

Exhibit 3

Declaration of

LIDIA S [REDACTED], A NUMBER [REDACTED]

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

1. My date of birth is October 3, 1996. My son's name is [REDACTED] (A number [REDACTED]). He is four years old and he was born on September 13, 2013. My son and I are from El Salvador.
2. I witnessed someone being decapitated, and I saw the faces of the murderers. The murderers threatened to kill me if I identified them. I was scared for my life and the life of my little boy. I was told the murderers have been asking about me, even as recently as last week.
3. We presented ourselves at the border about fifteen days ago. I believe that it was on or about June 13 2018.
4. My son and I were taken to the Ice Box for one day. We were not given food or water when we were apprehended. We were apprehended at 10 pm and were not given food or water until 6 am. We had to wait The Ice Box was so cold that my son and I shivered the entire time we were there and were unable to sleep. In addition, the only food we were given were sandwiches that were frozen and not able to be eaten. We went hungry the entire time we were there. My son was crying from hunger. My son was not able to eat the food and neither was I. The bathrooms at the facility were very dirty with a lot of trash everywhere – very filthy.
5. The next day we were transported a short distance to the Dog Pound for a day. The Dog Pound also was so cold that my son and I were shivering. The food at the Dog Pound was the same as at the Ice Box. The sandwiches were frozen and not able to be eaten. Again we went hungry and thirsty the entire time. The bathrooms again were overflowing and gross. Also again, my son and I did not drink water because of the conditions of the bathrooms and the sinks. The Dog Pound was so overcrowded that we could not walk around or sleep. The sinks in the port-o-potty did not have water, even after we pressed the pedal. The female guards were yelling at the mothers separated from their children not to look at their children in the separate cages. The female guards told the mothers and children that they would be punished for looking at each other.
6. The next day we were transported to the Dilley facility. We have been here about 13 days. I only have one kidney, and I developed a urinary tract infection while at the Dog Pound and unable to drink. My son also got very sick. We sought medical care four times at Dilley and were give only acetaminophen each time. At the fourth visit, the male nurse told me to go to the mental health facilities, because I was imagining my pain. He never gave me a physical examination and yelled at me that he had already given me medicine so what else did I want him to do. After my social worker found out I had been to the medical facilities four time without help, she insisted that a doctor see me. The doctor immediately sent me to the hospital where I found out my urinary tract infection had turned into a kidney infection, which

is very dangerous for me. While I was gone, my son was alone at Dilley. He developed a fever and threw up multiple times while I was away. However, he was not given any medicine.

7. Despite the severe illness of me and my son, we were not given any help from the medical facilities at Dilley. The only ones who helped us were social workers who insisted that we see doctors and not the nurses who had been ignoring us.
8. I was not told about my or my son's legal rights while at the Ice Box or the Dog Pound. Neither of us was given any written materials at either location.
9. While at Dilley, I have not been given any written notices, except the rules of the facility.
10. I have had one hearing, but I did not understand what the hearing was for or what happened at the hearing. There are no plan for our release at this time.

I, Lidia 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.

[REDACTED]

06-29-18
Date

Certificate of Translation

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

A handwritten signature in cursive script, appearing to read "Laura M. Flores", written over a horizontal line.

LAURA M. FLORES

RAICES

4092 TPC PARKWAY, APT 953

SAN ANTONIO, TX 78261

06/29/18

Date

Exhibit 4

**Declaration of
DILSIA R [REDACTED]**

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

1. My date of birth is July 23, 1981. My daughter's name is [REDACTED] She is 12 year old and was born on August 1, 2005. My daughter and I are from Honduras.
2. We forced to flee from Honduras due to extreme violence and insecurity. My husband and my two sons already reside in the United States.
3. We presented ourselves at the border about June 25, 2018. We were soaking wet and covered in mud from our journey across the river. The CBP officers that captured me yelled at me saying that he had kids himself and that in my position, he would never have put his children in this much risk. From that moment, we were taken to the "ice box" in our soaking wet clothes and covered in mud. We arrived at the ice box at 2am. When we arrived, we were searched and asked to take down our hair so that they could search our hair. We were later given a piece of bread with ham and a juice box in the ice box. We were starving but as we inspected the sandwich they took my daughter from me. I asked them where they took my daughter and they responded that she was in another room. She later told me that she was sent to a room by herself with another little girl.
4. The only other contact I had with the officer was to be moved to another cell in the ice box. I did not sleep at all that night, it was too cold. My daughter told me she was freezing as well. I sat there on the ground without any type of bed and shivered until the next day. I was reunited with my daughter the next morning in order to take a photograph picture and take our finger prints. Later, we were loaded on to a bus to be transported.
5. At 7 am the next day, we were taken to the "dog house." My daughter and I were again asked to let down our hair and lift our shirt to check our waists. Then they split us up again. However, this time I could actually see her through the metal fencing material. There we were given another sandwich with a water bottle and an apple. This time the sandwich was frozen. You could feel the ice when you bit into the sandwich. When they gave us sandwich for breakfast they put us in a cell. We were told to grab a thin mattress and throw it on the ground. We were given aluminum blankets.
6. I was finally able to sleep on the mattress but shortly after a tall woman officer that was dressed on brown woke me up by kicking me. She said "you are not in your own house... WAKE UP!" She ordered me to move to another room to answer questions. May daughter began to cry when I was taken away to another room. When she walked to the closest fence where I was taken, the official yelled at my daughter and said "What do you think you are doing over here? Do you want to get yourself deported right now?!" I found my daughter in tears when I saw her again.

7. We spent a day and a half in the dog house and the were transported to the ICE facilities in Dilley, Texas. I was officially reunited with my daughter when we loaded the bus to come to Dilley. My daughter, [REDACTED] got really sick on the bus ride to Dilley. She thinks the food from the dog house made her sick and caused her to vomit repeatedly.
8. We arrived in Dilley, Texas on or about June 27, 2018. Upon arrival, we received instructions and rules of the facility. After that a doctor took x-rays of our lungs and checked our blood pressure. In Dilley was the first time that we were able to shower. On June 28, 2018 at lunch was the first warm meal that we received. One June 29, 2018, my daughter has a medical appointment, she was told to drink lots of water because she is very dehydrated as a result of her stomach illness that caused her to vomit.
9. To date, I have met with one person about mine or my daughter's legal rights. His advice was that we might or may not get approved for asylum but we do not have any information regarding the next steps yet. We are hoping to be reunited with my husband soon.

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

6/29/18
Date

Certificate of Translation

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

A handwritten signature in blue ink, appearing to read "Luisa Muskus", written over a horizontal line.

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

06/29/2018

Date

Exhibit 7

#20801

Declaration of

Iris E [REDACTED], A NUMBER [REDACTED]

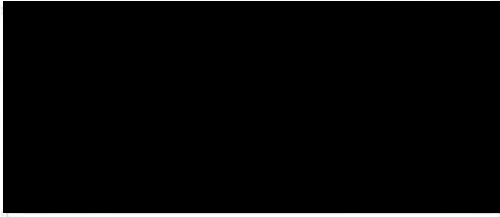
I, Iris E [REDACTED], A number [REDACTED], declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is February 22, 1990. My son's name is [REDACTED]. He is 10 years old and was born on September 15, 2007. My son and I are from El Salvador.
2. We left the country because of gangs. We used to own our own food business, but the gangs kept coming to us and demanding more and more money. When my son was in kindergarten, they threatened to kill him and so we eventually took him out of school. We paid them but they kept asking for more money and we paid because we were scared. We then shut down the store and we still paid them to stay safe, but could not pay anymore. Then my son and I left and they then threatened that my husband had 24 hours or they would kill him. We did not call the police because we knew of another family who went to the police and eventually that family went missing and no one knows what happened to them so we were scared and did not call the police.
3. We presented ourselves at the border about May 2, 2018. I believe that it was on or about May 2, 2018. We were not given water or food since arriving at the border and were not given water until we arrived at "La Perrera." When we arrived, I went to the bathroom and then my son who is 10 years of age was taken and put in another location because of his age. I was not told where my son had gone. I asked another woman and other people if they knew where my son was. I was very worried. Someone then told me that he is in the area where older kids go. I was separated from my son for 3 days. My son was able to shower only one time and I could not shower there at all for 3 days. The guards kicked adults and children to keep them awake, and would take blankets off children.
4. We were only given burritos to eat. We ate burritos in the morning, and for lunch and dinner. The burritos were spoiled. I knew that they were spoiled because they were very acidic and they tasted horrible. I knew that they were not good food to eat. They were very bitter. We were only given one extra pair of clothing.

5. When we arrived, we slept on the floor, which was very cold. Twelve hours later, they gave us green mats that were just three inches thick, which we had to put on the floor. They would make us wait in line for an hour before starting to do roll call in "La Perrera." We had to sleep very close to everyone. We were all nearly touching everyone unless you slept sitting straight up.
6. "La Perrera" was very cold. When we complained that it was too cold, the guards said that they were keeping it cold for the guards who liked it that way.
7. The lights were on the entire time. It was hard to sleep.
8. After three days, my son and I were taken to another place, Dilley, where we have been held for 58 days.
9. This place has fruit and snacks. The beds are good at this place in Dilley. If I have to go to the Cara building (register building), we have to wait outside for a very long time outside in a long line that goes around the building and there is no shade. It makes my skin red. When my son and I arrived to this place in Dilley, my son became very sick. He was sick for 3 1/2 weeks. I went to the pharmacy and explained the situation and they gave me medicine. I had to go the next day and that time, they shut the window and said that they could not talk and I was told that there was no more medicine. Then I went back to my room because they told me that they would tell me when the medicine is ready. Then the next day they called and said that they were going to call ICE because "You don't care about your child because you didn't come" and "What do you care about more—you or your child?"
10. We were not given any legal information at all during the process before getting to Dilley.
11. My son and I are still at the facility in Dilley. I bring my case notes with me everywhere all of the time.
12. They say that my son can stay here but that I will not be able to and that I will have to go back to my country. My son is the only one now who can talk about the case, but he does not know how to explain all of the case by himself.

I, Iris 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.



2.8-06-18

Date

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



Amber Rieff

Willamette University Clinical Law Program
245 Winter Street SE
Salem, OR 97301

6/28/18

Date

Exhibit 9

Declaration of

Maria A [REDACTED]

I, Maria 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 January 15, 1985. My son name is [REDACTED] He is four years old and he was born on March 15th, 2014. My son and I are from Honduras.
2. I left because I was living in a house and a gang came to my house and asked me if they could store guns in my house and they asked me which political party I was in and they told me that I had to keep these guns in my house. I did not keep the guns in the house because I did not feel safe. I refused to and they put a gun to my head and I felt so scared. I did not know what to do.
3. We presented ourselves at the border about on June 4th, 2018. We were taken to the place that they call the Cold Place at 11:00 PM and we stayed there for about eight hours. It was very cold at this place and my child and me were not able to rest or sleep. The guards forced us to keep walking from place to place. They had one bottle of water for us to drink. I could not sleep at all and either could my child. There were people yelling and crying and it was very scary and my son was very worried.
4. They had crackers and juice only to give my child and us was very hungry and unable to eat.
5. It was extremely cold. It was hard to keep warm. When other people would leave there would be extra blankets so we would try to take them to have more to keep warm but then the guards would notice that we had more blankets and they would take them from us so that we only had one.
6. The lights were on all the time.
7. After eight hours, my son and I were taken to "La Perrera" another place where we were held for one day.
8. It was very cold here and we had to sleep on the floor, on the concrete. My son was cold. We were given ham sandwiches at this place but we could not eat the sandwiches because the ham looked green and it did not seem like it would be safe to eat. I think that my son is very sick now because of the experience of this and here because it was so cold and he was not able to get help from the doctors. You can see right now that my son is very sick. He coughs and he cries that his eyes and ears hurt. He has a lot of snot coming from his nose.
9. I was not given any legal notice or documents until I arrived at this place in Dilley.
10. My son and I were taken out of that facility the 6th of June, 2018.

11. My son and I have been at the place in Dilley for about 23 days. We are planning to leave from here. I hope that I can leave. I have a friend who lives in America who is waiting for me here and will help me.
12. I got a negative with my case but I hope that eventually I can stay here and that my case will be resolved.

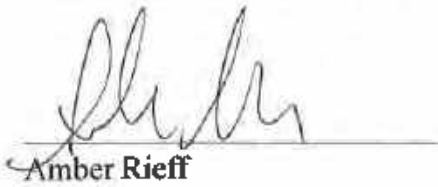
I, Maria A [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

[REDACTED]

29.06.2018
Date

Certificate of Translation

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



Amber Rieff

Willamette University Clinical Law Program
245 Winter Street SE
Salem, OR 9301

10/29/18
Date

Exhibit 10


Declaration of
ANA V [REDACTED] A NUMBER [REDACTED]

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

1. My date of birth is April 7, 1992. My daughter's name is [REDACTED]. Her A Number is [REDACTED]. She is six years old and was born on August 4, 2011. My daughter and I are from El Salvador.
2. I left El Salvador because I received death threats because I am gay. The same people who threatened me beat one of my transsexual friends to death. I was scared they also would beat me to death and would harm my daughter.
3. My daughter and I presented ourselves at the border about 50 days ago. I believe that it was on or about May 4. We were taken to a Dog Pound. The Dog Pound was overcrowded and there was nowhere to lie down. We could not sleep while we were there. In addition, the Dog Pound was so cold [REDACTED] and I were shivering. The guards at the Dog Pound yelled at me and called me names. The guards called me and my daughter lazy and kicked me with their boots in order to keep me awake so that my daughter and I could not sleep. If the children did fall asleep, the guards would wake them up.
4. The sandwiches at the Dog Pound were partially frozen and the lettuce was brown. My daughter would not eat much of the food and went hungry. I also was hungry because the food I was forced to take was frozen and bad. It was unable to be eaten.
5. The Dog Pound was very, very cold. Both my daughter and I were shivering. Everyone was getting sick. When I arrived, my clothes were wet and muddy, but I was not allowed to change.
6. My daughter and I were allowed to shower only once in the five days we were at the Dog Pound.
7. After five days, my daughter and I were taken to Dilley where we have been held for about 45 days.
8. Both my daughter and I got the flu at Dilley. I am still sick, and my daughter caught chicken pox about eight days ago, even though she received the chicken pox vaccination when she was here.
9. My daughter and I cannot get access to adequate medical care at Dilley, because the lines are too long. Today I stood in line for three and a half hours to receive my medicine. In addition, there is a lot of lice and viruses in the facility that infect the children, including my daughter who got lice in addition to the stomach flu.
10. We are given so many papers that I am overwhelmed and unable to understand them.
11. I do not know my status and there are no current plans for my release, despite my having been in Dilley for 50 days.

I, Ana V [REDACTED] swear under penalty of perjury that the above declaration is true and complete to

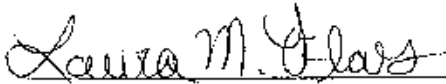
the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.



06-29-18
Date

Certificate of Translation

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



LAURA M FLORES

RAICES

4092 TPC PARKWAY, APT 953

SAN ANTONIO, TX 78261

06/29/18

Date

Exhibit 12

Declaration of

CRISTOBAL R [REDACTED]

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

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

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

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

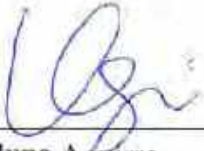
23. While at the Berks Facility I have spoken with somebody from an organization that I do not remember. We spoke for about ten minutes about my fear to return to my country. The officials at the facility say that I need to wait until someone from immigration comes and I can talk to them more about my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

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

[REDACTED]

6-2-9-78
Date

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



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

06/29/2018

Date

Exhibit 13

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

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

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

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

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

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

6-29-18
Date

Certificate of Translation

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

A handwritten signature in blue ink, appearing to read "Luisa Muskus", written over a horizontal line.

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

06/29/18
Date

Exhibit 15

Declaration of

Mayra S [REDACTED] A [REDACTED]

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

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

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

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

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

06/26/18
Date

Certificate of Translation

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



Ana Bueno

6/28/18
Date

Exhibit 16

Declaration of
RUTH M [REDACTED]

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

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

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

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

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

[REDACTED]

6/29/18
Date

Certificate of Translation

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


Yolanda Rodriguez

6/29/18
Date

Exhibit 18

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

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

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

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

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

[REDACTED]

06 29-18
Date

Certificate of Translation

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



Ana Bueno



Date

Exhibit 19

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

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

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

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

28 de Junio 2018
June 28, 2018

Certificate of Translation

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



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

6-28-2018

Date

Exhibit 20

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

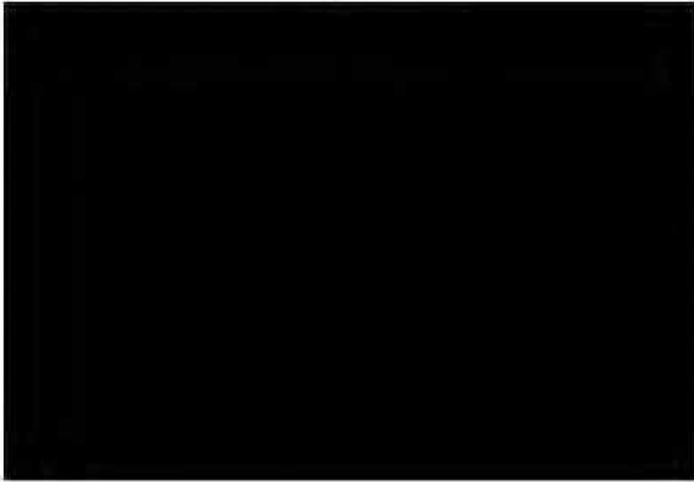
I, **BLANCA M [REDACTED]** declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

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

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

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

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



29-06-79
Date

Certificate of Translation

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

A handwritten signature in cursive script, appearing to read "Luisa Muskus", written over a horizontal line.

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

6-29-2018
Date

Exhibit 22

Declaration of

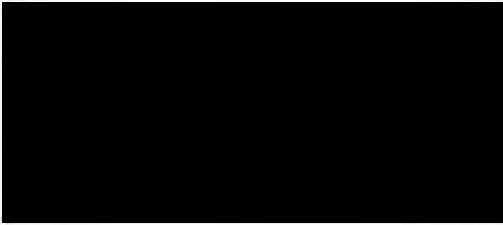
Fatima O [REDACTED]

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

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

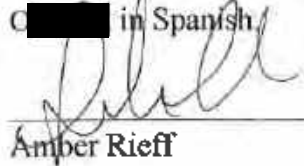
12. I am unaware of current status and keeps waiting to hear back about case status.

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



28-06-18
Date

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



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

6/28/18
Date

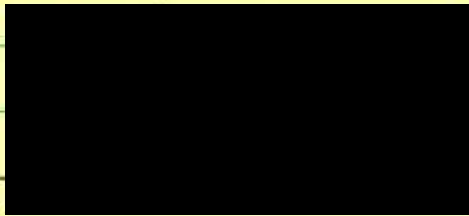
Exhibit 23

Declaration of
NoHEMI P [REDACTED]

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

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

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



June 27, 2018

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

Name: ESTELLA GALVAN

Signature: *Estella Galvan*

Date: 06-27-18

Exhibit 24

Declaration of

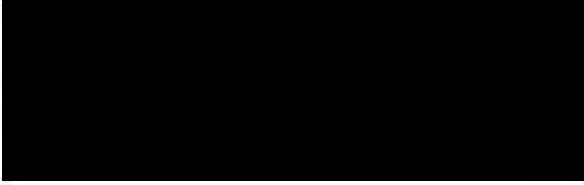
Doris M [REDACTED]

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

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

#21055

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



6-28-18

Date

Certificate of Translation

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



Amber Rieff

Willamette University
245 Winter Street SE
Salem, OR 97302

6/28/18

Date

Exhibit 25

No A#
Westaco
station

Karen B [REDACTED] - No A#

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

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

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

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

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

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

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

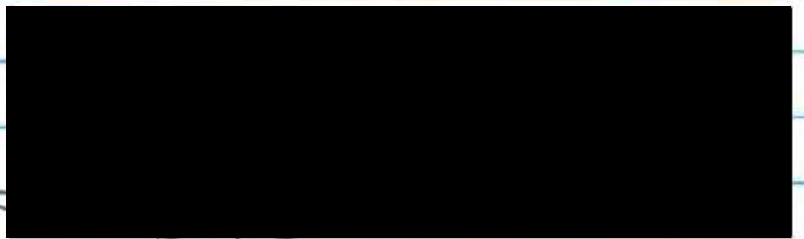
clothes or towels available.

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

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

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

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



6/14/18

Certificate of Translation

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



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

McAllen, Texas

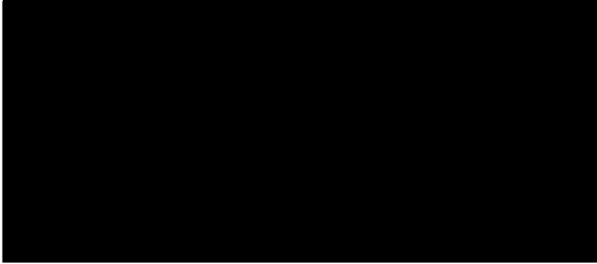
Exhibit 26

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

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

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


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



6.13.18
Date

Certificate of Translation

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


[NAME OF TRANSLATOR]
[ORGANIZATION]
[ADDRESS]

6-13-18
Date

Exhibit 27

#21067

DAISE M [REDACTED], A NUMBER [REDACTED]

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

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

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

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

[REDACTED]
06/29/2018
Date

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



LAURA M. FLORES

RAICES

4092 TPC PARKWAY, APT 953

SAN ANTONIO, TX 78261

6-29-2018

Date

Exhibit 28

Declaration of

ALEJANDRA R [REDACTED]

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

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

2. Describe Reason for leaving country of origin.

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

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

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

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

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

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

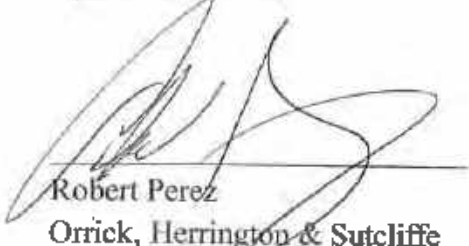
[REDACTED]

7/6/18

Date

Certificate of Translation

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


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


Date

Exhibit 30

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

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

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

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

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

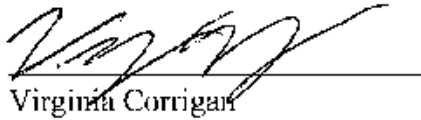
[REDACTED]

6/28/18

Date

Certificate of Translation

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



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

6/28/18

Date

Exhibit 31

Florida/ma [REDACTED] Declaration of [REDACTED], A NUMBER [REDACTED]

I, Florida/ma [REDACTED] A number [REDACTED] declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is 4/28/94. I am from Guatemala. My son's name is Broswin R [REDACTED]. He is 3 years old and he was born on 6/7/15.
2. We left Guatemala because we were afraid. My husband hits me and the carts would not protect me. I was afraid they would take my son away. I showed them a scar from where my husband burned me with a cigarette. The Border Patrol official did not believe me ~~is~~.
3. We presented ourselves at the border/were apprehended at around 9:00 a.m. (time). I believe that it was on or about 6/26/16 (date). We were taken to El Centro Border Patrol facility (facility).
4. When we arrived at El Centro around 9:00 a.m. my son got crackers + a juice. The only other food he was offered that day was a bean burrito. He was crying + wanted to ~~eat~~ eat.
5. The next day he got cereal, milk, + a fruit squeeze for breakfast and lunch, and a burrito for dinner. Dinner was at ~11:00 p.m. My son was crying because he was so hungry. He only ate one bite of his burrito because it makes him sick. Later I asked for milk for him and ~~got it~~ they brought him a milk. I have received three small bean burritos a day and water.

6. There is a water container in our room. The water tastes bad and is salty - There are no cups. We are drinking from the containers used for juice that was given to the kids.
7. The room we are in is crowded. We are eight people, four mothers and four children, in a small room. It is approximately 10ft x 10feet. We have two mattresses to share.
8. We sleep with our heads on the mattresses and our bodies on the cement floor because there are only two mattresses for eight people. The floor is very cold. My son and I share one aluminum blanket. My son sleeps a little on a corner of the mattress, because the floor is too cold. I cannot sleep because it is too cold. The lights are on all night.
7. We don't know what time it is because the lights are always on.

8. There is a toilet in our room, with no walls around it. There is a sink above the toilet. We hold up our blankets to give privacy when someone is using the bathroom. There is a 12-year-old boy and a 10-year old in the room with us.
9. We have no tooth brushes, soap, towels, or hair brushes. A woman in my room had her period and asked for ~~to~~ a tampon. She received one, but was denied a second. She did not get another for around 20 hours, so was using toilet paper. Later she was sent to shower and got more tampons.
10. There is no space in our room to move. The mats and people sleeping take up the space.
11. When I was interviewed by Border Patrol ~~next~~ I told them I was afraid to return to Guatemala because of my husband's violence + threats.
12. No one talked to me about my rights, or said that I could go before an immigration judge. They gave me papers

12 (cont'd) in English, maybe 15 pages, that I signed. I do not know what they said. I did not get to keep any of the papers.

13. I did not receive any information about my son's rights while he is detained. I did not receive, or see posted anywhere, information about lawyers or legal services to help with my case.

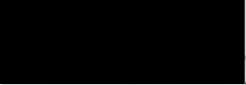
14. The Border Patrol Official called my family in Indiana, who said they would help us.


///

///

///

///

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



6/28/18
Date

Certificate of Translation

I, Tasha Wilson, certify that I am fluent in English and Spanish and that I read the above declaration to Floridalma L [REDACTED] in Spanish.

Tasha Ull

Name: Tasha Wilson

Organization: Center for Human Rights and Constitutional Law

Address:

6-28-18

Date

Exhibit 33

Declaration of
SINDY S [REDACTED] A NUMBER [REDACTED]

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

1. My date of birth is January 16, 1991. My daughter's name is **[REDACTED]** (A number **[REDACTED]**). She is eight years old and she was born on October 30, 2009. My daughter and I are from Honduras.
2. We crossed the river in a group in Reinosá on June 2, 2018. There were no agents on the other side of the river, so we walked for about an hour to get to the bridge. I wasn't quite sure where to go, but I followed the tracks of others. When we got to the bridge, I saw Customs and Border Patrol so I knew we were in the right place. We got in line to turn ourselves in to border patrol. All the agents asked were our names. They took our shoelaces, hair ties, and jewelry.
3. We got on to the bus with the officials and they took us to McAllen – to La Hielera (“The Icebox”). They took my watch, but I think we were there for two or three hours. It was very cold there. I heard there are some people who have to stay in there for longer. But God has been with me and we didn't have to spend much time there.
4. At La Hielera, we were in a cell, and the floor was full of people. We were exhausted, and we had to wait for people to be taken out to have their fingerprints taken to get a chance to rest. And it wasn't just our cell – every cell was full. They only gave us a juice and a cookie to eat.
5. An official took my photo and fingerprints. I didn't receive any paperwork notifying me of my daughter's rights and neither did my daughter. We weren't able to use the telephone to call an attorney, and we didn't receive a list of lawyers we could contact. The official also didn't ask why I had left Honduras.
6. After a couple of hours, we were taken to La Perrera (“The Dog Pound”) in the middle of the night. Inside, it's a big box with chain link enclosures. Those enclosures were full of people.
7. We weren't given any papers or any explanation of our rights. I wasn't able to make any phone calls, either to my family or to a lawyer.
8. There are some officials at La Perrera wearing gray uniforms. They treated people poorly. These officials wake you up from your cushion in the middle of the night by kicking you – at least I think it was the middle of the night, because there were no windows and the light was on all the time. They also treat you poorly verbally. I heard them telling some women “Why did you come to this country?” and to some men “Why did you come to this country, and now I have to pay for you with my taxes?” I saw a woman take an apple from a box to give to her child, and an official told her “What do you call that in your country? Don't you call that stealing?” There was a woman who was getting transferred to another facility, and I heard an official tell her “get all of your filthy things and get out of here.”
9. I didn't come here to be a charge on anyone. I came here fleeing for my life and my daughter's life. I'm willing to work to take care of myself and take care of my daughter – I just want to be here in the United States where we can be safe.

10. We couldn't go to the bathroom whenever we wanted. I had to ask the guards to let us out of the cell because they had locked the door. Whenever we were woken up in the middle of the night, we weren't allowed to go to the bathroom.
11. We weren't able to take a shower until the third day we were there. I was embarrassed because we weren't able to wash or brush our teeth. We had brought toothpaste, soap, and deodorant with us, but they had taken them away.
12. It was very cold, and that made it really difficult to sleep. And on top of that, we kept getting woken up by officials. For some reason they didn't want to let us sleep. I told an official that my daughter was asleep and I didn't want to wake her up to make her stand in line, but he yelled at me and made me wake her.
13. After three days, they didn't tell us where we were going, but they put us in a bus and brought us here to Dilley on June 5, 2018. On the bus, an official asked if the temperature was OK. A woman responded that she couldn't feel the air conditioning. The official said, "Oh, you can't feel the air? More air conditioning for me up here."
14. I had my credible fear interview last Thursday. It was delayed because no official was available. I brought my daughter with me, because the form told me to bring her. But the official let me leave her outside for the interview. I received a positive credible fear determination. My family is buying us tickets and we hope to leave for Los Angeles tomorrow to go live with my uncle.

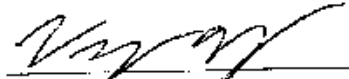
I, Sindy S [REDACTED], swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

6/28/18

Date

Certificate of Translation

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



Virginia Corrigan
823 Folsom Street, Suite 700
San Francisco, CA 94107

6/28/18 _____
Date

Exhibit 37

**Declaration of
ANA P [REDACTED], A NUMBER [REDACTED]**

I, Ana P [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. I was born July 8, 1981 in Honduras. My daughter is [REDACTED] (A [REDACTED]). She was born on September 16, 2006. She is 11 years old.
2. We came to the United States because we were afraid. Our house was destroyed by flooding and the landlord began to extort us. We paid him some money but he kept demanding more. He threatened to send gang members after my family if we did not pay. Later that day, gang members came asking around for us and saying that they were going to take revenge on us.
3. We entered the United States at Reynosa. We were apprehended by immigration officials on Wednesday, June 20, 2018 at 5:30pm.
4. At 7pm, they put us in an icy cold room with 40 people. They were all women and crying children. It was very crowded and not everyone was able to lie down.
5. When we entered the ice box, they brought us each a cookie and juice, but no water. Two hours later, we each received a bad ham sandwich and a small juice. They also brought a thermos of water and small cups. It was not enough water. We asked for more and a half hour later they brought more.
6. Because we were wet when we arrived, we were freezing. We did not receive dry clothes or towels. We each had an aluminum blanket. I used both of them to wrap around my daughter. My daughter crying because she was so cold.
7. There were only two toilets in the ice box. There was only a short wall blocking us from view. There was a sink above each toilet but no soap. We did not receive toothbrushes or toothpaste.
8. I was called into a room and had a video conference with an official. He asked for our names and other information. He did not give me any information about our rights or tell me we could have an attorney. He asked whether anyone would sponsor us in the United States. I said that my sister and brother-in-law in the U.S. He did not ask for their contact information or offer me a phone call.
9. At 12am on Friday June 22, my daughter and I were moved to a building called the doghouse. We were there for three days. When we arrived, they asked me for my daughter's age, and I told them that she was 11. They took her away and did not tell me where she was going.

10. I was held in a cage with 15-20 women. Everyone was always crying because we did not know where their children were. We had all been separated from them. The officials surveyed all of the women asking whether we had known that they were separating parents and children. They asked us why we were still willing to come to the United States. They did not give us any information about our legal rights or try to contact my sister in the United States.
11. On the second day in the doghouse, when we lined up to get our food, I saw my daughter in another line two cages away. She was crying. We made eye contact and I tried to comfort her with hand signs. We were not allowed near each other.
12. On Sunday June 24 at 11am, they called some of the mothers' names. Then they began calling the children's names. When I saw my daughter, we both cried and hugged each other.
13. My daughter said that she really needed me and missed me badly. She told me that when she was alone, she was cold and that her food was bad. She felt alone and often did not eat. She had stomach pain. She only had one shower, on the first day, and had to put on her dirty clothes again. They did give her a toothbrush and toothpaste.
14. We boarded a bus and arrived at Dilley on Sunday afternoon. When we arrived, we had showers and gave a urine sample. We received clothing and a medical screening. An official explained our legal rights and allowed me to call my sister.
15. My daughter has been having a lot of anxiety and trembles often. She has become withdrawn. She always wants to know where we are going next and when we will be able to leave and see her aunt.
16. We are waiting for our appointment with a lawyer. We have a hearing on July 2.


I, Ana 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]

6/28/18
Date

Certificate of Translation

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



Yolanda Rodriguez

6/28/18

Date

Exhibit 38

#21135

Declaration of

Alma R [REDACTED] A NUMBER XXX-XXX-XXX

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

1. My date of birth is February 10, 1980. My daughter's name is Maria F [REDACTED] She is thirteen years old and she was born on February 20, 2018. My daughter and I are from Guatemala. *2005 ARM L*
2. We left my home and country to offer a better life to my daughters, one left in Guatemala with my mother. In Guatemala there is no possibilities or opportunities to survive.
3. We were apprehended after walking approximately one hour north of the border. I believe that it was on or about June 10, 2018 at 5:00 PM. We were taken to the San Ysidro CBP station.
4. The food at this facility consists of only bean burrito, a cookie, and some juice for breakfast, lunch and dinner. The only water available is from a drinking fountain and no cups are available.
5. The temperature at this facility is colder than comfortable.
6. In the restrooms, there was toilet paper, but no soap or hot water. The restrooms out in the open where we sleep and are detained.
7. We were not provided a chance to shower. We were given a comfortable to sleep in and a thermal blanket but still felt cold. The lights were left on but it was not crowded.
8. We were not provided a toothbrush but only a sponge on a stick for dental hygiene.
9. I was not informed of any rights in regard to my daughter including the possibility of releasing her to my brother or responsible adult. Or of any right to change my decision if I made one concerning my daughter.
10. A Customs and Border Patrol ("CBP") agent called my brother in Florida. The CBP agent spoke with my brother himself while I listened. The CBP agent asked my brother if my brother had enough money to transport us to Florida and that releasing us to Florida would happen faster if he could afford our transportation. My brother stated he could not afford our transportation. The CBP agent then stated he would be back in touch. I was asked by the CBP agent if I wanted to say something to my brother and I told him yes. Told my brother that we were ok and not to worry
11. We were not allowed to read our declaration written by the CBP agent when we were first apprehended but were told just to sign it.

I, , 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.

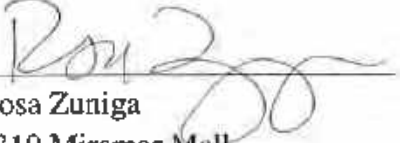


June 11, 2018

Date

Certificate of Translation

I, Rosa Zuniga, certify that I am fluent in English and Spanish and that I read the above declaration to Alma
R [REDACTED] in Spanish.



Rosa Zuniga
8310 Miramar Mall
Suite A
San Diego, CA 92121

June 11, 2018
Date

Exhibit 39

Marlyn E. [REDACTED] Declaration of [REDACTED], A NUMBER [REDACTED]

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

1. My date of birth is 7/9/95 I am from Honduras. My daughter's name is Claudia V. [REDACTED]. She is 7 years old and was born on 11/22/10. My son's name is Emerson [REDACTED]. He is 5 years old and was born on 9/23/12. My children's stepfather, who has been a father to them for five years, is Kevin A. [REDACTED] born on 6/12/95.
2. I/We left Honduras because we were afraid for our lives. We came here to save our children's lives. My children's biological father is violent and in a gang. He attacked my children's stepfather and cut his arm so he can no longer use it. He tapped us and robbed us and threatened our lives. He has killed people + has been in prison for that.
3. We presented ourselves at the border/were apprehended at around 12:00 pm (time). I believe that it was on or about 6/27/18 (date). We were taken to El Centro Border Patrol facility (facility).
4. My children ~~received~~ were given juice when they asked, and some crackers. They did not receive a meal until around 11:00 p.m., Eleven hours after we encountered Border Patrol. They have been offered small bean burritos, but they don't like them. The water here smells strongly of chlorine, but there is nothing I can do about it, so my children drink it. We have been offered food, bean burritos, three times a day. We are getting dinner around 11:00 p.m., when we are sleeping.

5. The temperature here is cold at night.
6. The lights are kept on all night. It is difficult to sleep. We put a plastic sheet over our heads. There are 10 mattresses, which we all share among 20 people.
7. The room we are in is crowded. There are around 20 people in the room, mothers and children. There is someone who has been here a week, who has her period, who has not been able to bathe. I have not bathed and my children have not bathed. There is a ~~bat~~ toilet in the corner of the room with a half-way wall and a sink with water. People wash ^{in the} ~~in the~~ sink. ~~without privacy.~~
8. There is a child here with diarrhea who is always using the bathroom. He is sick from the bean burritos.
- 9) There are no toothbrushes, hair brushes, or soap or towels. The room is dirty now, they have not cleaned it today.

10. I was interviewed together with Kevin and the children for about an hour. I told them we were afraid to return to Honduras. Kevin also told them he was afraid and that he would rather stay in custody here than return to Honduras. He showed them he cannot use his right arm because he was attacked by my children's biological father. He was told he would be sent back to Honduras. It did not matter to them that we are a family.
11. I was told I was going to see an immigration judge. I was given a paper to sign, ~~about~~ ^{about eight times} I think it was in English. I don't know what it said. They took it after I signed it.
12. I have not been given information about obtaining a lawyer or access to a telephone to call a lawyer.
13. I have not been advised of my children's rights while they are detained.

14. The interviewer called my ~~stepmother's~~ mother-in-law, who said ~~her son's~~ her son's name is Kevin. ~~never met him.~~ This was the mother of Kevin, who lives in Kansas. We did not get to speak with her. They hung up the phone.
15. They told Kevin that he did not have access to a lawyer or a chance to go in front of a judge.
16. My children are crying for Kevin and have seen him only one time, briefly, since we have been here.
- ///
- ///
- ///

I, Marlyn 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]
Signature

6/20/18
Date

Certificate of Translation

I, Tasha Wilson, certify that I am fluent in English and Spanish and that I read the above declaration to Marlyn E [REDACTED] in Spanish.

Tasha Wilson
Name: Tasha Wilson
Organization: Center for Human Rights and Constitutional Law
Address:

6-28-18
Date

Exhibit 40

This is a confidential legal document and the work product of a attorney-client relationship.

Declaration

Jeydi M [REDACTED], A# [REDACTED]

I, Jeydi 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 Jeydi M [REDACTED] born, March 23, 1989, A# [REDACTED] and my 4-year-old son [REDACTED] (A# [REDACTED]), born February 16, 2014, who was not interviewed and who is on my claim. I am from Progreso Lloro, Honduras.
2. In October 2017, my partner left Honduras taking my daughter with him to the United States.
3. I entered the United States on about June 4, 2018 near Brownsville, Texas. After I crossed into the United States we were detained by U.S. officials about 15 minutes later. The officers demanded my shoelaces, jewelry, and told me to get into a truck. The officer asked me questions about when I came and made me sign several papers. I asked if any of the papers were for my deportation and they said 'no'. Then they drove us to a heiliera.
4. At the heiliera they took my identification and asked me if the child with me was my son, and took us into a very cold room where we had to sleep in the floor with blankets of aluminum. They also took my finger prints, but not my son's. They also asked me questions about why I came to the US and if I had a fear of returning to Honduras. I told them I feared persecution. They also gave us a cookie and juice five times in 24 hours. Four times they gave me a sandwich. I stayed in the heiliera one night I think, but because they never turn off the lights I am not sure. There was no possibility to bath or take a shower.
5. The next day we were taken to the Peirerra in a bus. They gave us an apple, sandwich, cookies, juice, and water. I was taking medicine for an injury to my leg. There was no possibility to bath or take a shower, even though there was a shower there. I was at the Peirerra for one night, I think, then I was taken to Dilley.
6. The medical treatment in Dilley is not sufficient. The medicine that I received at Dilley for my leg injury did not stop the pain in my leg, although the medicine that I was taking in Honduras since August 2017 did stop the pain. There are long waits and the medicine they give us is not good. I had to wait for five days to get treatment for my leg. I asked for crutches so I could walk but they would not give them to me. They told me that I could only get crutches if I was admitted in to the medical unit here. My son was coughing, vomiting, and had a fever. They did not give him any medicine for his fever, cough or vomiting. About a week ago my child had a fever and was vomiting, and I went to the clinic, about six times in three days, and the nurses refused to admit my child or provide him any assistance. Only after he saw the doctor, and he confirmed the child had a fever, did my son receive treatment for a fever and conjunctivitis. They gave me an armband that meant that I don't have to wait at the pharmacy because I had to wait for 2 or 3 hours to get medicine before they gave me the armband. They gave me this armband after 20 days.
7. The nurse who first saw my child wrote that my child did not have a fever, but the next person who saw my child, and said he was a doctor, said my son did have a fever.
8. At Dilley, I was interviewed on Monday, June 7, 2018, and explained that I was fleeing my country because I feared harm. I am awaiting my asylum decision.

I, Jeydi 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: [REDACTED]

Date: 6/28/18

Certificate of Translation

I, Casey Miller, certify that I am fluent in English and Spanish, and that I read the above declaration to Jeydi M [REDACTED] in Spanish.

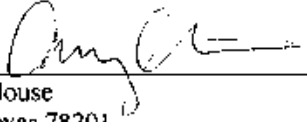
Casey Miller:  Date: 6/28/2018
802 Kentucky House
San Antonio, Texas 78201

Exhibit 42

Denia M

tion of

A NUMBER

I, Denia M (A number _____), 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 Sep 10, 1997. I am from Honduras. My daughter is Zoe V. Her date of birth is February 16, 2017. Her A# is _____.

2. I/We left Honduras because a gang killed my husband and threatened my and my daughter's lives.

3. We presented ourselves at the border/were apprehended at around mid-day (time). I believe that it was on or about June 27, 2018 (date). We were taken to El Centro Border Patrol Station (facility).

4. My husband and I owned a small store in Atlantida, Honduras. The gangs were forcing us to pay an Impuesto de guerra, or War Tax. My husband had stopped paying and they were threatening him. When I was pregnant, we decided not to register her with his name because he was being threatened.

5. About 3 months ago, they killed him and burned down our store. I was there and they told me I should run away or they would kill me and my daughter. We fled the same night, with just the clothes we were wearing.

6. I went to my mom ~~who paid for us to go~~ take a bus to Guatemala and then we went to Mexico. I wasn't able to attend my husband's funeral.
7. After my daughter and I were detained, we were brought to this building and put in a cell with about 10 other families. There were only seven mats for sleeping so some of us slept ~~standing up~~ sitting up. We had paper blankets, ~~and~~ it is very crowded, and we have to step over others to get to the bathroom.
8. Since we arrived yesterday, my daughter is now having diarrhea. It started this morning. I don't want to ask for a doctor because I am afraid the officials will retaliate and hurt my case if I do. My daughter also ~~is getting~~ has a bad diaper rash from the diapers.
9. There is another baby about 3 years old who has not ~~been able to go~~ had a bowel movement for four days and his stomach is very hard. The mother told the guards, and they did nothing. This mom said she has been here for 5 days.

Declaration of Denia III
page 2

10. They feed us two burritos per day but it isn't enough. I have an allergy to gluten so I am afraid to eat the burrito because it may make me sick. I am worried because I am not making enough milk now to feed my baby. Since I have been here and am not eating enough, my milk is drying up, so my daughter also is hungry and not getting enough to eat.
12. My daughter feels shut in in the cell all day. There are no toys or games. She goes up to the locked door and bangs on it.
13. At the facility, I did not get any papers explaining my rights or a list of lawyers to contact.

I, Denia 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.

Denia

Signature

6-28-2018

Date

Certificate of Translation

I, Clara Long, certify that I am fluent in English and Spanish and that I read the above declaration to Denia M [REDACTED] in Spanish.

Clara Long
Name: Clara Long
Organization: 350 Sansome St 1000
Address: San Francisco, CA 94104

6-28-2018
Date

Exhibit 45

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

April 16

- 1) My date of birth is ~~March 13~~ April 16, 1993. My son's name is [REDACTED]. He is 3 years old and was born on March 13, 2015. My son and I are from Guatemala.
- 2) I left Guatemala because there is much violence there. I wanted to give my son a better life. They asked me if I had a fear of returning to Guatemala and I said I did.
- 3) We ~~were~~ presented ourselves at the border near Mexicali on Saturday night, near midnight. I believe this was on June 23rd near midnight. We were taken to El Centro Border Patrol facility.
- 4) In the morning after we arrived, we received cookies, juice, and a burrito. This was around 6:00 am. At around 3:00 pm we received the same thing the same food. ~~The~~ My son is not familiar with that food. He became constipated. We asked for milk for the children, which was provided. Today we asked for food more appropriate for children. Some cereal and bottles of fruit was provided. The children were not eating.

enough before. I hope the feed they started providing today will be better!

5. The temperature at the facility is sometimes cold at night - but is all right.

6. The lights are on all night. There is a bathroom in our room, with a half wall. There are different numbers of people in the room, because people come and go. There are usually around 3 mothers and 3+ children in the room. There is one mattress for each ~~the~~ mother to share with her children.

7. We have been here for 3.5 days. We have been together since we have been here.

8. There are not toys for the children. The children were fighting over 2 balls, which were thrown away.

9. I ~~did not~~ was given a paper to sign. I do not know what language it was. Plus told I would go through a legal process if I was going to be able to stay here.

I was not told about free buyers or that I could have a buyer. I was not able to call anyone, ~~or told I had access to~~ ~~phone~~ myself. The first day I was here, (BP) called my uncle, but he did not answer. I do not know if they have called him again.

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

[REDACTED]
6-27-78
date

I Flor Sanchez, certify that I am Fluent in English and Spanish and that I read the above declaration to Abidalia [REDACTED] in Spanish

Flor Sanchez
name, organization, address

6/27/18
date

Exhibit 47

C/3

Declaration of Baljit K [REDACTED]

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

A# [REDACTED]

1. ~~My~~ My date of birth is January 2, 1988. My son's name is Lovepreet S [REDACTED]. He is 8 years old and was born on July 5, 2010. My son and I are ^{state} Punjab, India. I speak Punjabi.
from
2. The reason I left is because I fear for my life ^{in India} ~~there~~. I expressed ~~my~~ my fear of returning to a CBP officer.
3. My son and I were apprehended on Monday, June 25, 2018 after 10 AM. We were taken to this facility [El Centro].
4. I arrived around 2-3 pm, and was offered food in the evening. I'm hungry and have not been able to eat for the past 3 days. They offered me ^a burrito and juice, and I can only take the juice. When I tried to eat a burrito, I vomited. I would like to have Indian food.
5. I am in a room w/ 9-10 other women. All of us have a child, so there are 9-10 children in the room. The approximate size of the room is 18 x 20 ^{feet}.

2/3

6. There is a bathroom with a sink and toilet. The toilet is clean, but there is no soap and the room smells because of the trash in the bathroom. ^{We} ~~I~~ have not showered. There is no place to shower. There are no hygiene products.
7. The water does not taste good. We do not have our own cup so we use the container from the juice.
8. I have a sleeping mat and a mylar blanket I share with my son. All of the women have 1 mat and 1 blanket to share with their child. I did not receive a mat until my second day here. Anyone who arrives later in the day must share with the women already here.
9. The lights are on all night. I have to ~~cover~~ cover my head ~~with~~ with the blanket to sleep. I wake up often.
10. I have not received written notice of my legal rights. I have not seen any wall postings of my legal rights. I have not received verbal notice of my legal ~~to~~ rights.

3/3

11. I have had access to an interpreter two times. They try, but only speak Spanish here.

12. I was allowed to ^{talk}~~ask~~ ^{to} my husband after asking the second time to ^{talk}~~ask~~ with him.

I, Baljit K. [REDACTED] swear under penalty that the above declaration is true and complete to the best of my abilities. This declaration was recorded in Punjabi, a language in which I am fluent, and was read back to me in Punjabi.

[REDACTED]
Name

6/27/18
Date

Certificate of Translation

I, Damandeep Khokhar, certify that I am fluent in English and Punjabi and that I read the above declaration to Baljit K [REDACTED] in Punjabi. I interpreted ths document to Baljit K [REDACTED] on the phone.

Damandeep Khokhar

Damandeep Khokhar

Language Line

06/29/18

Date

Exhibit 49

Declaration of EDGAR R [REDACTED]

my son, YIMS F [REDACTED] has

A # [REDACTED]

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

- 1) My date of birth is July 10, 1978. My son's name is [REDACTED] Yims F [REDACTED]. My son and I are from Guatemala.
- 2) We left our country because the gang members near where we live were leaving notes for us. They said they were going to take my son. There was no opportunity for us there.
- 3) I have been here since Monday. The immigration guards caught us in the desert and brought us here.
- 4) When I arrived, they made me sign some papers. They showed me a list of lawyers, but they did not let me take the list or make any phone calls to any lawyers.
- 5) I was not told anything about my release or conditions of my release. I was not given information about being released on bond or on notification.

- 6) I was able to make one phone call to my ~~mother~~ ^{can so if I am} uncle to get his address of where I ~~will be~~ ^{will be} released.
- 7) All I have been able to eat here are burritos. They give us burritos three times a day. My son gets juice and crackers, but no milk. They told me that he cannot get milk because he is too old. We are both hungry.
- 8) The temperature in the room during the day is okay, but the temperature is cold at night. We need more blankets because it gets so cold at night. We have to ~~stay close~~ be close to stay warm.
- 9) We have not gotten new clothes and we have not been allowed to change.
- 10) There is nothing for us to do all day, but to stay in the room. We are allowed to leave the room only when they clean the room.
- 11) We have not been allowed to take a shower.

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

6/7/2018

I, Tasha Wilson, certify that I am fluent in
Spanish and that I read the above declaration to
Edgar R. [REDACTED] in Spanish.

[REDACTED]
6-27-18

Exhibit 50

#21187

Declaration of

[FULL NAME], A NUMBER XXX-XXX-XXX

Ermita M. [REDACTED]

I, [NAME] (A number XXX-XXX-XXX), 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 1/15/1984. My son/daughter's name is Jayson S. [REDACTED] twelve and he was born on 2/17/2006. My son and I are from Guatemala.
2. Describe Reason for leaving country of origin: Lived here for eleven years and left after grandmother was arrested in Guatemala for fifteen (15) years.
3. We ~~presented ourselves at the border about~~ were apprehended ten days ago. [TIME SINCE APPREHENSION]. I believe that it was on or about 4/25/18 [APPROXIMATE DATE]. We were taken to [FACILITY]. [DESCRIBE CONDITIONS AT THIS FACILITY] El Centro, CBP.
4. ~~[FOOD AT FACILITY]~~
5. [TEMPERATURE AT FACILITY] The facility is too cold. I asked for a jacket but was refused.
6. [LIGHTS, HYGIENE ETC.] We have not been able to take a shower and there is no soap. The lights are too bright and I can't sleep.
7. After ten days [LENGTH OF TIME AT FACILITY], my son, my sister in law, and I were taken to another place where we were held for XXX days.
8. ~~[DESCRIBE CONDITIONS LIKE ABOVE]~~
9. [DESCRIBE LEGAL NOTICE AND ACCESS TO COUNSEL ISSUES] No legal notice at all. Something was put before me and I signed it. I can't read.
10. ~~My son and I were taken out of that facility on a [DAY].~~
11. My son and I have been at the [CURRENT FACILITY] for about XXX days. We are planning to [DESCRIBE RELEASE PLANS]. I don't know what will happen now.
12. [DESCRIBE CURRENT CASE AND RELEASE STATUS]

Ermita M. [REDACTED]
I, [NAME], 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]


Date

6/27/18

#21188

Certificate of Translation

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



[NAME OF TRANSLATOR]
[ORGANIZATION]
[ADDRESS]

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

6-27-2018

Date

Exhibit 51

Declaration of Fanny D [REDACTED]


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

- 1) My date of birth is 8/19/97. My son's name is Olego S [REDACTED]. He is six years old and he was born on ~~January 6, 2012~~ June 2, 2012. My son and I are from Honduras.
- 2) I left Honduras because I was threatened. They (gang members) told me they would kill me because I did not give them both the money and the terribles from my terribles business. They destroyed my house and left a note saying they would kill me. We left two days later.
- 3) We crossed the border at around 9:00 a.m. on June 27, 2018, near Mexicali. Border Patrol approached us and we were taken to El Centro. It took about an hour to get to El Centro. We crossed together without others.
- 4) We received food at about 4:30 p.m., seven and a half hours after we were detained. My son received a small bean burrito, crackers, and a fruit squeeze pouch. He was still hungry after eating the burrito and wanted another.

- 5) I did not receive any written notice of my legal rights or the legal rights of my son.
- 6) I did not receive notice of my right to a hearing before an immigration judge. I told the Border Patrol I was afraid to return to Honduras, and why. An officer took notes of what I said on his computer.
- 7) I did not receive notice of the availability of lawyers, or free legal services.
- 8) I did not receive notice of my son's rights while he is at CBP.
- 9) I do not have access to a telephone to call a lawyer.
- 10) Border Patrol called my Aunt in Oakland. I talked to my Aunt on the phone.

I, Fanny D. [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my knowledge. This declaration was provided in Spanish language in which I am fluent and was read back to me in [REDACTED] 6/27/18

Certificate of Translation

I, ~~ESTELLA~~ ^{Galvan} ESTELLA certify that I am fluent in English and Spanish and that I read the above declaration to Tenny  in Spanish.

Estella Galvan
name

06-27-18

date

Exhibit 53

Declaration of Selena B [REDACTED] A:

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

1. My birthdate is May 8, 1996. My daughter's name is Adrianita Y [REDACTED] [REDACTED] She is (5) five years old. Her birthdate is July 26, 2012. My daughter and I are from Guatemala.

2. We were apprehended at the border on Monday night June 25, 2018. Upon capture we were brought to the Border Patrol facility at El Centro.

3. The food at the facility consists of burritos made with beans only for me and my daughter. ~~is given some crackers along~~ We get burritos twice a day. We are also given some crackers during the day. We are hungry and not provided enough food.

4. In our room there are approximately 14 people about seven (7) mothers and daughters.

The lights are kept on at all times making sleep difficult. We do not know whether it is day or night. We are not permitted outside the room except ~~for cleaning~~ when the room is being cleaned. There is a toilet in the room with a short wall and no door. There is a sink to wash our hands but no towels to dry them. We have not had a shower or change of clothes. There are no games in the room for my daughter to play with.

5. Last night, Tuesday, I was taken out of my room by a guard and brought to a larger area with other guards. The guard asked me questions about my family but didn't write down anything I said. He then placed a packet of papers in front of me ~~was~~ of about five (5) pages. ~~The~~ The papers were written in English and I didn't understand them. I was told to sign the papers on my behalf and on behalf of my daughter. I did so.

6. I have not been given any notices regarding any rights that ~~of~~ my daughter and I may have. I have not seen any notices

identifying lawyers or relating to
access to counsel.

We have been in this facility for
~~at~~ three (3) days.

I swear under the penalty of perjury
that the above declaration is true and correct
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]
Selena B [REDACTED]

June 27 2018

Date

I Martha Ramirez certify that I
am fluent in English and Spanish and
that I read the above declaration to
Selena B [REDACTED] in Spanish.

Martha Ramirez

6/27/18

Martha Ramirez

86 Melrose Drive

Mission Viejo, CA 92692

Exhibit 62

Declaration

GLADYS I [REDACTED], A# [REDACTED]

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

1. I am Gladys I [REDACTED] born November 11, 1988, A# [REDACTED] and my 5-year-old daughter [REDACTED] (A# [REDACTED]), born July 7, 2012, who was not interviewed and who is on my claim. I came from the Caserio de Duraznito, Durazno, Jalapa, Guatemala.
2. I arrived in the United States on June 8, 2018 at Juarez. I crossed the Rio Grande river and was approached by U.S. police. They said, "How can I help you." The one other woman crossing with me said, "We want asylum." The police told us that "just by being here you are committing a crime." The police then called a truck that took us away to a Perrera.
3. At the Perrera they collected our information and gave us some water. I was there for two hours. This place had no beds but I could sleep or sit on hard plastic mats. After two hours they took us to the hielera that was very cold and we stayed the night sleeping on thin mattresses with one blanket each. It was still cold even with the blankets. After one night we were brought back to the Perrera where we had to sloop one night without mattresses, but with blankets. We were not given water, but told to use the water we used to wash our hands. The water tasted very bad. In the Hielera and Perrera the officials were very intimidating. They would yell at us a lot. For example, they called one woman deaf for not understanding correctly what she wanted her to do. On the third day we were taken to Karnes in a bus.
4. I came to Karnes on June 11, 2018. And I had my interview last Tuesday, June 19, 2018. I told the officer I feared returning to my country because threats had been made against my life. I am still waiting to hear the outcome of my interview. I have a sponsor in Trenton, New Jersey, but the authorities have not called them yet. I have called my sponsor and they told me no one called. Calls are very expensive here. When I called my country, it costs me 9 USD for 15 minutes.
5. My child has had influenza with a fever and headache and we were put in isolation at the medical center for several days.
6. I stay at Karnes in a room with one other family. There are eight beds in the room. The other family has the mother and daughter.
7. The meals times are very early at Karnes. They wake us up at 6 a.m. and tell us we have to go to eat breakfast at 6:30 a.m., we have to eat lunch around 11 a.m., and dinner is at 5 p.m. This is difficult because the small children do not want to eat so early in the morning.

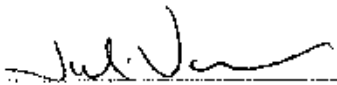
I, Gladys I [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

Name: [REDACTED]

Date: 6/25/2018.

Certificate of Translation

I, Julia Valero, certify that I am fluent in English and Spanish, and that I read the above declaration to Gladys
[REDACTED] in Spanish.

Julia Valero: 
802 Kentucky House
San Antonio, Texas 78201

Date: 6/25/18

Exhibit 63

Declaration of
Marcedonio P. [REDACTED], A NUMBER [REDACTED]

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

1. My date of birth is March 3, 1973. I am from Guatemala My son is
A# [REDACTED]

2. I/We left Guatemala with my ~~because~~ son Bryan because we had been threatened many times. The people who threatened us ~~at~~ we known as ~~to~~ to us as part of a gang call Solvutucha. They said to us either join us or we will kill you. There were other people who threatened ~~to~~ to kill us if we didn't give them money. We left because of fear for our lives.

3. We presented ourselves at the border/were apprehended at around Mexicali (time). I believe that it was on or about Monday June 25, 2018 (date). We were taken to the El Centro Border Patrol Facility (facility).

4. When I we, I my son and I, got to the facility I was separated from my son. I have not seen him since we were separated. I first saw him when this declaration was prepared.

5. I was placed into a room with about 25 other men. I ~~was not~~ spoke to an officer and told him ~~at~~ the circumstances ~~of~~ reasons that we left Guatemala. I then signed what I believe is a statement regarding the reasons we left Guatemala. Specifically the fear my son and I ~~felt~~ had for our safety and our lives.

6. The following day another officer asked me a series of questions about why we left. I told this officer the same things.

7. The room that I have been in does not have enough blankets for all the men who are in the room.

hungry.

with only beans


8. ~~There~~ We are fed burritos and water. We are
The lights are kept on in the room at
all times. ~~I~~ I don't know whether it is
night or day. There ~~is~~ is nothing in
~~the room~~ the room is very sterile.
We are not given soap to wash, ~~or~~
~~I~~ I have not had a shower since
I arrived.

9. There are no posted documents about
the availability of lawyers or about our
rights. I ~~we~~ have not been given
any papers regarding any rights we
have or about lawyers.

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

[REDACTED]
6/28/18

Certificate of Translation

I, Estelita Salazar, certify that I am fluent in English and Spanish and that I read the
above declaration to Marcedonio  in Spanish.

Name:

Organization:

Address:

06-28-18
Date

Exhibit 65

Sandra M. [REDACTED] Declaration of [REDACTED]
NUMBER [REDACTED]

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

1. My date of birth is 11/2/91. I am from Guatemala
2. We left Guatemala with my daughters because one of them had been kidnapped and the people who kidnapped her were following her around and trying to take her again. ~~We paid a ransom for her release.~~ because we paid a ransom for her release.
3. We presented ourselves at the border/were apprehended at around Mexicali (time). I believe that it was on or about June 25, 2018 in the morning (date). We were taken to the El Centro Border Patrol facility. (facility).
4. There are 10 mothers and 8 children in ~~our~~ our room. ~~The~~ My daughters Angeley A [REDACTED] and Alisson A [REDACTED] are fed three times a day. They get a burrito, a cracker and juice to eat each meal. I only get to eat twice a day. There is ~~no~~ drinking water in our room but the water is very bad. We are all hungry and thirsty. There is no soap in the room to wash our hands or brush our teeth.
5. There are not enough mattresses for all of the kids. The adults sleep on benches. The last two days the temperature has been kept very low and we have been cold. There is nothing in the room for the kids to play with. --no games, cards or toys. None of us have had a shower since we have been here.

6. The lights are on all the time.
my daughters are not able to sleep
very well because it is always light.
We have not been outside our room.
~~until we met with the~~

7. Several of the guards are very hostile.
~~They~~ They have said to me "why do you god damn
Guatemalan come to invade our country?" You
~~I asked for toilet paper and the guard~~
~~threw it at me.~~
disgust me."


I asked another guard for toilet paper
and he threw it at me.

I, Sandra 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 Spanish, a language in which I
am fluent, and was read back to me
in Spanish.

[REDACTED]
Sandra M. [REDACTED]

6/28/18

Certificate of Translation

I, Estella Galvan, certify that I am fluent in English and Spanish and that I read the above declaration to Sandra M  Spanish.

ESTELLA GALVAN

Name:

Organization:

Address: 28132 Leton Ct
Laguna Niguel, Calif 92677

06-28-18

Date

Exhibit 73

Declaration of
Elsa F [REDACTED] mother of Itzel C [REDACTED] (A [REDACTED])

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

1. My daughter's name is Itzel C [REDACTED] A [REDACTED]. She was born on December 29, 2015 and is 2 years old. We are from Guatemala.
2. I was arrested on Saturday June 9, 2018 at around 2pm. It was in Arizona just across the border from Mexico but I am not sure where. We were taken to a place about an hour and a half away where we stayed until Sunday at 7am.
3. The first place I was at was similar to this one (Tucson CBP). We were in a room with 5 families – about 12 people. It was crowded. I slept on a mattress with my daughter. Even with the aluminum blankets we were cold all night. The lights were on all the time.
4. There were 3 toilets with toilet paper, a sink, but no soap. I was not offered a shower. I was given a tooth brush but no toothpaste.
5. The first day at 4pm we were given a burrito, a cookie, juice and a bottle of water. We got the same thing at 9pm.
6. We left the first place at 7am on Sunday. We were taken to another station where along with 20 other people we were kept in a jail cell for 20 minutes. We were then transferred here. The trip took about 5 hours. We arrived around 3pm.
7. From 7am - 3pm we had just one bottle of water and one cookie and my daughter was given a small carton of milk. After we arrived we had three meals of burrito, cookie, juice, and water at 3:30, 6, and 9.
8. Beginning Monday we have been given the same meal at 7, 9, 1, and 6. At 9pm we are given juice. There is water available all day in our room but there is only one paper cup.
9. Sunday evening Itzel was crying and wouldn't eat. She had two very large white spots in her mouth. We were taken to the hospital where she saw a doctor and I was told that Itzel was dehydrated.

10. Itzel does not like the burritos and will not eat them. The first time Itzel ate one she got diarrhea. She would not eat them after that. So all she is eating are cookies and juice. I told this to the officer. She was given a small amount of vegetables on Monday but wouldn't eat them.
11. On Tuesday another mother asked for milk for her child. So I did the same thing. I got the milk but the officer was very nasty demanding to know why I didn't ask before. I didn't ask because I didn't know that I could get milk.
12. I was not told my rights or my daughter's rights or given any paper about my rights or about lawyers.

I, Elsa F. [REDACTED] mother of Itzel C. [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 read to me in Spanish, a language in which I am fluent.

[REDACTED]

06-13-2018
Date

Certificate of Translation

I, Betsy Aguirre, certify that I am fluent in English and Spanish and that I read the above declaration to Elsa F. [REDACTED] in Spanish.


Betsy Aguirre
Center for Human Rights & Constitutional Law

06-13-2018
Date

Exhibit 83

6/14/18

9:20 AM

CBP Processing

Carol V [REDACTED] (33 years old – 23, June, '84)
Daniel J [REDACTED] (3 years old – 13, September, '14)

Guatemala

Reason for leaving: Threats of extortion against her business, one threat in particular against her son and for this they left.

Border Patrol found us after we crossed the river yesterday (6/13/18) in the afternoon. They brought us here (CBP).

It is cold and there are a lot of people in the room, but the rest isn't so bad.

For food, there are sandwiches of only baloney. There is some juice but there is also water. WE have eaten three times.

The temperature is especially cold at night. In the day it is manageable but still cold.

There is always light.

The bathrooms are clean, you can wash your hands.

From here I have a friend with papers who is going to help me.

I have only been in this one center.

No one has explained to me what is going to happen next or any legal options I may have.

No one has spoken to me about asylum.

I have not had any kind of interview with Border Patrol.

I haven't seen anything that has struck me as bad.

There were separations, yesterday when we arrived here. You do not see the kids and the moms I saw already left from here in the morning.

The health of myself and my child is good.

6/14/18
9:20

Carol [REDACTED] -33
Son: Daniel J [REDACTED] -3
[REDACTED]

23 Junio '84
13 ~~Oct~~ ^{Sept.} '20104

Guatemala

Reason for leaving: Amanezas a su negocio, un amaneza a su hijo por eso él se fue.

La amiga encuentre con nosotros después del Rio Ajer (6/13/18) en el tarde. Trajaron a nosotros aqui (CBP).

los (Silver Blankets) donators
Es frio y estan muchas personas en los guantros pero el resto no estan tan mal.

Para comida, sandwiches de solamante jamon. Algunos jugos pero tambien ayi un cosa de agua. Come 3 veces.

Elle temperatura es frio especialmente en el noche. En la dia es aguantable pero frio.

Siempre hay Luz.

Los banos son limpios, pueden lavar las
manos.

Después de aquí yo tiene un amigo
con papeles que me va a ayudar.

Solamente estuve aquí en este Centro.

Nadie me explico que iba a pasar y
no me explico opciones legal.

No Hablaron de Asylum.

Ya no tienea un entrevista con la migración.

No me vistón algo que me calte mal.

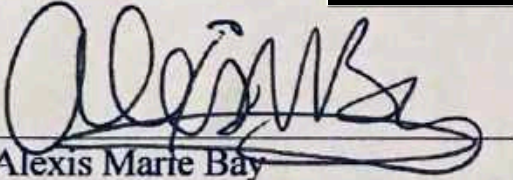
Si separon, ayer quando llegamos,
los niños ya no se ven, los señoras yo
vie se fue este mañana.

El Salud de yo y mi hijo estan bien

6/14/18

Certificate of Translation

I, Alexis Marie Bay, certify that I am fluent in English and Spanish and that I read the attached declaration to Carol V [REDACTED] in Spanish.



Alexis Marie Bay
213 East Warbler Ave
McAllen, Texas
78504

7/11/18

7/11/18

Exhibit 84

6/14/18

Alexia M [REDACTED] (DOB: 1/7/14)
Cindy J [REDACTED] (DOB: 10/12/97)

Country of Origin: Honduras

1 Day in CBP -McAllen

The girl has an infection of the chest that she has had before arriving to the center.

I encountered Border Patrol under the bridge yesterday (6/13/18) around 12 PM. Then we went up to the checkpoint on the bridge, so they could take my name and my daughter's name. This was before ever coming here.

When we arrived at the center there was some trash on the floor. After breakfast today, a woman came and cleaned it up.

The rooms are very cold and at times it gets colder than other times. The rooms for the most part are clean but they have very little room.

My daughter does not like the food, she only drinks the juice. We have eaten three times since arriving – sandwiches made of bread and baloney. A juice and crackers. Two times they made and served the sandwiches without gloves.

The center has had consistent light, there has not been a time when we were without light.

My daughter slept but I did not.

We've been here for one day.

The bathrooms are clean, and you can wash your hands but there is no soap, only water.

No one has explained nothing about what is going to happen or any legal options.

I left my home country because of my child's father. He abused me and kidnapped her one time.

6/14/18

Alecia

Cindy J

11/7/14

10/12/97

La niña tiene un infección de pecho
antes de llegar al centro.

Honduras

1 DAY

Encuentrate con la migradora abajo del
puente AXER (6/13/18) ^{ala} 12 pm. Después
fueron a punto para que el migrador
tome mi nombre y de mi hija.
Después llegaron aquí.

Quando llegar al centro estuve un
poco de basura en el piso. Después de
desayuno ya una señora limpio.

Los cuartos son frío, a veces mas
frío una tiempo de otro. Los cuartos
son limpios. tiene muy poquito espacio.

~~No ^{está} gusta~~ La niña no gusta
la comida, sola tome el jugo. Comeron
3 veces Sandwiches de pan y Jamon.
Un jugo y un galletita. 2 veces se asian
los sandwiches sin aguantar en los
manos.

Los ^h3es si trabajan; siempre hay
loz.

La niña si dormir pero yo no.

Estamos aquí por un día.

Los baños si estan limpios. Se puede
lavar los manos pero no hay Jabon, solamente
agua.

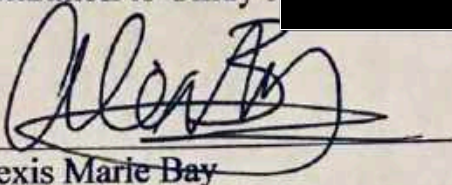
NADIE explico Nada de que va a pasar
o opciones legal.

Fue de mi país por miedo del
el papa de mi hija. El me abuso y
quito a mi niña.

6



I, Alexis Marie Bay, certify that I am fluent in English and Spanish and that I read the attached declaration to Cindy J [REDACTED] in Spanish.



Alexis Marie Bay
213 East Warbler Ave
McAllen, Texas
78504

7/11/18

7/11/18

Exhibit 85

Declaration of Edwin A. [REDACTED]

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

1. My name is Edwin A. [REDACTED]
[REDACTED] My date of birth
is January 10, 1989. I am
29 years old. I lived in Trujillo
Colon, Honduras, Viva Rio, Colon,
Honduras, about an hour and
a half from Trujillo. I lived
there with my whole family, including
my wife and 2 children.

2. On June 4, 2018, I left Viva Rio
together with my older son Edward
A. [REDACTED] for
the United States. My son Edward
is 3 years old, born December
08, 2014. There is an error on
the records of CBP that gives
his date of birth as December
18. I think they heard me badly.
His true date of birth is
December 8, 2014.

3. We crossed the river into the United States yesterday very early in the morning, June 13, 2018. We walked for about 40 minutes before we were picked up by an immigration patrol.

4. The immigration officer registered us and transported us in a bus about 25 minutes to the CBP Immigration holding facility, where we are now held. We arrived at this holding cell in McAllen, Texas, at about 2:00 am, though I do not know the precise time.

5. The immigration officers asked us if we were hungry and offered us sandwiches and juice. The food we received was enough.

6. Neither my son nor I have any medical needs but I know we can see a doctor or a nurse if we need to. I know that others here have been seen immediately,

When they are sick.

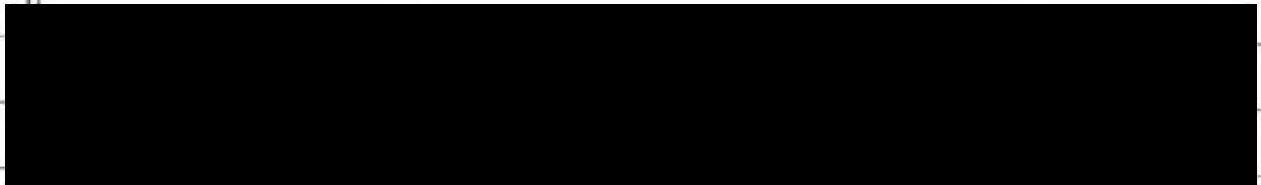
7. After we ate, we were given foil sheets, one for each of us. Nobody was given a mattress in our cell, not even the children. The temperature in the cell is very cold, but with the foil sheets it is okay, even for my son.

8. The cell has a toilet and clean drinking water. There is no soap to wash our hands. There is toilet paper.

9. We have not had a chance to shower or bathe since we came here. We are wearing the only clothes we had, and we have not been offered a change of clothes or the opportunity to wash our clothes. We have not been given toothbrushes or toothpaste.

10. There were about 12 in all in the cell when we arrived, girls as well as boys. I don't know exactly how many girls. There was one other boy who was about the same age as my son so they were both 3 years old. They were the youngest children in the cell.
11. There are no special activities for children in this facility. There are no books or toys and no videos for children or anybody else. There is no special food for children — they eat what we eat. I am not sure if it is possible to ask for food outside mealtimes if a child is hungry.
12. I have not received any information about what will happen next, where we will go, and when we will go. I have not received anything in writing — nothing about my case or why I am held, and no list of free lawyers.

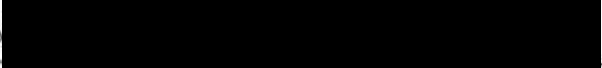
I swear that the foregoing is
true and correct to the
best of my knowledge and
recollection, under penalty of
perjury under the laws of
the United States



June 14, 2018
McAllen, Texas

Certificate of Translation

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

declaration to Edwin A  in Spanish.

Michael Bochenek

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

Dated: McAllen, Texas

June 14, 2018

Exhibit 86

Declaration of Elvi O [REDACTED]

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

1. My name is Elvi O [REDACTED] [REDACTED]. My date of birth is July 14, 1993. I am 34 years old. I lived in San Pedro Sula, Honduras with my daughter Enyi B [REDACTED], until May 30, 2018.

2. My daughter's date of birth is August 16, 2008. My wife and my two other daughters still live in Honduras. My wife and I are separated. I am currently detained in the CBP holding facility in McAllen, Texas, together with my daughter Enyi.

3. My daughter Enyi and I crossed into the United States yesterday, June 13, 2018, at about 8:00 pm.

We were apprehended by two immigration officials and taken in a transport van about 10 minutes to the CBP facility where we are now. We arrived at about 9:00pm, although I do not know the precise time.

4. We were registered and our belongings were stored. I received a ticket for my belongings. We were permitted to keep with us a sweater in addition to one shirt, as well as papers, money, and identification. All other property is being held for us.

5. When we arrived, after we were registered, we received 2 sandwiches each and a juice each. The sandwiches are bread and ham or baloney. The food we received was sufficient for us. Since that time, we have eaten four

times, given one sandwich each after the first time we ate, along with M&M's. They told us that if my daughter needs more food, they will give it to her.

6. We were given one foil blanket for the two of us. There were more blankets in the cell when we arrived, so we were able to use more than one. We slept on the floor spreading a ~~mattress~~ blanket under us to sleep on. We did not receive mattresses, and nobody else in the cell has mattresses. We were very tired, so we were able to sleep even though the lights were on all night.

7. There were about 10 adults and 10 children in the cell when we first arrived. The children included about 5 other girls, so my daughter was not the only girl in the cell.

8. There is clean drinking water for us in the cell. It is always kept full. When we need cups, if they run out, we can ask for more.
9. The toilet is separated from the cell by a low wall. It gives us privacy when we need to go to the bathroom. When the girls go to the bathroom, they ask us to move to the other side of the cell.
10. There is no soap in the bathroo. We wash our hands with water only.
11. We do not have toothbrushes, or toothpaste. We have not had the opportunity to shower or bathe while we have been here.
12. The temperature is not bad, it is normal. Neither my daughter nor I felt cold in the cell, including

at night. Maybe at night it
felt a little cold, but it was
not difficult for us to bear.

13 We have not received any infor-
mation about what will happen
next in our case. I have not
been told where we will go
or when. I have not been given
anything in writing about why
I am detained or what will
happen with my case.

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

[REDACTED]

June 14, 2018

Certificate of Translation

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

declaration to Elva [REDACTED] in Spanish.

Michael Bochenek

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

Dated: McAllen, Texas

June 14, 2018

Exhibit 87

6/14/18

1:50 PM

Guatemala

Gregorio C [REDACTED] (11/17/84)

Candelaria C [REDACTED] (11/30/06)

CBP Center

We encountered Border Patrol yesterday (6/13/18) under the bridge in the afternoon. Afterward's we came to this center at night.

I came here to improve our life and work in the United States.

Four times we have eaten the sandwiches of baloney and a juice. We have access to water.

The rooms are cold. The silver blankets do not give a lot of heat. The rooms are clean. At night there is not a lot of room but in the day time there is room.

The lights work.

We have access to the bathrooms and they are clean. They are cleaned daily, and you can wash your hands.

There were no explanations of legal options or what is going to happen.

-11/17/14

-11/30/06

6/14/18
1:50pmGregorio C
Candelaria C

6/13/18

Encontraste ayer con la migración en el
tarde abajo de puente. Después aquí en
el centro en la noche.

Guatemala

Acer adelante y trabaja aquí
en EEUU.

4 veces comieron los sandwiches de
Jamón y un Tigo. Acceso a agua.

En los cuartos se tiene frío. The silver blankets
no se hacen tanto calor. Cuartos son limpio.
En la noche no tanto espacio pero en la día sí.
~~Cuartos son limpios~~

Idia

Luces se trabajan.

Acceso a baños y son limpios y limpio
diarios. Pueden lavar las manos.

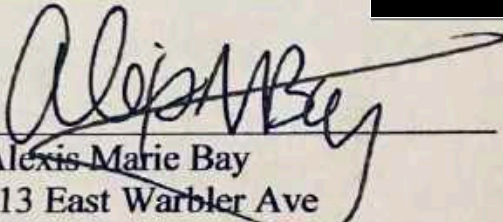
No Estime explicaciones legales o
de que va a pasar.

[Redacted]

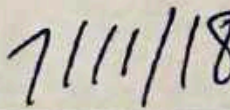
6/14/18

Certificate of Translation

I, Alexis Marie Bay, certify that I am fluent in English and Spanish and that I read the attached declaration to Gregorio C [REDACTED] in Spanish.



Alexis Marie Bay
213 East Warbler Ave
McAllen, Texas
78504



7/11/18

Exhibit 88

Declaration of Denis

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

1. My name is Denis [REDACTED]
[REDACTED] My date of birth is
November 30, 1986. I lived in
Proteccion, Santa Barbara
Honduras, together with my
family until May 20, 2018.
I am now detained together
with my 8-year-old son
Elkin A [REDACTED]
[REDACTED] in the CBP
holding facility in McAllen,
Texas. My son's date of
birth is February 26, 2010.

2. My son and I were apprehended
by immigration agents at about
8:00 pm yesterday, June 13, 2018.
They treated us very well.
They took down our personal
details and then took us to
the CBP facility where we are

now held.

3. When we arrived, we were placed in a cell with six other people, 3 adults and 3 children. The adults were all men. Some of the children were girls, some were boys. There are now a few more people in the cell with us.

4. The cell is clean. We were allowed to wear a shirt and a sweat shirt each. We were not given metal blankets or mattresses. The others who were in the cell before us had blankets, but we did not receive those. Nobody had mattresses.

5. We were given sandwiches and juice when we arrived. We have also received sandwiches and juice once more, first thing this morning. I received 2 sandwiches and my son received 1. The food was sufficient for us.

6. The toilet is in the cell. The wall gives us privacy when we use it. There is toilet paper but no water. We wash our hands with water only.
7. There is drinking water for all of us in the cell. There are clean cups for the water.
8. We have not showered or bathed since we arrived in this facility. We have not been given toothpaste or tooth brushes.
9. The temperature was fine for me, but my son was cold, especially when he slept. We slept on a concrete bench, with no blanket or mattress.
10. We are wearing the same clothes we arrived with. We have not been offered a change of clothes.

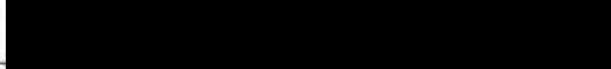
11. I have not received any information about the next steps in my case. I have been given no written notices since I arrived here.

I swear that the foregoing is the only correct under penalty of perjury under the laws of the United States.

June 14, 2018

Certificate of Translation

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

declaration to Denis  in Spanish.

Michael Bochenek

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

Dated: McAllen, Texas

June 14 2018

Exhibit 89

Declaration of Juan C [REDACTED]

DOB: 12/30/1985

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

1. My name is Juan C [REDACTED]
[REDACTED] My date of birth is
December 30, 1985. I am 32
years old. I was born in
Tels Atlántida, Honduras,
and lives with my wife
daughter, and my son ^{in La Caba}.
wife's name is Francis V [REDACTED]
[REDACTED] age 28. My
daughter is Jayiss [REDACTED]
[REDACTED] My son is
Carlos [REDACTED].
My children are twins, 8
years old. On June 19, 2018,
they will turn 9. Their date
of birth is June 19, 2009.
We all lived together in
La Caba, Atlántida, Honduras,
until 16 days ago.

2. I fled Honduras with my son 17 days ago because of death threats against my son and after my three cousins and brother were killed by the same people who made the threats against my son.
3. We travelled through Mexico and entered the United States yesterday evening, at about 7:30 pm. After we had walked for about an hour and a half, we were apprehended by immigration agents. The agents treated us very well, and acted very professionally.
4. They brought my son and me to the CBP holding cell in McAllen, Texas, where we are now held. The journey was approximately 35 minutes by van.
5. When we arrived here, the agents took our photos and our

fingerprints. They stored our belongings and gave me a ticket. They permitted each of us to keep one t-shirt and a sweatshirt with us in the cells.

6. There were about 15 of us in the cell when we arrived. Now about 10 of us remain. The cell is clean. We were each given a foil blanket but not mattresses. Nobody else in the cell has mattresses.

7. The toilet is clean and private. There is paper but not soap. There is plenty of water to wash our hands with. We also drinking water in the cell in a large bottle, which agents regularly check to refill if necessary. There are paper cups, enough for all of us. We have not received toothbrush or toothpaste, and we have not showered since we arrived here.

The lack of showers and toothbrushes and toothpaste is really the only thing that is lacking.


9. We have eaten three times since yesterday evening, and it is now mid-morning. Each meal was 2 sandwiches ~~and~~ and a pile, and they told us that if my son wanted more they would give him more food. The food was sufficient for us, and I have no complaint about the quality of the food.

10. The temperature is normal. The air conditioning is not very strong. We were able to sleep even though the lights were on all night.

11. We have not received any information about what will happen next. I understand I will see a judge, but I do not know

when that will be.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and recollection.



June 14, 2018

Certificate of Translation

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

declaration to Juan C [REDACTED] in Spanish.

Michael Bochenek

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

Dated: McAllen, Texas

June 14, 2018

Exhibit 90

Lucia G [REDACTED] (1/23/95)
Jazmin L [REDACTED] (8/7/2013)

El Salvador

CBP Center

6/14/18

We crossed in the afternoon and encountered Border Patrol at night. We arrived at this center the same night. This is the only center we have been to so far.

The rooms are really cold and at one point it was extremely cold. There is not a lot of room and I was not able to sleep but my daughter did sleep. The silver blankets do not work.

We have eaten three times. It was sandwiches of only baloney and a juice. We have access to water.

There is light.

The bathrooms are clean. You can wash your hands but there is no soap. You do have access to menstrual products and pampers.

I have not had any legal explanations or explanations about asylum or what is going to happen after arriving here.

I came here to work for my daughter. There is no work in my country that pays.

Lucia G [REDACTED]

El Salvador

Jazmin L [REDACTED]

8/7/2013

~~Enamoré a la niña con la migra a la noche.~~
~~La noche~~ Cruzaste en el tarde y en la noche
con la migra en la noche. Llegaron a
Centro el mismo noche. Solo en este aquí
estamos en este Centro.

Los cuartos bien frío y en un punto estuvo
muy frío. No muy mucho espacio y no puede
dormir pero la niña sí. Los Silver blanket no
trabaja.

3 veces comiste. fue Sandwich de solo
Jamón y un Jugo. tiene acceso a agua.

Hay Luz.

los baños son limpios. pedales llave
los manos pero no hay jabón. tiene
acceso a productos femenino y pañal.

No tenía explicaciones legal o de
asilo o que va pasar después de llegar
aquí.

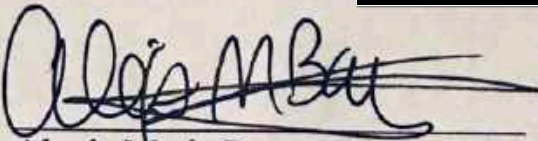
Llego aquí para Trabajar para llevar a
mi hija; no hay Trabajos que paguen
mi paiz.



6/14/18

Certificate of Translation

I, Alexis Marie Bay, certify that I am fluent in English and Spanish and that I read the attached declaration to Lucia G [REDACTED] in Spanish.



Alexis Marie Bay
213 East Warbler Ave
McAllen, Texas
78504

7/11/18

7/11/18

Exhibit 91

Norin

U

A#

DOB 12-14-1978

~~daughter~~

daughter - Belin

A#

We are from Honduras. Came fleeing
for our lives. I was robbed - stole some
ammos. Demanded more.

Lived with familia - wife

2 more daughters 10, 3 y.o.

I came as quickly as possible.

My wife left later because she was
also threatened.

Thieves wanted everything & would kill us
for it.

Belin is the oldest - in most risk of the
thieves targeted. Everyone knows that is
how it works. If they don't find you they
go after ~~the~~ your children. Belin goes to school
& has friends - they know how to find
her.

walked here. crossed the river -
met up w/ people. Didn't cross at
port of entry because it is too dangerous
gangs are watching. People were turned
away. Some were sleeping on the bridge
but that I seemed like a bad idea.

crossed on a raft. Then walked - it was a big group. Just walking with no idea where we were going. Had only the clothes on their backs - & ran out quickly.

My brother lives in VA. Came 5 years ago for similar reasons. Fleeing constant danger. We planned to go to him.

When border patrol came - 2 trucks - they loaded us up. Brought us to the station - took our information.

When we arrived here they ~~separated~~ separated us after a quick medical intake.

They just dumped us into men + women + she was off w/ another group.

Never asked him anything or told him anything. Only saw her again when they did intake + took fingerprints 2nd interview. They tried to get him to sign for deportation + explained he would be going to court - alone. They said that after court I would be reunified w/ my daughter. I refused to sign deportation + explained we could not go back.

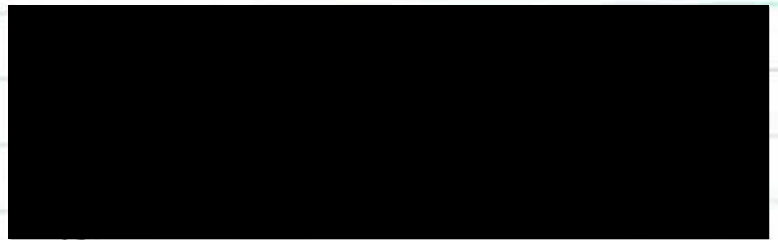
I. We are kept in separate cells, my daughter & I. We sleep on the floor. It is cold. No showers. No cushions or blankets.

I spoke to my wife about 6 days ago - from Mexico. I called her cell. She had fled the house immediately after me - with the children - she was planning to stay w/ friends in a different town hoping to live low & be safe.

They told me I would go to court & that after that I would come back to be with my daughter.

They told my daughter she would be sent to a shelter. While I was being interviewed, they took my daughter & they said they were sending her to a processing center. I cannot return to Honduras.

Signing for deportation is signing my death sentence.



6-14-18

CBS McAllen

Certificate of Translation

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



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

McAllen, Texas

Exhibit 93

Carol
My name is S [REDACTED]
[REDACTED]. I am from Guatemala,
born 03-08-1979. I was born and
lived in the town of Tierra Nueva
Uno. I traveled here and am
currently detained with my
grandson, Frederick G [REDACTED]
[REDACTED], d.o.b. 11/22/2013.
He was born in Tierra Nueva Uno,
Guatemala.

I was also traveling with the my
daughter is Carol S [REDACTED]
[REDACTED], born on 04/15/2000
I was separated from her at the
border and I am not aware of
where she is now. I am worried
because she suffers from a medical
condition related to her heart that
causes her to pass-out when under
stress + it is very dangerous.

We fled Guatemala on
May 24, 2018 because of threats
to our lives. The danger began
1 year ago when a man tried
to hire me to sell drugs in the neighborhood.

I refused and he became very angry. He came to my house, attacked me physically, beat me & fired his gun. He fled when he saw that the neighbors were recording him. We called the police & filed a complaint - but within a day they dropped the case. He sent me a message saying I had better not get the police involved ~~if~~ ever again - that he would go after my family & target the children.

After that I barely left the house. We tried to keep a very low profile. My daughter went to school & straight back - no talking to anyone.

On May 18, 2018 he came back. He said one way or another we would work for him. The next day my daughter said that there were strange men hanging around the school & following her. I received a message that my children would be the 1st targets. I immediately took my daughter out of school.

I sold the t.v. and borrowed some money and ~~we~~ we all left. My 16 y.o. son, Jonathan H [REDACTED] DOB -05/07/2002 went with his girlfriend. He was going to try to hide out at her house.

I fled w/ my 18 y.o. daughter Carol E [REDACTED], and my grandson Frederick F. His mother - my older daughter, Kimberley M [REDACTED] lives in Houston. She can be reached at [REDACTED] If I am separated from him I would like for him to be reunified with her.

We took buses + rides to the border and then crossed the river on a raft. Then we walked to the nearest road where we were apprehended. This was the only way I knew of how to cross. I followed migrants that I found along the way. We crossed on May 12, 2018.

When we were apprehended they took the three of us together to a place where we were put in a cell. I am not sure what it was called. It was about 30 min drive from where I am now (Ursula / McAllen). We managed to find a mat for the three of us to share for sleeping but most people - + children were sleeping on the cold hard floor. It was very cold in that facility. ~~Children~~
We arrived at about 9:00 pm. We did not get any food until about 3:00 am. My grandson was very hungry and ate the bologna sandwich but most kids could not eat it. They also gave him juice.

We recieved no information about our rights, the rights of the child, or any legal services information. There were toilet in the cells + some water - but no soap + no showers or clean clothes.

When they realized my daughter was 18, they separated us.

On May 13 my grandson and I were transferred here to Ursula.

I do not know what happened with my daughter.

I have been at Ursula 3 days - since Wed.

The conditions here at Ursula are not much better. They did let us take a shower. My grandson had vomited on his clothes so they gave him clean clothes when I asked, but they said there were no clean clothes for me.

We sleep on thin mattresses on the floor with metal blankets. The lights are on 24 hours a day and it is very very cold. ~~There is no rec room~~
We are fed three times a day. Usually some kind of tortilla with eggs or beans. No snacks for the children. Occasionally, ~~if~~ ~~at~~ once at lunch they gave some of the children extra crackers.

There is no recreation of any kind for the children. We are kept in cages with nothing to do but worry. No toys, no place to run or play - with hundreds of frightened children. Sometimes they make up games in the cages/cells. But if they run into the common area the mother will be scolded.

There are toilets but they are not normal flushable toilets. They do not have running water & you cannot flush the paper.

There is no real sink for washing hands - it is a basin of water and often runs out. There is no soap. Sometimes there is hand sanitizer but it usually has run out.

I swear that this is all true and accurate to the best of my knowledge. This declaration was ~~read to me~~ translated and read to me in Spanish which is my preferred language

6-15-18



Certificate of Translation

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



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

McAllen, Texas

Exhibit 95

#21394

Declaration of

Elry A

A NUMBER

I, Elry A 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 3/29/1988. My son/daughter's name is Daniel A. He is

Guatemala and he was born on [DOB 4/28/13]. My son and I are from

2. Describe Reason for leaving country of origin.

No opportunities, better quality of life for his family. Also, left because of delinquency. He fears to go back to Guatemala.

3. We presented ourselves at the border about [TIME SINCE APPREHENSION late 6/11/18 or early 4/12/18]. I believe that it was on or about [APPROXIMATE DATE late 6/11/18 or early 4/12/18]. We were taken to

a station. [DESCRIBE CONDITIONS AT THIS FACILITY then transferred to Ursula facility the same day.]

4. [FOOD AT FACILITY Burrito for Breakfast, Sandwich, water]

5. [TEMPERATURE AT FACILITY Always cold.]

6. [LIGHTS, HYGENE ETC. Lights are on night & day.]

7. After [LENGTH OF TIME AT FACILITY late 6/11/18 or early 4/12/18], my son, my sister-in-law, and I were taken to another place where we were held for late 6/11/18 or early 4/12/18 days.

8. [DESCRIBE CONDITIONS LIKE ABOVE Restrooms are dirty, showers are clean. He needs to shower his son at the same time he showers.]

9. [DESCRIBE LEGAL NOTICE AND ACCESS TO COUNSEL ISSUES No. Also, his son has not been given written legal notice of his son's legal rights.]

10. My son and I were taken out of that facility on a [DAY 6/11/18, 6/12/18].

#21395

11. My son and I have been at the [CURRENT FACILITY] _____

for about 3 days. We are planning to [DESCRIBE RELEASE

PLANS No information has been given to him
No phone calls allowed to him.

].

12. [DESCRIBE CURRENT CASE AND RELEASE

STATUS No information has been provided Regarding
court. Blankets provided only Keep him warm.
For a period of time. Don't sleep much. They are
crowded in the area.

I, [Elry A _____], 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.

6-15-18

Date

Certificate of Translation

I, [Georgina Guzman _____], certify that I am fluent in English and Spanish and that I
read the above declaration to [NAME] in Spanish.

Georgina Guzman
[Georgina Guzman]

[ORGANIZATION Texas Civil Rights Project
[ADDRESS PO Box 219, Alamo, TX 78516

6-15-18

Date

Exhibit 96

Eydiy [REDACTED], A NUMBER [REDACTED]

I, Eydiy [REDACTED] (A number [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 4/23/1982. My son/daughter's name is Kensy P [REDACTED]. He is 5 yrs and he was born on [DOB 9/19/2012]. My son and I are from Honduras. She
- Describe Reason for leaving country of origin.
Left my country for a better life for my daughter f. Kensy P [REDACTED]
- We presented ourselves at the border about [TIME SINCE APPREHENSION 6-11-18]. I believe that it was on or about [APPROXIMATE DATE 6-11-18]. We were taken to [Ursula facility]. [DESCRIBE CONDITIONS AT THIS FACILITY conditions are OK. have little time to shower because of the long lines (bologna, lettuce)]
- [FOOD AT FACILITY 3 meals (same) sandwich, apples, chips]. Daughter gets same food as mother. Daughter only eats apples.
- [TEMPERATURE AT FACILITY always cold]
- [LIGHTS, HYGENE ETC. always on]
- After [LENGTH OF TIME AT FACILITY 1 day], my son, my sister-in-law, and I were taken to another place where we were held for _____ days.
- [DESCRIBE CONDITIONS LIKE ABOVE There is overcrowding. She feels that they can't ask anything because they fear the people in charge. She doesn't sleep because i's afraid to be called at any moment. People are randomly called 24 hours a day.]
- [DESCRIBE LEGAL NOTICE AND ACCESS TO COUNSEL ISSUES No]
- My son and I were taken out of that facility on a [DAY Detained on 6/11/18 f Brought to this facility (Ursula) the same day]

11. My son and I have been at the [CURRENT FACILITY #21409]

for about 4 days. We are planning to [DESCRIBE RELEASE PLANS]

12. [DESCRIBE CURRENT CASE AND RELEASE

STATUS As of today 6/15 she has not received any written notice of her daughter's legal right. Have not gone to court. No access to a phone to make a call. They only asked her for contact info. of who will receive her & daughter in USA. She provided their contact info. Doctor comes by to check up on people when needed.

I, [Eydi Y. [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.

6-15-18
Date

Certificate of Translation

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

Georgina Guzman
[Georgina Guzman]
[ORGANIZATION Texas Civil Rights Project]
[ADDRESS P O Box 219, Alamo, Tx 78516]

6-15-18
Date

Exhibit 100

6/15/18

10:49 AM

Ursula Detention Center – McAllen

Miguel A [REDACTED]

Andry M [REDACTED]

We encountered Border Patrol on Wednesday (6/13/18) at midnight. It was under the bridge and it was there we encountered them. From there we got on a bus and ended up at the center and that is where I was separated from my daughter. There were no explanations for the separation.

The rooms were very cold. The bathrooms were inside the cells, behind a small wall. They were clean in the men's room. Also, the girl's bathroom in their room was clean. My daughter went into a room only for girls. There were girls of her age and one was pregnant. There was no soap in the bathrooms. In the room for men, there was no room and no room in the girl's room. We don't think there were many people in the rooms who were sick. The girl's room was clean. At times the men's room was dirty, but then would be cleaned. The silver blankets sometimes warm you up.

5 times we ate the sandwiches of baloney with the juice and crackers. In the men's room there was a water cooler with plastic cups and there was always water. There was light all of the time we were there at that center.

There were other dads separated from their kids and there were other girls separated from their dads.

Last night we arrived here to this center. This interview is the first time we have been together since the moment we were separated.

In the original center there were no explanations about anything.

It was when I got here that I did have an interview through a camera and computer with a man. He wanted to know why I came here, how I got here, where I was going, and know about my parents, and who was going to receive us.

In the original center, they took photos of us.

Here we have a small mat to sleep on. The center before we didn't have anything. Here we also have the silver blankets. The room where the men are kept, there are fathers, and of the ones I've spoken to, none have their kids. In the room where the girls are, they are older girls, and some of them have parents here, others don't.

The temperature here is normal. We are not cold here.

Here there is hot food. We ate one time. It was a burrito of rice and beans, a milk, an apple, and a chocolate chip cookie, and water. All of the food was in good condition.

The rooms are clean, and they have already cleaned them once. The bathrooms are private and clean. There is soap to wash your hands. There are no showers for the men but for the girls yes. My daughter took a shower this morning and it was a private shower.

The lights here work, there has not been a time without light.

I left my home country to protect my daughter. We are going to Miami.

6/15/18
10:49 AM

Miguel A
Andry M

Encontre con la mujer el miercoles
en el 12^o del noche. Fue abajo del puente
y alli lo encontre. De alli entro en el
wawa y llegaron al centro, y alli fue
que separaron de mi hija. No estuve
explicaciones de la separación.

En los cuartos estuve mucho frío.
Los baños estuve dentro de los cuartos.
Los baños si fue limpio de los hombres
y de las niñas. Mi hija fue en un
cuarto solamente de niñas. Fue niñas
~~pequeñas~~ grandecitas y una fue embarazada.
~~Los~~ Los baños no tenía jabón.
En los cuartos ^{de hombres} no había espacio ^{de} ~~de~~
~~hombre~~ y de los niñas ^{de niñas} ~~de~~ No plusi que
alguien en los cuartos estuve enferma.
De las niñas fue limpia, de los hombres
a veces estuve muy sucio pero dos veces
alguien limpio. Los de nylon ~~se hacen~~
Se calienten no.

Comeron 5 veces los sandwiches de
Jamón con el Jugito y galletitas. En
el cuarto de los hombres estuve un
"Cooler" de agua con copitas plásticas y
Siempre tenía agua.

Estuve ^{otro} todo el tiempo que nosotros
estamos en ese centro.

Estuve ^{otro} padres separados de sus hijos y también
Niños separados de sus padres.

(Juntos) Anoche llegaron aquí a este centro.
Es ahora que es primera vez estamos
Juntos de el momento que sepan.
(en la entrevista)

* En el centro original no estuve ni un
explicaciones de nada.

Es aquí que estuve un entrevista
por cámara y computadora con un hombre.
El quería saber el rason pa venir, como
llegaste, donde va, los padres de mí, que va
a pecinar.

* En el centro original tomaba fotos.

Aquí tenemos un ~~cama~~ ^{colchoncito}. En el centro
antes no tenía nada. Y también aquí tenemos
el Nylon. En el canto de hombres que
de los que yo hablo son padres pero nadie
se tiene su hijo. En el canto de la niñas, solamente
niñas grandecitas. Es un grupo de niñas que
se tiene padres aquí y algunas no.

El temperatura aquí es normal.
No tenemos tanto frío.

La comida es caliente. Comeron aquí
una vez. fue Burrito de arroz y frijol, leche,
manzana, galletita con chocolate, y agua. Todo
en buen condición.

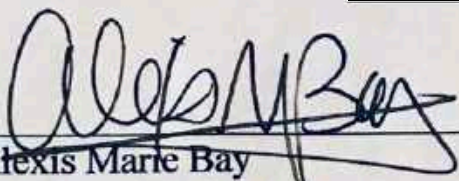
Los cuartos son limpios y se limpian ya
una vez. Y se tiene espacio. Los baños
ya está privada y limpio. Esta Jabon
para llevar manos. los hombres no hay
bañado pero los niñas si. Una vez
en la mañana este banarolls ~~los baños~~ y fue
privada.

Los luzes siempre trabaja, nunca hido
un momento de oscuridad.

Fue de mi país para proteger a
mi hija. Vamos a miami.

Certificate of Translation

I, Alexis Marie Bay, certify that I am fluent in English and Spanish and that I read the attached declaration to Miguel A [REDACTED] in Spanish.


Alexis Marie Bay
213 East Warbler Ave
McAllen, Texas
78504

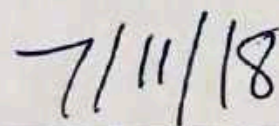

7/11/18

Exhibit 101

Declaration of Rebecca Y [REDACTED]

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

1. My name is Rebecca Y [REDACTED]
My date of birth is November 4,
1996. I am 21 years old. I lived
in Comayagua, Honduras, until
I left for the United States. I am
detained in McAllen, Texas, in
the Ursula detention center.
2. I left Honduras together with
my niece, Brittany M [REDACTED]
age 4, a little over 2 weeks ago.
We crossed the river into the
United States on Tuesday, June
12, 2018, sometime in the afternoon.
I walked with my niece for a
while, and when I stopped to
ask directions to find immigration
to turn myself in, I saw the
patrol.

- 3 The immigration patrol took me to the trailers together with my niece. I was put in the same cell with her. When I was registered, three people questioned me at different times, and I told each one who my niece was and how we were related.
4. Some time the same day, immigration agents pulled me out of my cell. They left my niece sleeping in the cell. They didn't tell me why they had pulled me out or whether I would go back to the cell. They didn't give me any information. They just asked for the ticket for my belongings, but gave me no explanation why.
- 5 They took me to the place I am now, alone. I told the agents here that my niece was still in the trailers. I kept asking everybody about her to get them to help me find her, but

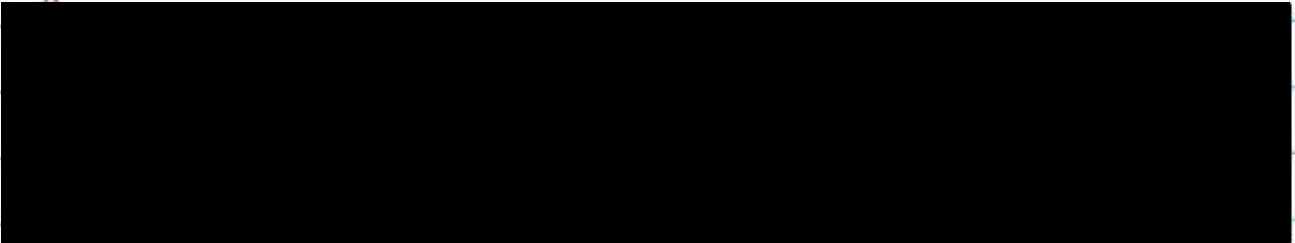
Nobody responded or gave me any information. They just told me she could be in a shelter for children, but I do not know that they ever bothered to take her name and search for her to reunite us.

6. I have been in this detention center all week, since Thursday night, with no information until this afternoon about my niece. I only found out she was here after a lawyer asked the girl who was caring for my niece to explain how she came to care for a girl she wasn't related to.

7. I felt terrible to be separated from my niece. I cannot explain what it felt like not to know where she was and not to have anybody take me seriously when I asked for help.

8. I hope that other women,
especially the mothers here,
never have to go through the
same experience.

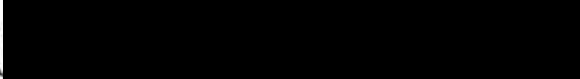
I swear under penalty of perjury
that this statement is true and
complete to the best of my ability.
I gave this statement in Spanish,
a language I speak fluently, and
it was read back to me in
Spanish before I signed it.



June 15, 2018
McAllen, Texas

Certificate of Translation

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

declaration to Rebecca Y  in Spanish.

Michael Bochenek

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

Dated: McAllen, Texas

June 15, 2018

Exhibit 103

Declaration of
[FULL NAME], A NUMBER XXX-XXX-XXX

Elmer V. [REDACTED]

I, [NAME] (A number XXX-XXX-XXX), 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 [DATE OF BIRTH] JUNE 27, 2001 17. My son/daughter's name is XXXX. He is [YEARS OLD] and he was born on [SON'S DOB]. My son and I are from [COUNTRY OF ORIGIN].

2. Describe Reason for leaving country of origin. Coatamela
Search for my father in the U.S. He lives in Hondo. 14 days ago

3. We presented ourselves at the border about [TIME SINCE APPREHENSION]. I believe that it was on or about [APPROXIMATE DATE] JUNE 29. We were taken to [FACILITY] Yuma. [DESCRIBE CONDITIONS AT THIS FACILITY] 10 p.m. the corner of Starvois. CBP

4. [FOOD AT FACILITY] from the time I arrived until Sunday morning I got was soup. the soup had no meat or vegetables.

5. [TEMPERATURE AT FACILITY] On Sunday I got soup, crackers & it is too cold at night. the floor is very cold & no one wants to sleep on it.

6. [LIGHTS, HYGENE ETC.] The lights are on all the time & it interferes with my sleep. I have not been ordered to have a shower & sleep in my clothes.

7. After [LENGTH OF TIME AT FACILITY], my son, my sister-in-law, and I were taken to another place where we were held for XXX days.

8. [DESCRIBE CONDITIONS LIKE ABOVE]

9. [DESCRIBE LEGAL NOTICE AND ACCESS TO COUNSEL ISSUES] No legal notice of any kind was given or posted. No phone call was offered. I gave

10. My son and I were taken out of that facility on a [DAY] my dad's phone number to an officer.

11. My son and I have been at the [CURRENT FACILITY] for about 3 days. We are planning to [DESCRIBE RELEASE PLANS]. go to Hondo when released.


12. [DESCRIBE CURRENT CASE AND RELEASE STATUS] I have been given no information about when I will be released.

I, [NAME], 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 25, 2018
Date

③ When I arrived I was given soup within about 2 hours. I was given a silver blanket but to this day I have no mattress + have to share with another boy. There are about 30 people in the room. There are 3 bathroom partitions I can shut the door but it does not lock. The only water we have is from the sink that we scoop with our hands. There is no soap in the bathroom. We can only sleep on the benches or cold floor. There is a TV in the room but it is not turned on. There is nothing else to do and we are not allowed out. The officer asked if I needed medical assistance. The room has cameras + we can see the guards in the control room facing us.

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

 LUIS SANDOVAL
[NAME OF TRANSLATOR]
[ORGANIZATION]
[ADDRESS]

June 25, 2018
Date

Exhibit 108

Declaration of
[FULL NAME], A NUMBER XXX-XXX-XXX

Vicente

I, [NAME] (A number XXX-XXX-XXX), 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 [DATE OF BIRTH]. My son/daughter's name is XXXX. He is [YEARS OLD] and he was born on [SON'S DOB]. My son and I are from [COUNTRY OF ORIGIN].
JANUARY 22, 1984 SON - MOISES D. [REDACTED] - 15 YEARS SON - HEANY [REDACTED] - 3 YEARS
2. Describe Reason for leaving country of origin. SON - MARCELO A. [REDACTED] - UNO
3. We presented ourselves at the border about [TIME SINCE APPREHENSION]. I believe that it was on 1 CANE or about [APPROXIMATE DATE]. We were taken to [FACILITY]. [DESCRIBE CONDITIONS AT THIS FACILITY]. CBP
MY FATHER US20 TO BORN ME. WHEN HE DIED, THE FATHER OF MY CHILD JUNE 20, 2018 LEFT AND DIDN'T WANT TO BRING US. I CAN'T LOOK FOR HIM. HE IS NOT A CITIZEN
4. [FOOD AT FACILITY] - EAT FOUR TIMES A DAY AT 6A, 12P, 7PM, AND 11PM
FOOD IS MEDIUM TEMPERATURE.
5. [TEMPERATURE AT FACILITY] - IT IS COLD. THE BLANKETS ARE MADE OF ALUMINUM.
WE DO NOT HAVE ADEQUATE CLOTHING.
6. [LIGHTS, HYGIENE ETC.] - WE HAVE NOT SHOWERED SINCE WE ARRIVED. WE HAVE NOT RECEIVED OTHER CLOTHING.
7. After [LENGTH OF TIME AT FACILITY], my son, my sister-in-law, and I were taken to another place where we were held for XXX days.
8. [DESCRIBE CONDITIONS LIKE ABOVE] - WE HAVE A BROTHER IN OAKLAND AND WOULD LIKE TO CALL.
9. [DESCRIBE LEGAL NOTICE AND ACCESS TO COUNSEL ISSUES] WE HAVE NOT HAD ACCESS TO A LAWYER OR A PHONE TO CALL A LAWYER. NO ONE TOLD US OUR
10. My son and I were taken out of that facility on a [DAY]. LEGAL RIGHTS. THERE IS NOTHING POSTED ABOUT OUR RIGHTS.
11. My son and I have been at the [CURRENT FACILITY] for about XXX days. We are planning to [DESCRIBE RELEASE PLANS].
CBP - YUMA FIVE DAYS. NO ONE HAS TOLD US ANYTHING ABOUT LEAVING.
12. [DESCRIBE CURRENT CASE AND RELEASE STATUS] WE HAVE NOT HEARD ANYTHING ABOUT SEEING A JUDGE OR BEING RELEASED. MY BROTHER LIVES IN OAKLAND, CALIFORNIA.
- I, [NAME], 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. I CANNOT BE SEPARATED FROM MY CHILDREN. THEY ARE TOO YOUNG TO SURVIVE WITHOUT ME. I WANT US ALL TO GO LIVE WITH MY BROTHER.

Date

06/25/2018

Certificate of Translation

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

Toni Lambert
[NAME OF TRANSLATOR]
[ORGANIZATION]
[ADDRESS]

6/25/2018
Date

Exhibit 109

Declaration of
[FULL NAME], A NUMBER XXX-XXX-XXX

Miriam G [REDACTED]

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

MIRIAM G [REDACTED]

1. My date of birth is DECEMBER 20, 1973 [DATE OF BIRTH]. My son/daughter's name is XXXX. He is [YEARS OLD] and he was born on SON'S DOB. My son and I are from [COUNTRY OF ORIGIN].

FEBRUARY 3, 2012

GUATEMALA

2. Describe Reason for leaving country of origin.

3. We presented ourselves at the border about My town is full of robbers who order money from me and threaten to kill my son because I don't have any. It is not safe there. I came here to give him [TIME SINCE APPREHENSION]. I believe that it was on or about JUNE 23, 2018 [APPROXIMATE DATE]. We were taken to two days ago [FACILITY]. [DESCRIBE CONDITIONS AT THIS FACILITY] SAFETY AND EDUCATION

CUSTOM & BORDER PROTECT.

4. [FOOD AT FACILITY] - We get soup two times a day, but it is not enough. We are always still hungry.
5. [TEMPERATURE AT FACILITY] - It is always cold in the facility. We only have a sheet made out of aluminum for warmth.
6. [LIGHTS, HYGIENE ETC.] - We have not showered since we arrived.

7. After [LENGTH OF TIME AT FACILITY], my son, my sister-in-law, and I were taken to another place where we were held for XXX days.

8. [DESCRIBE CONDITIONS LIKE ABOVE]

9. [DESCRIBE LEGAL NOTICE AND ACCESS TO COUNSEL ISSUES] - I was not told about my legal rights, and I have not talked to a lawyer. I signed something when I arrived, but I didn't understand what I was signing because it was in English.

10. My son and I were taken out of that facility on a [DAY].
11. My son and I have been at the [CURRENT FACILITY] for about XXX days. We are planning to [DESCRIBE RELEASE PLANS]. They have not given us any information on when we will be released or see the judge. My family lives in Oakland. I would like to go live with them. I do not want to be separated from my son.

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

06/25/2018
Date

Certificate of Translation

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

Toni Lambert

[NAME OF TRANSLATOR]

[ORGANIZATION]

[ADDRESS]

06/25/2018

Date

Exhibit 110

Declaration of
[FULL NAME], A NUMBER XXX-XXX-XXX

Loida G [REDACTED]

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

1. My date of birth is July 1, 1988. My son/daughter's name is Analeisy C [REDACTED]. He is [YEARS OLD] and she was born on [SON'S DOB] November 10, 2010. My son and I are from [COUNTRY OF ORIGIN] Guatemala.
2. Describe Reason for leaving country of origin.
I came here to work. We don't have food and I could not feed my daughter.
3. We presented ourselves at the border about [TIME SINCE APPREHENSION] two days ago. I believe that it was on or about [APPROXIMATE DATE] June 23, 2018. We were taken to [FACILITY] Customs + Border Patrol. [DESCRIBE CONDITIONS AT THIS FACILITY]
4. [FOOD AT FACILITY] - We get soup three times a day.
5. [TEMPERATURE AT FACILITY] - It is always cold in the facility. We only have a sheet made out of aluminum for warmth.
6. [LIGHTS, HYGIENE ETC.] - I have not showered since I arrived here and I have not received a change of clothes.
7. After [LENGTH OF TIME AT FACILITY], my son, my sister-in-law, and I were taken to another place where we were held for XXX days.
8. [DESCRIBE CONDITIONS LIKE ABOVE] My daughter has not been able to see a doctor. Her stomach has been hurting her.
9. [DESCRIBE LEGAL NOTICE AND ACCESS TO COUNSEL ISSUES] I have not received any information about my legal rights when I arrived, they gave me a paper, but it
10. My son and I were taken out of that facility on a [DAY]. was in English, so I could not understand. I have not spoken to a lawyer.
11. My son and I have been at the [CURRENT FACILITY] for about XXX days. We are planning to [DESCRIBE RELEASE PLANS] to I have not heard anything about being released. My sister lives in the United States and I would like to go live with her. I would not like to be separated from my daughter.
12. [DESCRIBE CURRENT CASE AND RELEASE STATUS]

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

06/23/2018
Date

Certificate of Translation

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

Toni Lombard

[NAME OF TRANSLATOR]

[ORGANIZATION]

[ADDRESS]

06/25/2018

Date

Exhibit 111

Declaration of
[FULL NAME], A NUMBER XXX-XXX-XXX

Loida C [REDACTED]
I, [NAME] (A number XXX-XXX-XXX), 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 Aug. 20, 1986 ~~DATE OF BIRTH~~ My son/daughter's name is XXXX. He is Twelve years [YEARS OLD] and he was born on June 25, 2006 [SON'S DOB]. My son and I are from [COUNTRY OF ORIGIN].
2. Describe Reason for leaving country of origin.
There were violent eruptions in my hometown, so it was not safe. I came here and left my baby because I could not afford to bring him. He is 1 and a half I send
3. We presented ourselves at the border about June 22, 2018 [TIME SINCE APPREHENSION]. I believe that it was on or about June 22, 2018 [APPROXIMATE DATE]. We were taken to [FACILITY]. [DESCRIBE CONDITIONS AT THIS FACILITY] More food
4. [FOOD AT FACILITY] Today I have not eaten because there were too many people and when I asked, they said there was not enough time. We get soup everyday and it is becoming hard to eat because it is
5. [TEMPERATURE AT FACILITY] the same everyday. It is always very cold in the facility and the sheet they gave us is
6. [LIGHTS, HYGENE ETC.] made out of aluminum.
7. After [LENGTH OF TIME AT FACILITY], my son, my sister-in-law, and I were taken to another place where we were held for XXX days. There is no soap for us to wash our hands with in the bathroom.
8. [DESCRIBE CONDITIONS LIKE ABOVE] We have been at this facility since we were arrested. When I came in, they had me sign a paper, but I'm not sure what it
9. [DESCRIBE LEGAL NOTICE AND ACCESS TO COUNSEL ISSUES] was because it was in English I have not talked to a lawyer and did not know I had a right to see a
10. My son and I were taken out of that facility on a [DAY]. Judge. I am not aware of any upcoming hearings.
11. My son and I have been at the [CURRENT FACILITY] for about XXX days. We are planning to [DESCRIBE RELEASE PLANS]. I have not heard anything about being released. I have a friend in the United States that is willing to take in me and my son. I would not like to be separated from my son.
12. [DESCRIBE CURRENT CASE AND RELEASE STATUS]

My son has a severe allergic reaction, and I asked to see a doctor, but it hasn't happened. It hurts him
I, [NAME], 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.

And there are marks.

06/25/2018
Date

Certificate of Translation

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

Toni Lambert
[NAME OF TRANSLATOR]
[ORGANIZATION]
[ADDRESS]

06/25/2018
Date

Exhibit 112

Declaration of
[FULL NAME], A NUMBER XXX-XXX-XXX

GENOVEVA B

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

1. My date of birth is FEBRUARY 23, 1988. My son/daughter's name is MAFI V. He is Eleven [YEARS OLD] and he was born on MAY 24, 2007. My son and I are from GUATEMALA [COUNTRY OF ORIGIN].
2. Describe Reason for leaving country of origin.
THERE IS NO WORK IN MY COUNTRY AND WE ARE HOMELESS. IT IS POOR AND THERE IS NO WORK. I CAME TO PROVIDE A BETTER LIFE FOR MY DAUGHTER.
3. We presented ourselves at the border about TWO DAYS AGO [TIME SINCE APPREHENSION]. I believe that it was on or about JUNE 23, 2018 [APPROXIMATE DATE]. We were taken to CUSTOM + BORDER PROTECT. [FACILITY]. [DESCRIBE CONDITIONS AT THIS FACILITY]
4. [FOOD AT FACILITY]
WE ARE FED SOUP, ONE TIME WE ARE TWO TIMES IN A DAY AND THE OTHER THREE.
5. [TEMPERATURE AT FACILITY]
IT IS VERY VERY COLD IN THE FACILITY. WE ONLY HAVE A SHEET MADE OUT OF ALUMINUM.
6. [LIGHTS, HYGIENE ETC.]
WE HAVE NOT SHOWERED SINCE WE ARRIVED.
7. After [LENGTH OF TIME AT FACILITY], my son, my sister-in-law, and I were taken to another place where we were held for XXX days.
8. [DESCRIBE CONDITIONS LIKE ABOVE]
9. [DESCRIBE LEGAL NOTICE AND ACCESS TO COUNSEL ISSUES] They presented papers to me when I arrived, but I did not understand because they were in English.
10. My son and I were taken out of that facility on a [DAY]. I do not know when I will see the judge and no one has told me
11. My son and I have been at the [CURRENT FACILITY] for about TWO days. We are planning to Anything [DESCRIBE RELEASE PLANS]. I do not know when we will be released. My cousin lives in Ohio. I would like about my rights.
12. [DESCRIBE CURRENT CASE AND RELEASE STATUS] to go live with her. I would not like to be separated from my daughter.

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

06/25/2018
Date

Certificate of Translation

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

Tamir K. Lomax

[NAME OF TRANSLATOR]

[ORGANIZATION]

[ADDRESS]

06/25/2018

Date

Exhibit 113

Declaration of
[FULL NAME], A NUMBER XXX-XXX-XXX

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

1. My date of birth is January 9, 1995. My son/daughter's name is Emily [REDACTED]. He is [YEARS OLD] and he was born on September 9, 2017. My son and I are from Guatemala [COUNTRY OF ORIGIN].
2. Describe Reason for leaving country of origin.
My husband left us and I did not know where he went. I was living with my mom, but she died. My daughter and I had nothing, so we came here. I have found my
3. We presented ourselves at the border about two days ago. I believe that it was on June 23, 2018 or about [APPROXIMATE DATE]. We were taken to [FACILITY]. [DESCRIBE CONDITIONS AT THIS FACILITY] Custom & Border Patrol And want to go live with him in California to make a better life for my daughter.
4. [FOOD AT FACILITY] I breastfeed my 9 month old daughter, but I do not have enough milk, and she will not take the soup. She is not eating enough. They gave me Gerber, but she will only eat very little. She has not seen a doctor.
5. [TEMPERATURE AT FACILITY] It is very cold in
6. [LIGHTS, HYGENE ETC.] the facility and we only have aluminum sheet. I have not been able to shower or wash my baby because it is too cold and I don't want her to get sick.
7. After [LENGTH OF TIME AT FACILITY], my son, my sister-in-law, and I were taken to another place where we were held for XXX days. Physician
8. [DESCRIBE CONDITIONS LIKE ABOVE] My daughter has a cold from being in the facility and they have not brought a doctor.
9. [DESCRIBE LEGAL NOTICE AND ACCESS TO COUNSEL ISSUES] I did not receive any information about court, and I have not talked to a lawyer. When I arrived, they had me sign a lot of papers, but they were in English and I did not understand what they said. They told me I could talk to a lawyer, but have not allowed me to yet.
10. My son and I were taken out of that facility on a [DAY].
11. My son and I have been at the [CURRENT FACILITY] for about XXX days. We are planning to [DESCRIBE RELEASE PLANS]. My husband lives in Oakland. My daughter and I would like to go live with him. I do not want to be separated from my daughter.
12. [DESCRIBE CURRENT CASE AND RELEASE STATUS]

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

06/25/2018
Date

Certificate of Translation

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

Toni LAMPANA
[NAME OF TRANSLATOR]
[ORGANIZATION]
[ADDRESS]

06/25/2018
Date

Exhibit 114

Declaration of
[FULL NAME], A NUMBER XXX-XXX-XXX

ANA M [REDACTED]
I, [NAME] (A number XXX-XXX-XXX), 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 MAY 20, 1987. My son/daughter's name is EVELIN L [REDACTED]. He is [YEARS OLD] and he was born on [SON'S DOB]. My son and I are from [COUNTRY OF ORIGIN] GUATEMALA
FEB. 27, 2010
2. Describe Reason for leaving country of origin. I AM A SINGLE MOTHER AFTER HAVING MY DAUGHTER. I LEFT TO TRY TO PROVIDE FOR HER.
3. We presented ourselves at the border about 3 DAYS AGO. I believe that it was on or about JUNE 22, 2018. We were taken to [FACILITY]. [DESCRIBE CONDITIONS AT THIS FACILITY]
I HAVE NOT EATEN BECAUSE THE SOUP MAKES ME SICK. MY DAUGHTER EATS SOUP 3 TIMES A DAY, BUT IT MAKES HER SICK TOO. THEY ONLY GIVE US SOUP.
5. [TEMPERATURE AT FACILITY] THE FACILITY IS VERY COLD. THEY ONLY GIVE US A SHEET MADE OUT OF ALUMINUM. MY DAUGHTER IS ALWAYS VERY COLD TOO.
6. [LIGHTS, HYGENE ETC.] WE SHOWERED & RECEIVED TOWELS AND WERE ABLE TO BRUSH OUR TEETH.
7. After [LENGTH OF TIME AT FACILITY], my son, my sister-in-law, and I were taken to another place where we were held for XXX days. WE WERE BROUGHT TO THIS FACILITY FIRST, AND HAVE BEEN HERE FOR 3 DAYS. NO ONE HAS TOLD ME MY LEGAL RIGHTS. THEY HAD
8. [DESCRIBE CONDITIONS LIKE ABOVE] ME SIGN A PAPER THAT THEY TOLD ME WAS FOR THE JUDGE, BUT I HAVE NOT HEARD ABOUT A HEARING. I HAVE NOT BEEN ABLE
9. [DESCRIBE LEGAL NOTICE AND ACCESS TO COUNSEL ISSUES] TO TALK TO A LAWYER.
10. My son and I were taken out of that facility on a [DAY].

11. My son and I have been at the [CURRENT FACILITY] for about XXX days. We are planning to [DESCRIBE RELEASE PLANS]. WE HAVE BEEN HERE FOR 3 DAYS AND NO ONE HAS TALKED TO US ABOUT BEING RELEASED. I HAVE A COUSIN IN CERRITA, CALIFORNIA THAT MY DAUGHTER AND I WANT TO GO LIVE WITH. I WOULD NOT LIKE TO BE SEPARATED FROM MY DAUGHTER. SHE DOES NOT KNOW MY COUSIN.
12. [DESCRIBE CURRENT CASE AND RELEASE STATUS]

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

06/25/2018
Date

Certificate of Translation

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

Toni Lambert

[NAME OF TRANSLATOR]

[ORGANIZATION]

[ADDRESS]

06/25/2018

Date

Exhibit 118

Declaration of
[FULL NAME], A NUMBER XXX-XXX-XXX

Ventura

Ventura
Ilsi

I, [NAME] (A number XXX-XXX-XXX), 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 [DATE OF BIRTH]. My son/daughter's name is XXXX. She is [YEARS OLD] and he was born on [SON'S DOB]. My son and I are from [COUNTRY OF ORIGIN].
November 16, 1996
March 17, 2012 daughter Guatemala approximately 6 years old
2. Describe Reason for leaving country of origin.
Father of Ilsi has kidnapped her several times since separating from me. At two years ago, ~~she~~ tried to live with Ilsi's grandparents (maternal), but grandfather was violent with the child.
3. We presented ourselves at the border about [TIME SINCE APPREHENSION]. I believe that it was on [DATE] or about [APPROXIMATE DATE]. We were taken to [FACILITY]. [DESCRIBE CONDITIONS AT THIS FACILITY].
one day ago - 9:30 AM on 6/24/18
June 24, 2018 Yuma CBP
I spoke with someone when I first arrived to give my name and other information. She also stated she was scared to return to Guatemala because of her husband, and they offered "cups of noodle" for their food three times a day. Ilsi gets a juice box three times a day; Ventura gets water only from faucet in the bathroom - no cup is offered. Soup is not warm so it does not cook the noodles. Ilsi offered one bag of gold fish crackers on day she arrived.
4. [FOOD AT FACILITY] told her this is the same story they have heard countless of times.
5. [TEMPERATURE AT FACILITY] Very cold, all day and not as bad b/c sun warms it up. But at night very cold.
6. [LIGHTS, HYGIENE ETC.] Lights remain on day night so it is hard to sleep.
7. After [LENGTH OF TIME AT FACILITY], my son, my sister-in-law, and I were taken to another place where we were held for XXX days. Also, it is too cold to sleep. Also, the ground they sleep on is hard and cold. No pillows or mattresses offered. She, her daughter each get one foil blanket which does not keep them warm enough. There are about 15 others in same room sleeping with them. His loud because kids are crying because of cold.
8. [DESCRIBE CONDITIONS LIKE ABOVE]
9. [DESCRIBE LEGAL NOTICE AND ACCESS TO COUNSEL ISSUES] Also we have not been able to shower because no clean clothes, no soap, no towels. At this point, however we have done five days without shower. Ventura received one piece of paper with a list of attorneys in the area.
10. My son and I were taken out of that facility on a [DAY].
11. My son and I have been at the [CURRENT FACILITY] for about XXX days. We are planning to [DESCRIBE RELEASE PLANS]. We do not know when we will be released. We are scared to return to Guatemala and would like to go to my brother-in-law in Virginia. His name is Odenilson Merida and phone number is 804-309-7968.
12. [DESCRIBE CURRENT CASE AND RELEASE STATUS]

I, [NAME], 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.

Date

Certificate of Translation

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



[NAME OF TRANSLATOR]

[ORGANIZATION]

[ADDRESS]

06/25/18

Date

Exhibit 121

Declaration of
[FULL NAME] A NUMBER XXX-XXX-XXX
Gravy [REDACTED]

Gravy [REDACTED]

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

1. My date of birth is December 29, 1996. My son's daughter's name is Dairany 1 years old. She is 1 years old and she was born on September 13, 2013. My son and I are from Guatemala.
 2. Describe Reason for leaving country of origin. I am afraid to return to Guatemala because my daughter's father has been threatening that he will do something bad to me and her daughter because I will not get back into a relationship with him. 3 days ago
 3. We presented ourselves at the border about [TIME SINCE APPREHENSION]. I believe that it was on or about [APPROXIMATE DATE]. We were taken to [FACILITY]. [DESCRIBE CONDITIONS AT THIS FACILITY] June 23, 2018. Yuma CBP.
 4. When I arrived, I was yelled at to stop documents. I did not understand what I was signing because it was in English. I did not receive copies of any of the documents I [FOOD AT FACILITY] started. They also did not believe me that my niece, who was also with me, my sister, and my daughter, was not my daughter. They told me to stop crying or I would not see my daughter again.
 5. [TEMPERATURE AT FACILITY] It is cold in our cell. I have to hug my daughter to me so that she can be warm enough to sleep. The lights stay on all the time so we cannot tell if it is day or night.
 6. [LIGHTS, HYGIENE ETC.] We have not been allowed to bathe or shower. And there is no soap to wash our hands with.
 7. After [LENGTH OF TIME AT FACILITY], my son, my sister-in-law, and I were taken to another place where we were held for XXX days. We are in a cell with about 25 other people. It is crowded and we have to walk over one another to use the bathroom.
 7. [DESCRIBE CONDITIONS LIKE ABOVE] We receive food, and my daughter receives juice. We have to drink water from the bathroom sink and we use our hands - we do not receive cups to drink from.
 8. [DESCRIBE LEGAL NOTICE AND ACCESS TO COUNSEL ISSUES] I have not received any documents or information about my legal situation or access to legal counsel.
 10. My son and I were taken out of that facility on a [DAY].
 9. My daughter and I have been at the Yuma CBP 3 days. We are planning to [DESCRIBE RELEASE PLANS]. We do not know when we will leave or where we will go.
 12. [DESCRIBE CURRENT CASE AND RELEASE STATUS] There are kids in the cell where we are being held and they do not get anything to play with so they are very bored.
- I, Gravy [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.

6-26-2018
Date

Certificate of Translation

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

Clara Lang

[NAME OF TRANSLATOR]

[ORGANIZATION]

[ADDRESS]

Clara Lang

Human Rights Watch 1030
350 Sansome St Ste
San Francisco CA 94104

6-26-2018

Date

Exhibit 130

Declaration of

ROSALVA P [REDACTED]


I, ROSALVA 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 May 11, 1986. My son/daughter's name is [REDACTED]. He is 1 years old and he was born on March 17, 2017. My son and I are from Michoacan, Mexico.
2. We came here on Tuesday, July 2nd. We came here seeking political asylum because there is a lot of violence in Michoacan. It's very bad. Very often the groups kill people with guns. There are these groups that come in and try to take over the town, and the ones that are already in the town fight those groups off. There is always violence in the streets. I felt like I couldn't send my kids to school and couldn't go to work. Everyone stays home.
3. I separated a year and two months ago with the father of my children. There was domestic violence in the household. After we separated, he started taking the children away from me and taking them to a remote ranch where I can't contact them. For example, when [REDACTED] was 5 months old, his father took him, then returned when he was 7 months old. And then he took him away again when he was 11 months old, and then returned him when he was 1 year and 1 month old. No one would go with me to get the children because they were afraid of the children's father. He doesn't know that I am here with the kids now.
4. My plan is to go to San Jose and live with my sister. She will support us while I put the kids in school and wait for my permission to work. My oldest child is just learning to read and my kids have missed a lot of school during the times their father took them away from me.
5. When I arrived at San Ysidro, I walked through the doorway into a room. I took a number and waited. When the officers called my number, they brought us to a place where they took my information. I told them I was here seeking asylum. They wrote that down, took our fingerprints, and then sent us to another room. The officers yelled at me because I was nervous when I was providing my children's birthdates. We were patted down and they took my suitcases and my earrings.
6. I came here with my 4 children. I am sitting here with my youngest son, [REDACTED] and I left my other 3 children with another woman in the room. My oldest daughter [REDACTED] is 12, my second oldest daughter [REDACTED] is 10, my son [REDACTED] is 7, and my son [REDACTED] is 1.
7. Once we were processed, they led us into the room we are staying in now. We were not offered a shower before going into the room. The room is about 20 feet by 20 feet. We have 2.5 inch thick mats on the floor to sleep on. The mats are made of vinyl with foam inside. We have one blanket per person. The blankets are made of very thin wool. We do not have any pillows. The room has hard laminate flooring.
8. It's always cold in our room. The AC is always on. They dim the lights at night, but they never turn them off all the way.
9. In our room there are 10-15 mothers and each of us has 1-4 kids. My 12 year old daughter is the oldest in the room, and the other kids range in age. The younger kids make it very difficult to sleep.

10. I think breakfast is at 5am, but I don't know for sure because we are not told ahead of time. They just come get us for the meal. Some of the people that have been here longer can predict that a meal is coming up. There is no clock in the room. There are 4 meals a day. Our last meal is at 10:30pm.
11. We go to the kitchen to eat and it's crowded. It's usually only women and children. The line starts from the time we leave our room and the line ends when we get to the food counter in the kitchen. Eat at the kitchen. There are seats and tables to eat at. Breakfast is a choice between cornflakes and milk or a burrito. The other three meals are a choice between a burrito or torta, with one option for fruit juice. I am always hungry. I don't like the food here. My kids are also hungry. They gave [REDACTED] one baby bottle. In the room we're in they have the powder for the formula, so I just rinse the bottle with water in the room and then refill it for him as needed. We also have disposable diapers and baby wipes, but we do not have baby powder. We are not provided any pacifiers, so we have to use water bottle caps for the babies. There are no teething rings for babies. We are provided tampons. We are not provided any dental hygiene items, apart from one mint stick we received when we first arrived. We are not provided hair brushes or hair bands.
12. There are no games or books for the kids. We were not given any clothes. [REDACTED] peed in his pants earlier today, so as they were bringing us in for this interview, they gave him these clean pants. We have no soap or laundry detergent to wash our clothes.
13. We have pregnant women in our room too, one is 5 months pregnant. They've offered medical visits.
14. I haven't heard about moms being separated, but there are couples that come and they put the men and women in separate rooms. They don't let the men and women see each other. Not in kitchen or anything.
15. In our room, you can see into the bathroom, but not very well. We don't have complete privacy, just aluminum doors. There are no windows. We only have a window into the hallway. We have a television outside the window. The television only plays cartoons and you can't hear it at all. We have a water cooler in our room. The cooler is one where the water jug is upside down, but the water is not cooled. We also have a sink, but no soap.
16. My kids and I have not bathed since we've been there. We were offered a shower one time since Tuesday, but I had not accepted it. At the kitchen they have hand sanitizer.
17. I have 4 sisters and 3 brothers in the US. All of them are adults, all older than me. They've been in the US for over ten years. One had papers and one got asylum 3 years ago. I have nieces and nephews that were born in the US. They have not allowed me to contact any of my family in the US.
18. They asked me about my sister's phone number and address because she is my sibling here with papers. Her name is [REDACTED] I gave them that information, but I don't know if they called my sister or not. I contacted my sister before I got here and my sister is expecting a call from me. My sister lives in San Jose, California and is about 40 years old.
19. The officers haven't given me any information about how long I have to stay here and I have not been read my rights. They don't tell us anything, but there's a pattern that if they check your luggage then you'll be processed soon. My luggage was checked this morning.
20. The kids are not allowed to go outside. They are indoors 24/7. They don't have a sense of day or night.

Certificate of Translation

I, Rocio HERBERT, certify that I am fluent in English and Spanish and that I read the above
declaration to ROSALVA F [REDACTED] in Spanish.


Name: ROCIO HERBERT
Orrick, Herrington & Sutcliffe
1000 Marsh Rd.
Menlo Park, CA 94025

7/5/18
Date

I, ROSALVA 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.

7.5.18
Date

Certificate of Translation

I, Rocio HERBERT, certify that I am fluent in English and Spanish and that I read the above declaration to ROSALVA F. [REDACTED] [REDACTED] ish.

Rocio Herbert
Name: Rocio HERBERT
Organization: ORRICE, HERRINGTON & SUTCLIFFE
Address: 1000 MARSH RD.
MENLO PARK, CA 94025

7/5/18
Date

I, ROSALVA 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.

7.5.18
Date

Exhibit 133

Declaration of
SERAFIN S [REDACTED]

I, SERAFIN 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 October 12, 1992. My daughter's name is [REDACTED]. She is 11 months and she was born on August 16, 2017. My daughter and I are from Mexico.
2. I am from a small town called San Miguelito in Guerrero, Mexico. About four (4) years, cartel members established a presence in my town. Many of the people in the town were scared, so they abandoned their homes. The cartel members moved in to the abandoned homes. My family owns a small wheat farm, so we stayed. Since the cartel came to my town, my family has tried to stay quiet so we don't get hurt. I have seen the cartel beat or kill people who refuse to obey them. About once every other month, the cartel will make an announcement over the loudspeaker and demand that all of the men in the town present themselves at a sports field. The cartel will tell all of the men that there is going to be more cartel members there and demand that the women of the town feed the cartel. The other women and I are then forced to cook for one-hundred or more cartel members. About two months ago, a cartel member began to express interest in me and asked me to be his lover. I refused. He saw me a few days later and told me that if I didn't become his lover, he would ask his boss for permission to take me by force. He also told me that if I left he would find me and kill my daughter. I was scared for my life and my daughters life. The next morning, I took a shuttle to Tlacotepec. From there I took a van to Iguala and a bus to Mexico City. Then flew to Tijuana.
3. We presented ourselves at the border on July 4, 2018. We were taken to the San Ysidro Pedestrian West Facility immediately. When we arrived, all of my personal items were taken from me. My baby's blanket would not fit in my bag. An officer yelled at me and made me throw it in the garbage.
4. Since we arrived at the facility, we have been fed every 6 hours. I usually get either a sandwich or a burrito, the guards give me a container of pureed baby food for my daughter and a juice. I am breastfeeding my daughter. Even when I eat all of the food that I am given, I am still hungry. We are not given snacks between meals and are not allowed to take food back to our rooms. I am not producing enough breastmilk to feed my baby because I am not eating enough. My daughter cries a lot because she is hungry.
5. I am staying in a room with approximately thirty (30) or forty (40) other mothers and children. The room is very crowded. The air conditioning in the room is always on, so it

is very cold in the room. There is little to no ventilation. Since the guards only take out the trash once a day, the room usually smells like sewage and dirty diapers.

6. The room that we are being held in has no windows to the outside. The lights are on all day and we cannot tell what time it is. It is very hard for me and my daughter to sleep because of the lights. Other children have trouble sleeping too, so there are always children crying. We are sleeping on a very thin mattress on the floor and have been given one scratchy blanket. I use the blanket to cover my daughter at night, but it has given her a rash on her face.
7. No one has talked to me about seeing a lawyer since we've gotten here. There are signs in the cafeteria, but they are all in English, so I don't know what they say.
8. My daughter and I have been at the San Ysidro Pedestrian West Facility for about one day. My cousin and aunt live here in California. Once we are released, we are planning to live with my cousin, he is going to sponsor me. When I arrived, I gave a guard my cousin's name and number, no one has allowed me to call him.
9. No one has told me anything about being released or what will happen next.

Certificate of Translation

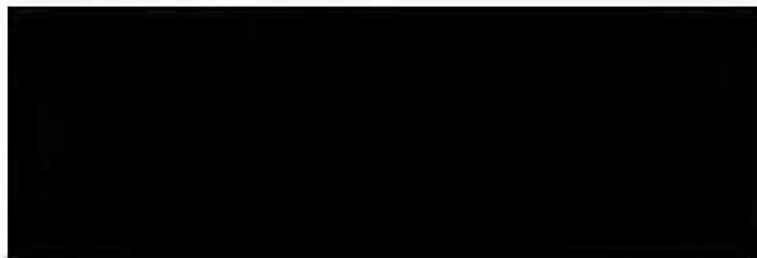
I, Hector Rivera, certify that I am fluent in English and Spanish and that I read the above
declaration to Serafin S [REDACTED] in Spanish.



Name:
Orrick, Herrington & Sutcliffe
1000 Marsh Rd.
Menlo Park, CA 94025

July 6th, 2018
Date

I, Serafin 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.



July 05 2018
Date

Exhibit 139

HAZLYN D [REDACTED]

I, HAZLYN 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 March 30, 1996. My daughter's name is [REDACTED]. She is seven months old and was born on November 13, 2017. My daughter and I are from Nicaragua.
2. I left my country because it is a war right now. The president is killing a lot of people, including killings of children. The police are going around wearing hoods completely covering their heads with AK-47s, they come to the civilian houses. If people refuse to open the door, they come through anyway. They are cracking down on students protesting there are shooting everywhere. They don't aim their guns, they just shoot all around, with no concern for the neighborhoods, or that the houses are flimsy and made of thin wood, where the bullets go right through. Lots of babies are being killed like this. They are shooting indiscriminately without aiming, just shoot the guns all around when they are confronting students or any protestors. I don't remember exactly when I left Nicaragua with my child, it was less than one month ago, but I know I was in Mexico for about seventeen days with friends. I left Mexico because I have no family there and because my daughter's grandmother is a U.S. citizen, her name is [REDACTED]. She lives in Ontario, California. I have her address and telephone number written down on a piece of paper that was confiscated from me when I was detained at this facility. We also have other relatives of my daughter that are U.S. citizens, for example her grandmother's sister, who lives in Victorville. They are all U.S. citizens.
3. I went to the Mexican Embassy in Nicaragua to get what I think was a tourist VISA. I got it and went to Mexico by plane. I came across the border from Mexico in a car with my daughter's aunt and drove to this facility yesterday afternoon asking for asylum and the officer told me to return today in the morning. We were trying to turn around to get a hotel for the night, so we could come back in the morning as instructed. When we tried to turn around, we were pulled over by the U.S. police, and everyone was arrested. They didn't believe that my daughter's aunt was a citizen, and that we were just turning around, they thought she was trying to smuggle me into the country. Everyone was taken to the police station, the aunt and her husband were released because they are citizens and my child and I were brought here from the station. I explained to the police officers that arrested us in U.S., that I am seeking asylum, but did not have the chance to tell the border officers in this facility. No one allowed me the opportunity, no one asked me questions. They just brought me into a room, gave me a blanket, and did not inform me of anything. I was given no instructions of any kind when I got here. I was just put in a room with a locked door with my daughter. There are at least 25 women and 10 children, boys and girls. The room is 20 foot paces long by 20 foot paces wide. There is no sunlight in the room. The overhead light is always on. There is one window leading to a corridor. There is one television. There are no chairs. We are given a thin rubber mat to sleep on and only one blanket for both me and my baby. My baby only has a small dress and a thin sweater, but nothing to cover her legs, no shoes, no hat. The room very cold. I am worried the baby is uncomfortable because the room is very cold and she is

#21600

getting sick, and I can hear the cold has caused her breathing to change and she is getting congested. No one has checked on us so I have not been able to tell anyone about my baby's medical condition.

4. There are three bathrooms in the room. The bathroom is only separated by a hip-high wall, there are no doors on anywhere. It is very dirty. The trash cans are always overflowing, there is always water all over the floor. There is no soap anywhere. There is one sink outside of the bathroom where we rinse the bottles. There is no soap. I can only rinse the bottle, but there is no way to wash the bottle.
5. I ate last night, I don't know what time it was. Today I ate twice. I was allowed to bring in my formula from my luggage, to get it back from my luggage that was confiscated when I came in. The food doesn't taste good but I have to eat it anyways because I am breastfeeding my child. I had to ask permission to take other things from the luggage, the teething biscuits which they let me have only two of, then asked to take ointment for her chest, a menthol ointment, they didn't let me take that. So I have nothing to give her for the cold.
6. No one has told me anything about my daughter's rights. I haven't seen any information posted anywhere about legal services. No one told me my daughter could be released to her grandmother, or being released.
7. I need help to stay in this country. I am very concerned because I cannot go back to Nicaragua because I am afraid of returning.

I, HAZLYN 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, translated and written into English and was read back to me in Spanish.

06-07-2018.

Date

#21601

Certificate of Translation

I, Lydia Lopez, certify that I am fluent in English and Spanish and that I read the above declaration to
HAZLYN D [REDACTED] in Spanish.



Lydia Lopez

La Raza Centro Legal

474 Valencia St., Ste. 295

San Francisco, CA 94103

07/06/2018

Date

Exhibit 140

Declaration of

EVA B [REDACTED]

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

1. My date of birth is December 20, 1995. My daughter's name is [REDACTED] She is one year old and she was born on November 15, 2016. My daughter and I are from Mexico.
2. My daughter and I were threatened in May 2018. A man they call [REDACTED] threatened me and my baby because he wanted me to go live with him. Later the same day, two men tried to kidnap me and said they would take me to go live with [REDACTED] Some neighbors saw what happened and I managed to run away. The men threatened to return and said they would take away my child instead, or come back for me.
3. We presented ourselves at the border about 8:30am on July 4, 2018. We were detained at the same port of entry where we presented ourselves, at the San Ysidro Pedestrian facility. We were in a waiting room all day while they took fingerprints and photos, and collected our documents. We were then taken to another room with about 55 other people and the room is kept at very cold temperatures. The children are cold at night, and my child and I have to huddle together to try to stay warm with two very thin blankets we were given. There is a schedule for eating that starts at 6am, and the last meal is served at midnight. There are interviews throughout the night and throughout the day. It's difficult to sleep because I do not know when the interviews are taking place.
4. The food is always the same, either a sandwich or a small burger. Sometimes we get a warm burrito, this is the only warm meal we've got so far.
5. The temperature is very cold all the time, and last night my child and I had to sleep next to a vent from the AC system and it was very cold. Other children were uncomfortable and cold. One girl was alone and she had to borrow blankets from another family because she was very cold. A mother with five children was only given three blankets.
6. Two lights are kept on throughout the night and the bathroom is not kept very clean, it's only cleaned once a day and there has not been any soap since I arrived. There is not even a soap dispenser there. I worry that the older children use the bathroom and cannot wash their hands and may spread germs throughout the larger room because they cannot wash hands with soap.
7. Since crossing the border yesterday, we have only been kept in this facility. We cannot hear the officers outside and they cannot hear us, through very thick glass, and they give us no information about our rights, our children's rights, or about when we can get released. We do not know when we're being called for interviews, but they told us it could be at any time of the day or night, and some women are called for interviews at 2 or 3am.
8. I have to ask for diapers and for a bottle for my child to drink milk. I was given a bottle upon entering, but when I lost it at the cafeteria I had to ask for a second bottle. I had to knock on the door five times

and wait up to 20 minutes before I could get the second bottle. I have no clothes to change and neither does my daughter. We have not been offered a shower since we arrived here at 8:30 yesterday. Only a couple of women got a change of pants for their children. We are not allowed to take food from the cafeteria for the young children, including my one-year old daughter. I've had to sneak juice sometimes to make sure she has something to snack. She and the other children do not want to eat the food, and they are in distress because they are not eating. One child could not eat for many days, and mother was told by an officer they would start injecting food in her daughter if she did not eat, because she was here for five days without eating.


9. Since arriving here I was not given any notice about access to counsel or about my child's legal rights or about my legal rights. There has only been fingerprinting and pictures taken, and I have not had an interview yet.
10. My daughter and I are still held at the same facility where we entered, San Ysidro Pedestrian.
11. My daughter and I have been at the current facility for one day and a half. We are planning to join our sponsor if we are able to leave this facility.
12. My current state and release status is uncertain because I have not had an interview with CBP officers yet. I was not given any information about a release date or about filing a case, and have not been given any referrals to get any advice from an attorney.

I, Eva 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.

05/07/18

Date

I, Lydia Lopez, certify that I am fluent in English and Spanish and that I read the above declaration to Eva
B [REDACTED] in Spanish.



Lydia Lopez

La Raza Centro Legal

474 Valencia St., Ste. 295, San Francisco CA 94103

July 5, 2018

Date

Exhibit 141

Declaration of
GLADYS E [REDACTED]

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

1. My date of birth is December 24, 1992. My daughter's name is [REDACTED]. She is two (2) years old and she was born on July 8, 2015. My daughter and I are Santa Eulalia, a town in Huehuetenango, Guatemala.
2. I left Guatemala for many reasons. I have been married to my husband for four years. Two years ago, he began drinking every day. Approximately three times per week, he hits me and calls me bad names in front of my daughter. My husband forces me to stay in the house. He refuses to let me leave the house to work or get food. It has become very hard to feed myself or my daughter. I am scared of my husband, I think he might kill me and my daughter. I also left Guatemala because I am discriminated against because I am indigenous. I am a member of the Kanjobal tribe, we are descendants of Mayans. The Hispanic Guatemalan people won't hire me. This makes it impossible for me to support my daughter and myself.
3. We presented ourselves at the border about three days ago. I believe that it was on or about July 4, 2018 around 9:00PM. We were taken to a room very close to the border with eight other people. We spent the night there and then were moved to a room in the San Ysidro Pedestrian West Facility. The room here is very crowded, there are about thirty-five adults and many children in the room. The room is approximately twenty-five (25) by fifteen (15) feet.
4. We were given food upon arrival and have been feed approximately every six hours. My daughter gets hungry between meals, but there are no snacks for her to have between meals. There is water in the room at all times.
5. There is a restroom in the room where I am staying. There is a small metal wall separating the bathroom from the sleeping area. There is no soap in the restroom. This bothers me because I cannot wash my hands after using the restroom and no one in there can wash their hands. I am worried that I might get sick or my daughter might get sick.
6. Since I have been here, I haven't been able to understand everything that the officials and guards have told me. I speak a Mayan dialect called Kanjobal. I understand most Spanish, but only when people speak very slowly. No one has talked to me about my rights or my daughter's rights since I've been here. An official told me that I have a right to have an

attorney, but I don't know how to contact an attorney. No one has given me any information about how to contact an attorney.

7. My best friend lives in El Monte, California and has said that she will sponsor me. I have not been able to contact my friend yet.

I, GLADYS 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 English, a language in which I am not fluent. The declaration was read back to me in Spanish, a language in which I am fluent.

[REDACTED]

06 Julio 2018

Date

Certificate of Translation

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



HECTOR RIVERA

ORRICK

1000 Marsh Road

Menlo Park, CA

July 6th, 2018

Date

Exhibit 142

Declaration of

MARIA E [REDACTED]

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

1. My date of birth is December 24, 1992. My daughter's name is [REDACTED]. She is two (2) years old and she was born on July 8, 2015. My daughter and I are Santa Eulalia, a town in Huehuetenango, Guatemala.
2. I left Guatemala for many reasons. I have been married to my husband for four years. Two years ago, he began drinking every day. Approximately three times per week, he hits me and calls me bad names in front of my daughter. My husband forces me to stay in the house. He refuses to let me leave the house to work or get food. It has become very hard to feed myself or my daughter. I am scared of my husband, I think he might kill me and my daughter. I also left Guatemala because I am discriminated against because I am indigenous. I am a member of the Kanjobal tribe, we are descendants of Mayans. The Hispanic Guatemalan people won't hire me. This makes it impossible for me to support my daughter and myself.
3. We presented ourselves at the border about three days ago. I believe that it was on or about July 4, 2018 around 9:00PM. We were taken to a room very close to the border with eight other people. We spent the night there and then were moved to a room in the San Ysidro Pedestrian West Facility. The room here is very crowded, there are about thirty-five adults and many children in the room. The room is approximately twenty-five (25) by fifteen (15) feet.
4. We were given food upon arrival and have been feed approximately every six hours. My daughter gets hungry between meals, but there are no snacks for her to have between meals. There is water in the room at all times.
5. There is a restroom in the room where I am staying. There is a small metal wall separating the bathroom from the sleeping arca. There is no soap in the restroom. This bothers me because I cannot wash my hands after using the restroom and no one in there can wash their hands. I am worried that I might get sick or my daughter might get sick.
6. Since I have been here, I haven't been able to understand everything that the officials and guards have told me. I speak a Mayan dialect called Kanjobal. I understand most Spanish, but only when people speak very slowly. No one has talked to me about my rights or my daughter's rights since I've been here. An official told me that I have a right to have an

attorney, but I don't know how to contact an attorney. No one has given me any information about how to contact an attorney.

7. My best friend lives in El Monte, California and has said that she will sponsor me. I have not been able to contact my friend yet.

I, MARIA 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 English, a language in which I am not fluent. The declaration was read back to me in Spanish, a language in which I am fluent.

06 Julio 2018

Date

Certificate of Translation

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



HECTOR RIVERA
ORRICK
1000 Marsh Road
Menlo Park, CA

July 06th, 2018

Date

Exhibit 148

Declaration of

LETICIA D [REDACTED]

I, LETICIA 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 July 5, 1989. My daughter's name is [REDACTED]. She is 11 months old and she was born on August 16, 2017. My daughter and I are from El Salvador.
2. Describe Reason for leaving country of origin.

I left El Salvador with my husband, my two daughters (including [REDACTED] and my son. When we were living in El Salvador my husband was working away from the house and I was home with my children. A member of the gang 18 told me that he wanted me to be his "woman". I said no. While I was walking with my children, including [REDACTED], the man took [REDACTED] from my arms, grabbed me off the street with my children and took me to a house. He let me go because my six year old daughter was screaming and a police car just happened to go by the house. He told me that if I reported the attack, he would kill me and my children. My husband and I determined that we had to leave. We know that after we left, the gang has gone to our house and kicked the door down looking for us.

In addition, my husband was required to pay extortion payments to MS-13 on his earnings.

My husband, son and older daughter crossed the border before us. My daughter and I crossed the border about a week after they did.

I am afraid to return to El Salvador.

3. We presented ourselves at the border about 8 am on July 4, 2018. We were taken to the San Ysidro Detention Facility – the Pedestrian West Facility.
4. I arrived with my daughter at 8 in the morning. We were first offered food around noon. It was a bean and egg burrito for me that was hot. My daughter was offered fruit juice. My daughter is provided with pureed food (carrots or potatoes) at 6 am and at noon. Otherwise, I have access to a bottle and formula at all times of the day.

Mostly she is having formula and breast milk.


There is water available in the room and disposable cups to drink.

5. The room is very cold – it feels like the air conditioning is always on. My daughter has trouble sleeping because she is too cold. We have only one blanket to share.
6. There are three toilets in the room where we are held. It is closed to the side but you can see out the front. There is toilet paper. There is a sink in each toilet area, but there is no soap and no paper to dry hands. We have access to diapers as needed and I have access to feminine hygiene products.

7. I have not been offered an opportunity take a shower or to bathe my daughter. I have not been given the opportunity to clean our clothes. This morning, my daughter's diaper leaked. We were provided with a replacement pair of pants for the dirty pants but have otherwise not received any clean clothes.
8. We are housed in a room with approximately 15 women and approximately 18 children. We have received a mat to sleep on that was about 3-4 inches thick. There is enough room for everyone but people are right next to you when you are sleeping. The door is locked all of the time and we are not able to leave.
9. The lights are on all of the time – they are turned down during the evening but the lights are still bright. We both have trouble sleeping and have to put the blankets over our heads in order to sleep.
10. We have not had a medical emergency but we know that it is difficult to get the attention of the facility staff. When we want something, we knock on the door but they often do not come quickly, if at all.
11. We have not been provided with any information about the legal process. I have not been provided with information regarding my daughter's legal rights. I have not been provided with the opportunity to use a phone to call an attorney.
12. My daughter and I have been at the San Ysidro – Pedestrian West Facility for about 2 days.
13. My husband has been released with my older daughter and son. He is in Virginia with his aunt. We are planning to join the rest of our family in Virginia once we are released.

Certificate of Translation

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


Robert Perez
Ornela, Herrington + Sutcliffe
405 Howard St
San Francisco, CA
94105

7/5/18
Date

I, Leticia 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]

07/05/2018

Exhibit 153

Declaration

I, Raul P. [REDACTED], declare under penalty of perjury that the following is ~~true~~^{true} and correct to the best of my knowledge and recollection:

1. My date of birth is April 8, 1990. My daughter's name is [REDACTED]. She is one and a half years old, and she was born on January 21, 2017. My daughter and I are from Guatemala.
2. We were apprehended at the border on June 28, 2018, on or about 11pm at night. We were taken to the Santa Teresa Border Patrol Station.
3. In general, our treatment has been fine. However, we have been here at the Santa Teresa Border Patrol Station for four days, and we don't know when or where we will be transferred or released.

* 4. (Cont'd on back)

I, Raul 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 to me in Spanish, a language in which I have some fluency and was read back to me in Spanish.

[REDACTED]
7/2/2018

I, Leah Chavla, certify that I am fluent in English and Spanish
and that I have read the above declaration to Raul A [REDACTED]
in Spanish.

Leah Chavla

7/2/2018

Leah Chavla

Women's Refugee Commission

1012 14th St NW, Suite 1100

Washington, DC 20011

4. Spanish is not our first language. We speak an indigenous
language called Canjobal (Qanjobal). Since we arrived at
the Border Patrol Station, it was assumed that we speak Spanish
fluently. We have not been provided with an interpreter.

Exhibit 154

Declaration of
YASMIN R [REDACTED], A NUMBER [REDACTED]

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

1. My date of birth is May 9, 1995. My daughter's name is [REDACTED]. She is three years old and she was born on January 8, 2015. My daughter and I are from El Salvador.
2. The gang Mara Salva Trucha threatened us with death because my husband is a police officer
3. We crossed the Rio Grande near Los Reinos MX about 25 days ago on the road to McAllen, TX. I believe that it was on or about June 3, 2018. They took one of the women in our group to the hospital and left me with the woman's one and four year old children, who they then took from me at the custom's facility that we call "Los Hiellera" or freezer. We were only at this facility two hours and the facilities were fine.
4. After this facility, my daughter and I were taken to the facility we call the "Perrera" or doghouse, where we were held for three days.
5. At this facility we were not permitted to bathe, even though we asked. Other women had their children who were five or older taken from them when they were told the needed to go to court. When they returned from court, the children were not returned to them until they were reunited at the ICE Dilley, TX facility.
6. We were not provided any written legal information.
7. My daughter and I were taken out of this facility on a June 6, 2018 and transported to the ICE Dilley, TX facility.
8. We have been at the ICE Dilley, TX facility for about 22 days. I was provided a lawyer on June 20, 2018 and I have been told that I will be released tomorrow to go to North Carolina to join up with my husband.

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

[REDACTED]

06/28/18

Date

Certificate of Translation

I, George Humphrey, certify that I am fluent in English and Spanish and that I read the above declaration to YASMIN R [REDACTED] in Spanish.



George Humphrey
Orrick, Herrington & Sutcliffe LLP
609 Main Street, 40th Floor
Houston, TX 77002

06/28/18

Date

Exhibit 155

Declaration of

DIXIA S [REDACTED], A NUMBER [REDACTED]

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

1. My date of birth is August 6, 1989. My daughter's name is [REDACTED] She is ten years old and was born on January 25, 2008. My daughter and I are from Honduras.
2. I left Honduras because I was threatened with death by the gang MS. MS had killed a man in front of her house, which I heard from within my house. MS threatened me two times to leave my neighborhood or would kill me. I did not report this to the police because I was afraid of the gang and believed that the gang has members in the police force. I also left because the boyfriend of my mother also threatened to kill me after I confronted him for abusing my mother.
3. We crossed the Rio Grande near the Mexican city of Reynosa and were arrested, around May 23, 2018, as we walked along the river near a bridge on our way to McAllen, Texas. We were taken to a facility called the "Hielera" or "Freezer."
4. Upon arrival at this facility, the officials separated me from my daughter, [REDACTED] who is ten years old. I asked that they not separate us, because my daughter has asthma and the facility was extremely cold. I was worried that my daughter would have an asthma attack. They told me that my daughter was too old and that she needed to go with children her age. They then took her from me. We could not see each other. They told me they were in different parts of the facility. It was around midnight when I arrived in my cell.
5. The facility was freezing, and they only gave me a thin, aluminum blanket. I did not have a jacket and shivered uncontrollably all night long. I missed my daughter desperately. I had to lay on the concrete floor because there were no mattresses. The cell was filled with women, and it was very difficult to go to the bathroom because women were everywhere, blocking the entrance to the bathroom.
6. When I arrived, I received a cookie and juice. At breakfast, I was given a frozen ham sandwich. The ham was black and horrible looking. Although I was hungry, I did not eat it. It wasn't rotten, however.
7. There were no shower that I was given access to at this facility.
8. After about twelve hours in the facility, I was put back with daughter on a bus that took us to the facility called the "Perrera" or Dog House. We were there about three and half days. When we arrived at the facility, they separated me again from my daughter. This time, they placed my daughter in a cell far away, but we could see each other. She was about a half a soccer field away.
9. I pleaded with a male officer to see my daughter, and he told me I would be able to see her at 5 pm, but I was not reunited with my daughter until we left the facility a couple of days later.
10. On the third day I was at this facility, a female officer came by in the morning asking for the mother of [REDACTED] She told me to yell out to my daughter to stop her crying or she could get sick from all of her continuous crying. I asked if I could leave the cell to be with her, but the officer would not permit me to do so. I yelled to my daughter to try to comfort her and told her to stop crying, have patience, and that they would be leaving soon.

#21662

11. They gave me an aluminum blanket at this facility, and it was cold, but not as cold as the first facility. The lights were always on and there were no windows.
12. I asked to be able to have a shower on the first day and a male officer told me there were many others that needed to bathe. On the second day, I was able to bathe, but they weren't allowing any mothers in my cell to bathe that had young children with them. One of those mothers told me she and her child hadn't bathed in 8 days. Others told me they hadn't bathed in 3, 4 and 5 days.
13. The bathrooms were filthy. The portable bathrooms were filled with excrement. There were only six toilets for all of us.
14. Some of the young children were vomiting and having stomach problems. One of the women, whose child was vomiting and not eating, asked for medical help. They gave her some Gerber food and later brought some fluids for dehydration.
15. My daughter and I left this facility on May 28, 2018, and we were taken to the ICE Dilley, TX facility. We have been at this facility for over a month.
16. My daughter contracted chicken pox at this facility, but she has received good medical treatment. She also received antibiotics for an infection she had in one of her molars.
17. My asylum request is under appeal.

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

06/29/2018

Date

Certificate of Translation

I, George Humphrey, certify that I am fluent in English and Spanish and that I read the above declaration to
DIXIA S in Spanish.

George Humphrey
Orrick, Herrington & Sutcliffe LLP
609 Main Street, 40th Floor
Houston, TX 77002

06/29/2018

Date

Exhibit 158

Declaration of
LESVIA E [REDACTED], A NUMBER [REDACTED]

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

1. My date of birth is February 11, 1995. My daughter's name is [REDACTED]. She is five and she was born on December 19, 2012. My daughter and I are from Guatemala.
2. My daughter and I left Guatemala because we have been being threatened for some time, ever since [REDACTED]'s uncle and his girlfriend we killed.
3. We crossed the border on June 24, 2018. We crossed a river and walked for about a half an hour, looking for officials. Finally we found them. We were standing there and they took down our information. They took our identification, and we put our belongings in a bag, which they took. Then we got on a bus.
4. We went to a place called "La Hielera" ("The Icebox"). We got in line and they reviewed a list to make sure we were all there. We were there for about eight hours. We got there in the afternoon and left around midnight. It was very cold.
5. After La Hielera, we were taken to La Perrera ("The Dog Cage"). We were in La Perrera for one day, just on Monday. It was cold there, although not as cold as La Hielera. It was really hard to sleep because the officials woke us up all the time. They wanted to do a list or take people here or there. The officials at La Perrera yell at you. If the children are doing anything, they yell at you. It is very uncomfortable there.
6. My daughter has a medical condition that makes it difficult for her to go to the bathroom. They took her medicine and did not replace it.
7. We arrived here on Tuesday, I think. I'm not sure what time it was. We did paperwork, which took hours. They told us that we had another process to go through here and that we would have a lawyer.
8. I would like to go live with my daughter's father, who is pursuing his asylum case in San Rafael, California.

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

29/06/18
Date

Certificate of Translation

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



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

6/29/18

Date

Exhibit 159

Declaration of
PATRICIA H [REDACTED], A NUMBER [REDACTED]

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

1. My date of birth is February 24, 1975. My son's name is [REDACTED] (A number [REDACTED]). He is thirteen years old and he was born on July 30, 2004. My son and I are from Mexico. We fled Mexico because we were being extorted by the drug cartels and the cartels threatened our lives.
2. On May 7, 2018, my son and I crossed the river and crossed the border into the United States, and there were agents waiting for us on the other side. The agents put us in a van. They asked us our names and where we from but did not ask why we were coming to the United States. They took all of our things from us.
3. We were taken to some immigration offices in Brownsville. I think it was called "La Hielera" ("The Icebox"). When we arrived, the officers separated me from my son. I asked why they had put me in one cell and him in another. They told me that the zero tolerance policy had started, and that they were going to separate mothers from their children. They told me I was going to go to court. I was told we would be separated because he couldn't go to court.
4. They took my son and I out of our cells, and we were interviewed by officials side by side. I was able to tell the official that we had come to the United States in order to ask for asylum because we were in danger. He told me that he would put it down in his file, but that Mexicans can't get asylum. He said he would put it down in his file anyway, so I told him my whole story.
5. The next day, on May 8, I was taken to another building about half an hour away. I was wearing handcuffs and chains on my feet. A lawyer came to us to explain what was going to happen. The lawyer told me that the judge would ask me if I knew that crossing the border was illegal, and the lawyer told me to say yes. The lawyer told me that the judge would decide whether to pardon us or whether to give us 3 to 6 days in jail.
6. There were about 30 of us there in front of the judge. First, the judge asked whether we knew it was a crime to cross into the United States. We said yes and then he pardoned us, I think. I said yes because that is what the lawyer had told me to say. Then he asked each of us a question and let me explain a little of my case. I told him that I had fled from Mexico for my safety, and that they had separated me from my son. The judge got angry that we had been separated. He told me that we would be put in a camp together while our immigration process happened. He gave me permission to stay in the country, but a lot of the other people in court with me were deported, and some were given 10 days in jail.
7. When I returned to La Hielera, the officials told me that they had already sent my son back to Mexico. I asked how they had done that if I hadn't signed any form, and the judge already told me that I could stay with my son. They told me I had two choices: either to stay in the United States because the judge had

given me permission, or to be deported back to Mexico where my son was. I was so angry and confused. I said that I wanted to go with my son. They told me to sign my deportation. I said no, because I didn't have any reason to be deported. They told me I would be deported either way.

8. The officers took me to the bridge. They left me there. Then I heard another immigration official calling my name. He told me that I had permission to stay in the United States. I replied that they had deported my son, and that I wanted to be with my son, because my son only has me – I knew my son was afraid and alone, so how could I leave him? The official told me that if I crossed the bridge it would be like a deportation. He told me to go with him and said that immigration would make it as if my son hadn't been deported.
9. The officers took me back to the immigration facility, and after some hours of waiting, they told me again that I had two choices: to stay in the United States or to be deported with my son. They told me that it was their error that he was deported but they couldn't bring him back.
10. The officers took me back to the bridge. I called the Mexican consulate and told them I didn't want to be deported and I wanted my son to be returned to me in the United States. The consular officer said that there was nothing they could do. He asked why we had crossed by the river and why we hadn't brought proof of the threats against us. I said we came fleeing for our lives and we didn't have time to bring proof. I said we my son had been deported by mistake. The official spoke rudely to me. He told me to shut up and not to talk about things I shouldn't talk about.
11. I crossed the bridge and went to find my son. I found him in the juvenile detention facility (D.I.F.) in Matamoros – the consulate had told me that was where to find him. They let him leave with me because I could prove he was my son.
12. We crossed the river again later in May, probably May 16, 2018. After we crossed the border we were kidnapped by a cartel. At first, we thought it was immigration officers again, but they took us prisoner. Next, I thought it was maybe the people who had threatened us in Mexico. They carried guns and they covered their faces. They held us in a house for eight days with about 120 other people. It was so hot, we sweated through our clothes. They left us some food but they locked us in. They only came back twice in those eight days to drop off food. They called the person who helped us cross the river to tell him that he needed to get money from my family to get us out.
13. On May 23, 2018 (I think it was a Friday) the police came by. We couldn't open the door, so the police told us to get down and shot the door open. We left the house. They gave us bags to put our things in and put us all in a van to immigration at Rio Grande. We had been on a ranch about half an hour outside of the city.
14. The officers took us to another La Hielera, and I was separated from my son again. I was crying a lot when they separated me from my son. I was worried that they were going to deport him again without me.
15. On the first day that we were at La Hielera for the second time, I had another discussion with an immigration official. I explained my whole situation to her again, including the fact that we had been deported and everything that had happened to us since we crossed the river again. I told her, again, that I was afraid to return to Mexico. I saw that she was taking notes, and then she went back to talk to other officials. I saw her come out again and take all the notes she had taken on my case and throw them away. Then they interviewed me again. We went back and forth, I was interviewed about four times, and each time the official went back to speak with the supervisor. I think they were confused about my

case. I could see that they weren't taking down all of the information about my case, including the ways that I had been hurt when I fled my home and when I was kidnapped. They told me I had to explain it all to the judge.

16. We were in La Hielera for two days. On Sunday, May 25, 2018, they took us to McAllen – to La Perrera (“The Dog Cage”). We were together on the drive over but they separated us again at La Perrera. We were in La Perrera for six days, until May 30.
17. For the whole six days we were in La Perrera, my son and I couldn't spend time with each other. We could only see each other from afar. I could see that my son felt ill, but the official told me that he had to ask for help, that I couldn't get help for him.
18. I was only able to bathe once – this after crossing a river, being held captive in a sweltering house for eight days, spending two days in La Hielera, and spending two days in La Perrera.
19. The officials were rude to me and the other women at La Perrera. The guards told us that our children were going to be adopted and that we were going to be deported. There was another woman there in La Perrera with us who came with us to Dilley. That mother told me that immigration had called her and told her that her son had already been adopted. She started hitting her head against the wall. Because she was being held in a different area of La Perrera, behind a black door, she couldn't see that her son was still there.
20. While I was at La Perrera, I wasn't able to use the telephone to call a lawyer or my family. I wanted to call my family because I knew they would be worried that they hadn't heard from us.
21. After six days, we were taken to Dilley. No one explained to us where we were going. We have been at Dilley since May 30, 2018. I am not sure why we have been here for so long. After eight days, we still hadn't had our credible fear interview scheduled. We asked a lawyer what was going on, and they said the case was still in process.
22. Last Thursday, we signed a form to be released, even though we had not yet had a credible fear interview. Our family bought us tickets. But then we were told that we couldn't leave on Saturday because we hadn't had our interview yet.
23. We had a credible fear interview on Wednesday. This morning, we received a positive determination. The uncertainty and stress has been very difficult for me and my son. We do not understand why this is happening and why our case is taking so long to process. We just want to leave this place and go to live with my friend in Houston.

I, Patricia 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]

6/29/18
Date

Certificate of Translation

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



Virginia Corrigan
Youth Law Center
823 Folsom Street, Suite 700
San Francisco, CA 94014

6/29/18

Date

Exhibit 160

Declaration of
Alba S [REDACTED] A [REDACTED]

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

1. I was born on March 31, 1987. I am a citizen of Honduras. My son [REDACTED] was born on January 1, 2016.
2. I left Honduras because my son and I were threatened with death by a criminal gang. They killed my brother in law. I ran to the United States seeking protection from murder.
3. On June 5, 2018, I entered the United States somewhere along the Texas border. I'm not sure where. I wanted to surrender myself to immigration. I crossed a river with another family. There was an immigration car and we went up to it and I presented myself and my son.
4. They asked me if we were the only ones traveling or if there were more. Then we were put in a car and taken to "la yelera" with other immigrants they picked up on their way. I arrived around 6. After they did all the paperwork around 8 I was given a ham sandwich, juice and a cookie. They gave me the same thing for my son. He only ate a tiny bit of the juice and a bite of the cookie.
5. Shortly after I arrived they called a woman into the office. She was sobbing. When she came out I asked what happened. She said she was being separated from her 10-year-old son. After that I was terrified that they were going to take my son. I began to pray and to cry. I wished I had stayed in Honduras and been killed. I saw other incidents of abuse – evil laughing at people for no reason
6. Sometime late in the night they took me by car sometime late in the night they took me by car to the "la perrera."
7. I was put in a small jail cell. There were 12 mothers and children. It was absolutely freezing. So cold. They gave me a small mat and an aluminum blanket. It was so cold I couldn't sleep. I constantly thinking about them taking my son. I am terrified even now that we will be separated.
8. In the middle of the night they moved me to a larger cell with about 30 women and children. There were 2 or 3 portapotties outside. There was one sink that would run out of water at times with a soap dispenser. There was no towel, toothbrush or comb.

9. We were roused about 6am for breakfast after they called role. For breakfast, they gave me a bean burrito, an apple, a cookie and water. They gave the same thing for the baby. He ate a bite from the apple and one from the burrito but he didn't like it. He ate the cookie. When they gave us food we only had an hour to eat. When that time was up they threw the food away and search to make sure they don't sneak food in but if so they will throw it away in front of them with anger. This meant I couldn't keep anything to feed my son who wasn't eating much at all, any food until whenever they served the next meal.
10. There was a mom preparing a bottle for her son and a female officer demanded to know who's bottle it was. The guard said the baby had teeth and was too old to have a bottle. She grabbed the bottle and threw it in the trash in front of the baby and everyone else. The woman was humiliated and afraid and didn't try to take the bottle from the garbage can.
11. They offered me a shower. I misunderstood and thought they asked if I already showered and I said yes so I didn't get one.
12. After breakfast, I had a phone interview. They asked me about myself and about what happened to me at home. They asked about my schooling, parents names and other biographic information. Then they sent me back to the cell.
13. I lost track of the time. I was so scared I couldn't think. I don't exactly know the time.
14. . On Thursday, I was taken with a group of women and children. We had told us we were going to be moved to a detention center 4 hours away. We went in two buses.
15. That's when I came to Dilley.
16. From the time we were arrested my son cried constantly. He was scared, he was cold, he was hungry. I couldn't comfort him because I was so upset myself.
17. I got to Dilley on June 7 mid afternoon. First thing we got a shower and new clothes and shoes. The we had a meal. We were each given a box with a sandwich, apple, water and a cookie. The we had an intake interview, and medical checkup. I was asked who was going to pick me up in the US and I was allowed to call that friend.

18. I was then taken to my room. I have enough blankets. There is a community shower and restrooms. There is shampoo, soap, towel, toothbrush and toothpaste.
19. I have bad cough due to change of climate. Cool inside and hot outside. The baby has been sick for two weeks. We've been to see the doctor twice. He has diarrhea, a cold, cough, red itchy eyes, a rash and fever. They gave me liquid baby Tylenol and something for the diarrhea. There is also a virus going around. Yesterday I was told it would be cleared in three days. With respect to the pharmacy, it's not uncommon to have to wait as long as two hours to get medicine. There's a high demand of medication.
20. I was never told anything about lawyers or rights until I got to Dilley. I saw a lawyer here and had a credible fear interview and went before a judge. I am waiting for the results.

I, **Alba 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.

6/28/18

Date

Certificate of Translation

I certify that I am fluent in English and Spanish and that I read the above declaration to **Alba S** [REDACTED] in Spanish.



Ana Bueno



Date

Exhibit 161

This is a confidential legal document and the work product of a attorney-client relationship.

Declaration

Blanca C [REDACTED] A# [REDACTED]

I, Blanca 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 Blanca C [REDACTED] born October 30, 1992, A# [REDACTED] and my 2-year-old son [REDACTED] (A# [REDACTED]), born September 19, 2015, who was not interviewed and who is on my claim. I am from Congo, Santa Ann, El Salvador.
2. I entered the United States on about June 12, 2018 near Reynosa (MacAllen), Texas. After I crossed into the United States on a boat we were detained by U.S. officials about 7 minutes later. The officers demanded my shoelaces, jewelry, and told me to get into a car. He asked for my identification, but the officer did not ask me any other questions. Then we drove about 30 minutes to a heiliera.
3. At the heiliera they took my finger prints, but not my son's, and they took photos of both of us. They also asked me questions about why I came to the US and if I had a fear of returning to El Salvador. I told them I feared harm in my country. They gave me a cold sandwich with ham and water; they gave my son cookies and juice and a burrito. I stayed in the heiliera three days. There was no possibility to bath or take a shower.
4. After three days we were taken to the Peirreria in a bus. They gave us a sandwich, an apple, cookies, juice, and water and my son milk and a burrito and potato chips. I was at the Peirreria for one night, then I was taken to Dilley.
5. I am disappointed by the medical services at Dilley. My son has been sick for one week he has been coughing and has a fever and was vomiting up until two days ago. The infirmary gave him antibiotics, but he is still coughing and has a fever. My son sleeps a little at night, but his fever spikes. I am not able to sleep because I am worried about my son's health. He does not eat, but drinks water and juice. He stopped his antibiotics one day ago.
6. At Dilley, I was interviewed on Monday, June 25, 2018, and explained that I was fleeing my country because I feared harm. I am awaiting my asylum decision.

I, Blanca 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: [REDACTED]

Date: 28-Junio-2018

Certificate of Translation

I, Casey Miller, certify that I am fluent in English and Spanish, and that I read the above declaration to Blanca C [REDACTED] in Spanish.

Casey Miller:
802 Kentucky House
San Antonio, Texas 78201

Date:

6/28/2018

Exhibit 162

This is a confidential legal document and the work product of a attorney-client relationship.

Declaration

Jeydi M [REDACTED], A# [REDACTED]

I, Jeydi 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 Jeydi M [REDACTED] born, March 23, 1989, A# [REDACTED] and my 4-year-old son [REDACTED] (A# [REDACTED]), born February 16, 2014, who was not interviewed and who is on my claim. I am from Progreso Lloro, Honduras.
2. In October 2017, my partner left Honduras taking my daughter with him to the United States.
3. I entered the United States on about June 4, 2018 near Brownsville, Texas. After I crossed into the United States we were detained by U.S. officials about 15 minutes later. The officers demanded my shoelaces, jewelry, and told me to get into a truck. The officer asked me questions about when I came and made me sign several papers. I asked if any of the papers were for my deportation and they said 'no'. Then they drove us to a heiliera.
4. At the heiliera they took my identification and asked me if the child with me was my son, and took us into a very cold room where we had to sleep in the floor with blankets of aluminum. They also took my finger prints, but not my son's. They also asked me questions about why I came to the US and if I had a fear of returning to Honduras. I told them I feared persecution. They also gave us a cookie and juice five times in 24 hours. Four times they gave me a sandwich. I stayed in the heiliera one night I think, but because they never turn off the lights I am not sure. There was no possibility to bath or take a shower.
5. The next day we were taken to the Peirerra in a bus. They gave us an apple, sandwich, cookies, juice, and water. I was taking medicine for an injury to my leg. There was no possibility to bath or take a shower, even though there was a shower there. I was at the Peirerra for one night, I think, then I was taken to Dilley.
6. The medical treatment in Dilley is not sufficient. The medicine that I received at Dilley for my leg injury did not stop the pain in my leg, although the medicine that I was taking in Honduras since August 2017 did stop the pain. There are long waits and the medicine they give us is not good. I had to wait for five days to get treatment for my leg. I asked for crutches so I could walk but they would not give them to me. They told me that I could only get crutches if I was admitted in to the medical unit here. My son was coughing, vomiting, and had a fever. They did not give him any medicine for his fever, cough or vomiting. About a week ago my child had a fever and was vomiting, and I went to the clinic, about six times in three days, and the nurses refused to admit my child or provide him any assistance. Only after he saw the doctor, and he confirmed the child had a fever, did my son receive treatment for a fever and conjunctivitis. They gave me an armband that meant that I don't have to wait at the pharmacy because I had to wait for 2 or 3 hours to get medicine before they gave me the armband. They gave me this armband after 20 days.
7. The nurse who first saw my child wrote that my child did not have a fever, but the next person who saw my child, and said he was a doctor, said my son did have a fever.
8. At Dilley, I was interviewed on Monday, June 7, 2018, and explained that I was fleeing my country because I feared harm. I am awaiting my asylum decision.

I, Jeydi 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: [REDACTED]

Date: 6/28/18

Certificate of Translation

I, Casey Miller, certify that I am fluent in English and Spanish, and that I read the above declaration to Jeydi M. [REDACTED] in Spanish.


Casey Miller:  Date: 6/28/2018
802 Kentucky House
San Antonio, Texas 78201

Exhibit 163

Declaration of

Lizeth R [REDACTED] A [REDACTED]

I, Lizeth 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. I was born on July 17th, 1994 in El Salvador. My son's name is [REDACTED] He is 5 years old and he was born on September 17th, 2012. My son and I are from El Salvador.
2. I fled spousal abuse to come to the US. My husband threatened to kill me and my son. I fled immediately after he made this threat. I know he intended to carry it out.
3. My plan was to go to the United States, surrender myself to immigration and ask for asylum. When I got to the border I heard that they were separating mothers from their children. I was so desperate to take my son away from his dangerous father that I took this horrific chance and came anyway.
4. At the beginning of June my son and I entered the US at Laredo. I got caught by immigration at night at the first check point. I was held there with my son and we spent the night there. There were no other people held with us. I couldn't sleep trying to help my son sleep in a hard piece of break/cement like a bench in a room with a toilet with no toilet paper and sink with no soap. I had only one aluminum blanket for both of us so I used it to wrap my son. It was freezing. They left the lights on all night.
5. We each got a burrito but nothing to drink when we were brought to Laredo..
6. Early in the morning they took us to "la yelera" center. We were not given any food before we were taken there, I was held in a room by myself with my son. There was a toilet, sink with no soap. They gave us crackers, and juice. They only they gave us crackers and juice the day and a half we were there. I asked an officer for more food because my son was starving. The officer brought a small burrito and juice which [REDACTED] ate.
7. I was not told I had the right to a lawyer or anything else about my right or those of my son until I got to Dilley.
8. Midday on June 9, we were put on a mini-bus with a couple of mothers and their children and taken to Dilley. When we arrived, we were given a box with a sandwich, apple, a cookie, a small rice and crispy and water. After not eating for a day and a half this was quite a treat. The people here explained how things work here. We had medical exams. I had a pregnancy test, x-rays and an exam. My son got vaccinations, x-rays and a checkup. I was told I had a right to a lawyer, was given a list of lawyers and a paper explaining [REDACTED]'s rights under Flores.
9. Compared to my early experience this is great. I have enough food. My son is still adapting to the food after starving at la yelera and he is starting to eat.

10. I've met with a lawyer and had my credible fear interview. I've been in the court and am waiting for the decision.


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

[REDACTED]

6/28/18
Date

Certificate of Translation

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



Ana Bueno

6/28/18
Date

Exhibit 164

Declaration of
MAIRA S [REDACTED] A NUMBER [REDACTED]

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

1. My date of birth is October 8, 1985. My daughter's name is [REDACTED] She is three and she was born on August 2, 2014. My son and I are from Guatemala.
2. We left our country of origin due to death threats to myself and my daughter as well as threats to kidnap my daughter, which were made by Mara 18 gang members due to the fact that I was opposed to the political regime and the Mara's authority in my neighborhood.
3. We presented ourselves at the border approximately on or about June 3, 2018, approximately at 2:00 pm. We were taken to a facility known as the "Ice House (Hielera)."
4. Food conditions at the Ice House were poor. [REDACTED] and I were fed only one bottle of water and 1 ham sandwich during our stay. Temperature at this facility is extremely cold. The facility was overcrowded and there was no space to lie down. Hygiene conditions at the Ice House were poor. The toilets were full and were not in clean conditions. Treatment by governmental officials was aggressive. A governmental official mocked my country of origin due to a volcano explosion and expressed that my country was "done."
5. After about one day at the Ice House, my daughter and I were taken to another place, known as the Dog House (*La Perrera*) where we were held for one day. Conditions at this Facility were equally as poor. We were fed an apple, a plain ham sandwich and a bottle water at night and the same food the next morning. My daughter and I were taken out of that facility for one day.
6. My daughter and I have been at the Dilley, Texas for approximately 22 days. When released, we are planning to meet with my husband, who is currently living in Boston, Massachusetts.
7. My next hearing is scheduled for June 29, 2018.

I, Maira 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.

[REDACTED]

6/28/18
Date:

Certificate of Translation

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



Emilio Grandio Urrea
Orrick, Herrington & Sutcliffe
609 Main, Houston, Texas, 77002

6-28-2018

Date

Exhibit 165

This is a confidential legal document and the work product of a attorney-client relationship.

Declaration

Yenny F [REDACTED] A# [REDACTED]

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

1. I am Yenny F [REDACTED] born, June 13, 1991, A# [REDACTED] and my 4-year-old daughter [REDACTED] born March 22, 2014, who was not interviewed and who is on my claim. I am from Barrio el Bosque, Tegucigalpa, Honduras.
2. I entered the United States on June 6, 2018 at MacAllen, Texas. After I crossed into the United States they were detained by U.S. officials about 10 minutes later. I gave the officers my shoelaces and got in the car. The officer did not ask us questions, but drove us for about a half hour to an heiliera.
3. At the heiliera they took my photo and finger prints and give us an aluminum cover. They also gave us a cookie and juice twice in 24 hours and a sandwich with bread and ham.
4. The next day we were taken to the Peirreria in a bus. They gave us one corn tortilla with beans and rice. There was also a video call with an immigration official. I told him that I was afraid to go back to Honduras. I just replied 'yes' to most of the questions, saying I was afraid to return to Honduras because of persecution by me husband that the government would not protect me from. I stayed in the Peirreria two days.
5. At the Peirreria I contracted an infection of my skin and so did my daughter maybe because I had to sleep on the floor on a thin mattress of about two inches of thickness with one thin aluminum cover.
6. My daughter is not eating at Dilley. She eats almost nothing, only drinks water. At breakfast I have to buy cereal for my daughter since she will not eat the food in the cafeteria. My daughter has lost 5 kilograms since leaving Honduras.
7. I have had to take my daughter to the doctor several times and I have to wait 30 to 40 minutes in the morning, 15 to 20 minutes in the afternoon, and about 20 minutes in the evening.
8. I received a positive decision and will leave tomorrow.

I, Yenny 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.

Name: [REDACTED]

Date: 28 JUNIO 18

Certificate of Translation

I, Casey Miller, certify that I am fluent in English and Spanish, and that I read the above declaration to Yenny F [REDACTED] in Spanish.

Casey Miller:
802 Kentucky House
San Antonio, Texas 78201

Date:

6/28/2018

Exhibit 166

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

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

1. My date of birth is April 18, 1988. My son's name is [REDACTED] (A Number [REDACTED]). He is 12 and he was born on November 7, 2005. My son and I are from El Salvador.
2. We came to the United States because my country is very dangerous. There are many gangs. A person came to my house and told me to pay money every month for our protection. I couldn't afford to pay and refused. They told me that if I didn't pay, they would take revenge on my son.
3. We entered the United States on June 25 at Reynosa and found immigration officials. We were thirsty. They told us to stand next to our kids. They did not ask us any questions. They asked if we were thirsty and gave us water as they put us in a vehicle.
4. I do not know where we were taken, but the other women called it the ice box. We received a piece of bread and there was a thermos of water we could drink from.
5. My son was taken away from me to another room. The officials told me that he was too old to remain with me. They gave me the cell number where he would be held. They told me that if I wanted to see him, I should tell them and they would let me.
6. I was put in a large room with only one small window. It had two cement benches and one bathroom. There were three other women but no kids. I saw other cells that had women with small children, as well as rooms with men and small children.
7. After two hours, the officials pulled me out of the room. They asked me for more information, including why I came to the United States. They asked if there was anyone here who would receive us. I gave contact information for my brother-in-law, [REDACTED]'s uncle. The official filled out paperwork and asked if I would sign, but did not show them to me and would not tell me clearly they said, so I refused. He did not tell me that I have a right to a lawyer or give me a list of lawyers.
8. I was able to see my son twice that night. He was still wet and muddy. He didn't have any soap or things to wash himself with. He told me that he was so cold that he couldn't sleep. I asked whether he had eaten, and he told me that he had only received a ham sandwich and was still very hungry. He told me that he wanted to cry but was trying to be strong. I was scared that the officials would take him somewhere else where I could not find him.
9. Later, I asked to see him again so I could find out whether he had slept. He still had not slept. I asked for another aluminum blanket for him, which I gave him. I told him to try to sleep and told him that I would try to sleep also.

10. The next day, June 26, they took us to another location called the dog kennel. They took my son away again. They told me that he was too old to stay with me. I watched them put my son in another cell and I wanted to cry. I felt so helpless. I told him that if they tried to take them somewhere else, he needed to say that he couldn't leave because his mother was here. He said, yes mama.
11. I was in a hallway cage with six other women. I believe the bigger cages were too full. It was just as cold as the ice box and the lights were on all the time. I was anxious the whole time about my son, because I didn't know what would happen to my son or how long we would be there. I was afraid he would get sick.
12. Later, they brought me my son to talk to me for ten minutes. He was very dirty and still wearing the same clothes. I knew he had not showered. His nose was running a lot because of the cold. I asked if he was ok and whether he was hungry. He said he had potato chips and a hot burrito but it was mostly rice and he was still hungry and cold. He asked me if I was cold, and I lied and told him no. I wanted to comfort him.
13. At the dog kennel, nobody told me about my rights or that I was allowed to have a lawyer.
14. On June 27, we left the dog kennel. When I saw my son, I gave him a huge hug and was very happy. We were on the bus for a very long time. My son started to feel a little better and was sniffing less.
15. When we arrived in Dilley, they let us take a shower, gave us clothes and shoes, and had a medical screening. They told us that we had the right to a lawyer and a phone call. They told us that our family could hire us a lawyer too.
16. My son has gotten sick again. But he keeps telling me that we need to be strong and have faith. He is trying to make me strong. We have an appointment with the doctor today.
17. Today, I had an appointment with pro bono lawyers to prepare for our hearing. I don't know when the hearing will be.


I, Brenda 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.

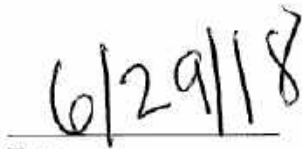
[REDACTED]

06/29/18
Date

Certificate of Translation

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



Yolanda Rodriguez

Date

Exhibit 168

**Declaration of
Keila P [REDACTED] A NUMBER [REDACTED]**

I, Keila P [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. I was born on May 12, 1985 in Honduras. My daughter is [REDACTED] [REDACTED] (A [REDACTED]). She was born on May 30, 2009 in Honduras. She is 9 years old.
2. My daughter and I traveled to the United States alone. On Friday June 22, we crossed a river near McAllen and walked 3 hours to try to find immigration authorities. We found them at 6pm and turned ourselves in.
3. I asked the immigration officials for water. They asked for our identification and shoelaces. They did not give us water. They radioed for someone to pick us up.
4. We were taken to a freezing room that had more than 30 people. They were all mothers and children. At 11pm we were finally given water and juice. We also got two very cold ham sandwiches. My daughter only ate a few bites, even though we were very hungry.
5. The officials called me out of the ice box and asked me why I left Honduras and if I was afraid to return. They also asked why I was going and if I had any relatives who would receive us in the United States. They asked me if I was guilty of entering the country and I said yes.
6. The officials did not tell us anything about our rights or give us a list of lawyers. We did not have an opportunity to use the phone. They did not ask whether my daughter was ok or if she needed a doctor.
7. We were in the cold room for two and a half days. We never had a shower or received any clean clothes. We did not get toothbrushes or toothpaste.
8. We received 3 meals day but it was not enough and we were still hungry all the time. There was a pitcher of water. I refilled the juice container with water and that is how we drank. Because there were so many people, there wasn't enough water.
9. My daughter clung to me to keep warm. She was crying the whole time and felt desperate and frustrated. She hardly ate any of the food.
10. On the afternoon of Sunday June 24, we were taken to the "perrera" or doghouse. My daughter and I were in one large cage with 30-35 people. They were all

women with children. Some of the children were small babies. There was a woman with a 17-day-old baby.

11. The children all got sick. My daughter was sick the whole time. She kept vomiting. I told an official that she was sick. He said, "why did you come from your country?" They did not bring a doctor or any medicine.
12. The mothers cleaned up the vomit on their own. We had some paper towels but nothing to sanitize with. The children would vomit on their clothing, and the officials would not give us new clothing. There was never enough soap to wash anything. There were six plastic toilets and three sinks.
13. We got three cold burritos, one milk, and three water bottles per day.
14. We had a mat to sleep on. The light was always on and we didn't know if it was day or night.
15. In the Perrera, they called me and I spoke with an official through a window. He asked if I had relatives in the US and got our information. He did not give me any information about our rights or tell me we had the right to a lawyer. We were not able to call anyone.
16. My daughter cried the whole time. She begged God to let us go see my sister.
17. On Tuesday June 26, we left the Perrera and took a bus to Dilley. It took more than four hours. They let us take a shower before we left and gave us food and water on the bus.
18. At Dilley, I was able to call my sister. They have not explained our legal rights or been given a list of lawyers. I have a credible fear hearing on July 3.
19. When we arrived in Dilley, we had a medical exam. Two days ago, I took my daughter to the doctor, but he did not give her any medicine because she did not have a fever. But my daughter still felt sick to her stomach all the time. Yesterday she had a fever so we went back to the doctor and got medicine. I think it is partly because she is so traumatized.

I, Keila 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.

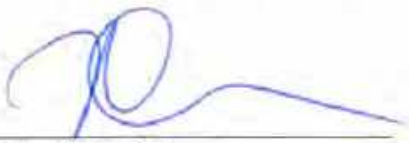
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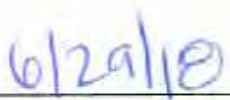
Date

Certificate of Translation

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



Yolanda Rodriguez



Date

Exhibit 169

**Declaration of
ROSA P [REDACTED], A NUMBER [REDACTED]**

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

1. I was born on May 27, 1984 in Guatemala. My daughter is [REDACTED] (A [REDACTED]). She was born on May 24, 2002 in Guatemala and is 16 years old.
2. My daughter and I came to the United States because my husband left us alone to come to America 14 years ago. Our indigenous community treated me badly because we did not have a man in the house. I felt vulnerable and afraid.
3. We traveled with a friend and her 11-year old son. We entered the United States at McAllen on the night of June 17, 2018. We walked across a bridge and presented ourselves to immigration officials.
4. The officials gave us water, juice, and cookies. They took my friend's 11-year-old son from her and would not tell her where they were taking him. She and her son were both distraught. I was terrified they might also take my daughter.
5. The officers put us in a frozen room with other women and children. We were so cold. It was crowded, without anywhere to sit except the cold floor. The lights were always on.
6. We were dirty and could not wash ourselves because there was no soap or clean clothes. We could not even brush our teeth. There was one toilet with toilet paper and one sink.
7. I did not understand anything that happened to us in the cold room. Nobody translated into Qeq'chi.
8. We had thin mylar blankets but they did not help. It made me extremely anxious to be in this situation.
9. The next morning, June 18, we were taken to new place called the pererra. We were there for five days.
10. At the pererra, they took my daughter away from me. I did not know where she was and could not ask. I was so afraid that something might have happened to her.

Certificate of Translation

I, Griselda B [REDACTED] certify that I am fluent in Qeq'chi and Spanish and that I read the above declaration to Rosa P [REDACTED] in Spanish.

[REDACTED]
6/29/18

Date

Certificate of Translation

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


Yolanda Rodriguez

6/29/18
Date

11. The five days were terrible. I was in a large caged area with my friend and a lot of other women. We were only fed twice per day. It was light all the time and we did not know if it was day or night. There was nothing to do. I felt anxious and frustrated.
12. At the pererra, they called me to ask questions, but I could not understand most of them. They did not speak Qeq'chi. The only questions I understood were where I was going and if there was anyone to receive us. I said that my husband lives in the United States and gave his contact information. They allowed me to call him.
13. On June 23, we finally reunited. I was overjoyed to see her. She has not wanted to tell anything about what she experienced when we were separated.
14. We went by bus to Dilley. Now, there is a phone translator sometimes. We had some medical screenings.
15. Two days ago I had a hearing. They asked me where I was from and my name. There was nobody to translate into Qeq'chi so I was not able to answer most of the questions. I have not received any information about my rights or told that I can use a lawyer.

I, Rosa 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 Qeq'chi, a language in which I am fluent, and was read back to my daughter in Spanish, which she translated to me in Qeq'chi.

[REDACTED]

6/29/18
Date

Exhibit 170

Declaration of
SAUDÍ S [REDACTED], A NUMBER [REDACTED]

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

1. My date of birth is May 20, 1990. My son's name is [REDACTED]. He is two years old, and he was born on May 6, 2016. My son and I are from Honduras.
2. I left Honduras to escape an abusive and drug using spouse who the police would not arrest.
3. We crossed the border about May 29, 2018. After my son was taken to a hospital for asthma, we were taken to a border patrol facility that we call "la hielera". The facilities were extremely cold, we were provided a small, thin nylon blanket and were not able to shower. We had no mattress to sleep on.
4. We were provided sufficient food, including hot meals.
5. The temperature of the facility was very cold.
6. We weren't able to shower.
7. After one day, my son and I were taken to another place that we call the "perrera" where we were held for four days.
8. The facility was extremely crowded and the bathrooms were filthy with the toilets overflowing. During our four days there, our name was not called, so we were unable to bathe.
9. After four days at the second customs facility, we were taken to the Dilley ICE facility, where we have been for 25 days. The conditions at this facility have been good.
10. No legal notices were provided to me or my child. After 26 days in custody, I was provided an attorney and had my hearing the next day. It has been 5 days since the hearing, and I am currently waiting for the decision from such hearing.

I, SAUDÍ 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.

[REDACTED]

06/28/2018

Date

Certificate of Translation

I, George Humphrey, certify that I am fluent in English and Spanish and that I read the above declaration to
SAUDI S [REDACTED] in Spanish.



George Humphrey
Orrick, Herrington & Sutcliffe LLP
609 Main Street, 40th Floor
Houston, TX 77002

06/28/2018

Date

Exhibit 171

#21731
Declaration of

SANTOS A [REDACTED] A NUMBER [REDACTED]

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

1. My date of birth is March 27, 1970. My daughter's name is [REDACTED]. She is 13 years old and she was born on September 17, 2004. My daughter and I are from Honduras.
2. My daughter and I left Honduras because my brother and nephew were recently killed by a group of drug dealers that have threatened to kill me and the rest of my family for no reason. Despite pressing charges against these group of people, the police has not acted on these crimes because they are afraid of their own lives. I feel like I have no choice but to flee the country with my youngest daughter.
3. We presented ourselves at the border about June 13, 2018. When I crossed the border, my daughter and I walked for about 5 minutes when the police stopped us and apprehended us. We were then taken to a facility known as the Hielera (Ice House). When we got there, they took our shoe laces, searched our hair and checked our entire bodies – backs and stomach. Conditions were extremely crowded at the Ice House. We were supposed to sleep on the floor without a mattress and it was uncomfortable and extremely cold. Neither my daughter nor I were able to sleep at all during our stay at this place. The toilets were partially visible to the public, so we felt very uncomfortable at using them.
4. We were then transferred (about a 45 minute drive) to a facility known as the Dog House (*Perrera*) on or about June 15, 2018. I was separated from my daughter for the entire time without any explanation. The Dog House was very cold as well but we were provided with a small mattress, so we could barely sleep. Because of the cold conditions, both my daughter and I caught a cold while at this place. The toilets were extremely dirty and over flooding. The smell was so bad that my daughter and I felt nausea. We remained in this facility for four days. We were given an apple, a cold burrito and a bottle of water for breakfast and lunch, and a cold sandwich and a bottle of water for dinner. Despite asking for additional food because we were hungry, we were not provided with any.
5. My daughter and I were then reunited and transported together (about a 30 minute drive) to a separate facility known as the Ice House (which is different than the Ice House mentioned in Numeral 3 above). We were held here for a day and a half. Here, an official told me that I was going to be punished for crossing the border and coerced me into signing several documents which were all in English language. Nobody explained what these documents related to (or translated them in to Spanish), but I felt nervous and intimidated by the official, so I signed the documents after he asked me to do so for the third time.
6. After spending a day and a half at the Ice House, my daughter and I were taken back again to the facility known as the Dog House (*Perrera*) and we were again separated from each other. I remained there for three days under the same conditions.

7. Up to this point, I was not given any sort of legal notice. We were not informed of any legal resources or rights.
8. Finally, my daughter and I were reunited again and taken to the ICE facility in Dilley, Texas. When we arrived, my daughter was given medical attention, although we were required to wait for several hours. My daughter and I have remained at Dilley for eight days. We had our credible fear interview today and hope to hear on a resolution by July 2, 2018.
9. Upon our release, I am hoping to join my brother, who is living in New Jersey and has expressed a willingness to sponsor us.

I, Santos 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]

Date: 6-29-2018

Certificate of Translation

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



Emilio Grandio URREA

Orrick, Herrington & Sutcliffe

609 Main St, floor 40, Houston, Texas, 77002

6-29-18

Date

Exhibit 172

Declaration of
SANDRA M [REDACTED], A NUMBER [REDACTED]

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

1. My date of birth is October 15, 1985. My daughter's name is [REDACTED]. She is 2 years old and she was born on July 1, 2016. My daughter and I are from Honduras.
2. We left Honduras because my husband was a government employee and he was very physically and emotionally abusive. He beat me while I was pregnant and caused my daughter to be born blind in one eye. I was told by the doctor in Honduras it was because I cried a lot when I was pregnant. I obtained several restraining orders but he never listened to them. He would still physically abuse me, rape, and emotionally abuse me. He also physically and emotionally abuse my children.
3. We presented ourselves at the border about June 12, 2018. When I was apprehended by Border Patrol I was patted down and my daughter was separated from me momentarily. She began crying frantically because she has very bad PTSD because of the abuse from her father. A photographer asked us to take a photo and [REDACTED]. We were taken to La Hielera and then the perrera. The condition of the restrooms in The Perrera were disgusting, the port-o-johns were overflowing and my daughter got very sick with vomiting, fever, and diarrhea. We were not able to sleep because it was so crowded and cold and we were repeatedly woken up with kicks by guards. It was so cold in both places and all we were given was a mylar blanket.
4. The food at both places was frozen sandwiches and the bologna looked like it was rotting, it was a dark color and the bread smelled very bad.
5. The lights were always on and very bright.
6. My daughter and I were taken out of that facility on the 6th day.
7. My daughter and I have been at the Dilley facility for about 13 days. We are planning to be released.

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

29-6-18
Date

Certificate of Translation

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



LAURA FLORES

RAICES

4092 TPC PARKWAY, APT 953

SAN ANTONIO, TX 78261

06/29/18

Date

Exhibit 173

#21738
Declaration of

Wendy P [REDACTED], A NUMBER [REDACTED]

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

1. My date of birth is March 31, 1994. My son's name is [REDACTED] He is 1 years old and he was born on February 3, 2017. My son and I are from Honduras.
2. My son and I left Honduras because of the constant threats from the local gangs. In several instances we were victims break in and intimidate my family in our home with death threats.
3. We crossed the border on or about June 25 2018 and immigration picked us up almost immediately. We were then taken to a facility known as the Ice House (Hielera). I was freezing because my clothing was still wet from crossing the river and fearful that my son would fall ill because he was also in wet clothes. Officials took our pictures and fingerprints at this location right after we were captured.
4. At the Hielera the officials gave us a very thin mattress. The temperature at the Hielera was very cold, and my son and I were provided a light aluminum blanket that was not adequate to keep us warm. The Heilera was extremely crowded and full of women and children.
5. To eat we were given one burrito which I share with my son. Food at the Hielera was scarce and cold. My son and I received a burrito for breakfast, lunch and dinner. [REDACTED] and I remained hungry after lunch and dinner. We did not sleep much during our stay at the Hielera. In addition, the lights were always on, so we were not able to tell whether it was daytime or nighttime, which further complicated our ability to sleep. We didn't even know the time and some officials refused to tell us what time it was.
6. Two days later, we were transferred to an ICE detention facility in Dilley, Texas. Upon arrival at the detention center was the first time we were given water to drink. My son was given juice at the Hielera but neither of us had water until we arrived in Dilley. In Dilley, we were also permitted to shower for the first time.
7. In Dilley, we were given a medical check and a warm meal. Further, we were allowed a phone call which I used to call my cousin who lives in the United States.
8. We were also given a written document stating our legal right in Spanish. Our interview with the CARA attorney is scheduled for July 3, 2018.

I, Wendy 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.

Date

#21740
Certificate of Translation

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



[REDACTED] - Luisa Muskus

Orrick
609 Main St.
Houston, Texas 77002

06/29/18
Date

Exhibit 174

Declaration of

Dulce M [REDACTED], A [REDACTED]

I, Dulce 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 April 30, 1996. My daughter's name is [REDACTED]. She is 6 years old and she was born on December 25, 2011. My daughter and I are from Honduras. My daughter's A number is [REDACTED].
2. I fled Honduras due to domestic violence. The father of [REDACTED] has attempted to murder me multiple times.
3. We presented ourselves at the border about 9 days ago. I believe that it was on or about June 20, 2018. We were taken to "Hielera" which was near Reynosa where my daughter and I entered the United States by boat.
4. The food was horrible. We received just pieces of "Bimbo" bread and plain ham. We did not receive showers, hygiene items, or water at the first location.
5. The temperature in the first location was very cold, causing both my daughter and me to get sick. We are still sick.
6. In the first location, the lights were kept on all night, which made it difficult to sleep. There were no mats provided and my daughter and I had to sleep on the concrete floors with nothing but an aluminum blanket. It was very crowded and there was not enough space to lie down. We had to curl into the fetal position.
7. After 1½ days, my daughter and I were taken to another place where we were held for 5 days.
8. In the second location we were given burritos for breakfast and lunch and a bread and ham sandwich for dinner. They kept the lights on all night, making it difficult to sleep. The toilets in the second location were plastic and dirty and needed to be dumped after each use. In the second location we slept on mats on a concrete floor with nothing but aluminum blankets. The temperature in the second location was very cold, causing us to get even more ill, in the second location, we were allowed to shower once. We were given bottles of water to drink what every meal and we had gallons of water available for us at all time but the water smell like bleach so we did not want to drink the water,.
9. We were not given legal notice about our rights when we first were apprehended. It was not until we arrived in Dilley that we were told about legal services. I was informed about legal services for our family, but not individually.

I, Dulce M [REDACTED], swear under penalty of perjury that the above declaration is true and complete to

the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.



29 junio 2018
Date

Certificate of Translation

I, Brenda Ulloa, certify that I am fluent in English and Spanish and that I read the above declaration to [REDACTED]
in Spanish.



Brenda Ulloa
Willamette University Clinical Law Program
245 Winter Street SE
Salem, OR 97301

6/29/2018

Date

Exhibit 175

Declaration of

Maria d [REDACTED], A [REDACTED]

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

1. My date of birth is February 22, 1987. My son's name is [REDACTED]. He is 9 year old and was born on July 26, 2008. My son and I are from Honduras.
2. We forced to flee from Honduras due to extreme violence and insecurity. My two brothers and my sister-in-law already live in the United States.
3. We presented ourselves at the border about June 25, 2018. We were soaking wet and covered in mud from our journey across the river and were met by a CBP officer after about three and one half hours of walking after we crossed the border. We were taken in the patrol car to the "ice box" where we were searched by the officials at the ice box. It made me and my son both uncomfortable. Afterwards, we were given a sandwich that was frozen. My son told me that he would press the sandwich between his hands to try and defrost it so that he could eat it.
4. I was then immediately separated from my 9 year old son in the ice box. I pleaded that the official not take my son but I was told that I was not in my country anymore. We were separated from each other until 6 a.m. when they asked us to take a picture together. Right before the picture, I saw my son laying on the concrete floor, wrapped in an aluminum blanket and shaking. When he stood up to take the picture with me, he was shaking because he was so cold. The ice box was terribly cold and all we had was an aluminum sheet. I was not able to sleep at all that night. I was just watching for the next opportunity to see my son. After we took the picture, we were separated again until 2 pm when we were transported over to the "dog house."
5. At the dog house, we were given a thin mattress and another aluminum blanket. We were kicked by the officials several times and asked to move and get up because they need us to move to different rooms so that they could take roll call and get a headcount. The guards were very rough with us and one of them came and told me and my son that we had no rights in this country because we entered the country illegally and that we needed to sign a piece of paper. I refused to sign it and the man yelled and made me and my son cry.
6. We ate cold tortillas with beans and rice, apples and water at the dog house. I also started to feel sick. I had chills and a cough. I asked for medicine about 1 pm but was sent away and told to come back 2 hours later. I returned and they said I need to come back later again. It was 9 pm before I was able to get medication.
7. At the dog house, an official told me that my son could go with my brothers and my sister-in-law but that I would have no chance of staying and would be deported back.

8. We were in the dog house for two days but we were not able to sleep because the guards never turned the lights off and there were a lot of people in the dog house. There were about 2-4 inches between every mattress; it was very crowded. We were not given the opportunity to shower at the ice house or the dog house. Further, the bathrooms in the dog house were unbearably dirty. They were portable plastic bathrooms that did not flush and all we had to wash our hands was a drop or two of water.
9. We were not very informed on the process. In fact, one morning we were all woken up to be brought to the ICE detention facility center in Dilley, Texas, and none of us knew where we were being taken. We arrived at the ICE detention facility in Dilley, Texas, on June 27, 2018.
10. Upon arrival, we received instructions and rules of the facility. After that a doctor took x-rays of our lungs and asked for a urine sample. In Dilley, was the first time that we were able to shower. It was the best shower of my life after being dirty for 4 days straight. Dilley was also the first time that we were given a warm meal. The day we arrived my son started feeling sick to his stomach but it seems to have passed.
11. On the morning of June 29, 2018, I met with a person about mine or my son's legal rights. He advised us that we would get notification of our appointment to come to asylum. We are hoping to have some news soon. When asked about the entire experience, my son says that the "ice box" was the worst. He was so worried when they separated us that we would stay apart and be taken to different places. He is so happy that we are now together.

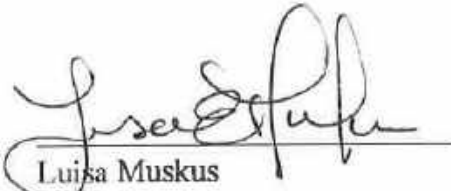
I, Maria d [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

[REDACTED]

06/29/18
Date

Certificate of Translation

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



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

06/22/18
Date

Exhibit 176

Declaration of
Herlinda C [REDACTED], [REDACTED]

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

1. I was born on December 28, 1984 in Guatemala. My son is [REDACTED] [REDACTED] (A [REDACTED]). He was born on March 6, 2007 and is 11 years old.
2. My son and I came to the United States because I was badly mistreated by my husband's family and did not feel safe. They eventually kicked me out of our home and made me homeless. We also faced poverty and discrimination because we are indigenous Maya.
3. We traveled with a friend and her 16-year-old daughter. My friend does not speak any Spanish. We entered the United States at McAllen on the night of Sunday, June 17, 2018. We walked across a bridge and presented ourselves to immigration officials.
4. They transported us in a bus, there were 26 people also in our group and they took all of us in the same bus. We were processed in McAllen. After processing, the officials gave us water, juice, and cookies. They put me and my friend and both children in the "icebox" room.
5. There was one toilet and sink for everyone in the icy room. We had toilet paper but no soap to wash ourselves. We had mud all over our clothes, but were not given any new clothes or towels. We had no toothbrush or toothpaste to brush our teeth.
6. I was called out of the room to be processed. I was asked for my age and country. I was not informed of my legal rights or told that I could use a lawyer. I did not have the opportunity to make a phone call, even though my brother lives in America and I would have called him. The officials did not offer medical attention or ask if my son was ok.
7. Then they took my child away on Saturday, June 18th morning. He was crying and trembling. I tried to ask questions but the officials cut me off. Their behavior scared me so much that I didn't even ask where they were taking my child. I told him, "Stay calm. Don't say anything". After taking my son, the officials put us

me and my friend in the perrera and both children were taken to a different cage in the perrera.

8. I saw [REDACTED] twice on Monday, June 18 and Tuesday, June 19th late afternoon on both days. I saw him for only 15 minutes each day. I asked for him on the Wednesday but they told me he was fine. I was concerned because he had a cough and I was worried he would get worse. I did not see him for three days nor did they give me any more reports on him. I thought that maybe they had taken him somewhere else and had not notified him.
9. While I was at the perrera no officials notified me of any rights and they did not give a list of lawyers. There was a group of lawyers that came to the perrera and these lawyers talked to some people. I got to meet with one for five minutes. He took my name, date of birth, asked me where I came from and if I had family that I could be released to. I told him that my brother, [REDACTED], lived in Minnesota and would receive me, if released.
10. [REDACTED] says that she has spoken to her child about how things were for him while he was separated from her. She said that they gave him one sandwich, 2 burritos a day, milk, apples, water bottle, and a cookie. He did not like the food and he would go hungry. The water bottles were also not enough water and he was still thirsty. She said that he told her that he had to sleep under a cold vent and the cold air was "too cold to sleep". He stayed awake most nights and could sleep well. The aluminum blanket was not warm enough. No one asked him if he was sick or if he felt well. She said that [REDACTED] did ask to see her but that he was told to wait that someone would come to get him but then no one showed up to take him to see her.
11. I asked [REDACTED] if he got sick and he said that his cough got worse and that his nose was congested and that it was difficult to sleep. He took a shower once on the second day and he was given a toothbrush once to brush his teeth. He was given sweat pants and a shirt while they washed his clothes, but his clothes were not completely clean, they still had mud stains on them when it was returned to him. He was not allowed to go outside and play or get some fresh air.
12. She says that [REDACTED] saw other children in his cage that were 6 years-old and they did not eat because they did not get in line to get food. These little kids only drank their water.

13. I have talked to [REDACTED] and feel that his staying in the perrera was difficult because he was not allowed to see me for three days and I knew he was sick.

14. I have not had a hearing nor have I seen a judge as of June 29th.

15. I did have an asylum meeting and was approved. However, I don't know when we will be released.

I, Herlinda 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]

6/28/18
Date

Certificate of Translation

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


Yolanda Rodriguez

6/28/18
Date

Exhibit 177

Declaration of

Yojana R [REDACTED] (A [REDACTED])

I, Yojana 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 date of birth is December 4, 1986. My daughter name is [REDACTED]. She is 4 years old and was born on January 22, 2014. My daughter and I are from Honduras.
2. I left my country because my brother in-law had threatened to kill my daughter and me because I went to the police after he hit my mother. He was apprehended but then released that same day. The following day, after he was released, my brother in-law and two other men, who were armed, followed me around. They attempted to take my daughter but I was able to fight back and take her from them. The next day they followed me again and I decided to leave the country. I did not go to the police because I saw from the incident involving my mother that nothing would be done.
3. We presented ourselves at the border about June 4, 2018. We were taken to "La Hielera" near Laredo. When we first arrived at the "Hielera," they took everything that I was holding including my daughter's jacket. They had me and my daughter put our ponytails down and took our shoelaces. They took our picture and asked us a few questions about why we were there and how we got there.
4. When we arrived at La Hielera, they offered us some rice and meat tacos but they did not offer us any water. We had to drink the water from the toilet to keep hydrated.
5. It was very cold. They did not give us any mats or blankets, even though the other mothers who were already there with their children had some. With it being so cold, it was difficult to sleep. I would hold my daughter in my lap while covering her with my sweatshirt to keep her warm while she slept. Once she was awake and warm, I would put the sweatshirt back on to keep myself warm. The lights were kept on at all times making it difficult to sleep through out the night.
6. We were not permitted showers or hygiene items. The toilets were placed in the same area we were being kept and when the toilets were used, we needed to let a guard know, because the flush button was on the outside. When using the toilets, there was no privacy.
7. After 1 1/2 days, my daughter and I were taken to "La Perrera" by bus, where we were held for 1 1/2 days.
8. For breakfast, lunch and dinner, they would give us the same tacos with rice and meat. My daughter was occasionally offered a juice. We had water available to us outside of the cages and we were free to get some as long as the cage was open. The water smelled and tasted like bleach. The lights were turned on and off periodically throughout the day. At night they were on at all times making it difficult to sleep. We were not given any mats or blankets at La Perrera. During the day, we would sit on a bench to avoid the cold floor but at night, I would sleep on the floor with my daughter on top of me to try to keep her off the cold floor.

9. At the "Hielera" and "Perrera," I was not given a list of legal resources I could access. I received that when I was here at Dilley.
10. My daughter and I were taken out of La Perrera on June 6, 2018.
11. My daughter and I have been at Dilley for about 24 days. We are planning to go live with a friend in Houston.
12. Ten days ago, I received a positive response to my case and I am not waiting to sign my exit paperwork.
13. I, Yojana R [REDACTED], swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

29/06/18
Date

Certificate of Translation

I, Brenda Ulloa , certify that I am fluent in English and Spanish and that I read the above declaration to Yojana
R [REDACTED] in Spanish.



Brenda Ulloa

Willamette University Clinical Law Program

245 Winter Street SE

Salem, OR 97301

6/29/18

Date

Exhibit 178

#21758

Declaration of

Vilma M [REDACTED] (A [REDACTED])

I, Vilma 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 June 19, 1981. My son name is [REDACTED] He is 9 years old and he was born on May 18, 2009. My son and I are from El Salvador.
2. I left my country because of domestic violence against my children and me.
3. We presented ourselves at the border about June 5, 2018. We were taken to "La Hielera" near Reynosa. When I first entered the facility I was given a sheet of paper that, in Spanish, explained that I was being accused of crossing into the United States illegally and because of that it was probable that my son was going to be separated from me.
4. We arrived in the evening and we did not receive any food until the following morning. We received water and a bread and a ham sandwich for all three meals. We only were given water during the meals.
5. It was very cold, but luckily we each had a sweatshirt that we used to place on the floor to be able to lie down. We did not receive blankets or mats at "La Hielera." It was very cold even with the sweatshirts. It was difficult to sleep.
6. We were not permitted showers or hygiene items. The toilets were placed very closed to the area where we slept, making it very difficult to sleep with the noise that was made when the toilets were being used. When using the toilets, there was no privacy. When my son needed to use the toilet, I would place myself in front of him to cover him from the others while he went, and he would do the same for me. The lights were always on and that made it difficult to sleep. The children waiting for food would knock on the door to see when the food was coming because sometimes they would take a long time to bring the food, and when the guards would show up they would yell "the food is coming" and slam the door on the children's faces.
7. After 2 days, my son, and I were taken to "La Perrera," by bus, where we were held for 4 days.
8. For breakfast, lunch and dinner, they would give us tortilla bread to make a taco with ham and eggs, an apple, some crackers and a small water bottle. Sometimes the eggs were very dark and old looking. We were allowed to shower only once and provided with towels, shampoo, and toothbrush with toothpaste. After showering they took our clothes to wash and let us borrow some to wear while we waited for us. The toilets were made of plastic and they would get dumped out once they were filled. The toilets in this case had doors for privacy. We received mats and aluminum blankets for sleeping. It was difficult to sleep because the light was always on. When they would roll call for those who were going to leave the facilities, they came in yelling "get up, get up." It was also very cold. When it was

time to eat, I could remember shaking because it was so cold. I heard guards yell "get your children to calm down, aren't you their mothers?" The younger children were crying.


9. At the "Hielera" and "Perrera," I was not given a list of legal resources I could access. I received that when I was here at Dilley.
10. My son and I were taken out of La Perrera on June 8, 2018.
11. My son and I have been at Dilley for about 21 days. We are planning to go live with my brothers in-law in New York.
12. My case received one negative response, but when I went back to appeal I received a positive and now I am just waiting for when I can sign my exit.
13. I, Vilma M. [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

[REDACTED]

6-29-2018
Date

Certificate of Translation

I, Brenda Ulloa , certify that I am fluent in English and Spanish and that I read the above declaration to Vilma
M [REDACTED] in Spanish.



Brenda Ulloa

Willamette University Clinical Law Program

245 Winter Street SE

Salem, OR 97301

6/29/2018

Date

Exhibit 180

Declaration of

Rocio M [REDACTED] A [REDACTED]

I, Rocio 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 July 18, 1984. My daughter's name is [REDACTED] She is 15 years old and was born on July 16, 2002. My daughter and I are from Mexico.
2. We left our home because I was receiving threats over the phone and people coming to me and telling me that they would kidnap my daughter. I have seen that happen to other people I know who have daughters. Most of the time, it is the Cartels, but I do not know for certain. We did not call the police because we know that they will not do anything to help and it might be more dangerous if we call attention to ourselves by calling the police.
3. We presented ourselves at the border on around June 6, 2018. We were taken to "La Llerera." It was impossible to sleep there. It was very cold. There were no beds or mats; we were to sleep on the concrete floor. There were toilets, but there was no privacy or doors. There were no things to clean ourselves like soap or toothpaste and we were never allowed to shower. They took all of our clothes except one layer. There was extreme wind and it was extremely cold.
4. They only gave us a small amount of water the size of one cup. Children would get a small juice. We got two pieces of white bread and a piece of ham for breakfast, lunch, and dinner. The water tasted bitter and like bleach.
5. It was extremely cold, making it difficult to sleep.
6. The light was always on and it was very bright and intense so it was impossible to sleep.
7. After two days, my daughter and I were taken to another place where we were held for 2 days.
8. This place is what they call "La Perrera." When we got to the "Perrera," my daughter was separated from me and placed in a separate area. It was extremely cold in this place as well. We were given one apple, one small bottle of water, a bag of chips, and a sandwich made of ham and two pieces of bread for each of the 3 meals. We were not given any additional water if it was not during breakfast, lunch, or dinner. The toilets did not flush so we had to empty the buckets of waste after the buckets were full. We were not able to shower and we were not given anything to clean ourselves like soap or toothbrushes. I do not know why it seemed like some people got to shower, but others did not. It seemed like some people were able to only have a very fast shower and had to get out quickly. I was never able to sleep because I always felt worried that they would call my name or make me stand in the line. They would have us stand in line by our countries. The lights were always on and were very bright. We were at this place for two days. When I asked, "Where is my child?" the guards said, "Everyone asks the same question and wants to know where their children are, we will tell you," but they never told me. It was not until I was reunited with my daughter that I finally knew where she was.

9. For the entire trip and stay in "La Perrera" and "La Hielera," we were not given documentation about legal services or access to counsel issues.
10. My daughter and I were taken out of that facility on a June 10, 2018.
11. My daughter and I have been at the location in Dilley for about 19 days. The experience here is better with food and sleep. We are planning to stay with my sister who lives in Los Angeles, California. My daughter fell ill on the third day we were here. I went to get medical attention, but did not receive services for her because the lines were too long.
12. I, **Rocio 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]

29-06-18

Date

Certificate of Translation

I, Brenda Ulloa, certify that I am fluent in English and Spanish and that I read the above declaration to Rocio M. [REDACTED] in Spanish.



Brenda Ulloa

Willamette University Clinical Law Program

245 Winter Street SE

Salem, OR 9301

6/29/18

Date

Exhibit 181

#21770

Declaration of

Iris E [REDACTED] A NUMBER [REDACTED]

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

1. My date of birth is February 22, 1990. My son's name is Josue G [REDACTED] He is 10 years old and was born on September 15, 2007. My son and I are from El Salvador.
2. We left the country because of gangs. We used to own our own food business, but the gangs kept coming to us and demanding more and more money. When my son was in kindergarten, they threatened to kill him and so we eventually took him out of school. We paid them but they kept asking for more money and we paid because we were scared. We then shut down the store and we still paid them to stay safe, but could not pay anymore. Then my son and I left and they then threatened that my husband had 24 hours or they would kill him. We did not call the police because we knew of another family who went to the police and eventually that family went missing and no one knows what happened to them so we were scared and did not call the police.
3. We presented ourselves at the border about May 2, 2018. I believe that it was on or about May 2, 2018. We were not given water or food since arriving at the border and were not given water until we arrived at "La Perrera." When we arrived, I went to the bathroom and then my son who is 10 years of age was taken and put in another location because of his age. I was not told where my son had gone. I asked another woman and other people if they knew where my son was. I was very worried. Someone then told me that he is in the area where older kids go. I was separated from my son for 3 days. My son was able to shower only one time and I could not shower there at all for 3 days. The guards kicked adults and children to keep them awake, and would take blankets off children.
4. We were only given burritos to eat. We ate burritos in the morning, and for lunch and dinner. The burritos were spoiled. I knew that they were spoiled because they were very acidic and they tasted horrible. I knew that they were not good food to eat. They were very bitter. We were only given one extra pair of clothing.

5. When we arrived, we slept on the floor, which was very cold. Twelve hours later, they gave us green mats that were just three inches thick, which we had to put on the floor. They would make us wait in line for an hour before starting to do roll call in "La Perrera." We had to sleep very close to everyone. We were all nearly touching everyone unless you slept sitting straight up.
6. "La Perrera" was very cold. When we complained that it was too cold, the guards said that they were keeping it cold for the guards who liked it that way.
7. The lights were on the entire time. It was hard to sleep.
8. After three days, my son and I were taken to another place, Dilley, where we have been held for 58 days.
9. This place has fruit and snacks. The beds are good at this place in Dilley. If I have to go to the Cara building (register building), we have to wait outside for a very long time outside in a long line that goes around the building and there is no shade. It makes my skin red. When my son and I arrived to this place in Dilley, my son became very sick. He was sick for 3 1/2 weeks. I went to the pharmacy and explained the situation and they gave me medicine. I had to go the next day and that time, they shut the window and said that they could not talk and I was told that there was no more medicine. Then I went back to my room because they told me that they would tell me when the medicine is ready. Then the next day they called and said that they were going to call ICE because "You don't care about your child because you didn't come" and "What do you care about more—you or your child?"
10. We were not given any legal information at all during the process before getting to Dilley.
11. My son and I are still at the facility in Dilley. I bring my case notes with me everywhere all of the time.
12. They say that my son can stay here but that I will not be able to and that I will have to go back to my country. My son is the only one now who can talk about the case, but he does not know how to explain all of the case by himself.

I, Iris 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.



28-06-18

Date

Certificate of Translation

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



Amber Rieff

Willamette University Clinical Law Program
245 Winter Street SE
Salem, OR 97301

6/28/18

Date

Exhibit 182

Declaration of
Mirza O [REDACTED], A [REDACTED]

I, Mirza O [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 August 8, 1989. My son name is [REDACTED] He is 11 years old and he was born on September 5, 2006. My son and I are from Honduras.
2. My son was going to school and a gang tried to force him to carry drugs with him into the school and threatened to kill him if he refused. He told me what was happening and when I went to speak with them they attacked me. I have a scar on my face now from this experience. I went to the police but they told me that I could not prove that my son was being threatened so we fled.
3. We presented ourselves at the border about June 22, 2016. We were taken to the place that they call "The Freezer". We had to take photos and put our names there. It was so cold--way too cold. We had to sleep on the concrete floor, which was very cold. They only gave us each one aluminum blanket and it did not do anything to keep us warm. We were not able to shower while we were there and they did not give us any extra clothing. We did not receive anything to clean ourselves. My son was separated from me and I was so scared and sad. They did not tell me where he was going or if he would be in the same facility as me. I was worried that he had been taken away. I did not know if he would be deported or what would happen. We were finally able to be together again and my son asked me where I was and I told him that I was right here the whole time but the guards did not tell us that we were so close to each other, even when all of us mothers had asked.
4. We were given one sandwich for breakfast, lunch and dinner and one small container of juice. The sandwiches were frozen. I tried to eat the sandwiches but I was not able to. I could not even eat the bread from the sandwiches because they were frozen and hard.
5. They had air conditioning and it was so cold and we could not sleep and we were shivering. It was horrible. We stayed here for a day and a half like this.
6. They had lights and they were bright and always turned on. The toilets were very dirty and the toilet paper was on the floor. There were no doors for privacy. We had to go to the bathroom in front of everyone.
7. After one and a half days, my son and I were taken to another place where we were held for two days.
8. They gave us two burritos and one apple each day. They also gave us one small container of milk to drink. It was impossible to sleep because there were about 1,000 people there and they would make us all stand up about every 2 hours to tell them that we are there when they called our names. There were small mats for us to sleep on and the mats were right next to each other so that we were crowded

together. The bathrooms were portable toilets. We were not able to shower the entire time that we were at this place. I was separated from my son but in this facility I could see where he had been placed. If I stood in one corner and he stood in the corner of his cage we could both see each other. I would yell to him that everything will be okay. At this place I saw children and babies vomiting and children that were very sick. I became very sick after staying in La Perrera but was able to get medicine to help.

9. I was not given legal notice or access to counsel services until I arrived in the facility in Dilley. The food here is very good and the beds are nice. The people here are very kind and treat us better than in Le Perrera.
10. My son and I were taken out of La Perrera on June 26th, 2018.
11. My son and I have been at the facility in Dilley for about three days. We are planning to go to Dallas, Texas, and stay with my aunt.
12. I do not know anything about my current case because I have been here for only three days.

I, Mirza 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]

29/6/18
Date

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



Amber Rieff

Willamette University Clinical Law Program
245 Winter Street SE
Salem, OR 9301

7/29/18

Date

Exhibit 184

Declaration of
NOLBIA C [REDACTED], A [REDACTED]

I, NOLBIA C [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 September 20, 1972. My son's name is [REDACTED]. He is 3 years old and was born on January 17, 2015. My son and I are from Honduras, where we fled because of death threats and extreme violence.
2. Earlier this year, I was being forced to start selling drugs by the Maras, specifically Mara 18. Some local gang members approached me in the streets asking me to sell some drugs for them after my refusal a few days later they approached my house and gave me 12 hours to leave the house or they would kill me. These events caused me to leave Honduras in a rush with only about 100 \$us dollars in my pocket. It took me about 45 days to arrive to the border from Honduras.
3. We presented ourselves at the border about June 15, 2018. When I crossed the border, my son and I walked for about 2 hours and a man stopped us and told us he would take us to safe place. We were taken to the "Ice House." When we got there, they took our shoe laces, searched our hair and checked our entire bodies – backs and stomach. It was very uncomfortable and humiliating. It was extremely crowded in the Ice House. There was about 25 women with children in one large room. I slept there for one night, sitting on the floor. It was very uncomfortable and extremely cold it was really hard to make my child stop crying and to make him sleep. The food was limited to cold sandwich that was frozen and we stayed there for about 6 hours.
4. The day after I was taken to the "dog house." At the dog house, we were searched by another official, which triggered much anxiety for me. My son had to go use the bathroom but was forced to wait on the threat that if we disrupted the process they would have to separate us. My son is only three years old the idea of being separated was terrifying. At the dog house, it was also very cold and we had only a mattress to lay on but no blankets during the day, the officials would get upset if we used blankets during the day. My son started to get sick at the dog house. I experienced headaches. I asked for medication for my son, but the officials told me there was no medications on site. I did not shower for 3 days but I met people who were there that had not showered for 8 days. The only bathrooms were the small plastic bathrooms that do not flush with terrible smells.
5. Up to this point, I was not given any sort of legal notice. I was not informed of any legal resources or rights with respect to [REDACTED] either.
6. After 3 days after I was apprehended by border patrol, I was taken to the ICE facility in Dilley, Texas. When I arrived, I was given medical attention. We were required to wait there all morning. My son has had a fever for roughly 10 days on and off and it is very hard to get him medical attention. The majority of kids and adults in the Dilley are sick. They are running fevers and have coughs. The lines are very

long sometimes I have waited up to 2 hours in the sun in order to get medicine and sometimes there is only one person dispensing medicine.

7. He started get a rash 3 days ago and it is now spreading to his legs. The doctors at the medical facility tell me that it is viral and it will go away on its own. I am very worried. I don't know what else I can do for him.
8. I have been given meeting with a lawyer in CARA and have been to one hearing before the judge.

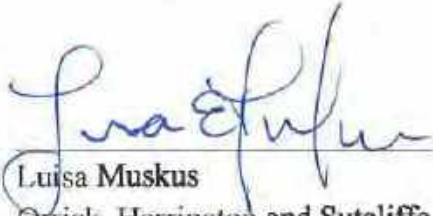
I, **NOLBIA C [REDACTED]**, swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

29-06-18
Date

#21785

Certificate of Translation

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

A handwritten signature in blue ink, appearing to read "Luisa Muskus", is written over a horizontal line.

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

06/28/2018
Date

Exhibit 185

BRISEYDA G [REDACTED]

A NUMBER [REDACTED]

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

1. My date of birth is June 12, 1996. My daughter's name is [REDACTED] She is 2 years and he was born on December 3, 2015. My daughter and I are from El Salvador. I am currently three months pregnant of my second child.
2. I left El Salvador for fear of losing my life and my daughter's life, as I suffered have suffered constant physical and sexual abuse by [REDACTED] who is a gang member in El Salvador. [REDACTED] also assaulted my daughter on several occasions, and threatened to kill us on several occasions, and assaulted me when he found out that I was pregnant of my second child (I am currently three months pregnant). Despite my attempts to have him arrested on several occasions, the police in El Salvador informed me that they are not willing to arrest him given that (as they have expressed to me), they do not arrest gang members. I fear that if I am deported back to El Salvador, [REDACTED] or other gang members will try to kill me and my family and the police will not protect me.
3. We presented ourselves at the border about 5:00 pm on or about June 15, 2018. Upon apprehension, we were then taken to a facility known as the *Hielera* (the Ice House). I was held at the Ice House for only two hours and was then taken to another facility known as the *Perrera* (Dog House).
4. My daughter and I received very bad treatment at the *Perrera*. Upon my arrival to this facility, I was interviewed by an official, who informed me that my case was a lost case and that I would be deported in four days. On another occasion, an official with a tag that read "J. Loza" asked that all detainees from El Salvador raise our hands, and thereafter referred to those of us that raised our hands as the "Maras."
5. The temperature at the *Perrera* was cold. My daughter and I were given one aluminum blanket, but it is not sufficiently warm and my daughter and I were not able to sleep much at this facility. In the early morning, officials at the facility would wake us up by kicking us in the ground. Food at the facility was scarce and cold. We were fed one cold burrito for breakfast, lunch and dinner and despite asking for more food, we were not given any.
6. After 5 days, my daughter and I were taken to Dilley, where we have been for 11 days. Here, my family has not been able to deposit money into my personal account despite trying to do so for several days. Several other detainees have had the same experience.
7. Medical attention at Dilley is deficient. I have attended the doctor's office several times to treat my daughter, who has suffered a cold and a fever, but lines typically take hours and we sometimes are not given medicine and are asked to come again the following day. During the last few days I stopped by the doctor's office to make consultations on my pregnancy, as I have not being feeling well, but medical staff have not attended me and have asked me to come back in three days.

#21788

8. My credible fear interview took place on June 28. Upon our release, my daughter and I intend to live with my sister and her husband [REDACTED], who currently live in Los Angeles.


I, Bryseyda 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]

Date: June 29, 2018

Certificate of Translation

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



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

6/29/18
Date

Exhibit 186

Declaration of

ALBA P [REDACTED]

I, Alba 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 June 7, 1984. My daughter's name is [REDACTED]. He is 11 years old and she was born on June 6, 2007. My daughter and I are from Guatemala.
2. My daughter and I left Guatemala for fear of risk to our lives by my partner [REDACTED] who has physically and psychologically abused me and my children for years and has threatened to kill me if I turn him to the police. Despite the death threats, I sought help from the police on more than one occasion and even sought charges against him (including a restraining order), but the police has informed me that they are not able to help, among other reasons, because they "are located too far from my neighborhood." In addition, we left Guatemala for fear to our lives due to general insecurity and the lack of police enforcement in Guatemala. To this point, my family has been assaulted in the past, and the police has not investigated the facts or made arrests due to fear of gangs and other felons.
3. We crossed the border on or about June 23, 2018 at approx. 7:30 pm and turned ourselves in immediately. We were then taken to a facility known as the Ice House (Hielera). Officials took our pictures and fingerprints at this location and about three hours later we were transported to another facility known as the Dog House (Perrera).
4. Food at the Perrera was cold and scarce. My daughter and I each were given an apple, a cold burrito and a bottle of water for breakfast and lunch and a cold sandwich, chips and a bottle of water for dinner. [REDACTED] and I remained hungry after lunch and asked for additional food, but they were not given any.
5. Temperature at the Perrera was very cold, and my daughter and I were provided a light aluminum blanket that was not adequate to keep us warm. For this reason, we could not sleep much during our stay at the Perrera. In addition, lights at the Perrera were always on, so we were not able to tell whether it was daytime or nighttime, which further complicated our ability to sleep. On a couple of occasions, officials at the Perrera woke my daughter up by kicking her. One morning, an official woke me up saying that I should stand up because the facility was not my home, but theirs. Due to the low temperature at the Perrera, [REDACTED] got a cold, which she is still suffering today. She was also hurting from a leg and asked for medical assistance, but she was denied any medical assistance during her stay.
6. After three days at the Perrera, my daughter and I were taken to Dilley, where we have remained for three days. Upon release, we plan to live with my cousin in New York.
7. Our credible fear interview is scheduled for July 3, 2018.

I, Alba 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.



29-06-2018
Date

Certificate of Translation

I, Emilio Grandio Urrea, certify that I am fluent in English and Spanish and that I read the above declaration to Alba F. Mendez in Spanish.



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

6-29-18

Date

Exhibit 188

#21798
Declaration of

Sara P [REDACTED]

I, Sara 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 January 21st 1987. My daughter's name is [REDACTED] She is 13 years old and she was born on June 29th, 2005. My daughter and I are from Honduras.
2. I was working in a commercial shop in Honduras and the government told my boss that they had to pay more money or else they would force our shop to close. My boss was not able to pay the money. They threatened him. He had to shut down the store. This was happening to many of the stores around this area and they told us that we would have to leave. I was scared and thought that they would come to threaten me while I was working. The place that I worked shut down and I had no way to make money so we left.
3. We presented ourselves at the border about June 25th, 2018. We were taken to what they call "The Freezer". There were no beds at all there any everyone had to sleep on the cold cement. I was able to have my daughter with me the whole time but many mothers were not able to. It was so cold where we were staying that we could not sleep or rest. We were given small aluminum blankets. One blanket was for me and one was for my daughter. We were not allowed to shower while we were there. The toilets were very dirty. Sometimes there was toilet paper but sometimes there was not. There was not usually water for us to wash our hands. We did not have toothbrushes.
4. There was a small container of juice and sandwiches that were very small. We were very hungry. It was painful how hungry we were. The sandwiches they gave us were still frozen and when I tried to eat it made me nauseous so I was not able to eat it and neither was my daughter.
5. It was extremely cold at this place and we were not able to sleep because of how cold it was.
6. They had light on all of the time. They were always turned on and they never turned them off.
7. After five hours, my daughter and I were taken to another place where we were held for two days.
8. The second place is what they call the "Dog Cages". We had sandwiches and they were still frozen like in the first place. They gave us an apple, a small cookie, and water bottles. They only gave us water when it was breakfast, lunch, or dinner. Right when we arrived I was separated from my daughter because they said that they had to separate children that were twelve years and older. They did not allow for me to hug my daughter or talk to her before they separated us. I could see my daughter from far away. I could not sleep at all because the police were always yelling at all of us on the floor. They would kick us when we were on the floor to make sure that we were not sleeping or resting. One time when I was sitting there and I did not respond to them kicking me the guard grabbed me my by shirt and pulled

#21799

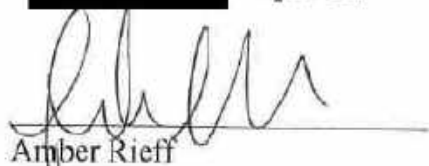
me back and forth only to make sure that I was awake. He did not do anything to me once I woke up but he only wanted to make sure that I was not sleeping. For sleeping there were no beds. They only gave us small mats to sleep on and all of the mats were touching side-by-side so there was no room to relax my body. It was the same for where the children were staying. I could see this through the cage. I was able to able to shower each day that I stayed there. They had towels and soap for us to use there. It was so cold and only had a short-sleeved shirt on. My daughter was wearing a long sleeved shirt but she was so cold. After staying here for two days we were then transported in a bus. In the bus the police did not yell at us and they were nice. I was not able to be with my daughter again until we were in the bus.

9. I have not yet received legal notice or access to counsel but I have an appointment to speak to someone in the visitor's center soon.
10. My daughter and I were taken out of that facility on the 26th of June 2018.
11. My daughter and I have been at the location in Dilley for about three days. It was a four or five hour trip by bus. In this experience in this facility in Dilley I am treated very well and in comparison to where we stayed before I feel like I can finally relax. My daughter and I can finally sleep. I have not been here for very long but the facility has beds and better food that we can eat.
12. We are planning to stay with my daughter's aunt. She lives in Florida. She is the sister of her father. She will let us stay with her.
13. I do not know anything about my case yet. I only know that they have told me that I will be able to meet with someone to discuss my case. I have plans to speak with them soon.
14. I, Sara 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.

06/29/18
Date

Certificate of Translation

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



Amber Rieff
Willamette University Clinical Law Program
245 Winter Street SE
Salem, OR 9301

6/29/18
Date

Exhibit 189

Declaración of

Beysi M [REDACTED]

I, Beysi 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 a Guatemalan citizen, born on 18 September 1986, in Guatemala. My son, [REDACTED] [REDACTED], was born 30 October 2006 in Guatemala.
2. We left Guatemala on May 29 to escape my husband who said he was going to kill us. My son and I crossed the border into the United States, near Sonora, Arizona and presented ourselves at an immigration office on Saturday, June 9 2018, seeking asylum. I said we were afraid to return to Guatemala and that if we return, the father of my son is going to kill me. He has said he would kill both of us. He is very dangerous and I'm scared of him. He is part of gang of that beats up people and kills them. He has hit me and my son. My son is also very afraid of his father.
3. We were immediately detained in a jail on June 9, 2018. I don't exactly where we were first held, but someone told me that we were in Arizona. We were there for about 1/2 day, then taken to a second place. No one ever told us the name of the place where we were being taken. We were there for about a day and a half and then taken to a third place, which were told was also in Arizona.
4. My son and I were always kept together. There was one time they tried to separate us and threatened us with deportation, but we stayed together.
5. In the first place we were held, they told me we could have a lawyer, but did not write it down. We were never given anything in writing about Rolvin's legal rights at any of the facilities where we held in Arizona.
6. In the first place we were held, they wanted me to sign something before I could see a lawyer. I told them I wanted a lawyer but I didn't want to sign anything. They told me everything was going to be okay, to go ahead and sign. The only thing I signed was papers they told me were needed to start a case. Then I signed documents to say my son didn't have any medical problems. The only time I signed anything was in the first place we were held, I didn't sign anything in the second or third place. My son had to sign something that said he didn't need a doctor. All papers were in English. No one gave me copies of any of these papers.
7. While in Arizona, I never requested a hearing and was never provided with a list of legal services that might be available to me. There was no list of free legal services posted on any walls near any phones -- only instructions on how to use the phone.
8. In the first place we were held, I had access to a telephone to call a lawyer and I called a friend in Chattanooga, Tenn. I left a message.
9. I didn't ask to see a lawyer until we arrived in Karnes, I didn't know I could have a lawyer.

10. At all of the facilities where we were held in Arizona we had access to toilets. We did not have access to a shower until we arrived at the third facility. When we were there both my son and I had our first shower. They gave us clean clothes and they took our clothes to wash them. We each had one shower only the whole time we were in Arizona.

11. The only food we were given was burritos, 3 times a day, and maybe a cookie. The only water we had was from the sink where we washed our hands. They were no cups, we had to use our hands to drink water.

12. My son didn't eat for a couple of days and fainted. He woke up with some water but never saw a doctor or a nurse.

13. It was very cold in all of the facilities. In the first place, it was just the two of us in a cold room, like a refrigerator. We had blankets, and a mat to sleep on, no beds. I caught the flu while we were there, but was not given any medicine. Thankfully, my son did not get the flu but he did develop an eye infection. in the "refrigerators" where they held us in Arizona. He did not receive medical attention or medicine until we got to Karnes. They gave him some eye drops and it is getting better now.

14. In the second facility, there were about 8 of us, mothers and sons only. It was also very cold there.

15. There were about 12 people total in the third place all mothers and children. The children were all ages. The youngest were babies, the oldest were 11 or 12. My son is 11.

16. The 12 of us were kept closed up the whole time. None of us had any exercise. The toilet was in the same room where we all stayed, there was no privacy.

17. In all 3 places, my son and I were kept together. In second place, they threatened to separate us, it was very frightening. They didn't hurt us, but threatened to send us back to Guatemala. We are both very afraid to go back to Guatemala.

18. We left the third jail in Arizona on a bus, which took us to an airport. Then we took an airplane to San Antonio, and came here on a bus or van to this facility. We arrived in Karnes on 13 of June 2018.

19. Neither my son or I ever received *written* notice of my son's legal rights at this facility. They only told us we could talk to our relatives and bathe. We have not received any notices of any rights to a hearing or anything else.

20. At orientation we were told we could talk to RAICES. We weren't given anything in writing, but were told we could talk to them. There aren't any notices about legal services near the telephones, only a paper explaining how to use the telephone.

21. I met with a lawyer from RAICES around June 20. I had to sign a paper for RAICES to visit.

22. I don't remember the name of the lawyer I spoke with. It was a man, but I don't remember his name, but he had a translator with him. I spoke to one lawyer only, for the both of us. That's the only time I've seen a lawyer.

23. I had a credible fear interview on Friday, June 22, 2018. There was someone with me to translate. I did not have a lawyer. I am waiting for an answer.

24. We do not have any relatives living in the US. My son's father lives in Guatemala and he is afraid to return to him.

25. No one has told my son or me that he could be released on certain conditions or given us any papers telling us anything like that.

26. I have told people I am afraid of returning to Guatemala, first when I applied for asylum in Arizona. I don't think anyone ever asked my son. I've done all the talking. When I first came someone wrote down what I said, I don't know who it was. No one asked my son any questions separately.

27. Here at Karnes, we have food, water and are fairly well taken care of. We needed medicine in Arizona, but never got it. We have access to medicine here.

28. Several times a day people come into our room to check if it's clean. They knock, but they still come in. If the children are upset, crying or being noisier than usual, the mother is scolded. They will speak to us in a rough tone in front of the children.

29. One time someone told my roommate that her son had to sleep in his own bed, not with her, or they were going to "take him away" and put her in prison. This added to my own stress with my son, but I do my best to protect him.

30. No one provided us with any information about reasons for housing my son in a detention facility. The only information we received was information about what happens in the facility.


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

[REDACTED]

6-25-18
Date

Certificate of Translation

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


Yolanda Rodriguez

6/25/18

Exhibit 190

Declaration of

BESY J [REDACTED], [REDACTED]

I, BESY J [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. I was born on August 14, 1989. My daughter's name is [REDACTED]. Her A number [REDACTED]. She is born on March 19, 2011 in Honduras. she is now 7 years old.
2. My mother has a small store. My grandmother was very ill with Parkinson's disease. My mom left the business to take care of grandmother. My mother left the business with me, and said so long as you pay the electricity and take care of the business I could use the money for me and Amber. The business was next to our house. On May 25, 2018, 3 men came up to the business, after I'd been taking care of it for a year. They asked me for money like a "tax" or extortion to keep the business. The men had the number 13 tattooed on their necks. I thought they were part of the MS-13. They asked me for 5000 limpiras, but I didn't have it. I only made about 3000 in an average month, so I couldn't pay. When they asked me for that, I became very afraid and walked into the house to call the police. The only people in the house were me and my older brother but he was sleeping. When I was on the phone, the 3 men heard me talking on the phone, and then used a bad word and called me an "hija de la gran puta," and told me it was not a joke. They told me "you are going to regret this, it is not a game." Then they left. I told my brother right after it happened before the cops came. He told me to calm down, then I asked him my brother to pick up [REDACTED] and his daughter from the school. We had to get them by noon, and it was about a 30-minutes walk away. He left so I could wait for the police. The police arrived about 30 minutes later and I told them what happened. They drove around the perimeter of the house and area and took off. I never heard from the police again.
3. The 3 men must have followed my my brother on the way to school. After he picked the girls up and was on their way home, they stopped them in kind of remote area and beat him up very badly area, they beat up my brother very bad in front of the girls. The gang members must have thought that both of the girls were mine. They told him, "We told your sister that this is not a game and the next dead ones will be her daughters." My brother told me One of them took out a knife and they pointed at the girls as they said it. My brother was severely bruised on his face and arms, but he was able to walk home and told her everything. The girls were crying, [REDACTED] came and hugged me and said, "Mommy, I don't want them to kill me." Over the next 3 days, we planned the departure and left on May 28, 2018.
4. We were apprehended near Juarez on June 9, 2018. The river was dry and we we crossed and saw the wall we crossed the river and saw the wall, immigration saw us and they drove across the wall. They asked us if we knew that we were entering illegally and if we knew it was a crime. They put us on an immigration truck and took us to what seemed like an office building. They asked us if anyone was sick and they took our information. They didn't ask us why we were crossing and I didn't volunteer any information.

5. I don't know the name of the place where we were taken. When we got to the office, around 10 pm, they asked us "who needs water," and if anyone was sick. A few people went, and they treated us pretty well. They gave us food and [REDACTED] ate a burrito and had some water. We had cots to sleep on. It was very cold and they gave us a prickly grey blankets. We could use the bathroom, but no showers. It was one piece of equipment, toilet on the bottom, with a sink on the top. All of us, men and women and all the children, boys and girls were in the same facility, but the men and women were separated. The other little girl stayed with her father and all the men. The oldest boy was about 7 years old, I think my daughter was one of the oldest.
6. There were about 30 people in one room with bunks. There weren't enough beds for everyone, but they had foam pads to put on the floor. They were more comfortable than the beds. One toilet for the 30 people, no privacy. There was a little half wall but not privacy. We were there for 3 days, but did not take a shower while we were there.
7. We were there from 10 pm until 8 am the next morning on June 10, 2018, when when they took us to another place, which was similar to the first. We left on a big bus, there was heavy mesh over the windows and we couldn't see outside where we were going. We were on the bus for about 45 minutes. They didn't tell us where we were going. Everyone went to the second place, except for one man and child and they were going to separate them because the man didn't know the child's birthdate. When they asked the boy if the man was his father, the boy didn't answer so they stayed behind. There was talk they would be separated.
8. When we got there, they gave us a burrito and juice. They separated us by fathers and mothers. If the father had a daughter, she went with him. If the mother had boys, the boys when with their mothers., same restroom with single unit, with sink attached. They room was a lot smaller, there were 14 of us.
9. The second place had the same kind of toilet and sink, but the second place didn't have beds or cots, just cement benches. They gave us blankets and we slept on the floor. It was extremely cold. Same type of blankets. Some of the women told the officials that their children were sick and needed medical attention. The officials did not ask everyone, like they did in the first place. At that time Amber was not sick so I didn't ask for any medical assistance.
10. I don't remember exactly what they told me there about our legal rights, but I remember that they said that the children could be treated differently. They brought separate food for the children and they were fed more often. They brought burritos with potatoes, then beans for 3 days, beans and more beans. One time, they gave us instant cup of soup.
11. They spoke to us in Spanish but did not give us anything in writing other than the list of lawyers. I didn't ask to talk to a lawyer. No one asked me about whether I was afraid to go home. They didn't want us to talk too much and I was afraid to say anything after they yelled at another woman who told them her daughter was sick.
12. The children had a lot of anxiety because it was cold, 3 days in one room. The children were not allowed to go outside, they seemed desperate and cried a lot.
13. On the third day, they woke us up at midnight to give the children a bath. We had 10 minutes only, and also the opportunity to bathe. We had soap, clean towels, shampoo. After everyone was finished bathing, they put us in another truck to take us to another place.

14. After they woke us up to bathe, they put us in another truck and took us to the third place. Shortly after the bus got on the road, [REDACTED] said, "Mommy, I don't feel well." She said her stomach was bothering her and I told her to wait if she could. We were on the bus for about 25 minutes. When we got off the bus, [REDACTED] started throwing up. Even though the driver and the people at the new place saw her throwing up, they didn't do or say anything.
15. When we arrived to the third place, they locked us in a room, gave us water. A woman started knocking on the door because she didn't feel well, but they didn't answer. Then, they woke us up at 5 in the morning and gave us soup. [REDACTED] didn't eat because her stomach was hurting. Shortly after they gave us the soup, they rounded women from other rooms together to put us on another bus.
16. The bus left around 6 in the morning, and they took us to an airport. They told us they were taking us to a shelter in Texas. In the third place, there wasn't a chance to tell anyone that [REDACTED] was sick, because they locked us in a room and even though the lady was already knocking, they saw her, but no one did anything. I thought they would ignore me too.
17. When we got to the airport, we got on another bus with air conditioning. They told us that we would be on the road for 9 hours. There were people from here (Karnes) on the bus and they were nice, they talked to us nicely. They gave us food on the bus and showed us where the restrooms were on the bus.
18. The bus stopped along the way around dinner time in a gas station. They gave us food to eat on the bus, ham and cheese sandwiches and water bottles. There was also milk, fruit and juice for the children. Amber didn't eat much, the bread only. She ate a little bit of the ham, but started to cry because her stomach was hurting. She did drink the water though. I told someone that my daughter wasn't feeling well, and they brought crayons to draw. I don't think they understood that she was sick – they thought that she was just sad.
19. We were on the bus for 9 hours, maybe more. At some point the big bus stopped, then 3 mini busses met the big bus, and they separated us into 3 mini buses, which took about an hour to bring us here.
20. During the journey, [REDACTED] told me she missed her grandmother and her dog. When I asked her if she wanted to go back, she said, No.
21. We arrived here on June 12 around 10 in the morning and stayed in a waiting area for almost 24 hours. [REDACTED] couldn't sleep even though we had been travelling all night, there were no beds or mats there. [REDACTED] gave us food, water: turkey sandwiches, fruit and juice but we couldn't take a shower or bathe or sleep until they finished us the ID cards. We finally got to our room about 11 am on the June 13th. By that time we hadn't really slept for 48 hours.
22. [REDACTED] received treatment for her stomach on June 13 when we saw a doctor. She gave her some kind of chewable tablet. I was able to go with her to see the doctor. It helped with her stomach, then she had diarrhea and had severe stomach pain and vomiting and they treated her over the next four days. Then I took her back because she had a cold and cough. They gave her a cough syrup which was better after a couple of days, but then she developed a pimply rash. The rash was under nose and inside her elbow. As soon as the doctor saw it, he said we had to go to isolation. They sent someone to our room for our stuff and put us in isolation. My friends thought we had already left. We weren't able to leave the room for 3 days.

23. People came in to take her temperature twice a day, and to bring us food. They would go off and ask her if she was okay. They thought it was some kind of infection and gave her liquid antibiotics.
24. At home [REDACTED] rarely got sick and on the first part of the trip she was eating and seemed fine. It seems that since we've been in detention, she's been sick – she's been sick the whole time.
25. At first, this place seemed very cold, but now we're used to it. All our time is monitored. People come into our rooms often, it seems like every 5 minutes or so. It's hard to adjust to the fact that people come into the room and now we're used to it.
26. Since we've been here they've given us handouts with legal information, but nothing specific about Amber. The handouts are in Spanish but only provide general information. They've told us we have a right to have a hearing but not much more. RAICES has given us more information. I've learned there are three ways to be released: 1) with a monitor; 2) based on word or oath; and 3) on a bond.
27. Yesterday I had a interview for asylum with an Anglo woman, in one of the 3 offices near the library. The interview was translated by the phone. It was to determine whether I had a credible fear of returning. I had to answer for [REDACTED] and I told them that [REDACTED] was afraid to return. I don't know when we'll have an answer.

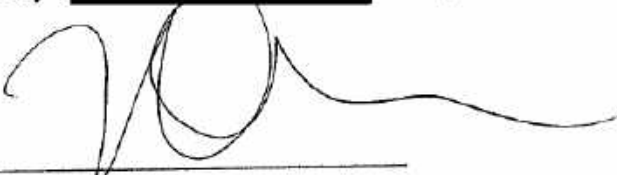
I, Besy J [REDACTED], A number [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

[REDACTED]

06/27/2018
Date

Certificate of Translation

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



Yolanda Rodriguez
June 27, 2018

6/27/18
Date

Exhibit 192

Declaration of
GLADIS B [REDACTED], A NUMBER [REDACTED]

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

1. My date of birth is March 19, 1984. My daughter's name is [REDACTED]. She is twelve years old and she was born on August 13, 2005. My daughter and I are from Guatemala.
2. I left Guatemala with my daughter, my sister, and my sister's son, who is thirteen. We are fleeing to the United States to seek asylum because our lives and our children's lives are at risk. I have come to this country because I need to protect my daughter and save her life.
3. We first presented ourselves at the border in Nogales about a month ago. When we first arrived at the port of entry, we told the officials there that we wanted to come into the United States and ask for asylum. I told the official that I was afraid to return to Guatemala and why I was afraid to return. At the port, we were told that we couldn't cross because there was a waiting list. There were a lot of people waiting to cross the border in Nogales. We waited in Nogales for our turn to cross for twelve days, until one morning finally our number was called and we were able to cross through the port.
4. Right after we crossed through the port of entry, we went to a place called "La Perrera." The four of us were held in a space that was surrounded by metal wire along with another woman and her daughter. We weren't given any paperwork informing us of my daughter's rights under *Flores* or of lawyers that we could contact for help on our case. I could see that the officials had paperwork, but I didn't know what it said and they didn't show it to me.
5. When I arrived at La Perrera, I spoke with an official and told him that I was afraid to return to Guatemala. He asked me why and I explained some of my experiences and my daughter's experiences in Guatemala that led me to seek asylum in the United States. The official asked me whether I was afraid that my child would be taken away from me in the United States. I told him that I felt very secure in God that everything would be OK and that my daughter would stay with me because I had been praying and praying to God to keep us together and to keep her safe. The official told me he would take my case.
6. The next morning, my family and I were taken to another facility about four hours away by car. I'm not sure what it was called but I heard that it was in Arizona. When we arrived, they put my sister and her son in a different room from us, and I was afraid that I would not see them again. I also signed some forms, but I don't know what they said. They were in English, which I cannot speak, and no one explained the forms to me.
7. The next morning, we were taken on a plane to Karnes, where the four of us are now. My daughter, sister, nephew, and I arrived on June 16, 2018. We arrived around 6 in the evening. We had to wait in

the waiting room for many hours, and finally we were able to go to our rooms after filling out some forms and having a medical examination. We didn't get into our rooms until about three in the morning.

8. The next morning, I spoke to some of the other women here and learned that there was a form that I could fill out to request asylum. Even though I had already told officials that I was requesting asylum and was afraid to return to Guatemala, I filled out the form and put it in a box. The staff here took the form from the box and told me I had already requested asylum and didn't need to speak to an official.
9. I was able to speak to my aunt, who lives in San Francisco, when I first arrived at Karnes. But I have not been able to speak to her since then, because it costs money to make calls and I don't have any money. My daughter and I would like to live with my aunt in San Francisco. My aunt's name is [REDACTED] [REDACTED] she is a United States citizen and has lived in the United States for fourteen or fifteen years.
10. I had a credible fear interview on Monday, June 25, 2018. My daughter was in the interview with me and we both answered the official's questions with the help of a telephone translator. I told the official that we wanted to live with my aunt, and I gave him her information. I have just heard that my daughter and I can be released to go live with my aunt once tickets are bought for me.
11. My daughter and I are not able to leave this facility. It would be uncomfortable to be here for longer, even though the treatment I've received has been decent. We don't deserve to be locked up here for any longer because we came here to be safe and free. We didn't do anything wrong to anyone, and we don't deserve to be stuck in here.
12. I, Gladis 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]

6/27/18

Date

Certificate of Translation

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



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

6/27/18

6/27/18

Exhibit 193

Declaration of

LUCIA R [REDACTED]

A NUMBER [REDACTED]

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

1. My date of birth is April 5, 1998. My daughter's name is [REDACTED]. She is nearly two years old and she was born on July 24, 2016. My daughter and I are from Guatemala. I also have a son, [REDACTED] who is almost five years old (DOB August 27, 2013) and is currently in Texas with my husband.
2. My family fled Guatemala because we were receiving death threats from gang members and from family members who were trying to get us to give them money and land. Gang members came to our door multiple times to threaten my husband and family, and they knew where we lived. We wanted to come to the United States so that we could be safe from these threats and so that we could raise our children safely.
3. At the border, my daughter and I crossed a river in a group with about ten adults and their children. I don't know where we were, exactly, but I heard that we were somewhere near San Luis. Agents were waiting for us on the other side of the river. They put us in a car for about half an hour or an hour. I'm not sure where they took us, but I think it was called La Perrera ("The Dog Cage").
4. When our group reached La Perrera, three mothers were separated from their children. One of the children was a six-year-old boy, another was a seven-year-old boy, and the third was a ten-year-old girl. The mothers were crying and so were the children. I don't know where they took the children. There was a father who said that he wanted to talk to his son because he could hear his son crying. They let the boy out but then he wouldn't leave his father. Officials pushed the father out of the way, grabbed the child and dragged him away crying. I don't know what happened to the child after that. The next day the mothers asked what happened to their children and were told that they were taken to a home, but nothing else. The mothers were just crying from worrying about their children. They put handcuffs on the parents who had been separated from their children, and chains around their feet. Officials took them away, but I don't know where they were taken.
5. They didn't separate me from my daughter because she hadn't turned two yet. All of the children over six or seven were being separated from their parents from what I can tell. Some children as young as three or four were also being separated. It seemed to be on a case by case basis.
6. My daughter and I were held in a crowded cell in La Perrera for four days. There were about 60 people in my cell. We were very squeezed in and we couldn't all lie down to sleep at the same time – we had to sleep in shifts. There were no men in our cell but I could tell that the men's cells were even more crowded.

7. Some people got mattresses, but most people just had to sleep on the floor. My daughter and I had to sleep on the floor, and it was really difficult. It was really hard to sleep because they kept waking us up to do a count, because the lights were on all the time, and because we were always hungry. Also, we only got metallic blankets, and it was really cold in the facility. If you had two it helped keep you warm, but with only one it didn't help at all. Plus, the metallic blankets made it so noisy in the cell that it was even more difficult to sleep.
8. The conditions in the cell were very unhygienic. There were 2 toilets for 60 people. The toilets were not that clean because there were so many people and so many children. There were people sleeping near the toilet and a low wall that everyone could look over. The only water was from the sink right about the toilet and it tasted like chemicals. I didn't want to drink that water. Nor did my daughter. She would only drink juice. Sometimes I would ask for extra juice. Sometimes they would give it to us, but sometimes they refused and told us to drink the water.
9. The only food we got to eat was soup, three times a day every day. The children also got juice. We were hungry all the time because there was never enough soup and we couldn't ask for more. Some people got ill and started vomiting from only eating soup. There was one child there who had diarrhea, had dry lips, he had a fever. The officials didn't do anything to help the child and didn't give him anything. They just told us that it was our fault the child was sick and slammed the door on us.
10. People were desperate, hopeless, and sad. They were crying all the time. Some officials had a bad heart and wouldn't bring napkins or diapers for the children, so the children had to just sit in a dirty diaper. I saw one child who was about two years old without any pants and no one gave him pants for three days.
11. After three days, I finally got to speak to an official and explain that I was in the United States to seek asylum. He just wrote something down and didn't say anything to me.
12. Finally, after four days, they woke us at 2 in the morning and let us take a shower in another building and gave us some clean clothes. Then we were given some food and water on the way to the airplane to come here. We also got to have a drink on the plane. The flight was three hours long and we landed in San Antonio. We arrived around 11 at night to 1 in the morning on June 6, 2018. We spent the whole night in the waiting room after taking a shower. My daughter and I couldn't sleep until we were able to get into our room, around 5 in the morning.
13. When we arrived the officials gave us some papers about asylum. I can't remember what they said. It didn't stay in my head. I just remembered that the officials told us that we could ask for asylum, and I did.
14. I had my credible fear interview last Thursday. I tried to explain my situation, but I didn't have the chance to speak with a lawyer before the interview. I received a credible fear denial for me and my daughter on Tuesday. I have spoken to a lawyer from RAICES and I am planning to appeal to an immigration judge. I want to be able to stay in the United States with my husband and children, where we can be safe from the people who are threatening us in Guatemala. My husband and son have already been released and are in Texas. I would like for my daughter and I to join them.

15. My daughter is sad to be in this facility and to be away from her father. She was very close to him and she cries for him often. I try to distract her but she is having a hard time. Recently, I bought her a coke from the store. She said "uno Papi" (one for dad) because she misses him and is used to sharing everything with him. Being detained for so long has also been difficult for me, as I haven't been able to talk to family. And I think my daughter feels my stress. It makes me feel bad because she is locked up in here too.

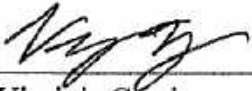
I, [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

6/27/18

Date

Certificate of Translation

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



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

6/27/18

Date

Exhibit 194

Declaration of

Maria R [REDACTED]

I, **Maria 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 date of birth is June 24, 1982. My daughter's name is [REDACTED] A [REDACTED] She was born on March 1, 2001, and is 17 years old. My daughter and I are both from Honduras.
2. We lived in a colonia near Cuyamer. I worked as a housekeeper for a very angry, bitter woman. She hit me often and once she burned my hand. She told me that if I called the police they wouldn't do anything for me. I think she also paid the police officer to go away.
3. On April 1, 2018, a man came to our house about 5 in the afternoon and made threats to rape [REDACTED] and me. I didn't know who he was, he was stranger. He said he knew that we lived alone, and that he thought we were both pretty. He said that one way or another he was going to rape us both. My daughter heard all of this also, and started to cry. He was wearing black and red and had tattoos like he was in the Mara gang.
4. After that we were afraid to come out. He returned two more times after April 1st, but we weren't home. My neighbors told me he asked my neighbors for me, but they told him I wasn't home. My neighbor [REDACTED] told me the man was bad and she suspected he was the one who killed her son about a year earlier. She had gone to the police but the police didn't do anything about it. I left on Honduras on May 23, 2018.
5. I didn't go to the police because they didn't do anything when they killed [REDACTED]'s son. I knew another woman who was a victim of domestic abuse and they didn't do anything for her either. All they did was give her appointment after appointment, but they didn't do anything about her either.
6. After we left were traveling for about 3 days, my neighbor told me the same man, dressed the same way with tattoos came back two more times looking for me.
7. We crossed the river near McAllen and presented ourselves at the border to ICE on May 28, 2018. The ICE officer asked us why we were there. I was very nervous, and didn't say too much. They thought [REDACTED] wasn't really my daughter. They threatened to take her away and actually did take her away for 4 days. They told me to give my daughter all of her documents, that she was going to stay and they were going to deport me. They told me not too cry. Then they wrongly claimed that my paperwork for [REDACTED] was false and claimed that she was not really 17. I kept saying she was born in 2001 and insisted she was 17. They wouldn't believe me and took her away.
8. First they put us together in a "fridge" that held about 30 people. For a full day, they gave us each one juice and one cookie, but no water. There were two restrooms for the thirty of us; they were separated from the main area by a partition of some kind. We could wash our hands – the sink was above the toilet

in a single piece of equipment. They didn't allow us to take a shower, change clothes. They gave us cookie and juice and Mylar sheets. There weren't any beds, so we slept on the cold cement.

9. While we were there, they took pictures of us and took other information. I asked if I could use the phone, and was told no, that I wasn't permitted to use it. They asked me if I had money for a lawyer, that's all. When I told them I did not, they didn't say anything about any rights to a free lawyer or provide a list of any kind.
10. We were there about a day, then they put us in cages like dog houses and were there for 4 days. It was the same building as the other place, but in the cage I was there with about 20 women. [REDACTED] was in a cage too, in a different part of the facility. They didn't allow me to see her. They told me I didn't have a right to see my child. We couldn't sleep, spent the whole time crying. I asked twice to use the phone but they wouldn't let me.
11. Sometimes they would let the kids out, if the kids tried to go the moms the officers would yell at the kids and wouldn't let them near the moms. [REDACTED] told me they kept telling her she was going to stay and her Mom was going to be deported. She said she didn't want to stay without her Mom.
12. We were there for four days in the cage and I didn't know where [REDACTED] was. I didn't see her. I learned after we were reunited that they kept the older kids ages 15-17 and girls separate from boys separately. [REDACTED] told me they were given food 3 times a day, either burritos with beans or a ham sandwich. She had the same food three times a day, with one apple a day. They gave us bottled water. [REDACTED] also received a change of clean clothes and a clean towel and allowed her to bathe once on May 31. I wasn't given the chance to take a bath. No one asked me if we needed medical attention.
13. After four days in the dog houses, they didn't say where we going, but they put us on a bus. That was the first time I saw [REDACTED] since we had been separated. Thankfully, we were together. Some of the women who rode on the bus with us went without their children.
14. We were on the bus about three hours and taken directly to Karnes. We arrived around 4 pm on June 1. First, they gave us sandwiches and bottled water and a piece of fruit. They took our pictures, sign some paperwork. We stayed there all night, until everything was finished. We were taken to our room about 5 in the morning of June 2, by that time we hadn't slept in 24 hours. We wanted to sleep, but they woke us up to go have breakfast. When we got to our room was the first time I could use the phone.
15. My husband lives in St. Louis, Missouri, he is [REDACTED] father and has been here for two years. I've asked for my husband to send money and they put it on account for me to use the phone
16. There are four people total in our room, another woman and daughter from Honduras. They other girl is 15. We have a blankets in our room and we've gotten used to the temperature.
17. We don't like a lot of the food, but we have plenty of it. We have hygiene supplies and pretty much what we need.

18. I've developed panic attacks and I see a psychologist. [REDACTED] cries and wants to know when we are leaving from her. [REDACTED] has gone to the psychologist also. She likes school. She never wanted to miss school in Honduras and doesn't want to miss it here either. We've been able to schedule the appointments after school. Other than anxiety, we haven't had any other health problems.

19. They told us about our rights after we had been processed. I've had the opportunity to meet with RAICES and they've explained my rights, and the process. [REDACTED] wasn't with me when they explained our rights. No one has explained anything about [REDACTED] rights or if they might be different from any rights I have. I haven't received anything in writing either. I've only heard that children may have different rights, but no one has explained the difference to me.

20. I was interviewed by Immigration on June 12. for about an hour and a half. I learned the next day that it has been denied. Yesterday RAICES told me I would have an appointment with them. I don't know when it will be or what will happen next. The only thing they said is that I would have a hearing with a judge within 7 days, but it's already been 15 days. The lawyer told me they asked the judge if we could be released before the hearing and have the hearing wherever we go next. We are waiting to hear if that proposal will be accepted.


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

[REDACTED]

6/27/18
Date

Certificate of Translation

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


Yolanda Rodriguez

6/27/18
Date

Exhibit 195

Declaration of
NORA E [REDACTED] A NUMBER [REDACTED]

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

1. My date of birth is October 24, 1994. My son's name is [REDACTED] (A# [REDACTED]). He is two years old and he was born on June 8, 2016. My son and I are from Honduras.
2. My son and I fled from Honduras because I had been threatened for years by criminals. After trying twice to move to different places in Honduras to escape these threats, I was assaulted by several men on my way home from work. They asked me for money and threatened to kill me if I didn't pay them. I feared for my life because I knew that I wasn't going to be able to pay them (I didn't owe them any money) and I knew that they would be able to find me again. I knew that I needed to seek safety for myself and my son in the United States. I am here to request asylum.
3. We crossed the border in Ciudad Juarez on June 8, 2018. My son and I crossed the river, and when we got out Customs and Border Patrol agents were waiting for us on the other side. We were taken immediately to La Hielera ("The Icebox"), which was about twenty minutes away by car. The officials did not ask me why I had come to the United States.
4. When we arrived at La Hielera, an official told me I had to sign some papers. I didn't know what they said because I can't read and no one explained them to me. I was worried about signing them because I didn't understand what I was signing, but the official got annoyed with me and told me I had to, so I signed them. I was not provided with any information about my rights, my child's rights, about attorneys who were available to help us, or about the asylum process. In fact, no one asked me why I had come to the United States, so I did not have the opportunity to explain that I was seeking asylum.
5. In La Hielera, my son and I were held in a crowded cell. There were about 25 of us in the cell. We only had enough room to lay out a blanket for us to sleep on, and we were also just given an aluminum sheet to cover us. It was cold all the time and the blankets hardly helped. Also, we weren't given a cushion and had to sleep on the hard floor. My son was throwing tantrums because he was so uncomfortable and not used to the situation.
6. The cell was so crowded that some people were laying near the toilet, which meant that it was impossible to use the bathroom in privacy. Also, the toilet was only behind a short wall that anyone could look over. Because there were so many people in the cell and we didn't have any broom, the cell was always dirty.
7. The only water available was from the sink directly above the toilet. I didn't want to drink that water, but because there was no other option, I didn't have a choice: my son and I drank the water. It tasted unpleasant. For food, all we got was bean burritos, juice, and cookies for three meals a day. We just got one burrito, juice and cookie. The burritos were very small and we were hungry all the time. My son

only ate a little bit of the burritos, but he would eat the cookies that we got. We weren't able to ask for more food – when someone asked for more juice, the officials didn't do anything.

8. When we arrived at La Hielera, our feet and shoes were wet from crossing the river, and our clothes were dirty. Despite that, we didn't get the chance to shower or receive clean, dry clothes.
9. We stayed at La Hielera Friday night, Saturday night, and Sunday part of the night. Very early in the morning – before sunrise – on Monday, June 11, 2018, we were woken up and told to get in a line. Everyone in the cell with us were taken to a different facility about twenty minutes away. The sun was just rising when we arrived.
10. At this second facility, I was able to call a friend of mine who lives in Los Angeles and is willing to have my son and I come live with him. My son and I were also able to take showers, but we had to put our soiled clothes back on afterwards. The clothes were very dirty by that point, but we weren't give clean clothes. No one at the second facility asked me what I had come to the United States with my son.
11. Very early on Tuesday morning – again before the sun came up – we were all made to line up again. We returned to La Hielera, ate breakfast, and then got on a bus and drove for nine hours to arrive here at Karnes.
12. We arrived at Karnes at 1 or 2 in the morning on June 13, 2018. We sat in a waiting room all night. There was nowhere to lie down, so I stayed up all night with my son in my arms. I got very tired and sleepy but I didn't have any other options. Finally, someone asked me if I wanted to request asylum, and I responded that I did, and they told me I needed to sign a paper to ask for asylum, so I did.
13. When I arrived here, I was able to speak for three minutes with my friend who is willing to receive my son and me. I wanted to use my son's three minute call later, but it had already expired. Since then, I have not been able to speak to my friend or to any other member of my family. I have started to work to earn some money so that I can make phone calls. I make \$3 a day and I usually work for about an hour and a half.
14. Yesterday, my tooth started to hurt. I went to the doctor and they told me that the tooth needed to be removed, but that they wouldn't do it here and I had to wait until I was released to get it fixed. Instead they are just giving me some pills to help with the pain.
15. I had my credible fear interview yesterday, and have not yet heard about a determination. I haven't been informed that my son can be released to a sponsor in the United States or to a bond hearing in front of an immigration judge. I also don't know about the possibility of being released on bond or on parole. I think I received a list of lawyers I could consult, but I'm not certain as I cannot read the paper.

I, Nora 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.

6/27/18

Date

Exhibit 196

Declaration of Sonia Y [REDACTED]

I, Sonia Y [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 name is Sonia Y [REDACTED] I am 43 years old. My date of birth, March 29, 1975. I am currently detained at the Karnes County Residential Center with my daughter, [REDACTED] (A [REDACTED]). She is eight old and was born on September 23, 2009. My daughter and I are from Honduras.

2. We fled from our country because we had been receiving threats from a local gang that I needed to leave my house because it now belonged to them. I was afraid that the gang would kill me if I did not leave my house.

3. We presented ourselves at the border in Nogales, Arizona, on June 15, 2018, about 6:00 AM. We were detained at the "hielera" until the following morning. We were fed twice at the hielera. Both times we were given a burrito, cookie and juice. [REDACTED] did not eat the burritos, only the cookies and drank the juice. We were also given bottled water. While we were there, we slept on a small mattress and we were given an aluminum blanket. [REDACTED] did not like the blanket because it made too much noise. The lights were not turned off during the night.

4. I was asked if I was afraid to return to Honduras and I was able to make a phone call, I called my niece. We were not advised about our legal rights at the hielera, and we were not advised that [REDACTED] and I had the right to call an attorney.

5. We left the hielera around noon, were transferred to the "perrera". We were at the perrera for one night. We arrived at 4:00 PM, we left about 9:00 AM the following day. When we arrived we were given a sandwich, an apple, and a cookie. [REDACTED] did not eat the sandwich because she does not like bologna. We were given orange juice to drink. We asked for water but

they would not give it to us, the officers told us to drink it from the toilet-sink. We were fed again at 11:00 PM, we had the same meal, bologna sandwich, apple, cookie and juice. [REDACTED] again did not eat the sandwich. The following day, we were given a bologna sandwich, apple, cookie and juice for breakfast. [REDACTED] did not eat the breakfast.

6. Overnight, the officers gave [REDACTED] and I a torn up blanket and a small mattress to sleep on. The blankets had big holes in them. They did not turn off the lights for us. It was very cold inside the perrera. At 11:30 PM, we were woken up so that we could take a shower. The water in the shower was very hot; the water burned [REDACTED] skin. We complained that it was too hot, and [REDACTED] did not want to get in. I did not feel that we were being given the option to shower or not, so we got in. We were only given three minutes to shower.

7. The perrera was not clean. There was trash everywhere, including dirty diapers. I did not notice that anyone was cleaning the common room. In the perrera, the officers were very angry all the time. Some of the officers would talk to us in very angry voices. I overheard one officer telling a mother that he was not going to give her water so that she could prepare her child's milk bottle.

8. In the perrera I was also able to make a phone call, I also called my niece. However, while at the perrera, we were not advised that we could have an attorney or that [REDACTED] and I had legal rights.

9. [REDACTED] and I arrived at the Karnes County Residential Center on June 15, 2018, about 4:00 PM. When we arrived we were given some paperwork but it was not explained to me. We were interviewed regarding our basic information. We saw a medic who did a check up on us. I was advised that I could have an attorney and was provided a list of legal sources. I was given a list of attorney resources with phone numbers but I was not explained from where I could call.

10. The bedroom at Karnes is clean; I have no complaints. My roommate and I take turns cleaning the bedroom, the officers told us it was our duty to keep them clean. The food here is also good. [REDACTED] has started school at Karnes, and sometimes she says that she does not want to go because she says the teacher is too mean.

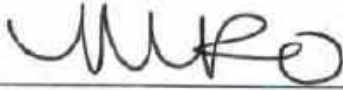
I, Sonia Y [REDACTED], swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

[REDACTED]

06-25-18
Date

Certificate of Translation

I, Maria Osornio, certify that I am fluent in English and Spanish and that I read the above declaration to Sonia Y [REDACTED] in Spanish.



Maria Osornio
802 Kentucky Ave
San Antonio, Texas 78201

06/25/18

Date

Exhibit 197

Declaration of Yerica F [REDACTED] (A [REDACTED])

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

1. My date of birth is February 4, 1998. My daughter, [REDACTED], is three years old and was born on August 27, 2014. My daughter and I are from Mexico.

2. We fled our country because [REDACTED] father would threaten that he wanted to take [REDACTED] away from me as retaliation for having separated from him. [REDACTED] father was abusive towards me during our relationship. He continued to harass me after we separated.

3. [REDACTED] and I presented ourselves at the border in Santa Teresa, New Mexico, about noon, on or about June 11, 2018. When I presented myself at the border I told the officers that I needed asylum. They told me to go into a waiting room. We were in the waiting room for about eight hours that day. That day, the officers gave us instant soup to eat and water to drink. [REDACTED] ate the food. The conditions of the waiting room were all right. The restrooms were not the cleanest, they smelled very bad and the toilet was dirty.

4. After waiting in the waiting room we were taken to some bedrooms, a few minutes drive away. The rooms were clean, but [REDACTED] and I slept on the floor with a thin mattress. We were given blankets. While we were in the bedrooms in Santa Teresa we were fed instant soup to and given water to drink. We were not fed more nutritious food, like fruits or vegetables.

5. I spent four nights at the detention center in Santa Teresa. Every day we were fed instant soup for breakfast, lunch and dinner. I do not believe it is right to only feed children instant soup. After the third day, [REDACTED] did not want to eat more instant soup.

6. After breakfast, we were transported back to the waiting room where we arrived. No one explained to us why we were transferred back and forth, this happened for a few days. We would

arrive at the waiting room at 7:30 – 8:00 AM and were there until 9:00 PM. During the day we would just sit in waiting room. While we were waiting in the waiting room, no one helped me or attended to us. As far as I remember, I was spoken to when I first arrived. The waiting room did not have any toys or a television for [REDACTED]. We just had to sit waiting.

7. While being held in Santa Teresa, the bedrooms did not have a place to shower. We were provided other necessities such as diapers, feminine products, soap and toilet paper. On my last day in Santa Teresa, I was just told to get my things because I was leaving. No one explained to me where we were going.

8. During the time I was detained in Santa Teresa, I was not advised of my legal rights or those of [REDACTED]. I was not allowed to communicate with anyone; I was not allowed to call my family. I was not advised that I could contact a lawyer.

9. After four nights and five days in Santa Teresa, we were put on a bus and brought to the Karnes County Residential Center. We arrived about midnight to Karnes and when we arrived we waited in a waiting room all night with about 11 other mothers and children. The officers at Karnes interviewed me and we also saw a doctor. The doctor listened to our breathing and heartbeat. [REDACTED] received vaccines, they told me which ones, but I do not remember. After we were interviewed we were allowed to shower and pick up clean clothing.

10. When we arrived at Karnes, I watched an orientation video about our legal rights but I did not really understand it. No one explained to me that [REDACTED] could request a bond hearing. I was provided a list of attorneys but I did not call any of them. I was not advised at any moment that I should see an attorney.

11. The bedrooms at Karnes have small beds; in my room there is another mother and daughter. I did not know them before arriving to Karnes. When we arrived we were advised the

GEO guards told us that we needed to clean our own bedrooms and they gave us cleaning supplies.

12. The food at Karnes is not very good; the meat here tastes funny. The water that we are provided tastes horrible, it has a chlorine taste. [REDACTED] does not like the food at Karnes. She stopped eating about four days ago. She will only eat the beans that are served.

13. While at Karnes, [REDACTED] and I have been reprimanded when [REDACTED] lost her temper. The guard told me that very rudely and angrily that I needed to pick up my daughter. When [REDACTED] strays from me, the guards have also reprimanded me for letting her stray too far, but she is never very far.

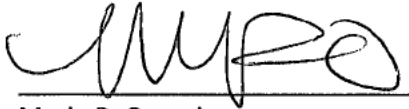
I, Yerica F [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

[REDACTED]

25-06-18
June 25, 2018

Certificate of Translation

I, Maria R. Osornio certify that I am fluent in English and Spanish and that I read the attached declaration to Yerica F [REDACTED] in Spanish.



Maria R. Osornio
802 Kentucky Ave.
San Antonio, TX 78210

06/25/18
Date

Exhibit 198

Declaration of Esperanza C [REDACTED] (A [REDACTED])

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

1. My name is Esperanza C [REDACTED]. I am 29 years old; I was born on March 17, 1989, in Guatemala. I am currently detained at the Karnes County Residential Center with my son, [REDACTED] (A [REDACTED]). [REDACTED] is eight years old, his birthday is June 28, 2009; he was also born in Guatemala.

2. I am fleeing Guatemala because [REDACTED] father and his new partner have been threatening to kill [REDACTED] and me. I am also feeling extreme poverty. There are no jobs for women in Guatemala.

3. [REDACTED] and I entered the United States on about June 20, 2018, at 10:00 PM, by walking over the border and waited for Customs and Border Patrol to find us. When they found us, the officers asked me why I had arrived; I told them that I had fled because [REDACTED] father had abandoned us. The officers told us that they did not believe us, that everyone from Guatemala said the same thing. After we were detained we were taken to a building where I spent five days. During these five days [REDACTED] and I slept on the floor in a small, thin mattress. We were not provided blankets even though the room was very cold. [REDACTED] complained about the cold, he would cry and could not sleep.

4. The officers were very rude to us, we would ask if we could go outside to get some air and they would tell us no. For food they would only give us bean burritos, cookies and they also gave us water but it tasted like it has chlorine in it. Sometimes the burritos were cold. [REDACTED] did not like the burritos or the cookies and he would not eat them. He also complained about the

water and would not drink it. [REDACTED] also got a juice, which he would drink. We would be fed twice a day, the first meal was at about 11:00 AM and then again at about 11:00 PM.

5. We were given water from a cooler, but we were not provided cups. We had to recycle the juice boxes to hold water. When the cooler ran out of water, we were told that we could get water from the toilet-sink, the same place where the women were washing dirty diapers.

6. We were woken up to take a shower at about midnight, but we did not take a shower because the water was too cold. This happened a few times. We complained about the water being too cold and they just told us there was nothing to do about it. [REDACTED] would tell me that the [REDACTED] did not want to take a shower. We waited a few days to shower, when we did it was out of necessity but the water was still very cold. The facility was dirty, there was trash everywhere and the room was only cleaned twice in the five days that [REDACTED] and I were in the detention. The restrooms did not have soap, even though some of the mothers would wash their children's cloth diapers in the bathroom. The bathrooms did not have doors.

7. They allowed me to make only one phone call and I called my sponsor in the United States. I was not advised that I could call an attorney or advised that [REDACTED] and I had legal rights.

8. I arrived at the Karnes County Residential Center on June 24, 2018, at 10:00 PM. I was in the waiting room for two hours. [REDACTED] and I were given a sandwich and chips; [REDACTED] ate them. After we ate we were able to shower. [REDACTED] and I saw a medic, we got an x-ray done, and they checked our breathing and our heartbeat. We got our pictures taken and received some paperwork. They told us the paperwork was to show me how to call my family, and some other information. After this they took us to our rooms. We share our room with another mother and her child. I do not know my roommate; I have never met her before.

9. Since my arrival, I have not been provided legal information regarding [REDACTED] case and mine. I have been told that I will have a credible fear interview but I have not been provided information about it or told when I will have to go.

10. At Karnes, my bedroom and bathroom are fine. The guards at Karnes told me that I needed to make my bed. [REDACTED] and I have been provided all of our toiletries and other necessities. The food here is better than it was at the border and so far, [REDACTED] and I have been comfortable at Karnes.

I, Esperanza 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]

06/25/18
Date

Certificate of Translation

I, Maria Osornio, certify that I am fluent in English and Spanish and that I read the above declaration to Esperanza C [REDACTED] in Spanish.



Maria Osornio
802 Kentucky Ave
San Antonio, Texas 78201

06/25/18
Date

Exhibit 199

Declaration of
Maria d [REDACTED] A NUMBER [REDACTED]

I, Maria d [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. I was born April 30, 1993. My daughter's name is [REDACTED]. She was born on August 6, 2014 and is 3 years old. My daughter and I are from Mexico.
2. I came to the United States because a gang kidnapped my husband and threatened to kidnap my daughter and me. My family was living in Zacatecas. My husband was kidnapped on June 2. I do not know why. The kidnappers then told my family that they were going to kidnap my daughter and me as well.
3. My daughter and I traveled by bus for 22 hours to Juarez. On June 9 in the early afternoon, we crossed the bridge and requested asylum.
4. An immigration official interviewed us. He told me that we had the right to a lawyer. He gave us some papers.
5. We were placed in a large cell with four mothers and their children. We received noodle soup, burritos, water, juice, and cookies for the children.
6. The cell had no toilet, so the officers led us to the restroom when we needed them. The restroom had toilet paper and soap.
7. The cell had only thin mats and rough blankets that were painful against my skin. My body hurt from the hard floor. We could not sleep because the lights were always on.
8. We never got to shower or wash ourselves. My daughter was always crying because she was dirty.
9. On June 11, they brought more people into the cell and it was very crowded.
10. On June 12, they finally gave us wipes to clean ourselves before they took us to the airport. Then we flew to Karnes. We arrived at midnight and were sent for a medical exam. We received new clothes and personal items, including toothbrushes and toothpaste.

11. As time goes by, my daughter has eaten less and less. She has become much more irritable and cries all the time. She is always uncomfortable. Although she likes the school, she desperately wants to get out of here and keeps asking when we can leave.

12. I had a credible fear interview and have been informed that I will be released. I have been in contact with a friend's husband, who will receive me. I cannot wait to leave.

I, Maria 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]

06/27/18

Date

Certificate of Translation

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



Ana Bueno

6/27/18

Date

Exhibit 200

Declaration of
Glenda D [REDACTED] A NUMBER [REDACTED]

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

1. My date of birth is April 7, 1987. My son's name is [REDACTED]. He was born on July 17, 2016 and is almost two years old. We are from El Salvador.
2. We left El Salvador because my husband and I and my three brothers received death threats from gang members who wanted our livestock and demanded that my brothers join their gang. When we refused, the gang demanded money to leave my brothers alone. We tried to move to a new city, but the gang members found our family and threatened us again. My husband fled to the US in an attempt to keep the rest of the family safe. But the gang continued to threaten to kill us and demand money.
3. My son and I arrived in the United States at Juarez on June 17, 2018. The coyote who led us told us to walk a short distance into the US and immigration officials would find us. We wanted to present ourselves and request asylum.
4. However, immigration was not anywhere and my son and I got lost for about 9 hours. During that time, I fell and cut myself. I was walking on the road and some people came by and offered to help us. Instead, they abducted us and took us to a hotel where we were held hostage for a week. The kidnappers demanded money from my husband for our release. They did not feed us. On June 23, I was able to call my husband who told me to call 911. The police arrived, questioned me about the kidnapping, and then turned my son and I over to immigration officials in El Paso.
5. We arrived at the immigration office at 12pm. They gave us two burritos, a water bottle for me, and juice for the baby. They let me call my husband in California. The immigration officer talked with him and told him where I was.
6. The officials told me that I could pay for an attorney, but did not tell me anything about our rights or give me a list of lawyers. I do not have any money for a lawyer and they did not tell me I could get a lawyer for free.
7. My son and I were held in a very small room with another woman and child, who was about five years old. It had two narrow cots and very little room to move around. The lights were on all the time. It was freezing. We had one rough blanket. My son cried constantly. We were always cold.
8. The room had a toilet that was exposed, with no privacy. There was toilet paper but no soap and nothing to clean ourselves with. We were never offered a shower. The officials gave me diapers but took away the baby wipes I had. I had to wipe my baby with rough toilet paper and he got a rash. I told the officials, and they gave me baby powder and rough towels.

9. The room was not cleaned all week. We had a box for trash but it was never collected.
10. We received food three times a day. It was usually a burrito and juice, but twice we got a cookie instead of a burrito for breakfast. They told us to flush the food down the toilet if we did not like it. They did not offer milk for my baby and he lost weight.
11. On June 26, we were brought to Karnes.
12. My baby will not eat any food except my breast milk. He used to nurse and also eat solid food. He is listless and does not want to play. He clings to me constantly.
13. I am depressed. I just feel flat. And listless. I may have cried all my tears but in any event I don't want to cry more in front of my son because it upsets him so much. The baby doesn't want to play.
14. The journey for us has been very hard. Despite all the difficulties, the worst part by far is watching my baby suffer and knowing that he is forever scarred.

I, Glenda 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.

6/27/18
Date

Certificate of Translation

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



Ana Bueno

6/27/18
Date

Exhibit 201

#21865

Declaration of

Maira L [REDACTED]

A [REDACTED]

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

1. I am a citizen of El Salvador born on October 1, 1992. My son, Leonardo Antonio Escobar-Rivera A 215 805 5325, was born on March 15, 2015. He is three.
2. On January 21, 2018 gang members killed my father in front of me and my sister. We knew the gang members. The gang was robbing my father. He didn't have any money so they killed him.
3. I came here with my sister and her 6-year-old son. We were separated when we were arrested. My sister and her son were released after one day to my uncle. My nephew has medical problems. He had had four surgeries on his eye. The eye is completely white. He also had surgery on the back of his head to relieve water.
4. I left El Salvador on June 4, 2018 traveling with a coyote. We arrived in El Paso on June 14 at 11 pm. We entered the US where we knew there would be immigration trucks. I approached an officer and told him that I came here because I am in danger and can't go back to my country. The immigration officer said that for crossing into the United States illegally they could take my child from me and put me in prison. We were taken into custody. I signed some papers. I was told that these papers were needed to move me to another place. We were then taken to a jail cell.
5. They were eight mothers with about 12 children. The cell was very small. People had to sleep sitting up. The lights were left on all the time. It was freezing. For both me and my son they gave me one cloth blanket to put on the floor and one aluminum blanket to cover us. We were cold all the time. There were children in the cell who never stopped crying. We were there three days. We never left the cell.
6. There was one toilet in the cell which was completely open to view. We got one roll of toilet paper a day. There was a sink but no soap. We drank water from the sink. There was no cup. We used our hands.
7. We weren't given food or water for 24 hours. At 10 am I was given a juice and a small bean burrito. My child was given two small burritos and a juice. The burritos were frozen. At 7 am was the next time we ate. We each had a burrito and two juices.
8. No one talked to me about having a lawyer or my rights or the rights of my son. In fact, for the three days no officer talked to me at all. I was never given a list of lawyers but I was told I could have one when I arrived at Karnes.
9. On the last night in El Paso I was forced to take a shower at 10 pm. They woke me up at 1 am and said I had to shower again. I said I already had one and that my son was sleeping and I didn't want to wake him up. They said wake him up and get in the shower. "Don't be a dirty pig." My son didn't want to

#21866

'take a shower because he was cold. When they weren't looking I just washed his hair and didn't wet his body. We were not given clean clothes. I had no toothbrush or toothpaste. I wasn't given a towel. I just got back into my clothes and returned to the freezing cell.

10. My son kept saying mommy I'm hungry – I'm cold –let's go back home. My son was frightened.
11. One day I asked an officer for a juice for my baby. The officer didn't give it to me and said be grateful you are here. This isn't your country.
12. We had food at 8 pm – a burrito and two juices. At around 9am the following day I was told to wake up because "they were leaving." We were put on a bus with about eight mothers with their children. From my cell I was the only person taken out. We were brought to Karnes.
13. We were on the bus three hours. We were given a toasted cheese sandwich and two juices. Then we got on an airplane with only one other lady and her baby. We were on the plane an hour and a half. Then we got on another airplane and flew for about an hour. This was a regular plane with normal people and me and the other lady and child who were traveling with us.
14. When we arrived, we were put in a mini bus and brought to Karnes. We got here June 17.
15. At Karnes I was asked to sign papers for myself and my child saying that I was asking for asylum. Then my son and I each had a medical exam – x-rays and an examination for contagious rashes. We took a shower in a private shower. We had shampoo, a toothbrush and toothpaste, comb, towel and clean clothes. For the first time since I came here I am allowed to use a telephone.
16. I had my credible fear interview on Monday. I have not had a decision.


I, Maira 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.

06/27/18

Date

#21867
Certificate of Translation

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



Ana Bueno

6/27/18

Date

Exhibit 202

**Declaration of
Jessica C [REDACTED], A NUMBER [REDACTED]**

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

1. My date of birth is February 18, 1985. My daughter's name is [REDACTED] She was born November 5, 2010 on and is 7 years old. My daughter and I are from Honduras.
2. I came to the United States because I was afraid for my life because of threats from gangs.
3. A coyote led my daughter and I to the border. I entered the United States at McAllen on May 28 or 29. After walking for about 30 minutes, we found an immigration truck and presented ourselves.
4. They took us to an office called the "La Yelera" by detainees. We arrived at noon and the officials gave each of us a ham sandwich and juice. We had the same meal again at dinnertime.
5. We were placed in a very crowded room. There were around thirty women and their children. Only one woman did not have a child with her.
6. We were each given an aluminum blanket, but we were still freezing. There was nothing between us and the cold floor. We could not sleep because it was so cold. My daughter would not lie down on the floor. The lights were on all day and night.
7. The room had a toilet. There were three cameras watching us. There was toilet paper, but we did not have toothpaste, toothbrushes, or soap.
8. Nobody at the refrigerator explained our rights. The officials did not tell me that we had a right to an attorney or to a phone call.
9. At midnight, the officials took us to another location called the "La perrera" or doghouse. It's called that because the walls are lined with very small cages and there is no room to walk. Women slept on the floor. The children had small beds in their cells.
10. They separated the men, women, and children. They took my daughter away and told me they would take her to another detention facility because I had to go to court.
11. We were taken to court in a bus. I admitted that I entered the United States illegally but did not know that I was pleading guilty to a crime. They told me that they would deport me back to Honduras and my daughter would remain in the United States with her father in New York.

12. Afterwards, they brought me back to the dog houses. They gave me the phone number where my daughter was being held to use after I was deported. They didn't tell me where my daughter was. They told us we were not allowed to ask questions.
13. Four days later, on June 1, they took me and two other women to the place where the children were held in cages. My daughter was in a cage at the end of the room. I ran to her crying. The officers laughed at me maliciously and called me a crybaby.
14. My daughter told me that she missed me a lot, cried often, and was afraid when we were separated. She would not talk to the officials there. They did give her food.
15. The next day, we took a long bus ride crowded with thirty people to Karnes and arrived in the late afternoon. We were up all night being processed. I was not told about a lawyer or my rights.
16. I had a credible fear interview 12 days after arriving to Karnes, and was denied.

I, Jessica 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]

6/27/18
Date

Certificate of Translation

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



Ana Bueno

6/27/18

Date

Exhibit 203

Declaration of

Karla J [REDACTED] A [REDACTED]

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

1. I am an Honduran citizen born on January 4, 1985. My daughter [REDACTED], A [REDACTED] [REDACTED] is 15 and was born on April 20, 2003.
2. I came to the United States after receiving death threats when I refused to pay gang members to protect my daughter. They burned both of her wrists with a lighter. I was afraid they would rape or kill her.
3. I traveled with my daughter to the Mexican border at Calexico, CA. I presented myself to an immigration officer and asked for asylum. I was told to sit on a bench outside where we sat for seven days. We were not given food or water, nor were we allowed to use the bathroom. We were not given anything to clean ourselves up with.
4. Eventually on what turned out to be the last two days I made a sign asking for water. Some passersby's who were commuters from Mexico gave me water and eventually some food. The man who swept the street let us use the toilet
5. After 7 days, we were taken inside where someone talked with me. We were taken upstairs where we stayed for four days. On the first night we were given one burrito and two juices. They never gave us water. The next day they began to feed us two meals a day – at 8 and 3. The food was a burrito and juice. My daughter would not eat the burrito because it was too spicy so she had only juice.
6. It was very cold. I was given one small sheet for both of us. We slept on the floor on a carpet. My daughter was cold. Then she developed a fever. I didn't tell anyone because they would yell at me. They were angry and yelled at me all the time.
7. After 4 days we were taken at 2am to San Diego by truck. We arrived around 8am. I was given two bags each containing a sandwich with a slice of ham, a bag of carrots and water. We were there about three hours.
8. Then we were taken by truck to an airport. Two people gave us clothes and sandals. We were allowed to go to the restroom and given towels, a comb and deodorant. They said we were being allowed to do this because we were going to an inspection. We each received a chicken sandwich with lettuce. My daughter would not eat the sandwich.
9. We were then brought by plane to San Antonio where we were taken to the Karnes facility. We have been here three days.

10. We were never given a notice of the right to a lawyer, to a bond hearing or anything else legal until we arrived at Karnes.
11. I was not allowed to use the telephone at Calexico or San Diego.
12. The water here at Karnes is over chlorinated. My daughter does not like the food and eats fruit, cereal and beans and rice.
13. I have told USCIS the reasons why I want asylum. I have not had a decision yet.

I, Karla 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]

6-25-2018

Date

Certificate of Translation

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



Yolanda Rodriguez

6/25/18
Date

Exhibit 204

Declaration

MADELIN Y [REDACTED] A# [REDACTED]

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

1. I am Madelin Y [REDACTED] born, October 9, 1999, A# [REDACTED] and my 3-year-old daughter [REDACTED] (A# [REDACTED]), born November 7, 2014, who was not interviewed and who is on my claim. I am from Azucenas, Jalapa, Guatemala.
2. I entered the United States on June 20, 2018 at Sonora. There was an officer in a truck who told us to come to the entry and open the gate for us to cross into the United States. I think because he saw that we were dehydrated and gave us cold water. We were then taken by truck to a place where they took all our belongings and then gave us soup, juice, and cookies. We were held there for four days and given only soup, juice, and cookies. The cookies and juice tasted very bad and we could not eat or drink it. They took declarations from us at this place. They asked my name and took my details. I said that I feared sexual abuse and violence from the father of my child.
3. I arrived at Karnes on June 24, 2018. At lunchtime my daughter became ill from eating the food and she had to go to the bathroom. When we came back they had thrown out my food. They then yelled at me when I asked for more food. They told me, "You can't go into the bathroom." When I replied, "Why not others did," the officer kept yelling at me. Another officer asked her colleague to stop but she did not. This terrified my daughter who had just heard a story about how a border patrolman had killed a migrant woman. I was forced to leave without finishing my meal. My daughter had not eaten her meal either.
4. The food and water is very bad and makes me and my child sick. I went to the doctor or nurse and I was given some medicine and told to return today at 6:30 pm to get more medicine.
5. Today, around 1 p.m. after eating lunch I saw a paper on my bed that said that I had an appointment. But when I came out to go to the appointment one of the guards yelled at me to go back into my room. The guards forced me to go back into my room. I told them I had an obligatory appointment with the psychologist, but they told me I could not leave my room. I missed my appointment. The appointment was very important to me because it was to help me process the trauma of physical, mental, and sexual abuse from the father of my child.
6. I have not seen a lawyer because no one told me that I could see a lawyer. I was not given any information about my procedure or what will happen to my claim. I did fill out a paper yesterday. I understood that this paper was to apply for asylum.


I, Madelin Y [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: [REDACTED]

Date: 6/25/2018

Certificate of Translation

I, Julia Valero, certify that I am fluent in English and Spanish, and that I read the above declaration to Madelin Y [REDACTED] in Spanish.

Julia Valero: 
802 Kentucky House
San Antonio, Texas 78201

Date: 6/25/18

Exhibit 205

Declaration

CLAUDIA A [REDACTED] A# [REDACTED]

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

1. I am Claudia A [REDACTED] born April 10, 1996, A# [REDACTED] and my 3-year-old son [REDACTED] (A# [REDACTED]), born August 27, 2014, who was not interviewed and who is on my claim. I am from La Libertad, El Salvador.
2. I entered the United States on June 14, 2018 by crossing the Rio Grande near Reynosa near El Paso, I am not sure where. I was detained by the river by U.S. officers. They took all of our documents, the shoelaces from our shoes, and all our belongings. This took about three hours. Then they took us to the hielera that was about one and half hours away.
3. At the hielera, I was given some food and water that tasted like chemicals, but I drank the water because I was so thirsty. I was kept there one night. It was very cold and we had no blankets and we had to sleep on the cement floor. It was impossible to sleep. I had to wrap my son in my sweater but he was still cold, even when I wrapped him in my arms too. In the morning they did not give us any food or water, but told us to board a bus.
4. We took a small bus for about 2-hours to the Perrera. When we arrived, we were checked by people who looked like doctors, but we were not given any food or water. At the Perrera, we were kept in fence-cages and given frozen burritos, water, milk, and one cookie. We had to sleep for three nights on very thin mattresses in the cold. The guards would wake up the children at 4 a.m. and telling them to walk around because "these were the rules in the U.S." And that "here we do things the way we say, not like in your own country." They would check us at 3 a.m. each night. At 4 a.m. or 5 a.m. they would sometimes take people out of the cages.
5. I was interviewed by an officer at the Perrera and I told that I was scared to go back to my country. I said I feared threats to my son and to myself from my child's father.
6. I arrived at Karnes 8 days ago on June 18, 2018. My son does not like the food, but he eats it because he has no choice. The food is not the food that we are used to eating.
7. At Karnes I live in a room with another mother and her son and we take turns cleaning our room.
8. Tomorrow, I will have my interview.

I, Claudia 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.

Name: [REDACTED]

Date: 06-25-2018

Certificate of Translation

I, Julia Valero, certify that I am fluent in English and Spanish, and that I read the above declaration to Claudia
A [REDACTED] in Spanish.

Julia Valero:  Date: 06/25/18
802 Kentucky House
San Antonio, Texas 78201

Exhibit 206

Declaration

YANETH C [REDACTED] A# [REDACTED]

I, Yaneth 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 Yaneth C [REDACTED] born May 10, 1990, A# [REDACTED] and my 8-year-old daughter [REDACTED] (A# [REDACTED]), born November 3, 2009, who was not interviewed and who is on my claim. I came with one child and I have another one back in Potrero Sula, Nueva Concepcion in Chalate, El Salvador. The one child in El Salvador is with my mother-law.
2. I arrived at Karnes 15 days ago. I had entered the United States on June 11, 2018 at Santa Teresa bridge. I went through immigration control. When entered at the border and I told the immigration official that I feared returning to El Salvador and then two officers asked me to wait to speak to another officer. I told the interviewing female CBP officer I fear returning to El Salvador. The CBP officer asked why I came to US. I said because I feared returning to El Salvador. The officer began screaming at me and told me that I was a lying because "all El Salvadorans, Hondurans, and Guatemalans come with the same lie." The CBP officer said she did make any more money asking more questions.
3. I was at the border only for one day and then sent to a Perrera for 48-hours where I was kept for 48-hours. There were no showers. I was given soup and water and a mattress to lie on. To go to the bathroom, I had to ring a bell and wait for an officer to come take me, which sometimes took time.
4. I came to Karnes on June 11, 2018. I have gastritis and has seen a nurse and a doctor. They gave her medicine and then asked her to go to pharmacy where she get her free medicine. She goes twice a day to get medicine.
5. I stay at Karnes in a room with one other family. There are six beds in the room. The other family has the mother and daughter. I can make phone calls from my room, but I don't know how much they cost as my husband pays for the phone calls.
6. Last Friday I had my first interview. The interviewer said that the CBP officer had not written down any claim for asylum. I do not know the outcome of their consideration of my asylum claim, but I have never received copies of any papers concerning my interviews since arriving.
7. I was able to speak to an attorney, but I decided to do the interview alone. I was told about the legal advice during orientation and give a piece of paper about RAICES. I thought it was better to do the interview myself as the interviewer used a Spanish interpreter on the telephone and I know my story well. I though my interview went fine. I told the officer that I wanted to claim asylum and why I feared returning to El Salvador. The interview took less than one hour and then the officer read back a summary to me. I have none of the papers that I had signed.
8. I clean my room own with my roommate. The people from GEO come into the room, about three or four times a day. They check day and night. Sunday through Thursday I have to be in my room by 8 pm, Friday through Saturday and other days after 10 pm.
9. While I was at Karnes I attended a town-hall meeting in which they told us that the law was changing but that the changes would not affect my case and that I did not need to speak to my lawyer, unless I wanted to. There were many people in the room so it was hard to hear. The people speaking said they wanted to clarify the situation and calm the gossip that they were going to throw everyone out. Some mothers were crying.

I, Yaneth 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.



6/25/2018
Date

Certificate of Translation

I, Julia Valero, certify that I am fluent in English and Spanish and that I read the above declaration to Yaneth C [REDACTED] in Spanish.

A handwritten signature in cursive script, appearing to read "Julia Valero", written over a horizontal line.

Julia Valero
RAICES
802 Kentucky Ave
San Antonio, Texas 78201

6/25/2018
Date

Exhibit 207

Declaration of
DANIEL M [REDACTED]

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

1. My date of birth is January 3, 1970. My son's name is [REDACTED]. He is 15 years old and was born on January 24, 2003. My son and I are from Honduras.
2. I left Honduras out of fear for my and my son's life. My cousin [REDACTED] was in a store in Santa Barbara where we are from. A young man, [REDACTED] entered the store with a gun, and tried to force him to drink with him, use cocaine, and sell cocaine. Later that same day, [REDACTED] followed my cousin as he was going home and murdered him in the town square. He shot him dead in the plaza, which is in the area where I live. I witnessed this happening with my son and my older brother. I called 911, but the police did not come. My brother made a police report and the police finally came about six hours later. The police arrested [REDACTED] and put him jail for about a year and a half. Then [REDACTED] posted 150,000 lempiras bail because he is part of an organized crime group. When [REDACTED] was freed, he came to my house with a pistol and threatened to kill me and my son, [REDACTED]. We were afraid to leave the house. Eight days later, we left for the United States.
3. [REDACTED] and I came to the United States. We were picked up by the Border Patrol and taken to a detention facility in El Paso, Texas, on about April 29, 2018. I felt traumatized and afraid. I just wanted to keep my son safe and with me.
4. In El Paso, we had to share a cell with 12 others. There were seven fathers and seven sons altogether in one room and it was very crowded. The temperature was freezing, and we were shivering. We had food and water, but very little – just a small burrito for each meal and one water bottle that we could fill at the sink in the room. There was a large plastic "canoe-like" structure to sleep in, but there were not enough for everyone, so we slept on the bare floor for a few nights. These canoes were very narrow and when we finally got one we had to share it by huddling together. We did not have blankets until some of the others left and we had to use the dirty blankets left behind. We stayed here for six days. We never left this room and did not know if it was day or night.
5. After six days, we were taken to a facility in New Mexico for one night. A male officer told my son [REDACTED] in Spanish that if he wanted to stay in the U.S., he would have to go into the military and fight in a war. He made my son agree that he would do that, and my son said he would be willing. I worried that [REDACTED] was going to be taken from me.

6. We then returned to the same facility in El Paso. The conditions in El Paso were the same as before and we had to share a bed again for two nights. Then we were transferred to Berks.
7. At Berks, we were not provided with access to a lawyer. My son and I had a credible fear interview over the phone with an officer without talking to a lawyer first. I was very traumatized by our journey and was not able to tell the whole story of why we had come to the United States. We received a negative credible fear decision.
8. We then had a hearing with an Immigration Judge over a video. I told the judge the story of my cousin who had been killed before our very eyes and the threats we had received. He asked me why I had not told these facts in the first credible fear interview and I explained how traumatized I had been. However, he did not change the negative credible fear decision.
9. My son and I did not meet with an attorney before our credible fear interview. A general group meeting was held at Berks, and we attended that, but we never had a one-on-one meeting with a lawyer because by the time we were notified of the meeting, the time was up.
10. I did not meet with an attorney before I saw the Immigration Judge. [REDACTED] [REDACTED] from Aldea, a lawyer, was present for the hearing, but I had never met her before and she does not speak Spanish. I do not speak any English. After the hearing, I was able to talk with [REDACTED] through an interpreter. She is appealing the decision for us.
11. We have been held in Berks since approximately May 6, 2018.


I, DANIEL 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 28, 2018

Date

CERTIFICATE OF TRANSLATION

I, MATTHEW A. CAMPANELLA, hereby certify that I am
proficient in both English and Spanish and am competent to translate the attached declaration
from English to Spanish. I further certify that I have translated the attached declaration and read
it back in its entirety in Spanish to the declarant, Daniel N 
to the best of my abilities.


Signature of Translator

MATTHEW A. CAMPANELLA
Printed Name of Translator

479 Naples St., San Francisco, CA 94112
Address of Translator



Exhibit 208

Declaration of

GABRIEL G [REDACTED]

I, GABRIEL 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 March 23, 1986. My son's name is [REDACTED] He is seven (7) years old and he was born on July 23, 2010. My son and I are from Guatemala.
2. My family and I are Catholic and we practice our religion. I am the music minister in my Church, and I sing. I was threatened by a group of 15 Evangelical Christians, who threatened to kill me if I did not join their religion and stop practicing mine. The second time, this same group told me that if I did not stop my music ministry at my Church, they would kill me and my son. I knew that I have the right to participate in the religion of my choice and that it was not their decision to tell me how to practice my religion. There is no authority in my town to report to them, so I went to another town, Varias, where I reported the threats to the police, but they did not do anything to protect me. Three days later, I took my young son and left the country.
3. We crossed a dry river bed into the United States, and I believe this was in Texas, but I am not sure. We approached a Border Patrol car on approximately June 10, 2018 and told them that we were seeking refuge in the United States and were afraid to return home. We were taken to a Border Patrol facility near where we were picked up, but I do not know the name of the place or where it was. We were held in a cell with about 10 adults and 10 children for five days. It was so crowded that people had to sleep around the toilet. We used dirty blankets that were left behind by others and slept on the bare floor. They never turned the lights off for the entire five days so we did not know if was day or night.
4. The food at the Border Patrol facility was very inadequate. We were given a small burrito each two or three times per day and a juice box. The officers verbally abused us and called us pigs ("marranos") when they gave us our food. No water was provided.
5. The temperature was very cold. We were shivering the whole time we were held there.
6. We had a toilet and toilet paper, but the sink barely worked. It only dripped water. Twenty people had to share the one toilet.
7. After five days, my son and I were sent to the detention center in Berks County, PA. I have no complaints about the conditions or treatment at the Berks detention center.

8. We have been here since June 19, 2018. I have had two credible fear interviews. The first one was with a legal representative who translated from our primary language, Qanjobal, but we did not have a lawyer. The second interview was on June 26, 2018, and we had a lawyer, [REDACTED] from Aldea, with us. We are waiting for a decision.

I, GABRIEL 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]

06/29/2018
Date:

CERTIFICATE OF TRANSLATION

I, Matthew A. Campanella, hereby certify that I am proficient in both English and Spanish and am competent to translate the attached declaration from English to Spanish. I further certify that I have translated the attached declaration and read it back in its entirety in Spanish to the declarant, Gabriel G [REDACTED] to the best of my abilities.


Signature of Translator

06/29/18

Matthew A. Campanella
Printed Name of Translator

479 Naples Street, San Francisco, CA 94112
Address of Translator



Exhibit 209

Declaration of
MATEO A [REDACTED]

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

1. I was born on July 25, 1990. My son's name is [REDACTED]. He is six (6) years old and he was born on December 11, 2011. My son and I are from Guatemala. Our primary language is Qanjobal. I speak Spanish as a second language and do not read it. My son does not speak any Spanish.
2. We left Guatemala at the end of May 2018. We arrived at the U.S.- Mexico border in the middle of June 2018.
3. We met two U.S. border patrol on the Mexico side of a fence at the border near Juarez. They were wearing green uniforms and were in two different vehicles. We had not crossed into the United States. The border patrol approached us on the Mexican side and asked me if we wanted to cross. I said that we were seeking help and could not cross here because the fence is too high. They took our shoelaces, belts, papers, and money and put us in one of their vehicles. They used a key and opened a gate to the U.S. side and drove us through. They took us to a detention center, but I do not know where it was located. This was in approximately the middle of June.
4. We stayed at the detention center for about 15 days. We slept in bunk beds with 10 other people in a small cell. We were crowded. We had no blankets.
5. We had very little food to eat. Every day we were given a small burrito and juice box for lunch and dinner, but no breakfast. We had some water and a small package of crackers.
6. The temperature was freezing cold and we were shivering because we had no blankets or sweatshirts.
7. The lights were on all day and night. We never knew if it was daytime or nighttime.
8. After 15 days, we were brought to Berks detention center. We arrived at 1:00 a.m. today, June 28, 2018.
9. I received notice of legal services that are available to me, but I cannot read. I have not called or seen a lawyer yet.

I, MATEO 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]

06/29/18
Date

Certificate of Translation

I, Matthew A. Campanella, certify that I am fluent in English and Spanish and that I read the above declaration to Mateo A [REDACTED] in Spanish.



Matthew A. Campanella
479 Naples Street
San Francisco, CA 94112
213-479-3066

06/29/18
Date

Exhibit 210

Declaration of

Daniel H [REDACTED]

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

1. My date of birth is July 1, 1985. My son's name is [REDACTED] He is 3 years old and he was born on September 19, 2014 [REDACTED] My son and I are from Honduras.
2. I left Honduras because I received threats from a gang.
3. We were detained at the border about six days ago. I believe that it was on or about June 23, 2018. We were taken to a place for a couple of hours. After that, we were brought to a place for two days. I am not sure where the place was, but it was about 30 minutes by bus from the border. I was not explained my right to appear before an immigration judge to review my bond situation or release. I was given some papers, but I cannot read or write, so I am not quite sure what they say.
4. At the place where we were detained for two days, we were only given juice, water, and burritos. We were not given any other type of food.
5. As far as I know, there was not access to a list of lawyers who I could call at the facility where I was for two days.
6. We could not do anything there. We could not leave, we were just in the room the entire time. It was small so we could not even really move.
7. At the place where I stayed for two days, it was freezing. It was so cold that we covered ourselves with aluminum, which we felt helped us stay slightly warmer. It was even colder because we had to sleep on the floor. A few people slept on mats, but most of us slept on the floor without a mat. Everyone was jammed in together, almost touching each other. I was cold and [REDACTED] was very cold.
8. At the place where I stayed for two days, the lights in the place did not go off all night. We did not know if it was daytime or nighttime [REDACTED] could not sleep because it was not dark.
9. At the place where I was held for two days, we were not given a shower.
10. After two days, my son and I were taken to Berks. We arrived in the middle of the night. Here, I have no complaints.
11. Here at Berks, they told me about my rights and my son's rights but I do not understand.

12. I, Daniel 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.

June 29, 2018
Date

I, Sarah Baranik, certify that I am fluent in English and Spanish and that I read the above declaration to Daniel
H [REDACTED] in Spanish.



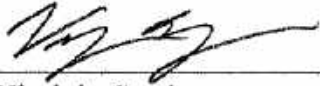
Sarah Baranik
1030 E Lancaster Avenue
Bryn Mawr, PA 19010

June 29, 2018

Date

Certificate of Translation

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



Virginia Corrigan
Youth Law Center
823 Folsom Street, Suite 700
San Francisco, CA 94017

6/27/18

Date

Exhibit 211

Declaration of

Felipe A [REDACTED]

I, Felipe 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 September 21, 1980. My son's name is [REDACTED] We call him [REDACTED] He is 9 years old and he was born on October 30, 2008 [REDACTED] My son and I are from Guatemala.
2. I left Guatemala because I received death threats. I came here to protect myself and my son, [REDACTED]
3. We presented ourselves at the border in Ciudad Juarez several weeks ago. I am not sure what date it was. We were taken to a place for 2-3 hours and then we were taken to another facility, where we stayed for 5-6 days.
4. At the facility where we stayed 5-6 days, the border control agents asked us why we came. I was afraid to respond because I do not speak English. Although I speak some Spanish, my native language is Kiche and I did not want to make any errors in Spanish and have it be misunderstood. They asked me to sign something and I was afraid to sign it because I do not read or write. I asked what the document was and I was told it was a deportation order, which mean that I would be deported and my son would stay here in the USA. My son and I started to cry because I did not want to be separated from him. I told my son that I was not going to sign the paper. I did not sign any paper that they gave me.
5. At the facility where we spent 5-6 days, we were given only burritos and juice. The children would get little cookies too. However, in general, all we were given was burritos, three times a day. We were not given other foods to eat.
6. It was very, very cold at the facility. I gave my son my jacket and also my blanket to try and keep him warm. The place was over-crowded and there were not enough mats to sleep on. Sometimes people had to share a mat on the floor or sleep on only one-half of the mat so at least their back could be off the floor, which was very cold. Some people just slept on the floor.
7. I had to give my son medicine for his throat because the cold was impacting his throat.
8. At the facility where we stayed for 5-6 days, we did not know what time it was because the lights were on all the time. No one knew whether it was day or night. The lights are bothersome, but we can do nothing. The children are accustomed to sleeping without lights, so it is hard for the children to sleep.
9. We all pitched in to keep the bathrooms clean at the facility. We were only given 2-3 minutes to shower.
10. I was not given access to a phone. Supposedly they tried to call my friend here but the call did not work. At the first facility I was at for 5-6 days, I was not told of my rights.
11. After 5-6 days, my son and I were taken to Berks. At Berks, I was given some papers but I do not know what the papers say.

12. My son and I have been at Berks for 14 days. I do not know when we will be released.
13. Here, we clean the bathroom, but I feel like we should contribute since the people are giving us food and place to sleep.

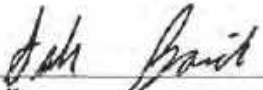
I, Felipe A. [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

[REDACTED]

Date

Certificate of Translation

I, Sarah Baranik, certify that I am fluent in English and Spanish and that I read the above declaration to Felipe
A [REDACTED] in Spanish.



Sarah Baranik
1030 E Lancaster Ave
Bryn-Mawr PA 19010

June 29, 2018
Date

Exhibit 213

Declaration of
MAUDIN L [REDACTED]

I, Maudin L [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 22 March 1978. My son/daughter's name is [REDACTED]
[REDACTED] He is 16 years old and he was born on 28 February 2002. My son and I are from Guatemala.
2. We left Guatemala after suffering threats of violence from extortionists. I have told 4 people at the Berks facility about the threats, a staff member, a psychologist, an officer and an immigration official on the phone.
3. We presented ourselves at the border on or about June 22. We entered through Mexicali and were held in a facility in California.
4. Water and food was available but we had no access to showers, it was overcrowded and we had to sleep on the floor. Everyone slept on the floor. There was no problem with the temperature and medical assistance was available.
5. After three days, my son and I were taken to the Berks facility, arriving June 25.
6. Conditions at Berks are satisfactory. The staff shines a flashlight in our room when we are sleeping.
7. My son and I have been at the current facility for about 4 days.

I, Maudin 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.

6-28-0018
June 28, 2018

Certificate of Translation

I, Fabiola Castellanos-Gaspar, certify that I am fluent in English and Spanish and that I read the above declaration to Maudin L [REDACTED] in Spanish.



Fabiola Castellanos-Gaspar
Welcoming Center for New Pennsylvanians
1617 JFK Blvd.
Suite 555
Philadelphia, PA 19103

June 28, 2018

Exhibit 214

Declaration of

Edwin G [REDACTED]

I, **Eduin 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 August 31, 1992. My son's name is [REDACTED] He is 7 years old and he was born on April 27, 2011. My son and I are from Honduras.
2. We left Honduras because we were afraid. I received death threats. I was riding on my motorcycle with my son, [REDACTED] On May 9th, we were stopped by gang members who wanted the motorcycle, but I refused and then I left. Three days later, on May 12th, I received an anonymous letter underneath the door of my house. My wife read it, and told me that it said they were either going to kill me or my son. I had thought about leaving before, but when they threatened [REDACTED] that is when I finally decided to leave. We left Honduras on May 19, 2018.
3. We presented ourselves at the border about 2:00am. I believe that it was on or about June 21, 2018. We were taken to an unknown facility.
4. At the first facility, we just stayed from 2:00am until 7:00am. We didn't have time to eat or shower. We were transferred to another facility about 20 minutes away.
5. We were at this facility for about three days, until June 25, 2018.
6. At this facility, this facility was terrible. We ate three burritos per day, we never got any healthy food.
7. The temperature at this facility was freezing. We only had aluminum blankets to warm ourselves.
8. They never turned the lights off. The lights were on day and night.
9. The hygiene at the facility was terrible. We stayed in a large room that was overcrowded, with about 22 people (11 fathers with their children). The toilet was in the same room where we were eating.
10. After three days, my son and I were taken to the original center where we were first held, and we stayed there for two more days.
11. At the facility, the conditions were just the same. We had the same unhealthy food, overcrowding, and temperature issues. My son, [REDACTED] never got sick, but one child was taken to the hospital. I do not know why.
12. At both facilities, we were never given a list of our rights or a list of free attorneys. At the second facility, we had a brief interview to take biographical information. We were not told that we had access to attorneys or legal services, and were not given access to a telephone to call attorneys. At this interview, I tried to tell the officer that I was afraid to return to Honduras, but he told me that I would be

able to share my story once I got to the next place. I was allowed to speak with my brother-in-law in New York, who is willing to take in me and [REDACTED] if we are released.


13. My son and I were taken out of that facility on June 27, 2018, and taken to Berks Family Detention Center. We traveled by plane.
14. My son and I have been at Berks for about 2 days. I have not received an interview with an officer here yet, but they told me that I would have one within 48 hours of arriving.
15. The situation at Berks is much better than the situation at the other two facilities. I have been given a list in Spanish of free legal counsel, as well as an explanation of my rights, as well as my son's rights.
16. At Berks, the food is very good, and the temperature is moderate. I know we have access to medical treatment—I have gotten cough medicine since I arrived. Our children have 2 and a half hours of school every day, in Spanish. I have met with two attorneys, who explained my rights to me and what will happen. I am still waiting for my credible fear interview.

I, Eduin 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]

29 de Junio
Date

Certificate of Translation

I, CHRISTINE FLOWERS, certify that I am fluent in English and Spanish and that I read the above declaration to  in Spanish.

Christine Flowers

Name:

Organization:

Address:

6-29-18

Date

Exhibit 215

Declaration of

VICTOR V [REDACTED]

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

1. My date of birth is DECEMBER 13, 1990. My son's name is [REDACTED]. He is NINE years old and he was born on NOVEMBER 2, 2008. My son and I are from HONDURAS.
2. We left because the local narcotics traffickers started recruiting him. The majority of the people in that area work for the local traffickers. I returned from work as a fisherman to my mother's house approximately on May 20, 2018. There were three men there. My mom was afraid, they had already spoken to her by the time I got there. She told me that these men were looking for me. The men told her that I could do move drugs for them through the water because I am a fisherman. At the moment I told them I would think about it because those were dangerous men but I had no intention of working for them. They told me that they would not tell me when they would come back, but that it would be soon and that they wanted an answer.

After that, I gathered some of my belongings and went to my wife's house who I have a three year old with. I told her that it would be best if I left with my older son because I was afraid that the gang members would take him while he was on his way to school. My boss gave me a small bonus so that I could make the journey.

3. We presented ourselves at the border around Juarez, on or about June 20, 2018. We were taken to a detention house. The facility personnel spoke Spanish to me. Upon arrival we were given water and a cracker. The first question I was asked was if I was afraid of going back to my country. I told them that I was and explained to them the reason I left. They took my fingerprints and had me sign. Then they told me that I would wait there until they could send me to Berks.

Then I was placed in the detention room. I was in the room with 10-12 people. We were given foam mattresses and nylon blankets. We slept on the floor but on top of the mattresses.

4. We were given burritos, juice, crackers, and water. We were given food three times per day.
5. The temperature was fine.
6. We had plenty of light and windows. We were given towels and soap to shower. We were not given toothpaste or toothbrushes. We had toilet paper.
7. After three days, my son, and I arrived at the BERKS DETENTION FACILITY.
8. We arrived to Berks at approximately 3 am. We were taken in, they took our picture, gave us toiletries, toothbrushes, dinner, a bath, and then a room to sleep in.

9. The first person that told me about my ability to call a lawyer was another resident. He told me what number to call, so I did that and got a hold of an attorney. I spoke with the attorney, she told me that she would help me get a hearing with the judge. She explained to me that I would have to explain my situation to the judge.

I had my first appointment with the Judge scheduled for June 27, 2018. The judge called me at Berks with an interpreter on June 27, 2018 at 10:30 AM. My lawyer was not with me during the call because she was not informed about the appointment. So I spoke to the Judge by myself. The Judge asked me why I left the country. I started telling him my story. He cut me off and asked if my lawyer was present. I told him "no." He asked if an officer from ICE was with me, I told him "no." He asked me if I was okay to continue the hearing by myself, I said "yes." So a Berks employee brings me a form to sign saying that it was okay for me to talk to the Judge without a lawyer present. The form that I signed was in English. The Judge's interpreter via the phone translated the form for me. I signed the form. Then we continued the hearing. After another 30 minutes of talking the Judge said that they cannot continue the hearing and to not sign the document. The Judge did not tell me why he was ending the hearing. He just told me to talk to my lawyer.

My lawyer said she spoke with the Judge and we are now waiting for another hearing to be scheduled.

10. My son and I have been in this Facility (Berks) for FIVE days. We are planning to live in Virginia because we have friends of the family there. My son can go to school and I would work to support us and my family.

I recently spoke with my mom and she told me that I should not come back because they are looking for me. The same three men have come back to my mom's house three times already looking for me. My mom tells them that I not there. They tell her that I am a liar and if I go back they will make me pay. I can't go to the police either because those same men pay off the police. In fact, I have a friend that went to the police for help and the police shot and killed him. I am very afraid of the police in Honduras.

11. At the moment I do not know the status of my case.

I, VICTOR 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]

JUNO: 28.6/28/2018
Date

Certificate of Translation

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



JORGE PESOK PICHARDO

ORRICK

1152 15th Street N.W.

Washington, D.C. 20005

June 28, 2018

Date

Exhibit 216

Declaration of

GUSTAVO A [REDACTED]

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

1. My date of birth is DECEMBER 8, 1990. My daughter's name is [REDACTED]. She is THREE YEARS OLD and she was born on MARCH 12, 2015. My daughter and I are from GUATEMALA.
2. I left Guatemala out of fear for daughter's life. My 16 year old sister was "taken" by [REDACTED] a 24 year old man, and is being forced to live with him. I confronted the [REDACTED] who physically assaulted me, and threatened to kill my daughter. After that I sold all my belongings in Guatemala to gather enough money to come to the U.S. in search of safety for my daughter.
3. My daughter and I presented ourselves at the border at or about Friday, May 18, 2018. We were taken to a detention facility in Sante Teresa, New Mexico. I surrendered myself at approximately 2 pm. I was questioned in Spanish, they took all the documents I was carrying. Both our pictures were taken. Then we were taken to a small room with four other people and a bench and plastic beds to sleep on without blankets. They were there for approximately 4 hours. During this time they were only given a couple of ounces of water each and his daughter received a couple of ounces of milk and one cracker.

After that they were transported to another unknown detention facility in New Mexico to continue to process him. There he was fingerprinted. He was at this facility for two days. He and his daughter were held in small approximately 7' x 7' room, with ten other individuals. The room was locked. The room did not have windows. The only furniture was a bench. We all slept in the floor and cuddled up to each other for warmth.

4. The New Mexico facility "treated us like dogs." We were given cold hot dog like food to eat and water at approximately 8 am and at 3 pm—only two meals per day. My daughter did not receive any special accommodations or food. She did not receive any diapers even when she urinated herself because she was so cold. My daughter would not eat. I complained about her wet diapers and that she would not eat and they did not do anything to help us.
5. After 2 days at the New Mexico facility my daughter and I were taken to the Berks Detention Facility where we have been held for 38 days.
6. When we arrived at Berks, approximately at 10 pm. During the intake process we were told that facility employees do not work for immigration so he should speak freely and not to be afraid. We were given dinner that night, a shower, and showed to our room where we slept for the night. The next day we were processed through medical where I received treatment for leg wounds he had.
7. After about two days of being at the Berks Facility I was given information regarding the legal process I would go through. They explained that I am here because I am seeking asylum. They explained to me

that I would need to have an asylum interview which occurred after approximately eight days of my arrival. They explained that if I qualified for asylum, they would release me.

Workers from the facility did not inform me of my ability to seek legal counsel. I learned about that from another resident of the facility. I then spoke with an attorney during their regular visits to the facility.

8. I was told yesterday that I would be deported. I do not have any more information other than being told that I am going to be deported.

I, GUSTAVO 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 28, 2018

Date

Certificate of Translation

I, Jorge Pesok-Pichardo, certify that I am fluent in English and Spanish and that I read the above declaration to GUSTAVO A [REDACTED] in Spanish.



Jorge Pesok-Pichardo
Orrick

152 15th Street N.W.
Washington, D.C. 20017

June 28, 2018

Date

Exhibit 217

Declaration of
Romeo N [REDACTED]

I, Romeo N [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 May 15, 1994. My daughter's name is [REDACTED] She is two years old and she was born on October 17, 2015. My daughter and I are from Guatemala.
2. My daughter and I had to leave Guatemala because individuals threatened my daughter and me with harm.
3. After a difficult journey through Mexico, we entered the United States. We were apprehended in Santa Teresa, Texas on June 20, 2018. We were then detained at a facility in Santa Teresa, Texas.
4. The night we arrived at the detention site, my daughter told me she was hungry. The officials there only gave me cookies and water for her. We did not receive dinner. My daughter found the cookie too sweet and did not eat much. On the next day, we did receive more food. We were given a burrito at each meal and water and juice were available. The food was not sufficient. We were still hungry. My daughter found the burrito to be too spicy and did not eat much. There were no other food options provided for my two-year-old daughter.
5. I was happy that I was allowed to be together with my daughter, we were not separated. However, our sleeping conditions were not comfortable. We were in a shared room with four other persons. We had space to lie down but there were no cushions or mattresses for us to sleep on. We had to sleep on the ground. We did not have pillows. We only had thin blankets. My two-year-old daughter also had to sleep on the hard floor without a cushion, mattress, or pillow.
6. We were not provided any written materials regarding our rights at the Santa Teresa site.
7. After three days, my daughter and I were taken to another place, Berks Family Detention facility, where we have been for almost seven days.
8. At Berks, we finally have our own beds to sleep on. We have been allowed to stay together throughout our detention here.
9. I do not recall receiving any information from the Berks officials about the possibility for a bond or any other conditions I must meet for the release of my daughter and me. I have met with a lawyer at Berks that explained possibilities for relief.

10. My attorney is exploring legal options for me. I have expressed our fear to return to Guatemala to officials at this site and also my attorney. I am unaware of any pending interviews or hearings.

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

06/29/2018

Date

Certificate of Translation

I, Steven Larin, certify that I am fluent in English and Spanish and that I read the above declaration to Romeo N [REDACTED] in Spanish.



Steven Larin
Nationalities Service Center
1216 Arch St., 4th Floor
Philadelphia, PA 19107
[REDACTED]

06/29/2018
Date

Exhibit 218

Declaration of

Wilder D [REDACTED]

I, **Wilder 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 June 19, 1993. My daughter's name is [REDACTED] She is 6 years old and she was born on September 7, 2011. My daughter and I are from Guatemala.
2. [REDACTED] and I left Guatemala on June 7, 2018. A car ran over [REDACTED] foot, and I borrowed money to help pay for her medical treatment. Now, the person who I borrowed money from wants to kill me, so I took [REDACTED] and traveled from Guatemala through Mexico and crossed into the United States on June 20, 2018.
3. We presented ourselves at the border at about 7:30 pm. I believe that it was on June 20, 2018. We were taken to a facility. I do not know the name of the facility.
4. I was able to call my cousins who live in Georgia, and tell them that I made it safely.
5. The food at the facility was pretty bad. We were fed twice per day, but it was not a lot of food. We each got a small burrito, some cookies, and water. [REDACTED] was hungry. They would give us water with meals, but we had to ask if we wanted more water.
6. We slept on the floor on mats. There were four of us in the room, which was about 3 meters by 5 meters. The lights were turned on all the time and there were no windows, so I'm not sure exactly how much time passed there, but I think it was around two or three days.
7. During the time we were at the first facility, we got to shower once. There wasn't a shower in the facility, so [REDACTED] and I were driven 45 minutes to another place where we could take a shower.
8. [REDACTED] did not have access to any toys at the first facility, and she didn't go to school. We just sat in our room. There were no other children her age there, just one who was younger, so there wasn't a whole lot for her to do. We were not allowed to go outside, so we just sat in our room all day.
9. At the end of our time at the first facility, we had a short interview where they asked me basic biographic information and why I came to the United States. The interview was in Spanish, even though my first language is Mam. They did not ask me what my first language was.
10. After four days, [REDACTED] and I were taken to the Berks Family Detention Center, where we have been held for the past 6 days, since June 24, 2018.
11. We arrived at Berks at 3:30am, and we were vaccinated. I had my vaccination records with me, and they vaccinated me and [REDACTED] The employees at Berks gave me a packet of papers with information about

my and [REDACTED] rights, which they also explained to me. However, it was so late in the night that I do not remember a whole lot from when I first arrived. After this, [REDACTED] and I went to our room to go to sleep.

12. [REDACTED] got lice when we were traveling through Mexico, and she was given a treatment on her hair once we arrived at Berks.
13. At Berks, we have our own room, and eat three times per day. [REDACTED] also has access to extra things, like cereal and bananas. We can always shower, and we have access to water. We sleep in a bed, and we are allowed to go outside. [REDACTED] has school every day from 9am until 11:45am.
14. Since we arrived at Berks, I have met with an attorney twice, once for 45 minutes and once for 20 minutes. I began my Credible Fear Interview on June 27, and it lasted for a little more than an hour. The Mam interpreter had to go though, so we resumed the interview on the morning of June 29. Some employees of the facility told me that we would finish my interview in an hour when I was at the doctor this morning. We started at 8:30 am, and finished around noon. An attorney was present on the phone. [REDACTED] was asleep in our room for the first part, but she joined around 11. They asked her if she wanted to speak, and she told them that she wanted me to speak for her. They asked me if I wanted to separate our claims, and I told them that I wanted to keep them together. At the end of the interview, they told me to wait for my result for the Credible Fear Interview.

I, Wilder 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]

24 Junio 2018
Date

Certificate of Translation

I, Amina Malik, certify that I am fluent in English and Spanish and that I read the above declaration to Wilder
D [REDACTED] in Spanish.

A handwritten signature in black ink, consisting of a large, stylized 'A' followed by a horizontal line and a loop.

Amina Malik

29 June 2018

Date