

# Exhibit 1

**REDACTED VERSION OF DOCUMENT  
FILED UNDER SEAL**

DECLARACIÓN DE [REDACTED]

Yo, [REDACTED], declaro y digo lo siguiente:

1. Mi nombre es [REDACTED]. Nací el día [REDACTED], 1981 in Tezoatlán de Segura y Luna, en el estado de Oaxaca, México. He estado viviendo en los estados unidos desde 2005 y actualmente yo vivo en Sebring, Florida.

2. Yo soy la mamá de [REDACTED], quién actualmente se encuentra detenido por la Oficina de Resentamiento de Refugiados en un centro de detención en Portland, Oregon. Llevo más de 4 meses cumpliendo con todo lo que me piden para recuperar el custodia de mi hijo.

3. Yo vine a los estados unidos para buscar una vida mejor para mi hijo. [REDACTED] era pequeño cuando me mudé a los estados unidos y lo dejé con mis padres y hermanos en México mientras que yo intentaba establecerme en EE.UU. Yo siempre he mantenido contacto con mi familia y con mi hijo, con solo una única interrupción. En 2007 me enfermé de cáncer. El doctor me dijo que el cáncer había expandido en mi cuerpo, era muy avanzado, hasta terminal. Yo estaba internada en un hospital por casi un año, y se me hizo muy difícil comunicarme con [REDACTED]. Volví a comunicarme con él en 2008 cuando mi salud empezó a mejorar. Desde entonces mi salud ha mejorado, gracias a Dios, aunque sigo recibiendo quimioterapia una vez al mes.

4. La primera vez que me di cuenta de que [REDACTED] había llegado a los Estados Unidos fue cuando recibí un correo de voz de él, en que me dijo que se encontraba detenido en Kansas City. Esto fue a setiembre de 2017. Yo no sabía que él hubiera puesto en marcha su plan para venir los Estados Unidos. Cuando recibí el mensaje me preocupé mucho y hasta que pensé que tal vez fue una broma de mal gusto. Acaba de pasar el Huracán Irma por Florida, y había muchos problemas con encontrar señal del celular. Tuve que manejar una hora y media a otro lugar para poder hacer llamadas y recibir mensajes, pero él no me había precisado dónde la inmigración lo tenía detenido. Llamé a muchos lugares en los días siguientes tratando de saber algo de [REDACTED] y su paradero. Me puse mal y muy desesperada, pues no sabía dónde estaba él ni como comunicarme. Llamé a muchas oficinas del gobierno, llamé a Inmigración, llamé a ICE, llamé al FBI, y a otras oficinas donde el gobierno tiene preso a la gente para la deportación, y otros sitios hasta que no sabía dónde pero era de gobierno. En ningún lado me dieron información.

5. En estos días a mediados de septiembre, cuando no sabía dónde estaba mi hijo, recibí una llamada de personas desconocidas que no se identificaron, que me dijeron que tenían a mi hijo y que yo tendría que pagar \$1,400 para que me lo devolviera. Me exigieron un depósito \$400 en una cuenta del banco y después otro pago de \$1,000 cuando me presentara ante ellos para recogerlo a mi hijo. Yo dije que yo quería hablar con mi hijo para saber si de verdad lo tenían y me dijeron que no, entonces yo colgué.

6. Yo no sabía nada más de mi hijo hasta el 19 de septiembre, cuando recibí un mensaje por facebook de Erich Corona, el case manager de mi hijo en Portland. Al principio, tenía dudas si de veras fuera él legítimo. Me acordaba que me habían llamado una vez esos tipos estafadores diciéndome que tenían mi hijo. No creí que de veras tenían a mi hijo hasta que pude hablar con él. Entonces sí me dio cuenta que era cierto. Cuando hablé con él, sentí como que me había regresado el alma a mi cuerpo. Había pasado noches sin dormir, buscando y buscando mi hijo sin saber dónde andaba. Una tortura día en día. Hasta que me puse a llorar de la emoción al escuchar su voz.

7. Erich me explicó que iba a mandarme unos formularios para aplicar ser patrocinadora de mi hijo, y me pidió muchos documentos. Desde el principio, me aseguraba una y otra vez que el proceso no iba a tardar mucho, unos 30 días a más tardar. Inmediatamente, me puse a reunir todos los documentos que me pidió Erich, y se los mandé sin demora ninguna. Dentro de una semana le había mandado todos los documentos que pidieron. Cada papel que me pidieron les he mandado de lo más pronto posible.

8. Sin embargo, Erich seguía pidiéndome más y más documentos: entre ellos, archivos de médicos para comprobar que mi cáncer no me estorbaría cuidar a mi hijo. Estos parecían muy personales, me causaron mucha pena, y no me parecían necesarios para tener mi hijo. Creo que una madre tiene derecho de cuidar a su hijo aunque esté incapacitada, aunque yo no lo estoy. Se me ocurrió que estaban buscando una excusa para negarme a mi hijo por estar enferma. Pero yo tengo una hija de cuatro años y nunca la he faltado nada. No obstante, les mandé todos los documentos que me pidieron tan pronto que pude obtenerlos del doctor. A pesar de todo, sigue el gobierno en no entregarme a mi hijo. 9. Al contrario, luego me exigieron todas las direcciones donde viví antes. Puse la dirección de un PO Box por una de ellas, porque la había usaba siempre, y de todos modos, tuve que ver con una casa en que viví en 2011 y 2012 y yo no me acordaba el número de la casa. Me dijeron que eso no se hace. Tuve que manejar una hora y media a la casa en sí para conseguir el número.

11. Luego me dijeron que me presentara para que me tomaran huellas digitales, aunque me habían asegurado varias veces que sacarme las huellas no fue necesario. Erich me contactó al principios de diciembre de 2017 para avisarme que tuve cita para el 16 de noviembre para las huellas, pero a él se le había olvidado avisarme. Me dijo que habían puesto una nueva cita para el 8 de enero, y que mi esposo y yo teníamos que ir. Como siempre, con esto también cumplimos, aunque nos costó manejar dos horas y media en llegar al sitio donde sacan las huellas. Unos días después, Erich me llamó para avisarme que el gobierno había perdido las huellas de mi esposo, y que tuvimos que presentarnos otra vez el 2 de febrero para sacar huellas.

12. También me hicieron un chequeo de casa, o sea el "home study." Una señorita llegó a la casa el 13 de diciembre, y pasó como una hora y media. Revisó la casa y todo los cuartos, incluyendo el cuarto de mi hija de 4 años y el cuarto que nosotros habíamos preparado para [REDACTED]. Luego me hizo una entrevista, y me hizo muchas preguntas sobre mi situación de Inmigración y como había entrado a los Estados Unidos. Me dijo que si me dan a mi hijo y no se presenta él por sus citas en la corte, las inmigración pueden llevar de preso a todos de la casa. Me aseguró la investigadora que en una semana tendrían resultados del "home study" y que para el año nuevo seguramente iban a entregarme a mi hijo. Me puse tan emocionada, hasta que le compré unos regalos de Navidad para mi hijo. Todavía los tengo, aún envueltos con papel de regalo de Navidad. Me da una tisteza profunda cada vez que los veo.

13. Últimamente, Erich me ha informado que ya iban a trasladar a [REDACTED] a un albergue cercana en Florida, que llegaría mi hijo el 1 o el 2 de febrero, pero ya pasaron las fechas indicadas, y ahora me dicen que aún no tienen donde alojarlo en Florida.

14. Según el abogado de mi hijo, mi hijo se enfermó tanto que lo llevaron al hospital la noche del 30 de enero. Pregunté a respeto con el case manager, y me respondió que lo habían llevado al doctor pero no era nada preocupante. Luego mi hijo me llamó, y me dijo que sentía muy mal, que estaba sangrando de la nariz y que no había comido. Alguien cortó la llamada sin darle tiempo de explicarme más. Nadie de Morrison ni del gobierno me han dado más información sobre la salud de mi hijo, los estudios, resultados o tratamiento médico que le están dando. Nadie me ha comunicado para pedir mi permiso para darle a mi hijo cualquier tratamiento médico o medicación.

15. Desde que supe que el gobierno estaba deteniendo mi hijo, ya hace más de cuatro meses, la única persona del gobierno con quien he hablado ha sido Erich, excepto cuando Erich fue a vacaciones

yo hablé con otro case manager, Maribel. Aparte de la investigadora de casas, nadie más del gobierno me ha comunicado para informarme sobre mi hijo. No me han avisado de ningún procedimiento por el cual una madre puede oponerse a la detención prolongada de su hijo, o que los oficiales migratorios no esán cumpliendo con sus multiples promesas de entregarle un hijo a una mamá desesperada. Durante meses, nadie me han dada información clara ni honesta.

16. Han pasado los meses y con cada día que pasa lo pienso menos probable el deseo que cualquier mamá en mis zapatos esperaría: el momento o el día que su hijo por fin llegue a casa. Primero le dicen a uno que en unas semanas va a tener su hijo, después, en un mes, y después, en otro mes—pero nunca cumplen. Con tanta tardanza, yo me he preguntado, ¿En qué estoy equivocando? ¿No he llenado todos los documento bien? ¿No he enviado cada cosa que me piden? ¿Porque no quieren liberar a mi hijo? Si están demorando hasta que cumpla mayor de edad para deportarlo, ¿porque no me lo dicen de una vez? Quiero que al menos me lo permitan ver un día, si solo por un rato, para que valga la pena que una familia sufre. [REDACTED] no es ningún peligroso para detenerlo por tanto tiempo. Una madre lo sabe, y el juez de inmigración ya lo decidió. ¿Qué madre no quisiera tener a su hijo en sus brazos, si solo por un momento?

Declaro bajo protesta de decir la verdad que toda la información que aquí he proporcionado es correcta y completa, consciente de las consecuencias legales de declarar con falsedad ante la autoridad.

Hecho el día 6 de febrero del año 2018, en Sebring, Florida.

[REDACTED]

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X

**DECLARATION OF** [REDACTED]

I, [REDACTED], declare and say the following:

1. My name is [REDACTED]. I was born on [REDACTED], 1981 in Tezoatlán de Segura y Luna, in the state of Oaxaca, Mexico. I have been living in the United States since 2005 and currently I live in Sebring, Florida.
2. I am the mother of [REDACTED], who is currently being held by the Office of Refugee Resettlement in a detention center in Portland, Oregon. I have been fulfilling everything they ask me for more than 4 months to recover custody of my son.
3. I came to the United States to find a better life for my son. [REDACTED] was small when I moved to the United States and left him with my parents and siblings in Mexico while I was trying to establish myself in the United States. I have always maintained contact with my family and my son, with only one interruption. In 2007 I got sick with cancer. The doctor told me that the cancer had expanded in my body, it was very advanced, even terminal. I was admitted to a hospital for almost a year, and it was very difficult for me to communicate with [REDACTED]. I began to communicate with him again in 2008 when my health began to improve. Since then my health has improved, thank God, although I still receive chemotherapy once a month.
4. The first time I realized that [REDACTED] had arrived in the United States was when I received a voicemail from him, in which he told me he was being held in Kansas City. This was in September of 2017. I did not know that he planned to come to the United States. When I received the message I was very worried and thought maybe it was a joke in bad taste. Hurricane Irma had just passed through Florida, and there were many problems with finding a cell phone signal. I had to drive an hour and a half to another place to make calls and receive messages, but he had not told me where immigration had detained him. I called many places in the following days trying to find out something about [REDACTED] and his whereabouts. I got sick and very desperate, because I did not know where he was or how to communicate with him. I called many government offices, called immigration, called ICE, other offices where the government holds people in jail for deportation, and other places I did not know where but it was government offices. Nowhere did they give me any information.
5. These days in mid-September, when I did not know where my son was, I received a call from unknown people who did not identify themselves, who told me they had my son, and that I would have to pay \$1,400 to get him back. They demanded a \$400 deposit in a bank account and then another \$1,000 payment when I met with them to pick up my son. I said that I wanted

to talk to my son to know if they really had him and they said no, so I hung up.

6. I did not know anything else about my son until September 19, when I received a message on Facebook from Erich Corona, my son's case manager in Portland. At first, I had doubts if it were really legitimate. I remembered that they had called me once those scammers saying they had my son. I did not think they really had my son until I could talk to him. Then I did realize that it was true. When I spoke with him, I felt like my soul had returned to my body. I had spent nights without sleep, searching and searching for my son without knowing where he was. A torture day by day. I started crying from emotion when I heard his voice.
7. Erich explained to me that he was going to send me some forms to apply to be my son's sponsor, and he asked me for many documents. From the beginning, he assured me again and again that the process would not take long, about 30 days at the most. Immediately, I began to gather all the documents that Erich asked me, and I sent them without delay. Within a week I had sent him all the documents they asked for. Every paper they requested I sent as quickly as possible.
8. However, Erich kept asking me for more and more documents: among them, files from doctors to verify that my cancer would not hinder me from taking care of my son. These seemed very personal, they caused me great sorrow, and they did not seem necessary to have my son. I believe that a mother has the right to take care of her child even though she is incapacitated, although I am not. It occurred to me that they were looking for an excuse to deny me my son for being sick. But I have a four-year-old daughter and she has never lacked anything. However, I sent them all the documents they asked for as soon as I could get them from the doctor. In spite of everything, the government has yet to provide my son to me.
9. On the contrary, they then demanded all the addresses where I lived before. I put the address of a PO Box for one of them, because I had always used it, and anyway, it had to do with a house in which I lived in 2011 and 2012 and I did not remember the house number. They told me that that is not how it is done. I had to drive an hour and a half to the house itself to get the house number.
10. Then they told me to show up so they could take my fingerprints, although they had assured me several times that getting my fingerprints was not necessary. Erich contacted me at the beginning of December of 2017 to let me know that I had an appointment for November 16 for the prints, but he had forgotten to let me know. He told me that they had put a new appointment for January 8, and that my husband and I had to go. As always, we also complied with this, although it took us two and a half hours to get to the place where the prints are taken. A few days later, Erich called me to let

me know that the government had lost the fingerprints for my husband, and that we had to show up again on February 2 to have prints taken.

11. I was also given a home check, or "home study." A young lady arrived at the house on December 13 and it took like an hour and a half. She checked the house and all the rooms, including my 4-year-old daughter's room and the room we had prepared for [REDACTED]. Then she interviewed me, and asked me a lot of questions about my immigration situation and how I had entered the United States. She told me that if they give my son to me and he does not show up for his court dates, immigration can arrest everyone in the house. The investigator assured me that in a week they would have results of the "home study" and that for the New Year they would surely give me my son. I got so excited, I even bought some Christmas presents for my son. I have them, still wrapped with Christmas wrapping paper. They give me a deep sorrow every time I see them.
12. Lastly, Erich informed me that they were going to transfer [REDACTED] to a nearby shelter in Florida, that my son would arrive on February 1 or 2, but the dates have already passed, and now they tell me that they still do not have where to host him in Florida.
13. According to my son's lawyer, my son became so ill that he was taken to the hospital on the night of January 30. I asked the case manager about that situation, and he replied that he had been taken to the doctor but it was not worrisome. Then my son called me, and he told me that he felt very bad, that he was bleeding from his nose and that he had not eaten. Someone cut the call without giving him time to explain more. No one from Morrison or the government has given me more information about my son's health, the studies, results or medical treatment he is receiving. No one has contacted me to ask for my permission to give my son any medical treatment or medication.
14. Ever since I learned that the government detained my son, more than four months ago, the only person from the government I spoke with was Erich, except when Erich went on vacation I spoke with another case manager, Maribel. Apart from the home investigator, no one else from the government has told me anything about my son. I have not been made aware of any procedure by which a mother can oppose the prolonged detention of her child, or that immigration officials are not fulfilling their multiple promises to give a child to a desperate mother. For months, no one has given me clear or honest information.
15. Months have passed and with each passing day I think less likely the dream that any mother in my shoes would wait for: the time or the day that her son finally gets home. First they tell you that in a few weeks you will have your child, then, in a month, and then in another month-but they never fulfill their



promises. With such delay, I have asked myself, what am I doing wrong? Have I not filled all the documents correctly? Have I not sent everything they ask from me? Why do they not you want to free my son? If you are delaying release until he reaches the adulthood so he can be deported, why won't they just say this at once? I want them to at least allow me to see him one day, if only for a while, so that it's worth it for a family to suffer. [REDACTED] is not dangerous to be detained for so long. A mother knows that, and the immigration judge already decided. What mother would not want to have her son in her arms, if only for a moment?

I declare under perjury to tell the truth and that all the information I have provided here is correct and complete, I am aware of the legal consequences of declaring with falsehood before the authority.

Done on February 6, 2018, in Sebring, Florida.

\_\_\_\_/s/\_\_\_\_

[REDACTED]

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DECLARATION OF TRANSLATOR

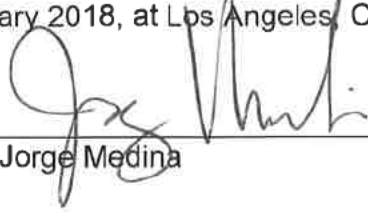
I, Jorge Medina, declare and say as follows:

1. I speak, read and write English and Spanish.

2. On this day I translated the declaration of [REDACTED] from Spanish to English. The annexed is a true and accurate translation of said declaration.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 6<sup>th</sup> day of February 2018, at Los Angeles, California.

  
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Jorge Medina

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# Exhibit 12

**REDACTED VERSION OF DOCUMENT  
FILED UNDER SEAL**

DECLARACIÓN DE [REDACTED]

Yo, [REDACTED], declaro y digo lo siguiente:

1. Yo soy la madre de [REDACTED], que actualmente se encuentra detenida en Shiloh RTC. Hago la presente para apoyar a mi hijo salir de la detención y venir a vivir conmigo. Si me llaman de testigo, afirmo que pudiera jurar de conocimiento personal a lo siguiente.

2. Actualmente vivo en un apartamento en Kemah, Texas, que queda a unos 45 minutes en coche de Shiloh. Me permiten hablar con [REDACTED] dos veces por semana, por unos 20 cada llamada. Cada otra semana voy a Manvel para visitar a mi hija [REDACTED]. Me gustaría ir con más frecuencia, pero no hay servicio de autobus de Houston a Shiloh. La parada de autobus mas cercana a Shiloh es a 12 millas, y yo no puedo caminar tanto. Asi que, me cobra un Uber o un Taxi unos \$80 para llevarme a Shiloh. Me da pesar, pero no gano lo suficiente para ir a ver a mi hija más de una vez cada dos semanas.

3. Desde mayo del año pasado, cuando se cayo presa mi hija, he notado que se ve cada vez más y más deprimida, y llora demasiado ella. Me dice que ya quiere estar allí en el centro de detención. Cuando vivíamos juntas mi hija y yo en Honduras, nunca tuvimos problemas mentales. En 2015 se le pegó el primer ataque de epilepsia, pero aparte de esto, [REDACTED] siempre fue una hija normal, nunca tiró ni un plato ni nada. Se reía, jugaba, lloraba normal como una niña en su niñez, en fin, una niñez sana y normal.

Opino yo que la detención le está afectando mucho a [REDACTED], y que se mejoraría rapido si me la regresarían a su mamá.

4. Tengo entendido que la obligan a [REDACTED] tomar medicamentos muy fuertes para la ansiedad. He notado que [REDACTED] se pone más nerviosa, tiene miedo, y tiembla. [REDACTED] me dice que varias veces se ha caido, y se lastimó la cabeza y los brazos, hasta quedarse en silla de ruedas, porque los medicamentos eran demasiados fuertes y no podía caminar. Se ha quejado de lo medicamentos al staff, como le da miedo estar en medio de la gente. Nadie me pidieron perimso para dar medicamentos a mi hija, aunque el staff de Shiloh siempre ha tenido mi numero de telefono y dirreción.

5. En el verano del año pasado, el investigator de casas, Jorge Arango, llegó dos veces para evaluar mi casa. Paso como o 45 minutes cada vez. Me hizo muchas preguntas, y grabó él mis respuestas en su celular. Al terminar, me dijo que todo estaba aprobado, y que para el siguiente semana iba llegar su reporte dando la aprobación que todo estaba bueno. Pasé mucho tiempo sin escuchar más de las posibilidades de tener a mi hija. Me puse desesperada, y le llamé varias veces preguntando que cuando me iban a entregarme a [REDACTED] Siempre me contestaron que dependía del médico, que [REDACTED] tendría que pasar dos semanas sin ataque epileptica o de ansiedad. No entiendo porque sigue detenida porque ya tiene [REDACTED] más de tres meses sin ningún ataque.

Declaro bajo protesta de decir la verdad que toda la información que aquí he proporcionado es correcta y completa, consciente de las consecuencias legales de declarar con falsedad ante la autoridad.

Hecho el día 28 de febrero del año 2018, en Kemah, Texas.



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DECLARATION OF [REDACTED]

I, [REDACTED], declare and say as follows:

1. I am the mother of [REDACTED] who is currently detained at Shiloh RTC. I execute the present declaration to support my daughter's release from detention so she can come live with me. If I am called to testify, I affirm that I could swear to the following from personal knowledge.

2. I am now living in an apartment in Kemah, Texas, which is located about 45 minutes by car from Shiloh. I am allowed to talk with [REDACTED] twice per week, for about 20 minutes each call. Every other week I go to Manvel to visit my daughter, [REDACTED] I would like to go more often, but there is no bus service from Houston to Shiloh. The closest bus stop to Shiloh is 12 miles away, and I cannot walk that much. So I have to pay an Uber or a taxi about \$80 to take me to Shiloh. Regrettably, I do not earn enough to go see my daughter more than once every two weeks.

3. Since last year, when my daughter became a prisoner, I have noticed that she is more and more depressed, and she cries too often. She tells me that she doesn't want to be in the detention center. When my daughter and I lived together in Honduras, we never had mental problems. In 2015 she had her first epileptic seizure, but apart from that, [REDACTED] was always a normal daughter, never throwing a plate or anything. She laughed, played and cried like a normal young girl, in short, her childhood was healthy

and normal. In my opinion, detention is affecting [REDACTED] a lot, and she would quickly get better if they were to return her to her me.

4. I understand they are requiring [REDACTED] to take very powerful medications for anxiety. I have noted that [REDACTED] is becoming more nervous, fearful, and she trembles. [REDACTED] tells me that she has fallen several times and has injured her head and arms, to the point that she ended up in a wheelchair, because the medications were too powerful and she couldn't walk. She has complained about the medications to the staff, that they make her afraid of people. Nobody asked me for permission to give medications to my daughter, even though the staff at Shiloh has always had my telephone number and address.

5. During the summer of last year, a home investigator, Jorge Arango, came twice to evaluate my house. He spent about 45 minutes here each time. He asked me many questions and recorded my answers on his cell phone. When he finished, he told me that everything was approved, and that the following week they would receive his report saying that everything was fine. Much time went by without any further word about the possibility of getting my daughter back. I became desperate, and I called several times asking when they were going to give me [REDACTED] back. They always answered that it depended on the doctor, that [REDACTED] would have to go two weeks without an epileptic or anxiety attack. I don't understand why she is still being detained because [REDACTED] has now gone more than three months without an attack.



I declare that all the information I have provided here is correct and complete,  
being aware of under my duty to tell the truth and the legal consequences of perjury.

Done this 28th day of February, 2018, at Kemah, Texas.

/s/  
[REDACTED]

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DECLARATION OF TRANSLATOR

I, Carlos Holguín, declare and say as follows:

1. I am fluent in English and Spanish.
2. On this day, I translated the foregoing declaration of [REDACTED] from  
Spanish into English.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 6th day of March, 2018, at Santa Clarita, California.

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Carlos Holguín

# Exhibit 65

**REDACTED VERSION OF DOCUMENT  
FILED UNDER SEAL**

DECLARACIÓN DE [REDACTED]

Yo, [REDACTED] declaro y digo lo siguiente:

1. Yo soy la hermana de [REDACTED] Tengo 29 años de edad.

Vivíamos juntas [REDACTED] y yo en Honduras por los primeros 11 años de su vida. Como soy mayor de [REDACTED] de unos 15 años, [REDACTED] siempre me ha considerado como segunda madre. Nuestra mamá murió en enero del año pasado, y el papá de [REDACTED] dejó de verla cuando estaba pequeña. Yo soy la única familiar que tiene [REDACTED] en los Estados Unidos.

2. A principios de agosto de 2017, me enteré que la inmigración la tenía a [REDACTED] detenida en un albergue en McAllen, Texas, que se llama la Casa Antigua. Inmediatamente después de saber que la habían detenida a mi hermana, me comuniqué con la inmigración para pedir el custodio de [REDACTED]. Me mandaron unos formularios. Los rellené y se los regresé a la inmigración dentro de tres días de recibirlos. En una semana más me dieron cita para sacar huellas digitales en Philadelphia, cerca de donde vivo yo durante los últimos cinco años. El 25 y el 27 de septiembre llegó una investigadora de casas, una mujer joven, de unos 27 años. Estuvo ella como una hora y media en mi casa el 25, y unas dos horas el día 27. Me hizo ella muchas preguntas, revisó toda la casa: baño, cocina, recámaras, todo. Tomó fotos de mí y de la casa. Me dijo que todo estaba bien, que tenía una casa amplia, y con buena ubicación con escuela para [REDACTED]. A la semana, me llamó para decirme que había salido positivo el estudio de casa. [REDACTED] todavía estaba en el albergue Casa Antigua.

4. A fin de cuentas, se me rehusaron el custodio de [REDACTED]. El primero de noviembre de 2017, me llamó Daniel, el supervisor de la Casa Antigua. Me informó que como tenía mi hija, Marta, 10 años de edad, un caso abierto de abuso infantil, y que me acusan de no protegerla de

mi ex-pareja, que no sería yo una custodia adecuada para [REDACTED]. No me dieron ninguna oportunidad de explicarles que la persona que golpeó a mi hija ya no vivía conmigo o que como resultado del caso de mi hija, aprendí ser mejor madre y que nada pasaría a [REDACTED] si me la permiten cuidar. No me dieron ninguna opción ni nada.

5. Actualmente [REDACTED] está detenida en Shiloh RTC, Texas, donde la mandaron como en diciembre de año pasado. Cuando [REDACTED] estaba en la Casa Antigua nos comunicábamos por teléfono dos días por semana. Pero no me han permitido hablar con [REDACTED] desde que la mandaron a Shiloh. Una persona de Shiloh le informó a mi hermana en Honduras que no me iban a permitir llamadas telefónicas con [REDACTED] porque mi hija Marta tiene el caso abierto, pero a mí nadie de Shiloh ni del gobierno me ha dicho nada.

6. Cuando nos permitían comunicarnos, noté que [REDACTED] andaba más y más triste y deprimida a causa de la detención prolongada. Me expresó una desesperación con su condición de presa. Tengo entendido que la mandaron a [REDACTED] para Shiloh porque tras meses de detención necesitaba atención psicológica. En Honduras [REDACTED] había presenciado el asesinato de nuestro hermano, y es verdad que sufrió un golpe fuerte en ese entonces. Sin embargo, en Honduras [REDACTED] seguía siendo una muchacha tranquila, aunque muy alejada de las personas. Como a las 13 años, empezó [REDACTED] a asistir a la iglesia con su mamá, y se puso mejor y más abierta, hasta que murió nuestra mamá, y entonces se cayó mucho en la depresión.

7. [REDACTED] abandonó a Honduras para México como en marzo del año pasado. No me dijo nada, hasta que alguien me llamó para informe que habían secuestrado a [REDACTED] en Guerrero, y exigiéndome mil dólares para no matarla a mi hermana y para moverla para Monterrey, México. Yo no tenía tanto dinero, y tuve que pedir ayuda de la iglesia. Ellos de la

iglesia me ayudaron, y logré mandarles el dinero a los secuestradores. Luego me exigieron más dinero para entregármela a la frontera con McAllen, y otra vez la iglesia me ayudó en juntar el dinero.

8. En enero, poco después que me habían negado el custodio de [REDACTED], Oscar, el ayudante del pastor de mi iglesia, se ofreció como custodio para [REDACTED]. Todavía no han tomado la decisión, y resulta que [REDACTED] sigue detenida en Shiloh sin poder comunicarse conmigo. Obviamente, [REDACTED] ha sufrido demasiado, y solo deseo que el gobierno la libere pronto y que por fin tenga mi hermana una vida saludable y normal.

Declaro bajo protesta de decir la verdad y pena de perjurio que toda la información que aquí he proporcionado es correcta y completa, consciente de las consecuencias legales de declarar con falsedad ante la autoridad.

Hecho el día \_\_\_\_ de mayo del año 2018, en Philadelphia, Pennsylvania.

[REDACTED]

///

DECLARATION OF [REDACTED]

I, [REDACTED], declare and say as follows:

1. I am [REDACTED] sister. I am 29 years old. [REDACTED] and I lived together in Honduras during the first 11 years of her life. Inasmuch as I am some 15 years older than [REDACTED], [REDACTED] has always thought of me as a second mother. Our mother died in January of last year, and [REDACTED] father stopped seeing her when she was small. I am the only family [REDACTED] has in the United States.

2. In early August of 2017, I learned that Immigration was detaining [REDACTED] in a shelter in McAllen, Texas, called Casa Antigua. Immediately after I learned that they had detained my sister, I contacted Immigration to ask for [REDACTED] custody. They sent me some forms. I filled those out and returned them to Immigration with three days of receipt. A week later, they gave me an appointment to take fingerprints in Philadelphia, near to where I've lived for the past five years. A home investigator, a young woman about 27 years old, came to my home on the 25 and 27 of September. She was here about an hour and a half on the 25th, and about two hours on the 27th. She asked me many questions, inspected the whole house: bathroom, kitchen, bedrooms, everything. She took photographs of me and my home. She told me that everything was fine, that I had ample house, with a good location with school for [REDACTED]. A week later, the investigator called me to say that everything on the home study had come out positively. [REDACTED] was then still at the Casa Antigua shelter.

4. In the end, they refused me [REDACTED] custody. The first of November of 2017, Daniel, the supervisor at Casa Antigua called me. He informed me that because my daughter, Marta, who is 10 years old, had an open child-abuse case, and that they were accusing me of not protecting her from my ex-boyfriend, that I would not be an adequate custodian for [REDACTED]. They didn't give me any

opportunity to explain to them that the person who hit my daughter no longer lived with me or that as a result of my daughter's case I had learned to be a better mother and that nothing would happen to [REDACTED] if they would let me take care of her. They gave me no option or anything.

5. [REDACTED] is now detained at Shiloh RTC, in Texas, where they sent her around December of last year. When [REDACTED] was at Casa Antigua we spoke over the telephone twice a week. But they haven't allowed me to talk to [REDACTED] since they sent her to Shiloh. Someone from Shiloh told my sister in Honduras that they weren't going to permit me telephone calls with [REDACTED] because my daughter Marta had an open case, but nobody from Shiloh or the government has told me anything.

6. When they did allow us to talk, I noted that [REDACTED] was more and more sad and depressed because of the prolonged detention. She told me she felt desperate over being a prisoner. I understand that they sent [REDACTED] to Shiloh because after months of detention she needed psychological care. In Honduras [REDACTED] had witnessed our brother's murder, and it is true that she suffered a strong blow at that time. Nonetheless, in Honduras [REDACTED] remained a calm girl, although very distant from others. When she was about 13, [REDACTED] started attending church with our mother, and she got better and more open, until our mother died, and then she suffered from much depression.

7. [REDACTED] left Honduras for Mexico in about March of last year. She didn't tell me anything, until someone called me to say they had kidnapped [REDACTED] in Guerrero, and demanded one thousand dollars in order not to kill my sister and to move her to Monterrey, Mexico. I didn't have that much money, and I had to ask for help at my church. The people from the church helped me, and I managed to send the kidnappers the money. They later demanded more money in order to send [REDACTED] to the border near McAllen, and again, the church helped me gather up the money.



8. In January, a little time after they had refused me [REDACTED] custody, Oscar, the assistant pastor of my church, offered himself as custodian for [REDACTED]. They still haven't made a decision, and as a result [REDACTED] is still detained at Shiloh without the ability to communicate with me. Obviously, [REDACTED] has suffered too much, and I only wish the government would free her soon and that my sister would at last have a healthy and normal life.

I declare under duty to tell the truth and penalty of perjury that all the information that I have provided here is correct and complete, being aware of the legal consequences of declaring falsely before the authorities.

Done this \_\_\_\_ day of March, 2018, in Philadelphia, Pennsylvania.

\_\_\_\_\_/s/\_\_\_\_\_  
[REDACTED]

\* \* \* \* \*

DECLARATION OF TRANSLATOR

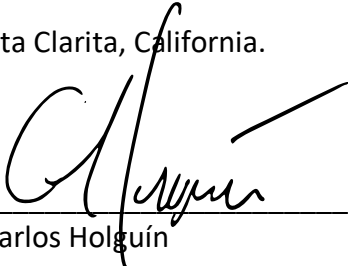
I, Carlos Holguín, declare and say as follows:

1. I am fluent in English and Spanish.

2. On this day, I translated the foregoing declaration of [REDACTED] from Spanish into English.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 13th day of March, 2018, at Santa Clarita, California.

  
\_\_\_\_\_  
Carlos Holguín



# Exhibit 66

**REDACTED VERSION OF DOCUMENT  
FILED UNDER SEAL**

DECLARACIÓN DE [REDACTED]

Yo, [REDACTED] declaro y digo lo siguiente:

1. Yo soy ciudadano de los Estados Unidos. Soy participante y ayudante del pastor de la iglesia Seventh Day Adventist, donde también participa [REDACTED] la hermana de [REDACTED] [REDACTED]. Tengo 50 años de edad.

2. Vivo con mi esposa y con mi hija, de 17 años, en Philadelphia. Trabajo como terapeuta en el departamento de psicología en la clínica de salud mental del condado en Philadelphia. Cuento con entrada adecuada para toda necesidades de [REDACTED]. Tengo una casa con tres recamaras, y contamos con una recámara libre para [REDACTED]. Ni a mi esposa ni a mi jamás nos han arrestado, ni hemos tenido problemas con la policía nunca.

3. En enero del año presente, poco después de que el gobierno se había rehusado a [REDACTED] cuidar a su hermana, inicié el proceso de pedir el custodio de [REDACTED]. Nos presentamos mi esposa y yo en Philadelphia el 2 de marzo para tomar huellas digitales. El viernes pasado, el 9 de marzo, tuve una entrevista telefónica con una trabajadora social. Me hizo ella muchas preguntas, desde que entré a los Estados Unidos hasta la presente. Al terminar la entrevista, me informó ella que todo parecía bien, y que el único problema que pueda existir es que no conocemos a [REDACTED]. Yo le comenté que me parecía extraño, porque nadie en los Estados Unidos, aparte de su hermana, conoce a [REDACTED]. No me dio ninguna idea de cuando harían una decisión en cuanto el custodio de [REDACTED].

Declaro bajo protesta de decir la verdad y pena de perjurio que toda la información que aquí he proporcionado es correcta y completa, consciente de las consecuencias legales de declarar con falsedad ante la autoridad.

Hecho el día 13 de mazo del año 2018, en Philadelphia, Pennsylvania.

[REDACTED]

DECLARATION OF [REDACTED]

I, [REDACTED] declare and say as follows:

1. I am a citizen of the United States. I am member of and assistant to the pastor of the Seventh Day Adventist church, where [REDACTED], the sister of [REDACTED], is also a member. I am 50 years old.

2. I live with my wife and my daughter, 17 years old, in Philadelphia. I work as a therapist in the psychology department of a mental health clinic in the county of Philadelphia. My income is sufficient to cover all of [REDACTED] needs. I have a house with three bedrooms, and we have an empty bedroom from [REDACTED]. Neither my wife nor I have ever been arrested, nor have we ever had problems with the police.

3. In January of this year, a little after the government had refused to let [REDACTED] take care of her sister, I initiated the process of asking for [REDACTED] custody. My wife and I went to Philadelphia on March 2 to take fingerprints. Last Friday, March 9, I had a telephonic interview with a social worker. She asked me many questions covering when I first entered the United States to the present. When the interview was over, she informed me that everything looked fine, but that that only problem that might exist is that we don't know [REDACTED]. I commented to her that this seemed strange, because nobody in the United States, apart from her sister, knows [REDACTED]. She didn't give me any idea about when they would make a decision regarding [REDACTED] custody.

I declare under duty to tell the truth and penalty of perjury that all the information that I have provided here is correct and complete, being aware of the legal consequences of declaring falsely before the authorities.

Done this 13th day of March, 2018, in Philadelphia, Pennsylvania.

/s/ [REDACTED]

\* \* \* \* \*

DECLARATION OF TRANSLATOR

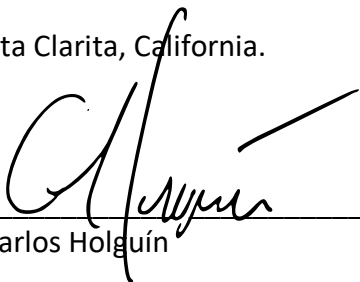
I, Carlos Holguín, declare and say as follows:

1. I am fluent in English and Spanish.

2. On this day, I translated the foregoing declaration of [REDACTED] from Spanish  
into English.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 13th day of March, 2018, at Santa Clarita, California.

  
\_\_\_\_\_  
Carlos Holguín

# Exhibit 67

**REDACTED VERSION OF DOCUMENT  
FILED UNDER SEAL**

1 I, [REDACTED], declare as follows:

2  
3 1. This declaration is based on my personal knowledge. If called to testify in this  
4 case, I would testify competently about these facts.

5 2. I am the grandfather of [REDACTED], who is currently  
6 detained at Shiloh Residential Treatment Center.

7 3. I am currently living in a duplex apartment in Oakland, California. I live in the  
8 apartment by myself and have two bedrooms. I work every day as a food vendor.

9 4. I want to be [REDACTED] sponsor because she is my granddaughter and I am her  
10 grandfather. We have a very close relationship. I spent a lot of time with [REDACTED] when  
11 we both lived in El Salvador. I came to the United States when she was five years old,  
12 and have helped to financially support [REDACTED] and her mother ever since. I think I  
13 would be a good sponsor for [REDACTED] because I want to take care of her and am able to  
14 do so.

15 5. I have talked with [REDACTED] mom about applying to be [REDACTED] sponsor. She  
16 is very supportive of me being [REDACTED] sponsor because I am her grandfather and  
17 would take good care of her.

18 6. I talk to [REDACTED] on the phone for 15 minutes every Friday. I tell her that I hope I  
19 will see her soon, that she should behave herself, and not to despair or get upset. She is  
20 always happy to talk to me on the phone. Because Texas is very far away from  
21 California, I have not been able to go and visit [REDACTED] in person. However, sometimes  
22 [REDACTED] social worker helps to set up video calls so that I can see [REDACTED] when we  
23 talk.

24 7. I have never been arrested or charged with a crime in the United States. I have  
25 lived here since 2004. When I lived in El Salvador, I was wrongfully arrested by the  
26 police and spent two years in jail. I had gone to a house with some friends without  
27 knowing that there was a person inside the house who was being held hostage. While we  
28 were inside, the police surrounded the house and arrested everyone inside. Even though I

1 explained that I had just gotten there and had nothing to do with the kidnapping, the  
2 police still arrested me. I waited in jail while my lawyer gathered evidence to support my  
3 release. After two years, I appeared in front of a judge and he let me go. I was never  
4 convicted of any crime. My lawyer obtained a "carta de libertad" and I was released.

5 8. I don't remember exactly when I initially applied to be [REDACTED] sponsor. In the  
6 fall of 2017 I tried to submit my fingerprints. However, ORR told me that I needed to  
7 submit documentation (the "carta de libertad") from El Salvador that explained my time  
8 in prison. I requested the documentation from El Salvador, and it arrived one month and  
9 eight days later. I immediately submitted it to ORR, and ORR told me to go and get my  
10 fingerprints taken again. I submitted my second set of fingerprints in January 2018. After  
11 I submitted my second set of fingerprints, ORR sent me a lot of information and  
12 scheduled a home study visit.

13 9. In February 2018, a home investigator came to my house to conduct a home study.  
14 She asked me a lot of questions and had me fill out a lot of paperwork. I don't think that  
15 the home study went very well, mainly because the home investigator asked me a lot of  
16 detailed questions about finances that I wasn't sure how to answer. I got the impression  
17 that the home investigator didn't think I made enough money to be able to support  
18 [REDACTED] and myself. I know I don't make a lot of money, but I make enough to take  
19 care of [REDACTED]. She is my granddaughter, and everything I have I will give to her.

20 10. The home investigator also asked if I would make [REDACTED] go to school. I support  
21 [REDACTED] going to school and getting an education. If she comes to live with me I will  
22 take her to school and I will bring her home from school. I will help her with what she  
23 needs.

24 11. When I asked the home investigator what was going to happen after the home  
25 study, she said that I was required to complete an orientation before [REDACTED] could be  
26 released. The home investigator didn't give me any information about how to complete  
27 the orientation. I contacted ORR to ask for orientation information and completed the  
28

1 orientation last month. I have not heard anything from ORR since then. I have never  
2 received the results of the home study.

3 12. When I reached out to [REDACTED] social worker at Shiloh, she told me that ORR  
4 threw out my application and that they are going to transfer [REDACTED] somewhere else.  
5 ORR has never officially told me that they are looking at other sponsors or that my  
6 application has been rejected.

7 13. I believe that I would be the best sponsor for [REDACTED] [REDACTED] has uncles and  
8 aunts from her father's side of the family who live in Los Angeles. [REDACTED] father  
9 died when she was very young. These uncles and aunts have not spoken with [REDACTED]  
10 since her father died and do not want to take care of her. I do not think that they would be  
11 good sponsors for [REDACTED]

12 14. [REDACTED] did not take any medications when she lived in El Salvador, and she did  
13 not have any mental health problems. Before the home investigator came to do the home  
14 study, [REDACTED] social worker texted me to ask if I could afford to buy certain  
15 medications if [REDACTED] was released to my care. She said that it would be my  
16 responsibility to buy them for her and make sure that she took them. The medications  
17 were "Adderall, 20 mg" and "Prozac, 20 mg." [REDACTED] counselor told me that  
18 [REDACTED] has to take the medications, otherwise she gets agitated.

19 15. Up until last week (March 9, 2018), I had never heard [REDACTED] get agitated during  
20 any of our weekly phone conversations. I think that being locked up for several months  
21 has made her be more anxious and upset. The last time that we talked, she told me that  
22 she was starting to feel desperate. I told her not to lose hope and that we are just waiting  
23 to see what the government says about me.

24 16. I have not been contacted by ORR to give permission for [REDACTED] to be given  
25 medication.  
26  
27  
28




1 I declare under penalty of perjury that the foregoing is true and correct. Executed on this  
2 15<sup>th</sup> day of March, 2018, at Oakland, California.



CERTIFICATE OF TRANSLATION

My name is Rebecca Gudeman and I swear that I am fluent in both the English and Spanish languages and I translated the foregoing declaration from English to Spanish to the best of my abilities.

Dated: March 15<sup>th</sup> 2018

  
Rebecca Gudeman