every two or three days I try to beg the officers to give me a new one because I am worried about the cleanliness of the bottle.
10. I have been here without bathing for 21 days. I have seen that when we try to complain to the consulate about the conditions, then the offices want to know what we said. Then they start yelling at us saying things like "You don't belong here." "Go back to where you came from." "You are pigs." "You came here to ruin my country." They try to intimidate us. I have seen officers hit other detainees in the stomach and when they try to complain about it, the officers just comes and says...he didn't even feel a thing. They also intimidate us into not reporting these types of things. There is a person detained with me that speaks English so he is translating what the guards say about us. For reporting the officer hitting the detainee, the officers warned us that we would get 25 years in jail if we couldn't prove that he was hit by the officer. There are cameras and they could easily see what had happened. After the complaint, the officer came and told the person, "look, I am gonna let you go, just don't say anything about what happened here, ok?"
11. There is another child that is in the same cage with my other nephew, M■■■■, that was also hit by an officer. I was asked to report that to whoever I could. I have also seen a case of a special needs child that was here for more than 16 days and they finally let them out yesterday.
12. I would ask that I be given a phone call from the place. In 21 days I have not been given a phone call. We are completely incognito. I understand from my nephew, M■■■■, that he has been given two phone calls for only one minute to his aunt that lives in Houston and that when he asked if anyone has called about him to arrange his reunification, she said no one has called.

I, W■■■■ A■■■■ C■■■■ L■■■■, 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.

W■■■■ A■■■■ C■■■■ L■■■■

6/15/19
Date

Certificate of Translation

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, Jodi Goodwin, certify that I am fluent in English and Spanish and that I read the above declaration to
W [REDACTED] A [REDACTED] C [REDACTED] L [REDACTED] in Spanish. Executed this 15th of June in McAllen, Texas.



Jodi Goodwin
Attorney

1221 East Harrison Avenue
Harlingen, Texas 78550

EXHIBIT 36

Declaration of

Y [REDACTED] M [REDACTED] M [REDACTED] C [REDACTED]

I, Y [REDACTED] M [REDACTED] M [REDACTED] C [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 from Guatemala.
2. I came to the United States with my son, E [REDACTED] A [REDACTED] G [REDACTED] M [REDACTED] ([REDACTED]) on June 12, 2019. We have been in this facility (Ursula CPC) for 4 days. 3 days ago, my baby soiled his clothes. I had no place to wash the clothes so I could not put them back on my baby because when he went to the bathroom his poop came out of his diaper and all over the clothing. Since then, my baby of only 3 months has only been wearing a small little jacket made of t-shirt material. I have nothing else for my son to wear. I have been covering him up by opening up diapers and placing them against his body and then wrapping him up in bad pad. I can only use the bad pad until the cotton starts to fall out. I have been told that they do not have any clothes here at this place. I just want my baby to be warm enough. I am having to make sure that I carry my baby super close to me to keep his little body warm. I also have borrowed a jacket from another person detained with me just to keep him covered.
3. I have seen other teen mothers that have been here for more than 17 days.

I, Y [REDACTED] M [REDACTED] M [REDACTED] C [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]
Y [REDACTED] M [REDACTED] M [REDACTED] C [REDACTED]

6/15/19

Date

Certificate of Translation

I, Jodi Goodwin, certify that I am fluent in English and Spanish and that I read the above declaration to Y [REDACTED] M [REDACTED] M [REDACTED] C [REDACTED], in Spanish. Executed this 15th of June in McAllen, Texas.



Jodi Goodwin
Attorney
1221 East Harrison Avenue
Harlingen, Texas 78550

EXHIBIT 38

Declaration of E [REDACTED] R [REDACTED] G [REDACTED] E [REDACTED] ([REDACTED])

I, E [REDACTED] R [REDACTED] G [REDACTED] E [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 from Honduras.
2. I fled Honduras for various reasons. My father has never taken care of me and has never been a father to me. My father is an alcoholic and I have only seen him a limited number of times throughout my life. Also, my mother began a relationship with another man who has been in jail and will be released soon, but I am afraid of him. I fled with my niece because I have always taken care of her since she was a baby.
3. I presented myself at the port of entry to immigration officials on or about Saturday, June 08, 2019. I didn't say anything and officers asked us to wait next to the bridge with other minors. During this time, officers asked for my birth certificate, as well as my niece's – they wrote down our information. After about 20 minutes of waiting, an immigration officer began to call each minor by name and they called me and my niece. They took my cell, my niece's earrings, a ring – which they put in a bag. They made me take off my shoelaces and they threw them away. I also had some over the counter medicine, which they made me throw me away.
4. After this, the officers put me in a vehicle with minors, but they were all male. My niece and I were the only girls. There were nine of us in the vehicle, but no officer in the back with us, only the officer that drove. We drove for about 15 minutes and we arrived to the "perrera" or dog cage.
5. We got off the vehicle and entered the perrera building. They called our names individually and then we lined up to have a medical person look at us. The medical person only checked each of us for a few seconds, mostly looking at our arms. We got no medicine, nor did they ask us any questions. After this quick revision, we each grabbed a juice, cookies, and an aluminum blanket – and sat on a bench. The medical person came back out and told us to stand up, and did second medical look for about 2-3 minutes. She asked us to stretch our arms and looked at us, my stomach, my head, and temperature.
6. After this, we sat down and waited on the bench. Officers allowed the male minors to go to the male perrera with other boys. My niece and I stayed there and waited about another half hour – my niece and I each received a sandwich (two slices of bread, 1 slice of ham, and lettuce). My niece and I were called back to the medical room, where they checked my niece and confirmed that she had some virus and gave my niece medicine. The medical person however did not explain what virus my niece had, nor what medicine she was giving her. The medical person also gave me a pill because I had contact with my niece, but they didn't explain what the pill was. This is the only time we received medical attention in this perrera.
7. After this medical visit, officers put me in the hallway with a small mattress and two aluminum blankets for my niece and me. My niece and I got masks to cover our faces. There were other people in the hallway, all were sick. An officer called me and told me to leave my niece in the hallway – my niece was crying

and I felt bad leaving my niece. I was scared because I thought they were going to separate me from my niece. The officer took my fingerprints and returned me to the hallway. My niece was very upset when I returned, it took a while for her to calm down. I was in this hallway for about 1.5 hours – my niece began to sweat and her fever had finished.

8. After this, an officer called my niece and me and told us to sit on a bench. They then put us in a vehicle with other adults, there were about 12-15 people in the vehicle. There was not an officer in the back of the vehicle with us, only the officer that was driving. We drove for about 30 minutes or so and arrived at the current center (Weslaco CBP Processing Center).
9. I arrived at the Weslaco center around midnight on Saturday night June 8 (Sunday morning, June 9). Officers told us to get out of the vehicle and we waited outside for about 10 minutes. Officers began to call us by names, then a medical person came out and told us to stand up. This person checked us for about 2 minutes, she didn't say anything to us.
10. From here, we entered the building and stood in line. The officers told us to get a juice for my niece and from there I entered my cell with my niece. The officer told us would be crammed in there, but I'd figure it out. There were many people in the cell, all were crammed into a cell – we didn't fit. The cell was dirty – there were paper strewn everywhere and I had to sit next to the toilet because that was the only place that was left. The toilet smelled and it was dirty – it was full of paper, the trash was overflowing.
11. I was full of anguish. I felt horror to see where we were and I was worried about my niece. I tried to cover her with the aluminum blanket to keep the strong stench from her at least. I was also scared because my niece was sick and I didn't know how she was supposed to get better in that place that was dirty and with so many other people. I wasn't able to sleep.
12. My niece and I have been detained in this center with other adults this whole time.
13. The next morning, officers yelled at us to wake up. They also banged on the windows with a hard object. They would startle me and my niece would wake up scared. The officers would stand outside the cell and we would all line up inside the cell, however we could fit, to get our breakfast from the guard at the door. They gave my niece a burrito, cookie, and a juice; they gave me a sandwich (two slices of bread and a still frozen piece of ham). We tried to eat in the cell, but my niece didn't want to eat the burrito or the cookie because she didn't like them – she didn't know that type of food. I also couldn't eat much because the food was bad and we had to eat next to the dirty toilet. Lunch and dinner on this Sunday went the same way; and it has been the same the entire time we've been here. Each of the three – four meals we receive are the same, as stated above.
14. The officers also yell and bang the doors and windows for dinner or for an evening snack (around 9 or 10 pm). Officers wake up the children or force us to wake up the children, otherwise the officers do not give us food for the younger children, like my niece. I especially did not want to wake up my niece because she was still sick or recovering from a high fever.

15. Every day has been the same the four days that my niece and I have been detained here. We are locked up in the cell every day – the door is locked. We are not able to go outside or allowed outside of the cell. The toilet is in the cell and is only separated from the rest of the cell with a short wall, but everyone can still see. I feel very uncomfortable using the restroom in that cell. I try to use my aluminum blanket to give some privacy when I use the restroom.
16. My niece gets medication twice a day and I receive the same pill once a day. The medical person explained that the medicine was so that I didn't get the virus and that my niece got the virus so her medicine helps fight off the virus, but they didn't explain what my niece has. However, they also have not explained what the medicine is, or any side effects, or anything I need to look out for with this medicine.
17. This whole time I have been detained, I have not been allowed a shower, nor has my niece been allowed to shower. I have also not had an opportunity to brush my teeth. I haven't asked to shower or for a toothbrush because I have heard other people ask for a bathroom or toothbrush but officers get angry. They have said many things, including "you're not in your country," and "you're being punished here, not to be asking for things."
18. On Monday morning, my niece had a very high fever of about 39 degrees Celsius (about 102 degrees Fahrenheit). I was worried that being detained in the cell, being crammed with so many people, and the lack of good food is what has also made it worse for my niece. However, again on Tuesday night my niece had fever again and I asked the medical person for help. They told me to go to my cell and that they would be there later and they gave my niece more medicine while we were in the cell. It is difficult for us to fully get better because new people are coming in that are very sick, while others are trying to recover but they get sick again because of the new illnesses that come into the cell.
19. There was a nine-year-old little girl that was detained in the same cell as me, but she was by herself. She cried for her dad, but none of the officers paid any attention to her. The little girl was already here in this center when I arrived and she was taken from the cell on Tuesday, June 11, 2019. I do not know what has happened to this little girl.
20. I hope that my niece and I are allowed to go with my sister, [REDACTED] [REDACTED] [REDACTED] [REDACTED] ([REDACTED]) who lives in Ft. Walton, FL. She is my niece's mother.
21. Officers did not explain my right to speak with my consulate. I have not spoken with my consulate.
22. Officers have not told me anything about why I am detained, about the immigration process, where they are going to send me, or what's next.
23. I do not have a lawyer and have not spoken to a lawyer. I have not spoken with my consulate nor have I been told that I have the right to see my consulate.
24. Officers have not allowed me to speak to anyone – no family members in my home country or in the United States.

I, E [REDACTED] R [REDACTED] G [REDACTED] E [REDACTED] ([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.

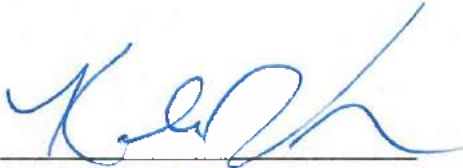
[REDACTED]
E [REDACTED] R [REDACTED] G [REDACTED] E [REDACTED] ([REDACTED])

06-12-2019
Date

Certificate of Translation

I, Karla M. Vargas, certify that I am fluent in English and Spanish and that I read the above declaration to
E [REDACTED] P [REDACTED] E [REDACTED] - E [REDACTED] ([REDACTED]) in Spanish.

Executed this 12th of June 2019 in Weslaco, TX.



Karla M. Vargas
Texas Civil Rights Project
1017 W. Hackberry Ave.

EXHIBIT 39

Declaration of
N [REDACTED] C [REDACTED] O [REDACTED] V [REDACTED], [REDACTED]

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

"My date of birth is [REDACTED]. I am from San Marcos, Guatemala.

1. I began travelling to the United States on May 26, 2019 with my common-law husband, G [REDACTED] C [REDACTED] V [REDACTED] A [REDACTED], whose date of birth is [REDACTED], and his father, M [REDACTED] E [REDACTED] V [REDACTED] I [REDACTED], and my son, A [REDACTED] G [REDACTED] O [REDACTED] V [REDACTED], whose date of birth is [REDACTED]. I left Guatemala for several reasons, one of which was to have a better life for my son. It is very difficult to care for a child in Guatemala. We travelled through Mexico until we arrived at the border between the United States and Mexico on May 31, 2019.

2. I was apprehended on or about May 31, 2019 when I met some border patrol agents. We arrived at a center after a short ride, and the border patrol agents separated me from my partner and his father, and put them in separate cells.

3. The agents took all of my extra clothes and all of the things I had to take care of my baby, including food. Shortly after we arrived, they gave us sandwiches and juices. We were to sleep on the floor. I tried to sleep, but it was difficult because an agent called me out to interview me. There was only one bathroom, and we had to use the bathroom in front of everyone else in the cell, which was very full. My baby did not want to eat, and I was struggling to feed him. I would have to give him water with a cap from a water bottle.

4. After almost one day in the center, they collected a large group of people, including the people that I had travelled with and others. I was able to travel with my partner and his father. When we arrived at another center, agents separated me and my baby from my partner and his father once again. The agents placed me in a cell with other minor children. The group that we travelled with had a lot of children, and I counted around 5 to 7 cells full of children. The cell that I was in was full of children around my age, some of them had their own children.

5. I was held in the second center for about eight days. We were given blankets to sleep on the floor. There were very few bathrooms for the number of people who

were there, and there was always a line. Sometimes, little kids could not wait and would urinate or defecate on themselves while waiting in line. I could see my partner, who was located in a cell across from mine, but we could not talk to each other. When we tried to talk, they would yell at us.

6. A few days after we arrived, I heard from another detainee that they were releasing a group of kids with their parents. I saw that my partner was in the group that was going to be released, and I asked a guard who told me that the group he was in was going to be released. I was hurt and sad when I saw that I wouldn't be released with him. After he left, I began to cry. I couldn't understand how I could be left behind like this.

6. After my partner was released, I began to feel really bad, physically. I developed a bad cough and my throat started to hurt. I started to have a runny nose. I noticed, however, that when others in my cell would ask to see a doctor, they were told that they would only be seen by a doctor if they had a fever, so I did not ask for medical attention.

7. For food, we were given the same food each day, which consisted of bottled water, some milk, an apple, cookies, and a microwaved burrito. The food was not appetizing, but I knew that I had to eat. My baby was still having a hard time eating, and I would try to breastfeed him or give him a bottle. Sometimes he would refuse to eat at all. I noticed that he was starting to have diarrhea.

8. When I saw that my son had a fever, I went to ask for medical attention to an agent and explained that he was sick. The agent asked me to wait for a few minutes outside of the cell for someone to come and check on him. After a few minutes, a nurse came and checked my son. She gave him some medicine. The next day, a nurse returned to give him more medicine and she gave me some medicine too.

9. I was tired and dirty and I wanted to be able to take a shower. The agents would advise us that they would give us an opportunity to take showers. There were about twenty-eight showers in the center, and they would count us off in groups. There were more people in the center than spots in the groups to shower, and so I did not have an opportunity to take a shower.

10. After over a week in the second detention center, the agents told me that I was going to be moved again, because I was sick. My baby also had a cough. We were moved in a small group with some other children and some adults to a third center.

11. At the third center, in Weslaco, Texas, where I am currently detained, we are given the same food. I have finally been able to take a shower, but I was not able to wash myself well because I had to carry my son, who is too young to walk. Although he got very clean I was still not able to fully shower myself. I have not seen a nurse or a doctor. I asked when I will have an opportunity to see a nurse or a doctor and they told me maybe tomorrow or the next day. My son is still suffering from diarrhea. I still have not had an opportunity to speak with my partner, or anyone from my family.

12. I constantly feel sad when I think about being detained here. I often start crying when I think about having to stay. I have been told by agents that they will move me to a foster home, and I hope that is soon, because it is better than being detained here.

13. I have several cousins and aunts in Tulsa, Oklahoma. My step father is in Tulsa, Oklahoma, and I would like to be released to him. His name is W [REDACTED] and his phone number is [REDACTED].”

Certificate of Translation

I, Erin D. Thorn Vela, certify that I am fluent in English and Spanish and that I read the above declaration to N [REDACTED] C [REDACTED] O [REDACTED] V [REDACTED] in Spanish. Executed this 12th of June in Weslaco, Texas.



Erin D. Thorn Vela

I, N [REDACTED] C [REDACTED] O [REDACTED] 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]

N [REDACTED] C [REDACTED] O [REDACTED] V [REDACTED]

06-12-2019

Date

EXHIBIT 40

Declaration of

A [REDACTED] F [REDACTED] L [REDACTED] P [REDACTED], [REDACTED]

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

1. I am 17-years-old and my date of birth is [REDACTED]. My daughter, D [REDACTED] E [REDACTED] L [REDACTED] P [REDACTED], was born on [REDACTED].
2. We are from a very small town in San Marcos, Guatemala, and I speak Mam and Spanish.
3. We left Guatemala in the end of May to come to the US. We crossed the border near El Paso on or around June 3, 2019. Since that time, we have been held by Border Patrol for over 14 days.
4. I crossed the border in the afternoon around 5 or 6 pm in the afternoon. The border agent took me and my daughter to an outside pen with a lot of people in it. I can't even say how many people were in it. There were too many to count.
5. After about an hour, they transferred us to a cell inside a building. They held us there for about 6 hours. At about 3 am in the morning they transferred us here to the Clint Border Patrol station.
6. We are being held in a room about 30 feet by 20 feet. There are so many people in the room and no windows. There are bunkbeds but not enough of them. My daughter and I have been sleeping on the floor with just a blanket, no mattress for two weeks.
7. I am the only one with a baby sleeping on the floor. The other mothers with babies have a bed. I am in a "girls only" cell, with a toilet separated by a partial wall. The girls help each other by holding up blankets for some privacy when we go to the bathroom.
8. I wish I could get clean. I've only been able to take a quick shower, maximum 3 minutes, two times since I've been here. And they let me brush my teeth twice but they took the brush and told me they were throwing it away. I have not changed my clothes in the entire time I have been in this facility. I cannot really wash clothes because there is nothing to put on while we wash them. We are also not given any soap with which to wash the clothing.
9. Every day they give us the same food: one packet of oatmeal and a juice in the morning, ramen soup for lunch and a burrito for dinner.
10. My daughter is still nursing but she needs food as well. I think the food here gave her diarrhea. About a week after we got here my daughter started to get really sick. When we went to the nurse, the nurse gave me new clothes to change her. She had not had a change of clothes before that.

11. After we saw the nurse, the agents took me and my daughter to the hospital for a few hours where she got fluids through an IV.
12. During the two weeks we've been here they have let us outside about 5 times for about 20 minutes each time. Otherwise, there is nothing to do all day but sit in the cell and sleep.
13. I was allowed to call my parents a couple of days ago after over 10 days in custody. I miss my mother so much. I don't know when they will let me out of here. I just want to go live with my sister in Tennessee.

I, A [REDACTED] F [REDACTED] L [REDACTED] 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]
A [REDACTED] F [REDACTED] L [REDACTED] P [REDACTED]

June 17, 2019
Date

EXHIBIT 41

Declaration of A [REDACTED] M [REDACTED] O [REDACTED] R [REDACTED], [REDACTED]

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

1. I came from El Salvador with my brothers who are 11 and 19 years-old. I am 15 years old. My birthdate is [REDACTED]. We came to be with our mother who lives in the United States because the gangs were threatening us. They came to our house and beat up our aunt and so we had to leave before they came back.
2. They took our older brother to another facility and then brought my younger brother and me here to the Clint Border Patrol Station two days ago. At first my brother and I were together, but then they said that he could not be in the same room.
3. A Border Patrol Agent came in our room with a two-year-old boy and asked us, "Who wants to take care of this little boy?" Another girl said she would take care of him, but she lost interest after a few hours and so I started taking care of him yesterday. His bracelet says he is two years old.
4. I feed the 2-year-old boy, change his diaper, and play with him. He is sick. He has a cough and a runny nose and scabs on his lips. He was coughing last night so I asked to take him to see the doctor and they told me that the doctor would come to our room, but the doctor never came.
5. The little boy that I am taking care of never speaks. He likes for me to hold him as much as possible.
6. We live in Room 203 with 25 children. I estimate that it is about 10' by 15'. The first night I slept on the concrete ground and used the blanket to cover me because it was so cold. I could not sleep because I was so cold and my head hurt. Yesterday, some of the girls left and so I was able to get one of the beds. Last night, the little boy and I were able to sleep in the bed together. Today a nurse got mad at us because a comb is missing. Two girls asked to use a comb, but only one was returned. We are not allowed to keep combs, so they came in and took out all of the beds and all of the blankets in order to punish us. Now we will have to sleep on the floor.
7. In our room, there are two toilets and a sink. One toilet is out in the open and the other is in a stall with no door so there is no privacy when we go to the bathroom. There is no soap.
8. We eat in the same room. Some of the children have to eat on the floor. I have to change the little boy's diaper on the bed.
9. Since arriving here, I have never been outside and never taken a shower.

I, A [REDACTED] M [REDACTED] O [REDACTED] R [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]

A [REDACTED] M [REDACTED] O [REDACTED] R [REDACTED]

June 19, 2019

EXHIBIT 42

DECLARATION OF A [REDACTED] T [REDACTED],
[REDACTED]

I, A [REDACTED] T [REDACTED], declare that the following is true and correct to the best of my knowledge and recollection:

1. My name is A [REDACTED] T [REDACTED]. I am 16 years old. I was born on [REDACTED], in San Andrés Xecul, Department of Totonicapán, Guatemala, and I lived there with my grandparents until I left for the United States last month.
2. My grandparents speak only K'iché. I speak Spanish and K'iché. I attended school through the third year of basic primary school, taught in K'iché and Spanish, although I did not finish the year.
3. I left Guatemala on my own in May, to join my parents in the United States. I do not remember exactly how long the journey from Guatemala took me. I remember that I climbed the wall into the United States and walked for about 15 or 20 minutes before Border Patrol agents found me and apprehended me along with another Guatemalan boy who was about 17 years old. I did not know him in Guatemala; we met near the border and crossed together.
4. I crossed the border nine days ago with the other boy in the morning on the day we were apprehended. The Border Patrol agents had us remove our shoelaces and belts and took our backpacks, saying we would get those back later. Then they took us in their vehicle to a place with a lot of agents where they registered us. I think we drove for almost 40 minutes before we reached that place.
5. After they registered us, the same agents drove the two of us another 30 minutes to the place where I am now. I don't know the name of it, but the lawyer taking this declaration tells me that I am at the Border Patrol station in Clive, Texas.
6. Here they registered us again and gave us food. There was a health check, only questions, they did not take blood or do other tests and did not examine me.

7. The days here are all the same. In the morning we get oatmeal and juice. Then we rest and wait for cleaning. When they clean, we leave the room where we are and go into the courtyard. Afterward we go back into the cell and wait for lunch. Lunch is soup, juice, and a pudding. Then we wait in our cells some more. In the afternoon we can go into the courtyard to play football for 30 minutes. The courtyard is outside, so we can get some sun. Then we go inside again and wait for the snack in the afternoon, which is a cookie. Then we get dinner. Dinner is a burrito, juice, and a cookie. There are other cleanings, a total of four times a day, so we leave our cells each time for that.
8. There are no other activities. We don't have any crafts or indoor games, except for a card game. We don't have any books to read. We don't get anything to draw with or make with our hands. There is no television to watch. There are no classes. We don't get religious services. I pray, but I do it on my own.
9. The bathroom is outside the cells, by the courtyard where we play football, so we have to ask to use the bathroom. We can ask any time, but three times I've asked and haven't been able to use it. Two times it was because they were cleaning the bathroom, so I had to wait about 15 minutes until they finish. The third time they didn't give me a reason; they just didn't let me go. This third time was at night. I had to wait until morning. I felt bad because I really had to go. I've used the bathroom at night other times, so I don't know why it wasn't possible this time.
10. The agents tell us when we're allowed to brush our teeth. We get toothbrushes that we keep in our pockets. I have mine with me now. We also get little tubes of toothpaste that we share, five of us to a tube. I don't have any toothpaste with me now. Sometimes we brush our teeth twice a day. Sometimes it's once a day. Sometimes it's every other day. It really depends on the day.
11. I'm staying in a large room, maybe twice the size of the conference room in the Border Patrol station where I am making this declaration. Now there are 31 of us in the room, but at the beginning

there were a lot more. We only had a little space between us when we slept, and some people slept sitting up when we were most crowded.

12. We get cloth blankets. There are big mats, something like big exercise mats, that we sleep on. They're very big; three of us sleep on one.

13. Everybody in the room with me is under age 18, all boys. Some are 15. Some are as young as 13. Some are 17.

14. I have never been sick in the time I have been here, but others have. Others have gotten flu, coughs, stomach aches. When they get sick, they are able to get medicine.

15. I have had two showers in the nine days I have been here. We get a small soap and a small bottle of shampoo when we shower. I am wearing the same clothes I arrived in. I wash my socks when I take a shower. I have never washed any of my other clothes, including my shirt or my underwear, and the center here has not washed them for me, so my clothes are dirty. I don't feel good about this. I would like to be able to wear clean clothes.

16. The staff here haven't told me anything about what will happen in my case and whether I'll be able to live with my parents.

17. I've been able to talk to my parents twice in the time I have been here. The first time was for seven minutes. The second time was for five minutes. The first call was the day I arrived. I was able to make the second call because an official came around asking us how long we had been here. I had been here seven days, so I was able to make a call.

18. Seven minutes isn't long enough to talk to my parents. I would like more time. It would be good to get at least 20 minutes, and to be able to call my parents every other day.

19. The officials here should tell us how long we are going to be staying here and what will happen next. They should also give us a little more food. The amount of food we get really isn't enough, so I'm hungry later in the day.

I make this declaration under penalty of perjury under the laws of the United States. This declaration
was read to me in Spanish, a language in which I am fluent.

[REDACTED]

A [REDACTED] T [REDACTED]

Date: 19-June-2019

Certificate of Translation

I, MICHAEL BOCHENEK, certify that I am fluent in English and Spanish and that I read the above
declaration to A [REDACTED] T [REDACTED] in Spanish. Executed this 19th day of June, 2019, in Clint, Texas.



MICHAEL BOCHENEK
Human Rights Watch
350 Fifth Avenue
34th Floor
New York, NY 10118

EXHIBIT 43

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

Declaration of A [REDACTED] F [REDACTED] T [REDACTED] C [REDACTED]

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

1. I am 14 years old and my date of birth is [REDACTED]. I come from a province called Jalapa in Guatemala. I came to the US with my mother A [REDACTED] I [REDACTED] C [REDACTED] N [REDACTED] [REDACTED], my sister Y [REDACTED] E [REDACTED] T [REDACTED] C [REDACTED] [REDACTED] and my niece G [REDACTED] I [REDACTED] G [REDACTED] T [REDACTED] [REDACTED]. My mother has raised my niece, G [REDACTED], since she was born, and my niece calls my mother "mama."
2. We had to leave Guatemala because my father is abusive. We crossed the border on June 13, 2019 around 9 at night. They put us in a cell by around 3 in the morning. It was cold. For the first two nights, we didn't have blankets or any mattress.
3. After two days we saw that other people got aluminum foil blankets, so we asked for them. We were so very tired because we didn't sleep at all for those first nights. After we got the foil blankets I have slept a little but it's hard to rest because the lights are always on, all day and all night. My mom started to get a fever and sore throat on the second day. I have a fever now and a sore throat.
4. We weren't allowed to take a shower for five days after arriving. Finally, today we were allowed to take a shower, but we haven't been allowed to change or wash our clothes. We've asked for a toothbrushes to clean our teeth but they say there aren't any.
5. This morning they put us in a new cell. It is so cold. I was shaking so hard and my little niece was very cold too.
6. I am afraid of the guards. On Saturday, I was trying to leave our cell to go to the bathroom and a guard said, "where are you going?" I said, "I'm going to the bathroom." He said, "you don't even say thank you." Then he pushed me in the chest back into the cell and slammed the door. After that, they locked the door to the cell and we have to ask for permission to go to the bathroom. I don't want to ask to go to the bathroom because I'm afraid they are going to yell at us.
7. The food here is not enough. In the morning they give us a burrito and sometimes juice. They don't give any milk to my niece, who is two years old. For lunch and dinner, there give us spaghetti or hamburger but not much of it. For dinner they give us a hot dog. The food is not good, and I feel hungry.
8. We haven't been outside since we've been here. There is nothing to do in the cell. We are so bored and scared.

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

9. I don't know what's going to happen to us, if they are going to release us or separate my mom from my niece. I just want to get out of here all together.

I, A [REDACTED] F [REDACTED] T [REDACTED] C [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.

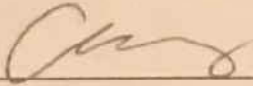
June 18, 2019

June 18, 2019

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

Certificate of Translation

I, Clara Long, certify that I am fluent in English and Spanish and that I read the above declaration to A [REDACTED]
F [REDACTED] T [REDACTED] C [REDACTED] in Spanish. Executed this 18 of June in El Paso, TX.



Clara Long
Human Rights Watch
350 Sansome St. Ste. 1000
San Francisco, CA 94104

EXHIBIT 44

Declaration of A [REDACTED] J [REDACTED] E [REDACTED] M [REDACTED]

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

1. I am 11 years old and my date of birth is [REDACTED]. I come from La Union, El Salvador. I came to the US with my identical twin brother A [REDACTED] N [REDACTED] E [REDACTED] M [REDACTED] and my sister A [REDACTED] C [REDACTED] E [REDACTED] M [REDACTED], who is 19 years old and her son, K [REDACTED] U [REDACTED] B [REDACTED] E [REDACTED], who is three years old. My parents are in New Jersey.
2. We crossed the border on June 7, 2019 in the morning. They took us first to a tent area. That's where they separated me and my twin from my sister and her son. Since that time, for 13 days, we have been in Border Patrol detention.
3. We are being held in a cold cell. We sleep on the floor on mats with blankets. I have only been permitted to take a shower twice in the almost two weeks we've been here. We've been allowed to brush our teeth once.
4. About three days ago I got a fever. They moved me alone to a flu cell. There is no one to take care of you there. They just give you pills twice a day. I also am having an allergic reaction all over my skin. My skin is itchy and red and my nose is stuffed up. Two times they gave me a pill for it but not anymore.
5. The food here is the same every day. There is oatmeal in the morning. I don't like it, so I don't eat it. In the afternoon there is soup. In the evening, they give us a burrito.
6. There is nothing to do all day, just watch television. They let us out of our cell twice a day for a few minutes but other than that we just sit there. We cry a lot and the other kids in the cell also cry. There was a four-year old boy in my cell for 15 days. He said he came with his father, but they separated them. It's so ugly to be locked up all the time.
7. When they separated us from my sister, we lost contact with my family. My sister had a paper with my parents address and phone number on it, and she also has that information memorized. I don't know my parents' number. I have asked the guards here twice if they can ask my sister for my parents' phone number. They took her name but did not say they would ask her for my parents' number.

8. We haven't been able to speak to anyone in my family until we met with the lawyer here today. No one from the detention center has tried to make contact with our family. We are all alone. Every time I talk about my family I start to cry.

I, A [REDACTED] J [REDACTED] E [REDACTED] 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]

A [REDACTED] J [REDACTED] E [REDACTED] M [REDACTED]

June 19, 2019
Date

Certificate of Translation

I, Clara Long, certify that I am fluent in English and Spanish and that I read the above declaration to A [REDACTED] J [REDACTED] E [REDACTED] M [REDACTED] in Spanish. Executed this 19 of June in Clint, TX.

A handwritten signature in black ink, appearing to be 'CL', is written over a solid horizontal line.

Clara Long
Human Rights Watch
350 Sansome St. Ste. 1000
San Francisco, CA 94104

EXHIBIT 45

Declaration of C [REDACTED] R [REDACTED] A [REDACTED]

I, C [REDACTED] R [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 son is V [REDACTED] H [REDACTED] S [REDACTED] and he is one-years old. His date of birth is [REDACTED] and his [REDACTED] [REDACTED] I am traveling with my son and my husband, D [REDACTED] P [REDACTED] d [REDACTED] N [REDACTED] [REDACTED].
2. We crossed the border near Juarez, Mexico on June 7, 2019. Since that time, for 11 days, we've been held in Border Patrol detention. They separated us from my husband. I haven't spoken him since we came in and they haven't let him see his son. They keep telling me we can't leave here until there is "space," but I don't know what space they mean.
3. My son, V [REDACTED], is not eating well here in detention. They give us burritos in the morning and the evening and some bread at lunchtime. It's not the food he is used to and he doesn't eat very much of it. I think he is hungry.
4. For the first ten days we were here, they held us in a tent. We slept on the floor with a mattress and a blanket. The lights were on all the time. I was worried about scorpions biting us.
5. We've only been able to take a shower once in the whole time we've been here. It was about a week after we got here. I felt so dirty and my baby was so dirty too. He has a cold and a runny nose.
6. Today they moved us to a new cell inside the building. There are a lot of families in there and it's very cold. We haven't spent the night in that cell yet but there doesn't seem to be enough space for everyone to lie down at the time. I don't know what we will do to sleep tonight.
7. We have been in here for so long and we haven't been allowed to talk to anyone in my family. I know they are so worried about us and it makes me so anxious.

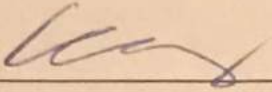
I, C [REDACTED] R [REDACTED] A [REDACTED], swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Portuguese, a language in which I am fluent, and was read back to me in Portuguese.

June 18, 2019

June 18, 2019

Certificate of Translation

I, Clara Long, certify that I am fluent in English and Portuguese and that I read the above declaration to C [REDACTED]
R [REDACTED] A [REDACTED] in Spanish. Executed this 18 of June in El Paso, TX.



Clara Long
Human Rights Watch
350 Sansome St. Ste. 1000
San Francisco, CA 94104

EXHIBIT 46

Declaration of

C [REDACTED] V [REDACTED] I [REDACTED] G [REDACTED]

I, C [REDACTED] V [REDACTED] I [REDACTED] G [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 from Guatemala and I traveled with my aunt and cousin around and we left Guatemala April 24, 2019. We crossed the border around June 3, 2019 and were picked up by the "migra." They took us by car to a place. They asked if my aunt was my mother and when I said no, they separated me from her and my cousin.
2. I was taken to this place on June 4, 2019 and I have been here for 15 days. I have spoken to my mother, who lives in Delaware, only once since I have been here – after being here for 10 days. I am sad because I miss my mother. I don't know why I am still here.
3. Before I spoke to my mother last Friday, I spoke to a woman who told me I was being moved that day or Monday. But I was not moved on Monday and I am still here.
4. I live in a room with 13 girls, 2 who have babies. About 5 days ago, S [REDACTED] Y [REDACTED] C [REDACTED] [REDACTED] who is 4 years old arrived. The guards told another girl who was 17 years old to take care of S [REDACTED]. But this girl left and so I began to take care of S [REDACTED] since she was all by herself.
5. S [REDACTED] is also from Guatemala and told me that she traveled to the United States with her father who dropped her off with someone and went home. S [REDACTED] was supposed to meet her mom but she doesn't know where she lives or her phone number. When S [REDACTED] arrived, she cried a lot.
6. The guards asked me to bathe S [REDACTED] the day before yesterday. This was her first bath since arriving 4 days before. I brushed S [REDACTED]'s teeth after every meal.
7. This morning at around 6am a guard came into the room and read off a list of people's names. He told all of the people whose name were on the list to come with him. S [REDACTED]'s name was on the list, but mine was not. It was early in the morning, so S [REDACTED] and I were asleep side by side. S [REDACTED] heard her name and clung to me, crying. I had to explain to her that they had called her name, and that she had to go along without me. It was hard to have to tell her that. She did not want to go with a group of people that she does not know, and they did not tell her where she was going. S [REDACTED] looked back at me as she joined the group that had been called. Tears were running down her face. I felt very sad but did not want her to see me cry.
8. Since I have been here, I have not been able to wash my clothes.
9. At breakfast, I eat oatmeal and a pudding and juice. For lunch, I eat soup, a juice, and a cookie. At 3pm, we get to eat a cookie for a snack. For dinner, I eat a bean burrito, a pudding, and a juice. At 9pm, we get a cookie. But sometimes I am still hungry.

I, C [REDACTED] V [REDACTED] I [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]
C [REDACTED] V [REDACTED] I [REDACTED] G [REDACTED]

June 20, 2019

Certificate of Translation

I, Katherine Hagan, certify that I am fluent in English and Spanish and that I read the above declaration to C [REDACTED] V [REDACTED] I [REDACTED] G [REDACTED] in Spanish.



Katherine Hagan, MTS, CHI
1873 Columbia Alley
Eugene, OR 97403

June 20, 2019

EXHIBIT 48

DECLARATION OF E [REDACTED] S [REDACTED] Y [REDACTED],
[REDACTED]

I, E [REDACTED] S [REDACTED] Y [REDACTED], declare that the following is true and correct to the best of my knowledge and belief:

1. My name is E [REDACTED] S [REDACTED] Y [REDACTED]. I was born on [REDACTED] in El Progreso, Yoro, Honduras. The lawyer who is taking this declaration from me tells me the immigration agents have listed my year of birth as [REDACTED], but that is wrong; I was born in [REDACTED]. I am now detained in the Border Patrol station in Clint, Texas.
2. I left El Progreso with my 26-year-old uncle in May 2019 to travel to the United States. I don't remember the exact date when we crossed the border, or the place where we crossed. I remember that one day in the morning we passed a wire fence and went to some buildings that looked like offices, with a big sign that said, "Welcome to the United States."
3. The immigration officials took us to a big room, sort of a warehouse, where we spent the night. The room was full, really full. I don't know how many people there were. We had blankets made of nylon that night. We didn't get mattresses, although there were a lot of hard mattress-shaped things on the floor. I don't know what these were, but they were harder than wood. Some people slept on those. There was water to drink, but it tasted a bit salty and warm, a bit strange. We spent the night in that place without taking showers. We didn't have toothbrushes or toothpaste in this place. There were toilets there, four of the kind of plastic toilets that they use for construction sites. The toilets had toilet paper and hand disinfectant, but everything, all the waste, was right there in the bottom so they smelled a lot. These toilets were outside the big warehouse where we slept. We had to ask to use the bathrooms, but I didn't have any problem when I asked to use the toilet. I used them twice when I was there.

4. From there, my uncle and I went by bus about two hours to a place they called the *hielera*, because it is very cold. We spent two days in the *hielera*. This place had a lot of people; it was very, very full. I was in a cell with my uncle. There were men and women in the same cell. I remember three men in all, including my uncle, each with kids. There were a lot of women in the cell.

5. The bathroom in the *hielera* was in the cell with us. There is no door or wall covering the front of the bathroom, so you can see inside it when people are using it. When I had to use it, my uncle covered the entryway with the blankets we had.

6. There were no mattresses in the *hielera*, not even the weird hard ones that we had in the first place. We slept directly on the ground with the nylon blankets. We slept on the floor near the toilet.

7. We were not able to shower while we were in the *hielera*. We didn't have toothbrushes or toothpaste there. There also wasn't any water to drink, not even in bottles or in a big container. The only time we drank was when we ate. Then we had some juice we could drink, but not water.

8. The *hielera* was cold, really, really cold. It was exactly as if we were inside a freezer.

9. I left the *hielera* after two days. That's when they separated my uncle and me. They said he couldn't enter the United States, so he would be deported. A Border Patrol officer took me and an older boy in a car to this place where I am now. It took a long time to reach here; I don't remember how long.

10. There are 37 of us in the cell here. All of us are under 18. All of us are girls, except for one little boy. There are three 16-year-olds and one 14-year-old, and girls of other ages. There's also a three-year-old boy there that the girls are taking care of. He cries a lot for his mother, so we try to comfort him. He's not anybody's brother in the cell. I think he came on his own. I don't know why he's in the cell with us.

11. We spend time just lying down. We watch movies even though the sound is off. We're allowed to go outside to spend time in the sun every few days. I've been outside four times in the 13 days I've

been here. I think maybe we spend an hour outside each time. We also go outside the cell when they clean. We stand in the hallway then.

12. There are some books we can read, but they are all torn up. We don't have any other activities—we can't draw or do crafts. There is no school.

13. I've been here 13 days. It's a long time. Some children have been here longer. One girl has been here 22 days.

14. The food we get is a burrito, a juice, and a cookie, and also a pudding, for dinner. For lunch we get a soup, also with juice and a cookie. Breakfast is oatmeal and a juice. I would like other food. I've asked if we can get tortillas with rice and beans, but we can't change the food.

15. I've taken four showers since I've been here. That's when we're allowed to brush our teeth also. We don't have toothbrushes or toothpaste at other times.

16. I have one change of clothes. They haven't been washed. I've been wearing the same shirt and the same underwear since I've been here. When I take a shower, I have to put on the same dirty clothes. A girl gave me some tights when she left, so I've been wearing those. The day before yesterday, the jail here gave me the sweater I'm wearing. They also gave me some socks earlier.

17. I have some cousins in Houston who are willing to care for me. I don't know when I will be able to live with them. The officials here tell me I will be sent to a shelter in Houston first while they investigate my cousins, and then I can live with them. I don't know when I will go to the shelter or how long it will take for them to investigate my cousins.

I make this declaration under penalty of perjury under the laws of the United States. This declaration was read to me in Spanish, a language in which I am fluent.

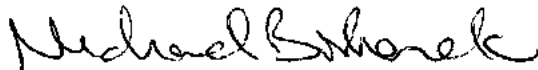
[REDACTED]
E [REDACTED] S [REDACTED] Y [REDACTED]

Date: 6/19/2019

Certificate of Translation

I, MICHAEL BOCHENEK, certify that I am fluent in English and Spanish and that I read the above declaration to

in Spanish. Executed this 19th day of June, 2019, in Clint, Texas.



MICHAEL BOCHENEK
Human Rights Watch
350 Fifth Avenue
34th Floor
New York, NY 10118

EXHIBIT 49

Declaration of

**E [REDACTED] Y [REDACTED] F [REDACTED] C [REDACTED], [REDACTED]
Mother of E [REDACTED] T [REDACTED] M [REDACTED] F [REDACTED], [REDACTED]**

I, E [REDACTED] Y [REDACTED] F [REDACTED] C [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 from El Salvador. I am the mother of E [REDACTED] T [REDACTED] M [REDACTED] F [REDACTED]. Her date of birth is [REDACTED]. Today is E [REDACTED]'s five-month old birthday.
2. I was apprehended with [REDACTED], my 20-year old sister who is 8 months pregnant, and her 3-year-old son. We crossed into the U.S. by land and presented ourselves to border agents on or about June 14, 2019. We were taken to a facility that was very cold. We were each given an aluminum blanket.
3. After about 2 or 3 hours E [REDACTED] and I were taken by bus to the Clint facility, where we have been ever since. My sister and her son stayed behind. Yesterday, they told me my sister was released and is going to a place she can live with family. I wish E [REDACTED] and I could be released too.
4. I have been at the Clint facility for about 3 days. I don't want to be here. I feel like I have been incarcerated. When I think of the days that E [REDACTED] and I have already spent here, I start to cry.
5. At Clint I am fed three times a day. For breakfast it is oatmeal with jello and juice. For lunch I have soup, juice, and a cookie. For dinner, I have a burrito, jello, and juice. They have milk but only give it to the babies. There is water here and we can drink it any time with cups.
6. I am breastfeeding E [REDACTED]. I do not know if baby formula is available.
7. The room we are in is very crowded. There about 30 people in a room, including about 4 kids younger than a year and a few who are about 9 years old.
8. I wish I could wear clean clothes. I have been wearing the same clothes for days. My pants were dirty when we got here so officials took mine and gave me another pair to wear. I'm still wearing my own shirt, but it is dirty and has stains from breastmilk on it. My socks have a hole and are dirty. E [REDACTED] has also been wearing the same clothes for days. We have not been given an opportunity to change.
9. The first two nights here we had to sleep on the floor without a mattress. Last night was the first night we were given a mattress. The lights are turned off from 11 pm to 5 am. It is cold in the room all the time. I have a lot of difficulty sleeping here. It's so cold it's making people sick. I worry that E [REDACTED] and I will get sick from the cold.
10. The bathrooms do not have any walls. There is no privacy. Everyone can see me when I am using the toilet which is humiliating. We can wash our hands in the bathroom but there is no soap to use. E [REDACTED] and I have not been allowed to bathe since we were apprehended. We have also not been given toothbrushes or toothpaste.

11. Some of the guards here at Clint are mad a lot of the time. When we ask them things, they respond in an angry way. I'm scared to ask them to raise the temperature because I don't want to make them more angry. All of us feel scared of the guards getting angry. One day I was crying because I didn't want to be here. A male guard came up and said to me, "Why did you come here if you don't like it?" When I think about what he said, I start to cry. It is so difficult to be here. At times I am sobbing.
12. There is a nurse here but neither E [REDACTED] or I have seen her. I don't think that there is a doctor here. I don't know if there are any counselors, social workers, or mental health professionals here.
13. I don't know when I will be released. I want to go live with E [REDACTED]'s father in Washington, D.C. He is here legally. However, yesterday an official who was a woman told me that I would have to be here one and a half to two weeks longer. Even though I want to live with E [REDACTED]'s father, they said that there wasn't space available for us anywhere else. Other girls have told me that they have been here 20 to 26 days. The girl whose mat is next to mine said she's been here more than 20 days. Whenever I think of how long other girls have been here, and how long E [REDACTED] and I might be here, I start to cry. This is not a place where children and babies should be. Just like me and E [REDACTED], other girls here have family members who can care for them in the United States.
14. I don't know if I can call my mother.
15. I have not been told about any rights my daughter or I may have under Flores.

I, E [REDACTED] Y [REDACTED] F [REDACTED] C [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.

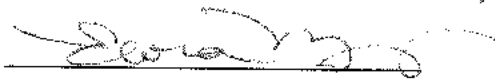
[NAME]

6 77 2019
Date

- 16. There are children who are very young here, only two or three years old, and their mother is not with them. They cry for their mothers all the time. Other children who are older try to take care of the little ones. It is an incredibly sad situation.

Certificate of Translation

I, Elora Mukherjee, certify that I am fluent in English and Spanish and that I read the above declaration to
E ■ Y ■ F ■ C ■ in Spanish. Executed this 17 of June in Clint, Texas.



[NAME OF TRANSLATOR]

[ORGANIZATION]

[ADDRESS]

Elora Mukherjee
Morningside Heights Legal Services, Inc.
Columbia Law School
435 W. 116th Street
New York, NY 10027
212-854-4291

EXHIBIT 50

Declaration of

G [REDACTED] M [REDACTED] M [REDACTED] A [REDACTED]

I, **G [REDACTED] M [REDACTED] M [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 17 years old. I am from El Salvador. I came with my younger brother, **Y [REDACTED] A [REDACTED] M [REDACTED] A [REDACTED]** who is 13 years old and with my older brother, **N [REDACTED] d [REDACTED] J [REDACTED] L [REDACTED] A [REDACTED]**, who is 25 years old.
2. When I got to the U.S., Border Patrol got me within 5 minutes or so. They took me to a place with tents, and they took my fingerprints, and gave me a number.
3. The main reason I left El Salvador because the gang MS 13 was threatening us. I lived there with my older brother and my younger brother. The older one has a business, and MS 13 was telling him he had to give them \$5 every day. When he couldn't do that anymore, they started coming to my school to find me and tell me they were going to hurt me and do horrible things to me. I didn't go to school for 2 weeks, and I was terrified. I couldn't leave my house. My mother and father are both in the United States, so I wanted to come to live with them to be safe.
4. I was allowed to talk with my mother yesterday, but it was only for 1 minute. The guard told me to hurry up, and he made me hang up after just 1 minute. I have been here at Clint Border Patrol for 7 days.
5. When they brought me to the tent place, it was about 2 in the afternoon. I was in the tent about 1 hour. They gave me a burrito and apple juice, but they told me to eat fast, and I was so scared my hand was shaking, and I couldn't drink the juice.
6. They separated me from my brothers there. They put me in a room that was freezing, and three other girls there gave me a sweater to try to keep me warm. I was still freezing. There were 2 blankets on the floor that were like aluminum, but the officials didn't give me one. There were 4 of us in the room.
7. I slept on the floor until they woke us up at about 2 in the morning to look at my documents, and at 4 they woke us up again to bring me here (Clint Border Patrol Station).
8. When I got here sat on the floor until 11 in the morning. They gave me oatmeal, juice, and a chocolate pudding. I eat what everyone else here eats, and I'm always really hungry. Between lunch and dinner, I can get 1 cookie, but that's all. I'm losing weight.
9. I can't see my younger brother who is also here. I asked permission to see him, and they said "No." There was one day when he asked, and they finally let us see each other for about 3 minutes. I was very happy to see **Y [REDACTED]**, but it was very hard, too. I don't know where my older brother is. I think he is in prison and will be deported, but I don't know.
10. I told the guard yesterday that I felt sick, because I had a sore throat. I went to the doctor, and she said I had a little fever, but she didn't look at my throat. She gave me a piece of candy and sent me back to the room I was in. I felt worse later—my throat hurt more—and when I asked to see the doctor again, the doctor

said she was very busy and I should go back and wait. I went back again and had to wait an hour. She didn't do anything to help. I feel sicker today. My throat is very sore.

11. The room I'm in had about 40 girls in it at the beginning, but now it's mostly very small children. There are about 28 now. Two of them, a girl who is 4 and another who is 5, don't know their names and don't know where they're from. The 4-year-old has been here a long time, and the other about 10 days. They don't have a mother or father to care for them, so 2 girls are taking care of them.

12. There are 8 bunk beds and 2 mats on the floor for sleeping. The smaller ones sleep in the beds, and the ones here the longest time sleep on the mats on the floor. The beds are next to one another, so we all sleep next to one another. I don't sleep much because the air bothers me.

13. The toilet is in the same room we're in. There is no curtain or anything. We try to hold a cover up when we use it, but the girls on the top bunk beds can see everything. There is water but no soap to wash our hands after using the bathroom.

14. The water they give us makes us sicker. It smells like chlorine.

15. One of the guards came in yesterday afternoon and asked us how many stripes were on the flag of the United States. We tried to guess, but when we were wrong, he slammed the door.

I, G [REDACTED] M [REDACTED] M [REDACTED] A [REDACTED], [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 19, 2019

G [REDACTED] M [REDACTED] M [REDACTED] A [REDACTED]

Certificate of Translation

I, Kathleen O'Gorman, certify that I am fluent in English and Spanish and that I read the above declaration to
G■■■■ M■■■■ M■■■■ A■■■■ in Spanish.



June 19, 2019

Kathleen O'Gorman
Illinois Wesleyan University
1312 Park Street
Bloomington, IL 61701

EXHIBIT 51

Declaration of

G [REDACTED] M [REDACTED] C [REDACTED] B [REDACTED]

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

1. My name is G [REDACTED] M [REDACTED] C [REDACTED] B [REDACTED]. My birthday is [REDACTED]. I am 7 years old. I am from El Salvador. I came with my Aunt K [REDACTED] L [REDACTED] A [REDACTED] C [REDACTED] and her female cousin. They are both big. We came to the United States because there were people who wanted to hurt us. There were people who had eyes on me whenever I went to school. My aunt, her cousin, and I looked for Border Patrol after we walked into the United States. We found them right away, and they told us to get into a car with the other people that we had come with.
2. From there they took me to a tent where it was very cold, and there were no blankets. My aunt, her cousin, and I slept on the ground in the tent. We spent the night there. I woke up in the very early morning. It was still dark outside. I was scared because my aunt was not there next to me anymore. My aunt's cousin told me that she wasn't there anymore because she was pregnant and the baby was on the way. I started to cry. Someone called my name about an hour later, and they took me to where my aunt was. She was sitting in a normal chair and was not connected to anything. I was very, very scared, but it was a relief to see her.
3. I was there with my aunt in a small room for just a little while. Then we were both taken outside. An officer told me to get into a car. My aunt was standing outside the car. They told me that she was not coming with me. I wanted to go back to where my aunt's cousin was, but they would not let me. When I went to go see my aunt, I did not know that they would not bring me back to my aunt's cousin. I felt like they had tricked me. A lady officer brought me here, to the Clint Border Patrol Station. Today is the fourth day that I have been here.
4. I am in room 203 with between 10 and 20 girls. On some days a nurse comes and brings two combs for everybody to share. One is a lice comb and the other one is a normal hairbrush. They leave the combs with the children in the room for about 15 or 20 minutes. Then someone comes back and tells us to give them back the lice comb and hairbrush.
5. Yesterday after lunch a nurse brought the lice comb and hairbrush. A little while later a guard came back and asked for the lice comb and hairbrush. He was bald and had a light complexion. When the guard asked for the lice comb and hairbrush, we did not know where they were. We looked at each other to see who had the combs. The guard was angry and asked in a rough voice who had the brushes. The other kids were scared, and so was I. I felt dizzy and started to cry. He said that we had ten minutes to look for the combs, and that if we could not find them, we were going to be without beds and without covers. He gave us ten minutes. All of us were panicked looking for the combs. We looked under the beds. Kids asked each other if they had seen the brushes.
6. He came back and yelled at us, asking if we had found the combs. We had to tell him that we couldn't find them. When we told him, officers came into the room and started taking everything away. They took pillows and blankets. We had a blanket that we were using to hold up in front of the bathroom

because there is not a door. The officer took even that one. He said that we were going to sleep in the floor. He said it was punishment for losing the combs.

7. What he said was true. We all slept on the hard tile floor last night. Nobody tried to climb into a bed because the guard said that they were going to take away anybody who tried to get into the bed. They told us that we could not have blankets anymore.
8. I asked to call my dad, who lives in Washington, DC. An officer took me out into the hallway to call my dad. I told my dad what happened. My dad asked to speak to someone who works in the place where I am being held. I passed the phone to a man officer, but I cannot remember what the officer said to my dad.

I, G [REDACTED] M [REDACTED] C [REDACTED] B [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]

G [REDACTED] M [REDACTED] C [REDACTED] B [REDACTED]

02 20 19
Date

Certificate of Translation

I, Katherine Hagan, certify that I am fluent in English and Spanish and that I read the above declaration to
G [REDACTED] M [REDACTED] C [REDACTED] B [REDACTED] G [REDACTED] in Spanish. Executed this June 20, 2019, in Clint, Texas.



Katherine Hagan, MTS, MS, CHI
1873 Columbia Alley
Eugene, OR 97403

EXHIBIT 52

Declaration of G [REDACTED] S [REDACTED] C [REDACTED] C [REDACTED], [REDACTED] with F [REDACTED] I [REDACTED] C [REDACTED]
C [REDACTED] (an Infant)

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

1. I came from San Vicente, El Salvador, with my baby son, F [REDACTED] I [REDACTED] C [REDACTED]. My baby is eight months old. His birthdate is [REDACTED]. His [REDACTED] [REDACTED]. My birthdate is [REDACTED]. I am 17 years old.
2. I left El Salvador because my baby and I were in danger from the gangs. They wanted money from me, but I don't have money and so they said they would kill us. My father and F [REDACTED] father both disappeared and so my older sister and I decided to come to the U.S. where our cousin lives because we were fearful for our lives.
3. My older sister's name is A [REDACTED] R [REDACTED] C [REDACTED] C [REDACTED]. She is 28 years old. I don't know her A number. They separated us shortly after we arrived in the U.S. about three weeks ago and I have not been allowed to speak to her ever since.
4. I don't know where we crossed into the U.S., but we came across a river. The Border Patrol were waiting for us as soon as we crossed the river, and they took us about half an hour away by car to a tent where there were a lot of people from Central America. At the tent, they gave us a bad tortilla, which I could not eat. They gave us no water at first, but then later, they gave us water after we asked for some. My baby had a fever and I had brought medicine for my baby but a U.S. government official made me throw away the baby's medicine. I explained that my baby was sick, but they made me throw away my baby's medicine anyway. He also made me throw away my baby's clothes, bottle, baby formula, baby food, and diapers.
5. We arrived at the tent area in the morning. It was very hot. There were too many people to fit inside the tent, including lots of children and young mothers with babies. I could not find shade, but I had a baby so people let me inside the tent. Other children and young mothers with baby were not able to be inside the tent. We waited there all day until the night came. It was very cold at night and they did not give us any blankets. The baby and I slept on the ground and tried to keep warm the best we could with body heat. They had taken my baby's medicine away and so his fever came back that night. I asked for medicine for my baby and the guard asked me, "Who told you to come here with your baby anyway?"
6. They woke me up at 4:00 a.m. and then took my baby and me to a place called the Ice Box. It took about an hour by car. They did not have a car seat for the baby so I held him in my arms. They did not have a seat belt for me.
7. When we got to the Ice Box, I told them that my baby was sick, but they would not give me any medicine. They had someone examine him and that person saw that my baby had a fever and so sent him to the hospital. The hospital gave him medicine (Amoxicillin) and then sent us back to the Ice Box.

8. They do not treat children well at the Ice Box. They gave us nothing to eat the entire time we were there except a cookie and some water. The water tasted ugly, like chlorine. It was very cold and the baby and I had to sit on concrete floors. They had thrown our clothes away and so we were freezing. I asked for a blanket but they only gave us a metal sheet.
9. In the afternoon, they brought us to Clint. It took about an hour by driving. There was no car seat for the baby and no seat belt for me. I just held him in my arms.
10. We have been here for 18 days and they never gave us a shower or bath until yesterday. It was the first time since we came to the U.S. that they let us use soap or wash our bodies. Day before yesterday, they finally gave us clean clothes. My son was sick and so his shirt had been covered with mucous. I tried to wash it the best that I could with water but they never gave us soap until yesterday. They only let me brush my teeth twice—ten days after we arrived and then three days later. They took the toothpaste and toothbrush away afterwards so that I can't brush my teeth. It makes me feel very bad not to be able to clean myself and my baby here.
11. I am always hungry here. They do not give us enough to eat. For breakfast, they give us one package of instant porridge and a pouch of juice. That's all. For lunch, they give us one bowl of soup, one cookie, and a pouch of juice. It is the same soup every day. We cannot get more than the one bowl. There are no snacks. For dinner, they give us one bean burrito, a cookie, and one pouch of juice. The baby is losing weight and so am I. I am nursing my baby and it is not enough nutrition for a breastfeeding mother. I cannot make enough milk to meet my baby's needs and they threw away his formula and baby food (baby cereal) so they gave him some food, but it is the same food they give us. His body could not process it so he threw it up and got diarrhea.
12. We sleep in a room with three bunk beds. There are about 25-30 people in the room. There are only beds for six people so we have to share them. The room is full of unaccompanied girls and mothers with babies. There were three mothers with babies, but now there are two. Four of us (two mothers with babies) share a mattress. The other mother and baby slept on the floor. Most of the girls sleep on the floor. Usually the oldest girls sleep on the beds and share a mattress. Usually the youngest children in the room sleep on the floor. Most of the children are all alone. One was only two years old. She came to the U.S. with her aunt, but they separated her. One of the girls tried to take care of her. Sometimes the 2-year-old who was all alone had to sleep on the floor. It is concrete. It is very cold. There are only two mats in the room and so most of the children on the floor sleep directly on the concrete. That little girl slept like that for most of the twelve days she was kept here. Most of the children in our room are kept here for weeks at a time like that—often sleeping on the concrete floor.
13. I don't know why they have kept us here for so long. I gave them the information for my cousin who lives in the U.S. the first day arrived here in the morning. Her name is M[REDACTED] Q[REDACTED] C[REDACTED]. Her telephone number is [REDACTED]. She says that I can live with her. They never called even called her until two days ago. They said that

they cannot send me to go live with her, but have to send me and my baby somewhere else and the people at that facility will decide where I go next.

14. I have asked to speak to my mother or sister (whom I came to the U.S. with) but the officials will not let me. I keep asking and they keep saying, "No."

I, G S C C 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.

G. S. C. C.

June 17, 2019

G S C C

Certificate of Translation

I, Kathleen O'Gorman, certify that I am fluent in English and Spanish and that I read the above declaration to G■■■■ S■■■■ C■■■■ Co■■■■ in Spanish.



Kathleen O'Gorman
Illinois Wesleyan University
1312 Park Ave.
Bloomington, IL 61701

June 17, 2019

EXHIBIT 53

Declaration of
J [REDACTED] V [REDACTED] S [REDACTED] M [REDACTED], [REDACTED]
Mother of I [REDACTED] M [REDACTED] C [REDACTED] S [REDACTED], [REDACTED]

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

1. My name is J [REDACTED] V [REDACTED] S [REDACTED] M [REDACTED]. I was born on [REDACTED]. I am the mother of I [REDACTED] M [REDACTED] C [REDACTED] S [REDACTED], who was born on [REDACTED]. We are from El Salvador.
2. I crossed the border into the United States by land on or about May 31, 2019. I crossed with my daughter I [REDACTED] and my thirteen-year old sister. We were walking, then approached by border patrol officers in cars. They took us in a car to a detention center called a *hielera* (an icebox), where we were detained for one or two hours. Then officers called our names and brought us here in a van. There was no car seat for I [REDACTED]; she sat on my lap. The van had about ten people in it, mostly girls.
3. My daughter, my sister, and I have been in the Clint detention center for 17 days. I feel sad here because I should be with my family. I miss my family and I really want to leave this place. I wish I could live with my father in Oklahoma. He has been in the United States for about ten years.
4. I have had a hard time here at Clint because both my daughter and my sister were sick. My daughter had the flu for five days, and my sister had the flu for seven days. My daughter had a fever, a cough, an infection in her eyes and ears, and a rash on her stomach, back, and legs. During this time, we were isolated in a room with other girls who were sick.
5. We are not permitted to bath or shower regularly here. We have only been permitted to shower two times in 17 days. Our showers are only five minutes long. My daughter's rash was terrible, perhaps because she could not bath and clean her skin. For the two times we could shower, we had access to soap. We have no access to soap at any other time.
6. We are not permitted to brush our teeth regularly here. The doctor let us brush our teeth two times in 17 days. We do not have toothbrushes or toothpaste at any other time.
7. We are locked in a room for most of the day. The room has no windows. It is very crowded with about 50 of us crammed in together. All of us are 17 years old or younger. Some of the children are one or two years old, like my daughter. There are about five mothers with children, including me. Some of the children are only five years old and do not have their mothers or fathers to care for them.

8. In the room, there are a few mats and cots, but no beds or mattresses. For the past several nights, my daughter, my sister, and I have been sleeping on the cement floor because there is no other place to sleep. There are not sufficient mats and cots for everyone. Before my daughter got sick, we were able to sleep on a mat. But then we had to be isolated with the others who were sick. When we were allowed to return to the room, someone else had occupied the mat that we used to sleep on. We now have no choice but to sleep on the cement floor. Each night about fifteen girls sleep on the floor. Sometimes in the middle of the night, at about 3 or 4 a.m., the guards will come to call people, which wakes everyone up.
9. During the day, the guards often close the door of our room. When this happens, my daughter feels so sad and starts to cry. She says she wants to leave, she wants to go out. I feel so sad too.
10. There is no privacy for using the toilets. Everyone can see me when I am using the toilets. At times I feel so embarrassed because there are boys watching me when I am using the toilets.
11. Every morning, we wake, then get breakfast, then return to the room until lunchtime, then get dinner, then stay in the room. We just sit around in the room all day. There is nothing else we can do. Only three times over 17 days, I have been allowed to go outside. Each time, I was allowed outside for only 20 minutes. I wish I could go outside with my daughter more often.
12. At times I am hungry here. Every day, we are given the same food: oatmeal and juice for breakfast; soup, a cookie, and juice for lunch; and a bean burrito, yogurt, and juice for dinner. There is no milk available for my daughter, my sister, or me. Sometimes I ask for more food, and the guards refuse to give it to me. "You have had your ration," they tell me. My daughter does not like the oatmeal.
13. For 17 days, my daughter and I have been wearing the same clothing. We do not have opportunities to wash our clothes. Our clothing is dirty. I wish we could change our clothes.
14. I have not received any information about when I will leave this place. I have asked an official when I am going to leave because I have been here so long. He only told me to have patience.
15. It seems that children who are here at Clint without their own children are often detained about ten days. Their time here can be longer if they sick, so that these kids are here for about two weeks.

16. But children like me who are here with our own children are detained longer. One teenage girl with a child was here for 23 days. Another teenage girl with a child was here for 21 days. I do not know why they are here so long.
17. There are some children here without their mothers who are very young, only two or three years old. The guards tell other girls to take care of these youngsters, even though some of the girls do not want to take care of such young children. There are a lot of children who are five or six years old who are here without their mothers.
18. One day I asked a teenager if she was the mother of a young baby girl who was only about six meses o one year old. The teenager said no. She said that she had to take care of the baby because the baby's mother was pregnant and had been taken to the hospital. The baby was here without her mother for eight or nine days. I felt very upset to learn this terrible information. I would never want my own daughter to be here alone without me. I have not seen this baby for a number of days.
19. I wish I had more opportunities to call my family. About five times, I asked guards if I could call my father. The guards let me call him about three times in 17 days, for only five minutes each time. I wish I could speak with my father more often and for longer times. Sometimes the guards say that they are too busy to let me make a phone call.
20. The guards here are both men and women. Some of them are mean. They do not smile.
21. I do not know if there are any counselors, social workers, or mental health professionals here.
22. I have not received an explanation of the rules here.
23. I have not received any information about the rights that my daughter, my sister, and I have under the *Flores* settlement agreement.

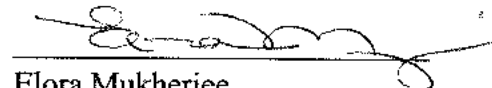
I, J[REDACTED] V[REDACTED] S[REDACTED] M[REDACTED], swear under penalty of perjury that the above declaration is true and correct to the best of my abilities. This declaration was provided in English and was read back to me in Spanish, a language in which I am fluent.

17-06-2019

Date June 17, 2019

Certificate of Translation

I, Elora Mukherjee, certify that I am fluent in English and Spanish and that I read the above declaration to J [REDACTED] V [REDACTED] S [REDACTED] M [REDACTED] in Spanish. Executed this 17th of June in Clint, Texas.



Elora Mukherjee
Columbia School of Law
435 W. 116th Street
New York, NY 10025

EXHIBIT 54

Declaration of K [REDACTED] A [REDACTED] R [REDACTED] L [REDACTED]

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

1. I came from Santa Rosa Barbarena, Guatemala. My birthday is [REDACTED] I am 14 years old.
2. I left Guatemala with my 18-year-old sister, A [REDACTED] C [REDACTED] R [REDACTED], because the gangs wanted us to join them, but we did not want to. We knew that they sometimes rape or kidnap girls who do not do what they want. That is what they did to girls in our old neighborhood so when they came to make us join us in our new neighborhood, we knew we had to leave and so we left a week later.
3. Our father, J [REDACTED] A [REDACTED] R [REDACTED] C [REDACTED], lives in Northern California and so we came to the U.S. so that we could live with him and be safe. His telephone number is [REDACTED]
[REDACTED] Our mother does not take care of us. She leaves for long periods of time and often yells at us. My sisters have raised me.
4. We crossed a small tributary on Friday and immediately an official met us and took us to an area with a tent about ten minutes away. They lined us up and checked our skin and our hair. Then they checked our birth certificates and other paperwork. That is when they took my sister away from me and now I am very worried about her. I don't know where she is or if she is ok. I am worried they will send her back to Guatemala and something will happen to her there because she would not join the gang.
5. Afterwards they took us to a building and placed me in a small room. It was freezing. I slept on the ground. It was concrete. There were other people in the room. One was a grandma and said she had been there for 20 days.
6. I am currently at Clint. I am in a room with about 50 children. There are three boys, ages about 2, 8, and 10 years of age. Another boy came today. I think he is about eight years of age. The rest of the children range from ages of about 4 to 17 years of age. There is one mother with a baby. There are ten bunkbeds and one single bed. If someone leaves a bed, you just have to grab it. The youngest children often have to sleep on the concrete floor. There are two large pads on the floor that sleep two or three children, and there are two pads that are very thin and sleep two children per pad. There are about twenty children who sleep on the concrete every night.
7. There are young children with no parents. There was an 8-year-old with no parent here who was trying to take care of a little 4-year-old girl. She did not know how to take care of a little girl so she kept asking me what to do, and I started telling her but then just started taking care of her myself. I take her to the bathroom, give her my extra food if she is hungry, and tell people to leave her alone if they are bothering her. She has been sick the whole time I have been taking care of her, and is coughing and has mucous. She doesn't talk hardly at all, just yes and no. She wears diapers and I change them for her. Her bracelet says her name is K [REDACTED] X [REDACTED] M [REDACTED] but I

don't know where they got that name. The roster says her birth date is [REDACTED] and her A number is [REDACTED].

8. I am also taking care of another little girl who arrived yesterday. The roster says her name is G [REDACTED] M [REDACTED] C [REDACTED] B [REDACTED] and her A-number is [REDACTED]. It says her birthdate is [REDACTED]. She said that she came to the U.S. with her aunt and cousin, but was taken away from them by the guards. Like me, she is very sad and crying all the time. Right now, I am holding both little girls in my lap to try to comfort them.
9. I need comfort, too. I am bigger than they are, but I am a child, too. I have not been able to talk to my father or my sister and I want to speak with them. It is very upsetting to be separated from our families.

I, K [REDACTED] R [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]

June 17, 2019

K [REDACTED] R [REDACTED] L [REDACTED]

Certificate of Translation

I, Kathleen O’Gorman, certify that I am fluent in English and Spanish and that I read the above declaration to K [REDACTED] R [REDACTED] L [REDACTED] in Spanish.



Kathleen O’Gorman
Illinois Wesleyan University
1312 Park Ave.
Bloomington, IL 61701

June 17, 2019

EXHIBIT 55

Declaration of
K [REDACTED] A [REDACTED] S [REDACTED] D [REDACTED]

I, K [REDACTED] A [REDACTED] S [REDACTED] D [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 from Guatemala. I am detained with my brother, J [REDACTED] E [REDACTED] S [REDACTED]. His birthdate is [REDACTED] and he was also born in Guatemala. I am age 15 and my brother is age 13.
2. My brother and I left Guatemala because the neighborhood that we lived is a very dangerous with a great deal of gang activity. My father abandoned our family when I was young. My mother came to the United States about eleven years ago. My brother and I were living with our grandparents who are now elderly. It was very difficult for our grandparents to care for us and protect us any longer.
3. We were apprehended by when we crossed the border. We presented ourselves at the border on or about June 9 or 10. We were taken into custody and taken to the *hieleras* for several hours.
4. After several hours, we were brought to the Clint CBP facility. We have been in this facility for about 9 days.
5. We have contacted our mother who lives in Maryland with our aunt and uncle. My mother wants to be reunited with us. We have her telephone number and we have provided her contact information to CBP authorities. No one at this facility has discussed a release plan. We do not know what is going on.
6. I am in a room with about 15 other girls. Some little girls are 3 and 4 years old. Their parents are not here, and they are expected to take care of themselves. I have to sleep on the floor because there are not enough beds for everyone.
7. My brother was in a room with about 25 other boys. Due to bad air circulation and others who were sick, my brother got the flu. He has been in a room with other boys who have the flu for the last day. He has been given medicine but is confined to the room with other sick boys.
8. My brother and I have been separated. We only see each other during meal times.

I, K [REDACTED] A [REDACTED] S [REDACTED] D [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]

K [REDACTED] A [REDACTED] S [REDACTED] D [REDACTED]

6-19-19

Date

Certificate of Translation

Certificate of Translation

I, Bill Ong Hing, certify that I am fluent in English and Spanish and that I read the above declaration to K [REDACTED]
A [REDACTED] S [REDACTED] D [REDACTED] in Spanish. Executed this June 19, 2019, in Clint, Texas..



Bill Ong Hing
University of San Francisco School of Law
2199 Fulton Street
San Francisco, CA 94117

EXHIBIT 56

Declaration of

I, [REDACTED] A [REDACTED] D [REDACTED] P [REDACTED] on behalf of N [REDACTED] S [REDACTED] D [REDACTED]

I, [REDACTED] A [REDACTED] D [REDACTED] 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 [REDACTED] I am from Guatemala.
2. I entered the United States at Ciudad Juarez with my daughter, N [REDACTED] S [REDACTED] D [REDACTED] who will turn 2 years old on [REDACTED] I turned myself and my daughter into Border Patrol around June 10, 2019. I fled Guatemala because my husband is in the Guatemalan army and the drug traffickers began recruiting him. They threatened him verbally that if he did not join them, they would kill me and my daughter.
3. Border Patrol took me and my daughter to a place in El Paso that had tents where I stayed with my daughter and about 60 mothers and children. I was there for about 1 day. My daughter had a cough and felt feverish so I asked to see a doctor. I don't know if this person was a doctor or a nurse. They took me to someone who just looked at my daughter and did not conduct an exam. This person said nothing was wrong with my daughter and did not prescribe any medicine.
4. At the El Paso location, we were only given a half cup of oatmeal and a cookie for breakfast, instant soup for lunch, and a juice and cookie for dinner. We were not given any fruit or milk for my daughter. They took our papers but did not allow us to state our case.
5. On Wednesday, we were given a hearing date in November 2019 and sent to Juarez. I was told there was no space in the shelters. I was afraid for my daughter's safety and we had no place to live and nothing to eat there.
6. Because it was unsafe, I crossed the border again and was picked up by Border Patrol. I was brought to Santa Teresa on Saturday, June 15, 2019. I stayed in a tent with about 65 mothers and children.
7. After a few days here, we were moved to a room because about five women had lice and they wanted to fumigate the tent. The room is much worse than the tent. There are about 40 women and children in the room. We have to sleep on the concrete floor, there are no beds or mattresses. Each person only gets an aluminum blanket. The room is very cold because the air conditioner is always on. We are scared to ask the guards to change the temperature. The room is so crowded there is not enough space to lie down. Many of us have to sleep sitting up. The overhead fluorescent lights are always on and it is difficult to sleep.
8. Children are not allowed to go outside. There are no windows in the room and no books or toys to play with. We have to eat our meals in the same place that we sleep, which is unsanitary.
9. For food, we get a burrito with an egg for breakfast. A ham and cheese sandwich for lunch and a dinner burrito with ground beef. N [REDACTED] will eat the egg but doesn't eat the sandwich or dinner. She has lost weight. We are given fruit at lunch which she eats. We are given water that we have to pour into our own bottles that we have to share and reuse. Sometimes the guards are nice and will give us a new bottle. Sometimes they won't. There are two bathrooms with sinks but there is no soap to wash hands inside the

room. The bathrooms have only half walls. There are no showers and we have to use the sink to bathe our children. I had to borrow soap from another woman who brought it with her.

I, I [REDACTED] A [REDACTED] D [REDACTED] 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.

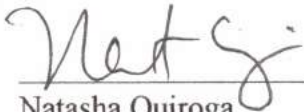
[REDACTED]

June 19, 2019

L [REDACTED] A [REDACTED] D [REDACTED] P [REDACTED]

Certificate of Translation

I, Natasha Quiroga certify that I am fluent in English and Spanish and that I read the above declaration to
I [REDACTED] A [REDACTED] D [REDACTED] P [REDACTED] in Spanish.



June 19, 2019

Natasha Quiroga
2325 15th St. NW #414
Washington, DC 20009

EXHIBIT 57

Declaration of M [REDACTED] O [REDACTED] M [REDACTED] O [REDACTED]

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

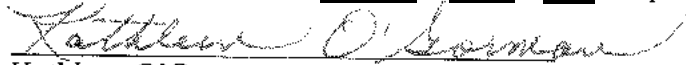
1. I came from Ignacio Zaragoza, Mexico. My birthday is [REDACTED] I am 15 years old.
2. My parents live in the United States and I tried to get paperwork from the police so that I could come to be with my parents, but my uncles previously were involved in the black market and so the police would not give me the paperwork, so I had to come to the United States without it because I wanted to come be with my parents. Mexico has become too dangerous. Last year they kidnapped my aunt and uncle and burned his head and hammered his knuckles until they were broken. The police do not protect my family.
3. I arrived in the United States nine days ago. I have been at the Clint Border Patrol Facility for nine days. There are many children here. I have been staying in a room with 25 children. There were no beds, only four mats. We would put two mats together and sleep six children on them. The rest of the children slept right on the ground, including little children. It is concrete. There are babies, as well as older children. They give us two blankets. One to put on the concrete and the other to put over us. There was a two-year-old boy who had been in quarantine because he was sick. There was another girl taking care of him, but she also got sick so when he was released from quarantine, I started to take care of him. I am the third teenage girl who have tried to take care of this little two-year-old boy. His name is E [REDACTED] A [REDACTED] D [REDACTED]. The roster says his A number is [REDACTED] and his date of birth is [REDACTED]. I feed him and give him water.
4. I also take care of another little kid. She calls me "Mama." Her name is A [REDACTED] S [REDACTED] C [REDACTED]. She is 6 years old. I have been taking care of her for three days. I try to comfort her and help her go to sleep. A [REDACTED] said that she came with her parents and her little sister and they separated her from her parents. Her dad told A [REDACTED] that the guards said that they would bring her to a place that was better for kids. She has been here for three days. According to the roster, her A-number is [REDACTED] and her date of birth is [REDACTED].
5. I, M [REDACTED] O [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]
June 17, 2019

M [REDACTED] O [REDACTED] M [REDACTED] O [REDACTED]

Certificate of Translation

I, Kathleen O’Gorman, certify that I am fluent in English and Spanish and that I read the above declaration to M [REDACTED] O [REDACTED] M [REDACTED] O [REDACTED] in Spanish.



Kathleen O’Gorman
Illinois Wesleyan University
1312 Park Ave.
Bloomington, IL 61701

June 17, 2019

EXHIBIT 58

Declaration of

M [REDACTED] J [REDACTED] R [REDACTED] R [REDACTED]

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

1. My name is M [REDACTED] J [REDACTED] R [REDACTED] R [REDACTED]. I was born on [REDACTED]. I am seventeen years old. I am from El Salvador.
2. On or about June 1, 2019, my mother and I crossed the bridge to enter the United States. We presented ourselves to border patrol agents, who then separated us. They refused to explain why they were doing so. Since that moment, I have not known where my mother is. I have not known if my mother was in the United States or elsewhere, or even if she was alive. I have been extremely worried about her.
3. After they separated us I was taken to a detention center people called "la casita." All the other people detained in the facility were 18 and older. They were all older than me. I was very uncomfortable. I was there for several days.
4. They did not let me make any phone calls there.
5. I was put in a cell with a lot of men, too many to tell. It was way too full and extremely cold. There were no beds, no matts, only the concrete floor. The lights were on all night. There was not enough room for everyone to lie down so I had hunch over while sitting and crumple up in a ball to try to sleep. I barely got any rest or sleep.
6. It was very dirty there. Our cell was filthy. It was never cleaned while I was there. There were toilets and a sink to wash your hands but no soap. I did not have the opportunity to shower there at all.
7. It wasn't long before I got sick with a high fever. However, I didn't get the opportunity to see a doctor until my second day of fever. I was given pills to bring my fever down. I don't what kind of medicine it was.
8. At la casita, food was not given out frequently and I was always hungry. I received food about two times a day. It was always miniature tacos. I didn't ask for more food. I was afraid to ask. I believed the guards wouldn't give me more because of the way I saw them treating other men.
9. I felt really bad there. I was worrying about my mother the whole time.
10. About several days I was transported to the Clint Station by car in the middle of the night. The drive here took about an hour. I was relieved to be out of the first place. The conditions here are better.

11. There is more space here and I am with boys closer to my age. I share a room with many boys. There are no windows. I do not know how many boys there are in my room. There are four boys in my room who are five years old. Here I have a mat and I am able to lay down. I am able to sleep more here because they turn the lights off at night then turn them back on in the morning. It's also not as cold as it was at the casita.
12. I get more food at Clint but I'm still hungry sometimes. It's the same food every day: oatmeal, a cookie, and juice for breakfast; instant ramen soup and juice for lunch; and a burrito, juice, and cookie for dinner. Sometimes the burrito has meat, sometimes it's only beans. There's no milk, fruit, or vegetables here.
13. I haven't seen a doctor since arriving here but I have seen a nurse. I didn't have a chance to bathe in the first location at all. At Clint I have been able to bathe once for two minutes. I have not had a chance to wash my clothing since crossing the border. They have not given me a toothbrush or tooth paste. I've been allowed to brush my teeth three times since crossing the border.
14. Here I've been allowed to go outside for a bit once in the morning and once in the afternoon. Sometimes I'm only allowed outside once a day. When I do get to go outside I play ball with the other kids.
15. To date I have not received any information about my rights under the Flores case. I do not know if there are any social workers or counselors here.
16. Several minutes ago, I had my first opportunity to make a phone call since crossing the border. The legal team from *Flores* who are talking with me today told me that they were able to find my mother and that I would be released to her soon. They arranged for me to call her a few minutes ago. I am so happy that I have finally been able to connect with my mother. I wish I could have been with her the whole time from June 1 through today.

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

M [REDACTED] J [REDACTED] R [REDACTED] R [REDACTED]

June 7 2019
Date

Certificate of Translation

I, Elora Mukherjee, certify that I am fluent in English and Spanish and that I read the above declaration to M [REDACTED] J [REDACTED] R [REDACTED] R [REDACTED] in Spanish. Executed this 17th of June in Clint, Texas.

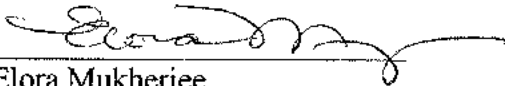

Elora Mukherjee
Columbia School of Law
435 W. 116th Street
New York, NY 10025

EXHIBIT 59

Declaration of M [REDACTED] J [REDACTED] S [REDACTED]

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

1. I am 14 years old and my date of birth is [REDACTED]. I come from a province called Xela in Guatemala. I speak Spanish and Mam. My Mam is better than my Spanish. Spanish is a bit difficult for me, but I am able to get through with some Spanish.
2. I came to the United States with a 33-year old family friend who was also a neighbor. When we got to the US border, we looked for a border patrol agent to turn ourselves in. I have been housed at the Clint facility for 21 days.
3. I was in the first cell for 7 days, sleeping with no mattress. We had fabric blankets in our cell but no mattresses. It is hard to sleep when you don't have a mattress. I then came down with the flu. I then went into the flu cell for 7 days.
4. When you are in the flu cell, you also sleep on the floor, but you have a mattress. They were 21 other kids in that space with the flu. I had a fever in there and I was shaking. Some of the other kids were vomiting. They all had fevers. No one was taking care of the kids with the flu. They were all teenagers. Now I understand that there are some small children inside the flu cell. I don't know who is taking care of them.
5. We were not allowed to leave the flu cell, ever. It was very boring. I did nothing to entertain myself nor was anything offered. It was sad, very sad. I felt locked up and closed in. In the other cells, we can go out of the cell to get water one time a day. They say we can go outside once a day but I don't go because I am afraid of them yelling at me. I've only been outside twice in the 21 days since I've been here.
6. After the flu cell I went into a new cell. There are about 30 people in the same cell with me. At first, I was sleeping on the ground, and then for the last five days I have been sleeping in a bed.
7. Every day we get the same food: oatmeal, instant soup and a burrito. It's not enough. In the afternoons I get very hungry. The burritos we are given are not filling.

8. I have not talked to any family since I've been here. I have not spoken to my mother and don't know why I have been here so long. I just want to get out of here.
9. When I finally leave here, I think I will be sent to a different place; we are told that we will go from here to a shelter. Sometimes when we ask, we are told we will be here for months.

I, M [REDACTED] J [REDACTED] 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.

17 de Junio 2,079

Date

M [REDACTED] J [REDACTED] S [REDACTED]

EXHIBIT 60

Declaration of

N [REDACTED] L [REDACTED] Q [REDACTED] D [REDACTED],
With G [REDACTED] Y [REDACTED] A [REDACTED] D [REDACTED]

I, N [REDACTED] L [REDACTED] Q [REDACTED] D [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 15 years old. My brother is G [REDACTED] Y [REDACTED] A [REDACTED] D [REDACTED]. His birthday is [REDACTED]. He's 6 years old. We are from Honduras. We arrived in the United States 8 days ago. We came alone. It took 2 months to get here. I
2. One of the reasons I left my grandma and aunt in Honduras to be with my mother here in the United States. She has lived here about 17 months, and I miss her a lot. I also want to get an education here. Another important reason was because it is so dangerous where I live because of the gangs. They are all around where I live, and it is so bad, I'm afraid to go out of my house. I am afraid they'll rape me or kill me, because I know they do that.
3. When they picked us up, they took us to a place that was a tent. I was there a short time. Then they took us to Clint Border Patrol Station, the place I'm at now.
4. They gave both of us a burrito, juice, and a piece of chocolate. We get the same food every day. We are hungry all the time here. We can't have food between meals if we're still hungry.
5. G [REDACTED] is still wearing the clothes he had on for our trip. They were washed one time. I am wearing the shirt I had on for the trip from Honduras, too.
6. I can't sleep, because the room we are in is so crowded. When we got here, some people had the beds already. There are just a few. So we have been sleeping on a mat on the floor. G [REDACTED] does sleep well.
7. We aren't allowed to go to the bathroom at night. I have to put diapers on G [REDACTED] at night since he isn't allowed to use the bathroom. He didn't wear diapers for years, because he is 6.
8. There is soap and water to wash our hands after we use the bathroom. The bathroom is outside of the room where we stay.
9. I don't want to go back to my country.

I, N [REDACTED] L [REDACTED] Q [REDACTED] D [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 19, 2019

N [REDACTED] L [REDACTED] Q [REDACTED] D [REDACTED]

Certificate of Translation

I, Kathleen O'Gorman, certify that I am fluent in English and Spanish and that I read the above declaration to N [REDACTED] I [REDACTED] Q [REDACTED] D [REDACTED] in Spanish.



June 19, 2019

Kathleen O'Gorman
Illinois Wesleyan University
1312 Park Street
Bloomington, IL 61701

EXHIBIT 61

Declaration of

S [REDACTED] P [REDACTED] T [REDACTED] G [REDACTED], [REDACTED]

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

1. My name is S [REDACTED] P [REDACTED] T [REDACTED] G [REDACTED]. My birth is [REDACTED]. I am 12-years-old. I am from Guatemala. My brother, M [REDACTED] A [REDACTED] T [REDACTED] G [REDACTED] ([REDACTED]), was born on [REDACTED]. He is 11 months old. I am here with my mother, Antonia Francisca Garcia-Aguilar.
2. I ran across a bridge with my mother and baby brother yesterday afternoon. We ran because it is dangerous on the bridge. There were border police at the end of the bridge, and they told us to get into a car that was parked there. Then they took us here, to the Santa Teresa Border Patrol facility. They told us to take out our shoelaces and the hair bands from our hair. Everything went in the trash. They took my jacket and my mother's jacket and put it in the trash. My mother had a shawl to wrap my baby brother in. The officer put shawl in the trash, too. My mother had a t-shirt for my baby brother, too, and she told the officer that she wanted to keep it in case it was cold inside and he needed it. The officer just said, "No. In the trash."
3. After that we went into a room where we sat on the floor. Someone brought us tacos and fruit punch. We were thirsty but there was not water to drink. An officer came in and gave us an ugly stare, like he didn't want people to be there. There was an adult man in the room who knew some English and translated what the officer said. The man said that the officer had said, "*Pinches chapines otra vez*" [Fucking Guatemalans again]. My mother wanted to ask for some water, but she was afraid to because of the man's stare and what he said. A woman came in and told me and my mom to lift up our shirts so she could see if we had anything under them. They looked in my hair and in my baby brother's hair to see if we had anything hidden there. They took pictures of my mother. They were going to take my picture but then said they weren't going to.
4. After that an officer yelled at us to come with him. He took us to a different room where it was very cold. He came back for us after a while and called me, my mom, and my baby brother out into the hallway. There were computers on tables out there. He showed my mom a sheet of paper and said, "Sign it, and I'll explain it afterwards." My mother told the officer that it would be better for him to explain what the document was about first, before she signed it. The officer said to her in Spanish, "*Tenés huevos para responder*" [You have balls, talking back]. When he explained that the paper was to deport us, my mother she said that she wasn't going to sign it. He said that it didn't matter, that they were going to take us to Mexico the next day anyway. He said, "So you're not going to sign it?" and when my mother answered that she wouldn't, he pulled the file folder back and slammed it shut.
5. That is when the guard took us back to the cold room, where we have been ever since. There are about 50 people there. They are all mothers and their children. There is no furniture there. There are only cement benches. And it's very cold. We asked an officer for a blanket but he told us that there were enough in the room and to ask around. We were freezing for four hours until an older woman lent us her

blanket. The concrete was frozen underneath us, so we put the elderly woman's blanket between us and the cold concrete. My mother tried to wrap her shawl around me and M [REDACTED] but it is not big enough to keep us all warm. I wish that they had let us keep our jackets and her other shawl. My baby brother cried all night and couldn't sleep because of how cold he was. The lights were on all night. It was very noisy, and other people were crying. My mother and I cried and began to pray.

6. We were starving when the guards brought breakfast around 8am this morning, because the last thing we ate was when we first arrived yesterday afternoon. They brought the same tacos and fruit punch that we received yesterday. My mother gives my baby brother corn porridge at home, along with carrots and other vegetables that he can eat. He doesn't drink powdered milk and only take my mother's milk. Here he can only have my mother's milk because there is no food for him. My little brother had a dirty diaper this morning, and I asked an officer for wet wipes. He brought them back after twenty minutes.
7. My little brother has gotten bumps on his neck since we got here. They showed up on his neck this morning, after we spent the night here. The guard who brought us in to do this interview asked my mom if we had seen a doctor. We haven't yet. My mother says she is thinking about whether or not to ask to see a doctor, because the guards respond in a rough way when other people ask for something.

I, S [REDACTED] P [REDACTED] T [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]

S [REDACTED] P [REDACTED] T [REDACTED] G [REDACTED]

6/19/19
Date

Certificate of Translation

I, Katherine Hagan, certify that I am fluent in English and Spanish and that I read the above declaration to S [REDACTED] P [REDACTED] T [REDACTED] G [REDACTED] in Spanish. Executed this June 18, 2019, in Clint, Texas..



Katherine Hagan, MTS, MS, CHI
1873 Columbia Alley
Eugene, OR 97403

EXHIBIT 62

7-29800
Declaration of

Y [REDACTED] A [REDACTED] M [REDACTED] A [REDACTED]. [REDACTED]

I, Y [REDACTED] A [REDACTED] M [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 13 years old. I am from El Salvador. I came with my older sister, C [REDACTED] M [REDACTED] M [REDACTED] A [REDACTED], [REDACTED] who is 17 years old and with my older brother, N [REDACTED] J [REDACTED] I [REDACTED] A [REDACTED], who is 25 years old.
2. The Border Patrol picked me up about 5 minutes after I got to the United States. They took me to a place with tents and gave me a number. There were about 50 males in the place they put me. It was freezing. They were all in a group from Honduras, and they were all ages, from 3 years old, to my age, to a lot older. My brother wasn't with me, and I was scared, because I didn't know what was happening to him or my sister. I was sleeping on the floor, and they called me at about 1 in the morning. The light was on all the time. I asked for water, but they told me "No," because I didn't have a bottle. After they called me, they called 2 other teenagers, and they put us in the room with my sister and the other 3 girls for about 20 minutes. They made us get in a line, and they brought us here in a van.
3. The main reason I left El Salvador because the gang MS 13 was threatening us. I lived there with my older brother and my sister. My older brother has a business, and MS 13 was telling him he had to give them \$5 every day. When he couldn't, they said they were going to come after him. There are a lot of the gang members in my school. They made fun of me about my braces. It got a lot worse, and they started following me home. There are about 20 people killed every day in my community, so I was really scared, since I tried to stay away from them, but they were following me.
4. I got here (Clint Border Patrol Station) about 4 in the morning. Around 7 they gave us food. It was the same breakfast we always have: oatmeal, juice, a cookie. They separated me from my brother and sister. When they did that, I felt desperation. I still feel desperate, because when I ask to see my sister, they don't let me. There was 1 time I asked (Saturday), and they let me see her for about 3 minutes. They said there had to be an official there with us the whole time. A guard was close to us the entire time, so we couldn't have privacy.
5. When I got here, the room I was in had about 68 males. Now it has about 38. When I first got here, there weren't enough beds to go around, so I slept on the floor. Yesterday was the first time I could sleep in a bed. I had a metallic blanket. I sleep very badly because the TV is on all night. At about 6 in the morning, one of the officials puts music on very loud to wake us up.
6. There are a lot of sick people in my room. I have a mask so I won't get sick.
7. The toilet is outside in a plastic place. There isn't water or soap to wash our hands after we use the bathroom. We have to ask for toilet paper if we want any. Some officials let us use the bathroom at night, and some don't let us.
8. I'm always hungry. If I ask for food, they don't give it to me.

9. I was allowed to talk with my mother on Saturday, but it was only for 1 minute. The guard told me to hurry up, and he made me hang up after just 1 minute. I have been here at Clint Border Patrol for 7 days.
10. There is a 17-year-old in my room who is the leader. He helps the guards get us in a line and do other things, so he is the favorite with another guy. They get twice the food as the rest of us for helping the guards.
11. We get a cookie at night. Last night a 5-year-old boy wanted to help the official give out the cookies to everyone, but the 17-year-old said he was the one who did that. The brother of the 5-year-old came over and started telling the 17-year-old to let his little brother help. The 17-year-old reported him to the official, and the official came over and said the older brother should not say anything to the 17-year-old because he was the one who helped all the time. He yelled at the brother of the little boy and said next time he would punish him.
12. I took 2 showers, but each one has to be 1 minute to shower and get dressed. We have toothbrushes but no toothpaste.

I, Y [REDACTED] A [REDACTED] M [REDACTED] A [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 19, 2019

Y [REDACTED] A [REDACTED] M [REDACTED] A [REDACTED]

Certificate of Translation

I, Kathleen O'Gorman, certify that I am fluent in English and Spanish and that I read the above declaration to Y [REDACTED] A [REDACTED] M [REDACTED] A [REDACTED] in Spanish.



June 19, 2019

Kathleen O'Gorman
Illinois Wesleyan University
1312 Park Street
Bloomington, IL 61701

EXHIBIT 64

Declaration of
K [REDACTED] A [REDACTED] R [REDACTED] T [REDACTED]

I, K [REDACTED] A [REDACTED] R [REDACTED] T [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 17 years old. I am from Honduras.
2. I left Honduras because I was being constantly harassed by gangs for "rent." If I did not pay, they threatened to kill me and my family. I was afraid for my life. My father abandoned the family when I was young, and my mother could not protect me from the gangs.
3. I was apprehended by myself. I presented myself at the border near the end of May. I was immediately taken into custody.
4. After a short time, I was brought to the Clint CBP facility.
5. I have been at the Clint CBP facility for about three weeks.
6. I have not been told of any release date or any release plan. I do not know when I will be released. I informed officials that I have a cousin in Tennessee who is willing to take me in. I provided her contact information for officials. I also have other cousins and aunts in the United States.
7. The facility is locked. I am unable to leave. I have been warned not to attempt to leave without permission.
8. After arriving at Clint CBP, I contracted influenza. I had fevers, chills, trouble swallowing, sore throat. I was tired. I was kept in a room with 6 to 9 other persons who also had the flu. Everyone was very sick. I was given medicine to take. I was released from the room after about three days. I have been asked to wear a face mask. I am still using the face mask. Others have also been asked to wear the masks.
9. I have been able to call my cousin in Tennessee a few times. She also does not know what is going on, but she is willing to take me in.

I, K [REDACTED] A [REDACTED] R [REDACTED] T [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.

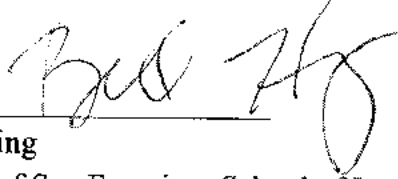
K [REDACTED] A [REDACTED] R [REDACTED] T [REDACTED]

6-18-2019

Date

Certificate of Translation

I, Bill Ong Hing, certify that I am fluent in English and Spanish and that I read the above declaration to K [REDACTED] A [REDACTED] R [REDACTED] T [REDACTED] in Spanish. Executed this June 18, 2019, in Clint, Texas..



Bill Ong Hing
University of San Francisco School of Law
2199 Fulton Street
San Francisco, CA 94117

EXHIBIT 65

Declaration of
M [REDACTED] M [REDACTED] P [REDACTED], [REDACTED]

I, M [REDACTED] M [REDACTED] P [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 from Guatemala.
2. I left Guatemala in part because my parents urged me to leave. They could not protect me from dangers in Guatemala, and they were concerned about my future. They wanted me to leave for my own well-being and safety.
3. I was apprehended by myself. For about 9 days, I was detained in an area covered by a tent that was very uncomfortable. It was crowded and cold at night. I did not feel safe there. I was given food, but not soap for cleaning. Things were very unsanitary. I got sick there.
4. After about 9 days, I was brought to the Clint CBP facility.
5. I have been at the current Clint CBP facility for about 10 days.
6. No one has discussed with me any release plan. I have no idea what is going on. I have a family friend in Florida, Pablo, who is willing to take me in. I have given his contact information and address to CBP officers.
7. At this facility, I am not free to leave. I have been told that I will get in trouble if I try to leave without permission.
8. The officers here speak to me in Spanish. Although I can speak basic Spanish, I am actually Mayan, and my first language is "Chuj." No one here can speak Chuj. I am much more comfortable speaking in Chuj.
9. When I arrived at this facility, I was very sick. My head ached, and I had a fever. I got sick where they had kept me under the tent. Here at Clint, I was seen by a doctor. I had to stay in a room with other sick people for about 3 days. I was given medicine. The others were given medicine as well. We all had to wear masks.
10. The food here is the same food every day. It is not enough. I am usually hungry.
11. I still have the same clothes on that I came with from Guatemala. When I got arrested, all my other belongings were thrown away. I have not been able to wash my clothes. I have not been given any other clothes.

12. I am currently in a room with about 45 other boys ranging in age from about 3 to 17 years old. A few of us have beds, the others sleep on the floor. The boys who are 3 and 4 years old are by themselves.
13. I have been able to speak with my family friend [REDACTED] who lives in Florida twice. He does not know what is going on. He is willing to take responsibility for me.

I, M [REDACTED] M [REDACTED] 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.

X


M [REDACTED] M [REDACTED] P [REDACTED]

6-19-2019

Date

Certificate of Translation

I, Bill Ong Hing, certify that I am fluent in English and Spanish and that I read the above declaration to M [REDACTED]
M [REDACTED] P [REDACTED] in Spanish. Executed this June 18, 2019, in Clint, Texas..



Bill Ong Hing

University of San Francisco School of Law

2199 Fulton Street

San Francisco, CA 94117

19 He also indicated
to me that he could not read
or write. Thus, he marked "X"
in the signature line.

EXHIBIT 66

Declaration of

S [REDACTED] N [REDACTED] A [REDACTED] M [REDACTED] M [REDACTED], [REDACTED]

I, S [REDACTED] N [REDACTED] A [REDACTED] M [REDACTED] M [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 from Guatemala.
2. I left Guatemala near the end of May 2019. I left in part because the father of my son was abusive toward me and my grandmother could not protect me. My mother and father left to live in the United States many years ago. The father of my son left me to be with another one. My son is [REDACTED] [REDACTED] [REDACTED]. I fled Guatemala with my son.
3. My son and I were apprehended with five others as we approached the border on or about June 1, 2019. We presented ourselves at the border about 8 AM. We told CBP agents that we were afraid to return to Guatemala.
4. We were taken to a facility for about a day. There, we were not able to sleep that night; no beds were provided, we could not bathe. We had to sit on the floor. The next day we were taken to another facility for an hour or so, then eventually we were brought to the Clint CBP facility.
5. I have been at the Clint CBP facility for about 17 days.
6. When arriving at the Clint facility, I informed officers that my father lives in Nebraska. I gave officers my father's name and contact information. Since I gave that information to officers, no one has discussed anything further with me. I have not heard of a release. I have no idea what is going on. I have not been told of any other optional facilities where I can live.
7. This facility is locked. I am not allowed to leave the facility. Every few days, I am allowed to go out to walk around. Most of the time I am confined to the sleeping area where at least fifty other persons are also detained. Food is provided regularly three times per day, however there is not enough. I am still nursing my child. The health care is good. A week ago my son got very sick with diarrhea and flu. He was rushed to the hospital where he was hospitalized for two days. An I.V. was placed in his arm. I was really afraid for his life. I was allowed to be with him. Finally, he got better, but he is still taking medicine that has been provided.
8. I have been allowed to call my father in Nebraska a couple times, but he does not know what is going on either.

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL
#29613

I, S [REDACTED] N [REDACTED] A [REDACTED] M [REDACTED] 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.

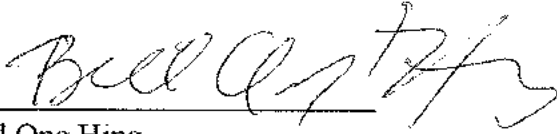
[NAME]

6-17-2019
Date

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

Certificate of Translation

I, Bill Ong Hing, certify that I am fluent in English and Spanish and that I read the above declaration to S [REDACTED]
N [REDACTED] A [REDACTED] M [REDACTED] M [REDACTED] in Spanish. Executed this June 17, 2019, in Clint, Texas..



Bill Ong Hing
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