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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

JENNY LISETTE FLORES, *et al.*,

Plaintiffs,

- vs -

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

Defendants.

) Case No. CV 85-4544 DMG (AGRx)

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) EXHIBITS IN SUPPORT OF  
) PLAINTIFFS' RESPONSE TO  
) DEFENDANTS' FIRST JUVENILE  
) COORDINATOR REPORTS  
) VOLUME 1 OF 12 [REDACTED  
) VERSION OF DOCUMENT  
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# Exhibit 1

## DECLARATION OF PETER SCHEY

I, Peter Schey, depose and say:

1. I serve with Carlos Holguin as class counsel in the case entitled Flores v. Sessions, Case No. CV 85-4544 DMG (AGRx).

2. According to monthly data provided to Plaintiffs' class counsel by defendants, Casa Padre (operated by Southwest Key) is the largest facility operated by Defendants for unaccompanied children and currently holds approximately 900 class members for weeks or months. Based on a site inspection and class member interviews conducted pursuant to Paragraphs 32 and 33 of the Flores Agreement by 26 volunteer lawyers on July 12 and 13, 2018, and the statements of facility staff and numerous class members, class counsel is informed and believes that the facility is fully secure in violation of Paragraph 6 (licensed group home shall be "non-secure"). Class counsel has informed Defendants that they wish to conduct further site inspections and class member interviews at other facilities where the Office of Refugee Resettlement (ORR) houses detained unaccompanied minors (including recently separated minors) between July 23 and August 3, 2018. However, monitoring is always ongoing and Plaintiffs believe the current material breaches are so serious and jeopardizing class members' health, safety and the exercise of their rights under the Agreement, that the status conference scheduled for July 27, 2018, should not be postponed.

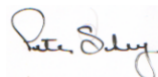
3. Per policy instruction, unaccompanied children are “provided the opportunity to make a minimum of two telephone calls per week (10 minutes each) to family members and/or sponsors ...” Children Entering the United States Unaccompanied: Section 3.3.10 Telephone Calls, Visitation, and Mail (Jan. 28, 2015). Interviews with numerous separated class members at Casa Padre on July 12 and 13, 2018, indicate many are unable to contact their parents because they do not know where they are detained by Defendants, and many others are permitted only one 10 minute telephone call a week.

4. Under Paragraph 32, class counsel has the right to interview class members. Class counsel seek and obtain the consent of parents at a family detention facilities prior to interviewing class member children. By separating class members from their parents without a plan to maintain parental decision-making, Defendants made class members’ parents unavailable to class counsel to seek consent to interview their children. Despite numerous requests over the past two weeks to meet and confer about being provided the names and locations of separated class members’ parents, Defendants have declined, making obtaining consent for class member interviews under Paragraph 32 almost impossible. Because of the urgency of the situation caused by the family separations, and under objection, class counsel commenced interviews with separated class members at Casa Padre on July 12 and 13, 2018.

5. The over 200 declarations being filed with Plaintiffs' Memorandum as exhibits were gathered during monitoring inspections and class member interviews conducted in June and July 2018 at various CBP stations in several states and all three ICE family detention centers. Plaintiffs are submitting as exhibits all declarations provided by class members or parents.

6. In a small number of cases, in different ways, class members or their parents commend Defendants for their treatment with regards edible food, clean drinking water, mats to sleep on, blankets, toiletries, soap, cells not being overcrowded, being told of their rights, or being treated with respect and dignity. However, the overwhelming majority of class members and parents interviewed in June and July 2018 -- probably about 90% -- provide testimony that is shocking and atrocious. It amounts to a picture not just of forcibly separating thousands of children from their parents, but on a much broader level of a program of forced hunger, forced thirst, forced sleep deprivation, coupled with routine insults, threats, and physical assault, that leave class member children crying, trembling, hungry, thirsty, sleepless, sick, and terrified. Mental health experts agree that many class members will never fully recover from the terror and humiliation they experienced in Defendants' custody.

Executed this 15th day of July, 2018, in Oak View, California.



Peter Schey

## Exhibit 2



## List of Licensed Group Homes and Homeless Youth Centers

(last updated on July 12, 2018)

In July 2018, a small group of volunteers contacted licensed group homes and homeless youth centers across the country to identify locations that may have bed space for unaccompanied minors. We identified cities with large populations of Central American immigrants, and researched or called each individual center. The following questions were asked and captured during the conversation. This list is not exhaustive but is a first step is compiling a list of homes that unaccompanied minors may transition to.

1. Homeless shelter/licensed group home address, phone number. Include any info on the shelter- what's nearby, a picture, types of activities, special info, languages spoken, etc.
2. Specific POC, email and phone number of person that handles intake of unaccompanied minors
3. Any kind of demographic info on the shelter that can help an unaccompanied minor choose a shelter to go to.
  - Are there restrictions on the # of boys vs. the # of girls?
  - Is there an age restriction at the shelter?
  - Are undocumented children OK? They may be applying for political asylum or special immigrant juvenile status but still need a shelter in the meantime.
4. Approx. # of total beds in the shelter in total
5. Approx. # of total beds available currently vs. # available next week July 16th, July 23rd, 30th, August 6th, August 13th?

State	Facility	Website	POC	Conditions	Total # of Beds	# Beds Avail	Spanish Speaking
MN	The Bridge for Youth 1111 West 22nd Street Minneapolis, MN 55405	<a href="http://www.bridgeforyouth.org/">http://www.bridgeforyouth.org/</a>		Beds are first come first serve- call first (612) 230-6601 <ul style="list-style-type: none"> <li>- Youth ages 10-17</li> <li>- Do an assessment with the youth and go over history with the youth</li> <li>- Would still face to face meet with them and see if</li> </ul>			Y

				you can provide			
GA	CARRIE STEELE PITTS HOME, INC. 667 Fairburn Road Atlanta, GA 30331	<a href="http://csph.org/join-us/">http://csph.org/join-us/</a>	<b>Evelyn A. Lavizzo PhD, Executive Director</b> <b>404-691-9974</b>	12-18 yr olds. The residential care program at the Home includes basic daily care up to 20 youth; therapeutic programming to meet the increased needs of adolescents in foster care, a fitness/nutrition program and adaptive supportive educational services. The youth that live at CSPH are faced with greater psychological, educational, emotional and health challenges than in past years.			
IL	Mercy Home for Boys & Girls			Admission process- unable to provide bed numbers			
GA	Families First 80 Joseph E. Lowery Boulevard, NW Atlanta, GA 30314-3421	<a href="https://www.familiesfirst.org/">https://www.familiesfirst.org/</a>	404-853-2800	Each cooperative can serve 6-7 teens at one time 2 Cooperatives Female and Male Ages 13-20 Weekly group counseling sessions. Goal is to ensure success in each child by the age of 25.			
IL	Access Points Puerto Rican Cultural Center 872-829-2654 (same as El Rescate)	<a href="http://www.csh.org">www.csh.org</a>	Milagros Perez-contact, not	Emergency shelter - 21 day stay - 14-17 year olds - point is to avoid foster care and promotes unification			Y

			necess arily minors	<ul style="list-style-type: none"> <li>- If youth is locked out or kicked out of home generally</li> <li>- Would need to discuss with funding/coordinator - family youth and services bureau</li> <li>- 4 beds available</li> <li>- Will call back</li> </ul>			
IL	The Catholic Charities of Chicago			Left message for Vice-President of Child, Youth and Family Services Laura Rios			
IL	DCFS - Il department of children and family services			John Egan 312-328-2269 Dept of DCFS - housing and beds - Left VM			
OR	<b>Janus Youth Programs, Inc.</b>	<a href="http://www.janusyouth.org">http://www.janusyouth.org</a>	Use website for contact info 503-432-3986	Beds are first come first served-call 503-432-3986	60 in summer	unknown	yes
OR	Station 7-Looking Glass			They will call me back			
N CA	Diamond Youth Shelter	<a href="https://larkinstreetyouth.org/">https://larkinstreetyouth.org/</a>	415-567-1020	San Francisco 12-17 require subpoena for police entry Do take pregnant teens Contact for intake: Monique Thomas 415-567-1020	Up to 15	9 available as of Friday	Yes - 1 staff member, trying to get more

N CA	Huckleberry House	<a href="https://www.huckleberryyouth.org/contact-us/">https://www.huckleberryyouth.org/contact-us/</a>	(415) 621-2929	San Francisco 12-17 Have taken kids from ORR before Focus on family reunification (overall, not just in immigration context) Patrick Buckaelw Katie Reisinger	Up to 6	Totally depends - 1 maybe 2	Yes - 50%
N CA	Dreamcatcher	<a href="http://www.alamedafsf.org/dreamcatcher/">http://www.alamedafsf.org/dreamcatcher/</a>	510-522-8363 800-379-1114	Alameda 13-18 Emergency short-term placement shelter only - 21 days max - don't get funding from state placement services - will receive referrals from anywhere/one for emergency safe shelter  Whoever answers phone	Up to 12 Up to 20 starting in October	Varies a lot - maybe 1 or 2 - maybe more in October	Sometimes - 1 right now
N CA				San Jose  Deborah Pell at Bill Wilson Center - she didn't think they would be the right place to call, recommended:  Catholic Charities - have ORR contract - they have MOUs with Bill Wilson Center if needed  408-468-0100  Angela Albright - left message			

N CA	Social Advocates for Youth	<a href="https://www.saysc.org/programs/the-dr-james-e-coffee-house-emergency-teen-shelter/">https://www.saysc.org/programs/the-dr-james-e-coffee-house-emergency-teen-shelter/</a>	707-546-3432	Need a parent signature within 72 hours 12-17  Shauna Rundstrum	Up to 6	Varies, probably 2-3	Yes - usually at least 1
N CA	Sanctuary Youth Shelter	<a href="http://www.fresnoeoc.org/sanctuary-youth-shelter">http://www.fresnoeoc.org/sanctuary-youth-shelter</a>	(559) 498-8543	Fresno  No answer			
N CA	New Morning	<a href="https://www.newmorningyfs.org/24-hour-shelter">https://www.newmorningyfs.org/24-hour-shelter</a>	530.62 6.4190	Placerville 6 -17 Currently licensed as a level 4 group home, kids without behavioral/mental health  Changing license to runaway youth homeless shelter - once license switches - 30 day max  On site counselor  Annah Wilson Shelter Director <a href="mailto:annah@newmorningyfs.org">annah@newmorningyfs.org</a>	12	Varies a lot - currently have 4 (2 boy, 2 girl)	Yes - 1 clinician speaks Spanish but she needs to be brought in
N CA	Wind Youth Services	<a href="https://www.windyouth.org/programs/emergency-youth-shelter/">https://www.windyouth.org/programs/emergency-youth-shelter/</a>	(916) 504-3313	Sacramento 13-24  Homeless youth shelter This number is the right starting point.	3 locations	Varies	Yes
N CA	Hutton House	<a href="https://www.cent">https://www.cent</a>	(209)	Modesto	Up to	Varies	Yes

		erforhumanservi ces.org/what-we- do/shelter- services/hutton- house/	526- 1623	13-17 Cannot take any children under CPS care  Family reunification, counseling  Anyone at the number - 24/7	8		
N CA	Genesis House	<a href="https://www.genesis-house.org/">https://www.genesis-house.org/</a>	559- 280- 4619	Visalia  11-17  Left message			
N CA	Tahoe Youth and Family Services			South Tahoe  Host home - have a network of approved homes  Left message			
??	Casa Libre	<a href="http://www.casa-libre.org">www.casa-libre.org</a>		It is a licensed emergency and long-term 14-bed shelter for minors under the age of 18 without homes, including unaccompanied immigrant and refugee children.	4 beds availa ble curre ntly		
S CA	Covenant House CA East Hollywood	<a href="http://www.covenanthousecalifornia.org">www.covenanthousecalifornia.org</a> 323-461-3131	Raymo nd (Shelte r)	Shelter for youth ages 18-24, none under age of 18. Accept walk-ins. All genders accepted	2 beds for males , Waitli st for	Unsure	Yes

					females (2-3 wk)		
S CA	Covenant House CA Oakland	200 Harrison St. www.covenanthousecalifornia.org	510-379-1010 <a href="mailto:grevolorio@covca.org">grevolorio@covca.org</a> Quocavib	Males and females 18-24. Same as above	4 month wait list. Emergency bed situation on coaches (3 nights)		Spanish
S CA	DMH Enhanced Emergency Shelter Program	LA County	213-738-6194 "Nare" Admin "William" Gatekeeper No website given	Network of emergency shelters throughout LA County for youth age 18-25. They offer a 36 day program for youth to access resources, case worker, helath, etc. *Must also have mental health concern Welcoming of Transgender community :)	Immediate openings	Unsure of future. Call and get put on list for a intake	Spanish Armenian Russian
S CA	Jovenes, Inc	LA	Luis Medina 323-	Emergency and transitional housing for MALES only, 18-24	? (Left message)	?	Spanish

			260-8035 X 102 www.jovensinc.org				
S CA	LA Youth (LAYN)	1550 N. Gower St. LA	intake@layn.org	Emergency shelter for youth, 12-17	Sent email	?	
S CA	Homes For Life	San Gabriel CA (Housing Locations vary)	310-337-7417 www.homesforlife.org	Mental health diagnosis required, chronic homeless Adults 18-59, registration with LA County referral program_Pasadena, CA Contact: 626-438-8776 Torrance, CA Contact: Harbor Interfaith 424-276-3609	Yes-Group homes range 6-9 people	?	
S CA	Salvation Army The Way In		Kenji	Not an emergency shelter, transitional housing with case management services Females 18-21 (no beds) Males 18-25 available beds Intake: call to do a screening, when something is open they call you back, things change by the hour so leave info. Accepting of undocumented migrants	5		Spanish
S CA	Angel's Flight		213-318-5732 Spanis	Housing for at-risk, Call for any assistance with immigration issues! House for Children 10-17 Spanish-speaking intake available	16 Total 10		Spanish



			h Speaki ng Ask for Angie Lopez  213- 318- 5730 Gina Parker Rudy Trujillio	First step is to call intake!	beds now		
TX	Catholic Charities Youth Shelter at Pearl Longbine Cottage	<a href="http://cctxp.org/emergency-youth-shelter/">http://cctxp.org/emergency-youth-shelter/</a>	<a href="mailto:ssteelman@cctxp.org">ssteelman@cctxp.org</a> (806) 376- 4571	Emergency shelter for both genders, ages 5-17 for up to 90 days. Needs referrals. Operated by Catholic Charities.	Unabl e to leave a mess age. Infor matio n from CASA CAR ES site.		
TX	ACH Tarrant County		682- 432- 1080 <a href="mailto:melissa.opheim@ach.tarrantcountytx.gov">melissa.opheim@ach.tarrantcountytx.gov</a>	Licensed full service agency; has an emergency shelter, can do foster care if funding available.	Need s more infor matio n;		

			<a href="http://hservices.org">hservices.org</a> Melissa Opheim		willing to help if specific information provided.		
MA	Crossroads Family Center		Lauren Antonelli, M.A., <a href="mailto:Lauren.Antonelli@ebcrossroads.org">Lauren.Antonelli@ebcrossroads.org</a> , (617) 567 - 5926 ext. 21	State funded family shelter so don't think they are permitted to take unaccompanied minors, but "desperately" wants to help and open to all ideas about how!			
TX	Assessment Center of Tarrant County		<a href="mailto:ycastro@ccdfw.org">ycastro@ccdfw.org</a> ; <a href="mailto:ics@ccdfw.org">ics@ccdfw.org</a>	Part of Catholic Charities. Unable to reach by phone; only between 8-12pm. Licensed shelter; intended primarily for assessment, no supervisors, 90 day limit	Sent emails to both.		
TX	Azleway		903 566 8444	Faith based; residential placement for neglected and abused kids only. Possible resource if there is			

				a diagnosis--and funding.			
TX	BCFS, several sites	bcfs_tfc_intakes@bcfs.net	210 208 5669	Needs referrals from the centers. Already works with the State of Texas and ORR to house minors. Appears to be a foster care system, not emergency shelters.	No information on beds without referral information.		
TX	RMYA, The Bridge	<a href="http://www.rmya.org/">http://www.rmya.org/</a>	(210) 340- 7933	Co-ed facility that serves children between 5-17 years old on a temporary basis (1-30 days). Has a structured program.	Left VM for direct or to call back		
NYC	Covenant House New York 460 West 41st Street, New York, NY 10036-6801	<a href="https://ny.covenanthouse.org/crisis-center">https://ny.covenanthouse.org/crisis-center</a>	212-613-0300, info@covenanthouse.org	Age 16-24 awaiting return call or email			
NYC	Ali Forney Center 321 W 125th Street New York, NY 10027	<a href="https://www.aliforneycenter.org">https://www.aliforneycenter.org</a>	(212) 222-3427	LGBTQ, Emergency housing in homelike apartments (Queens & Brooklyn) can stay 1-6 months	52		

				waitlist (youth 16-20 wait 2 wks, 21-24 wait 6 months) left message for return call			
NYC	Trinity Place Shelter 164 W 100th Street New York, New York 10025	<a href="http://trinityplaceshelter.org/">http://trinityplaceshelter.org/</a>	(646) 580- 7045	LGBTQ, transitional shelter emailed for info- no phone staff until evening	10 beds		
NYC	Streetworks overnight NYC (confidential location, address not disclosed until referred)	<a href="https://www.safehorizon.org/streetwork/">https://www.safehorizon.org/streetwork/</a>	917- 507- 1562, Lauren Manley, lauren manley@streetworks.safehorizon.org	Referral required, form can be provided by email, Ages 16-20 with priority to 16/17 year olds Undocumented is ok, no ID requirements Provides housing up to 60 days	24 (currently 16 male, 8 female)	Fluctuating availability, unable to confirm	Y and translation services for other languages
DC	Covenant House Washington DC  2001 Mississippi Ave SE Washington, DC	<a href="http://covenanthouse.org/">http://covenanthouse.org/</a>	202- 610- 9600	Only serves 18-24yrs			
GA	Safe House Outreach <a href="#">89 Ellis St. NE</a> <a href="#">Atlanta, GA 30303</a>	<a href="http://www.safehouseoutreach.org">www.safehouseoutreach.org</a>	<b>Melissa Holcombe</b> {o}404.	Do not offer housing, but serve hot meals twice daily at 11:30am and 6:30pm. They would love to serve these children in any way we can. They could also help with clothing and possible job connections.			

			523.222 1 Ext:104				
DC	Sasha Bruce Youthwork (has Barracks Row Drop in Center)	sashabruce.org	202- 675- 9340  plieber @sash abruce .org	Left voicemail			
DC	Washington DC Lines to call  DC Shelter Hotline: 202- 399-7093  Emergency Hotline: 202- 463-6211						
MA	ST Mary's Center for Women and Children	programs@stma ryscenterma.org	617.43 6.8600	Left VM; Bridge Home program is short term crisis housing for children who have experienced trauma. They have up to 12 beds at any one time and serve children newborn to 12.			
MA	Bridge Over Troubled Waters		617- 423- 9575	Left VM; Emergency Residence is short-term transitional residential program for homeless youth ages 14-24.			
AZ	Tungland Corp		877- 886-	Multiple locations; waiting to call back from Sterling Bartow			

			4526				
AZ	Tumbleweed	Recommended by CASA		Designed for homeless teenagers only			
AZ	Child Care Resource		800-308-9000	Awaiting callback for "licensed or certified" providers			
AZ	Catholic Charities	Phoenix	602-285-1999	Awaiting call back			
AZ	Phoenix Rescue Mission	Phoenix		Will not take single children; only w/mother; limited space			
AZ	Governor's office	Ombudsman	602-364-0777	Awaiting call back			
AZ	Angie's House	<a href="http://www.angieshouseaz.com">www.angieshouseaz.com</a>	(928) 301-2169	No Answer			
AZ	Child Crisis Arizona	<a href="https://childcrisisaz.org/">https://childcrisisaz.org/</a>	Amy Holstein, Director, 480-969-2308	3 day emergency, assess for longer care, parents Age restrictions 0-10; beds 42 beds, one shelter;	42 beds	Couldn't say	Yes
AZ	Arizona Dept. of Economic Security	<a href="https://des.az.gov/services/aging-and-adult/arizona-">https://des.az.gov/services/aging-and-adult/arizona-</a>	Brett, no number given	They don't handle these issues only strict refugee settlement			

		<a href="#">refugee-resettlement-program</a>					
AZ	Cornerstone Mission Project, Inc.	<a href="http://www.cornerstonemissionaz.org/">http://www.cornerstonemissionaz.org/</a>		They are a rural homeless shelter for persons over 18			
AZ	A New Leaf	<a href="http://www.turnanewleaf.org/">http://www.turnanewleaf.org/</a>	Candy, volunteer coordinator, 480-969-4024	She couldn't tell me whether they can definitely accommodate, however she was sympathetic and wanted to get us resources.			
AZ	Lutheran Social Services of the Southwest	<a href="http://www.lss-sw.org/">http://www.lss-sw.org/</a>	Connie, COO, 480-396-3795 Phone tree	Left voicemail			
AZ	Catholic Social Service Migration & Refugee Services	<a href="http://www.ccs-soaz.org">www.ccs-soaz.org</a>	Dawn Dishman	Left voicemail			
MD	Loving Arms	<a href="http://lovingarmsinc.com/maryland-division/">http://lovingarmsinc.com/maryland-division/</a>	443-415-1174	Serves youth 12–18 years old; do not need to be documented	Beds are available, first	Beds are available	

					come first serve		
MD	Kemp Mill Group Home (Hearts and Homes for Youth)	<a href="http://heartsandhomes.org/">http://heartsandhomes.org/</a>	301-679-1391 (left message)	Serves males 13-18			
MD	John C. Tracey Girls' Home (Hearts and Homes for Youth)	<a href="http://heartsandhomes.org/">http://heartsandhomes.org/</a>	301-679-1391 (left message)	Serves females 13-17	8		
MD	Jump Start Semi-Independent Living Program for Boys (Hearts and Homes for Youth)	<a href="http://heartsandhomes.org/">http://heartsandhomes.org/</a>	301-679-1391 (left message)	Serves males 17-20	8		
MD	YESS of Charles County	<a href="https://yessofcc.org/about/">https://yessofcc.org/about/</a> ;		Operate's Sonya's House <a href="https://yessofcc.org/sonyas-house/">https://yessofcc.org/sonyas-house/</a>			
MD	Promise Place	<a href="http://www.sashabruce.org/programs/safehomes/promise-place/">http://www.sashabruce.org/programs/safehomes/promise-place/</a>	202-547-7777, 240-764-8274	Serves youth 12-24; must be documented resident of Prince George's County (referred through hotline at 888-731-0999)	20		



NYC	VERA Institute of Youth Justice		Krista Larsen, 212-376-3110	Large non-profit that handles Govt. contracts, Director. Left voicemail. Additional contacts provided in email to Patrice.			
NYC	NYC Mayor's Office of Immigrant Affairs		Sonia Lin, 212-788-2831, General Counsel & Policy Director	Left voicemail and exchanged emails.			
VA	Virginia Refugee Resettlement Service Providers		IRC Director, Harriet Kuhr, 434-979-7772, x105	Contacted 18 offices. Left voicemails. Ms. Kuhr advised US Conf. of Catholic Bishops and Lutheran Immigration and Refugee Services, place unaccompanied children in foster care.			
FL	Covenant House Florida - Fort Lauderdale	<a href="http://www.covenanthousefl.org/">http://www.covenanthousefl.org/</a>	(954) 561-5559	80 youth including young mothers and their babies.	80		
FL	Covenant House Florida - Orlando	<a href="http://www.covenanthousefl.org/">http://www.covenanthousefl.org/</a>	(407) 482-0404	37 youth including young parents and their babies	37		

FL	Interface Youth Shelter, Gainesville	<a href="http://www.cdsfl.org/youth/interface-youth-program-shelters/">http://www.cdsfl.org/youth/interface-youth-program-shelters/</a>	(352) 244-0618	youth age 10-17	20		
FL	Interface Youth Shelter, Palatka	<a href="http://www.cdsfl.org/youth/interface-youth-program-shelters/">http://www.cdsfl.org/youth/interface-youth-program-shelters/</a>	(386) 385-0405	youth age 10-17	20		
FL	Interface Youth Shelter, Lake City	<a href="http://www.cdsfl.org/youth/interface-youth-program-shelters/">http://www.cdsfl.org/youth/interface-youth-program-shelters/</a>	(386) 487-0190	youth age 10-17	20		
FL	Youth Crisis Center (Jacksonville)	<a href="https://youthcrisiscenter.org/our-programs/residential-program/">https://youthcrisiscenter.org/our-programs/residential-program/</a>	904.725.6662	children and teens ages 10-17			
FL	Miami Bridge	<a href="http://miamibridge.org/emergency-shelter-care/">http://miamibridge.org/emergency-shelter-care/</a>	305-635-8953		48		Y
FL	Arnette House	<a href="https://arnettehouse.org/what-we-do/#Residential-Services">https://arnettehouse.org/what-we-do/#Residential-Services</a>	(352) 622-6135	10-17 year olds	20		
FL	Hidle House	<a href="http://www.anchoragechildrenshome.org/hidle-house.htm">http://www.anchoragechildrenshome.org/hidle-house.htm</a>	(850) 784-1020	10-17.	20		

FL	Bridge Transitional Living	<a href="http://www.anchoragechildrenshome.org/bridge-program.htm">http://www.anchoragechildrenshome.org/bridge-program.htm</a>	(850) 481-8501	ages 16-22			
FL	Hannah's House	<a href="http://www.anchoragechildrenshome.org/hannahs-house.htm">http://www.anchoragechildrenshome.org/hannahs-house.htm</a>	<u>(850) 481-8501</u>	pregnant mothers ages 16-22 and their infants			
FL	SafePlace2B	<a href="http://www.family-resources.org/contact-us/">http://www.family-resources.org/contact-us/</a>	(727) 298-1606	10 to 17			
FL	Someplace Else Crisis Shelter	<a href="http://www.ccys.org/programs-at-a-glance/someplace-else-crisis-shelter/">http://www.ccys.org/programs-at-a-glance/someplace-else-crisis-shelter/</a>	850-576-6000	10 to 17			

# 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.

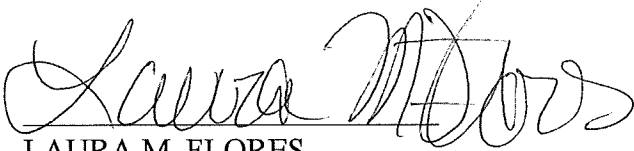
7. Despite the severe illness of me and my son, we were not given any help from the medical facilities at Dilley. The only ones who helped us were social workers who insisted that we see doctors and not the nurses who had been ignoring us.
  8. I was not told about my or my son's legal rights while at 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.



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.



Luisa Muskus

Orrick Herrington and Sutcliffe  
609 Main Street  
Houston, Texas 77002

06/29/2018

Date

# Exhibit 5

**Declaration of**  
**Josselin H [REDACTED], A NUMBER [REDACTED]**

I, Josselin 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 June 29<sup>th</sup>, 2005. I am 13 years old. My mother and I are from Honduras.
2. We left the country because my mom was working at a shop and they threatened her. She was really scared and did not know what to do. Eventually the place she worked shut down and so we were not able to afford living there anymore so we had to leave the country.
3. We presented ourselves at the border about June 25<sup>th</sup>, 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 mother 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 mother. 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 mother.
5. It was extremely cold at this place and we were not able to sleep because of how cold it was. The air conditioning was turned on very high and it was pointed right above where I was sleeping.
6. The lights were always on. We were not given anything to clean ourselves or allowed to shower. A lot of the times we could not wash our hands after going to the bathroom. Sometimes they would have a little water for us to wash our hands but not always.
7. After 5 hours my mother and I were taken to another place where we were held for two days.
8. In "La Perrera" I was separated from my mother as we arrived. I had to go to this other caged area where other children were. I do not understand why but whenever I would try to fall asleep a police would come and kick me in my feet to wake me up. Once I would wake up they would walk away. We had sandwiches and they were still frozen like in the first place. They gave us apples, a small cookie, and water bottles. They only gave us water when it was breakfast, lunch, or dinner. 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. I was able to able to shower one time that I stayed there. They had towels and soap for us to use there. It was so cold and I only had one shirt on. 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 mother 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 mother and I were taken out of that facility on the 26<sup>th</sup> of June, 2018.
11. My mother and I have been at the location in Dilley for about 3 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 mother 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 aunt in Florida.
13. My mom and 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.

I, Josselin 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]

06/29/18

Date

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



Amber Rieff

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

6/29/18  
Date

# Exhibit 6



#18328  
Declaration of

KEYLIN M [REDACTED], A NUMBER [REDACTED]

I, KEYLIN 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 19, 2001, and I am sixteen years old. My mother's name is [REDACTED] [REDACTED], and her A number is [REDACTED]. Her date of birth is December 3, 1979. My mother and I are from Honduras.
2. We left our country, because my mother's life had been threatened, and she 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 mother and I were shivering the entire time. I was miserable from the cold.
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 mother and I were hungry the entire time we were at the Ice Box.
6. After about one day, my mother 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 four days we were there.
7. I was very frightened and depressed the entire time. I was scared of the guards and scared I would be deported without my mother. I did not know where she was. I am still depressed. I also have nightmares and a lot of anxiety because of the separation.
8. The female guards yelled at me and the other girls a lot. They called us names and made fun of us. The female guards would not let us and kicked us with their boots to keep us awake. They also called the some of the girls filthy and told them not to throw anything on the floor the way they would at home in their country. The female guards made me and the other girls strip naked in front of them and leered at us before their showers. It was very uncomfortable and caused me a lot of anxiety. I am still fearful of the guards today because of my treatment at the Dog Pound.
9. The guards were really angry all the time, and we tried to stay quiet and not attract their attention.
10. The Dog House is even colder than the Ice Box, and I was shivering the entire time. I was so cold that I had severe pain in my leg. I did not tell the guards, because they told us that if we said we were hurt that we would have to stay at the Dog House longer.

#18329

11. The guards also would not allow us to keep the mylar blankets that people gave use when they were leaving because they said we were only allowed one blanket. We received no mattress pads.
12. My leg hurt so bad from the cold that I hid one of the extra blankets so that I could wrap it around my leg. This made me very scared because the guards said they would punish us if we took extra blankets.
13. The food at the Dog House was the same as at the Ice House. It was frozen and smelled bad. I did not eat it, and I went hungry the entire time I was there.
14. I did not have any toothpaste or a toothbrush the entire time I was at the Dog House.
15. The bathrooms at the Dog House were dirty and disgusting. I was told to continue to use them and not to make the bathrooms dirtier, even though the toilets were already overflowing.
16. I was muddy and wet when I was apprehended, but I was not allowed to shower or change for five days. I was told that detainees were only allowed one shower the entire time they were at the facility.
17. I was housed in dog cages and I was constantly moved. This made me fearful for my safety and makes me scared today whenever a guard tells me I have to move.
18. After four days we were moved to another Ice Box, where I was reunited with my mother. We stayed there for one day, but we were not given food or water the entire day.
19. 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.
20. 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.
21. After the second Dog House, we were moved to the Dilley facility.
22. There are no current plans for our release.

I, Keylin 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.

06/29/18

Date

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



LAURA M. FLORES

RAICES

4092 TPC PARKWAY, APT 953

SAN ANTONIO, TX 78261

07/29/18

Date

# Exhibit 7

#18332

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.



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 8

#18337

**Declaration of**

**DIXIANA S [REDACTED], A NUMBER [REDACTED]**

I, **DIXIANA 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 25, 2008. I am from Honduras.
2. My mother says we crossed the Rio Grande near the Mexican city of Reynosa and were apprehended as we walked along the river near a bridge on our way to McAllen, Texas. My mother says that it was on or about May 23, 2018, and that we were taken to a facility called the "Hielera" or "Freezer."
3. Upon arrival at this facility, the officials separated me from my mother. I was placed with female girls from 5 to 6 years old to fifteen or 16 years old. There were large numbers of girls, some of whom had to sleep on concrete and sitting up because there wasn't sufficient room in the cell. I slept on the floor in a passage way where I could find room. It was around midnight, and I was given an aluminum blanket. There were no mattresses. I had difficulty reaching the bathroom, because I didn't want to push through other girls and wake them. When I did go to the bathroom, there was no door or separation between the toilets. The lights were on all night.
4. When I arrived, they gave me a cookie and juice. For breakfast, they gave me a frozen ham sandwich. The ham was black. I took one bite, but did not eat the rest because of the taste. They also gave me blue colored water. I saved this for later and someone stole it from me while I was sleeping.
5. I was very scared that I would never see my mother again. I cried. Most of the other girls with me were also crying. Another girl, who was about 16 or 17, had a baby and both her and the baby were crying.
6. Although there was a water dispenser in my cell, there was no water. Other girls requested water from an officer, and the officer said he would bring water, but never did. I was very thirsty.
7. After about twelve hours in the facility, I was put back with mother on a bus that took us to the facility called the "Perrera" or Dog House. We were there three or four days. When we arrived at the facility, they separated me again from my mother. I could see my mom far away in another cell.
8. When I arrived, I was put in the cell with girls who had not bathed who were 10 years or older. I bathed on the first day. There were separated showers, and I was given clean clothes. My dirty clothes were cleaned and returned to me.
9. While I was in the cell with the bathed girls, I was half asleep and they were calling a girl who had a similar first name as me. A male officer kicked me to wake me up to confirm whether or not I was the person they were looking for. I was not. The kick scared me and hurt, although I did not get a bruise.
10. They left a cookie jar full of cookies that we could eat at any time. For breakfast, I had a burrito with egg and rice, a granola bar, an apple, a cup of milk, a bottle of water and a bag of potato chips. For lunch, I had a burrito, an apple, a bottle of water, and another bag of potato chips. For dinner, I had a ham sandwich with lettuce, an apple, a bottle of water and a bag of potato chips. The food was the same every day. I saved my potato chips and someone stole them from me when I slept.

11. I didn't cry the first day when I was at this facility, but I began crying all of the time on the second and third day because I missed my mother. The majority of the other girls in my cell were also crying the whole time I was there. A male officer told me I would be able to see my mother at 6 pm for an hour and to stop crying.
12. The lights were always on. There were no windows, and I didn't know whether it was day or not. I asked what time it was when the officer told me I could see my mom at 6 pm, but he said he was not permitted to tell me what time it was. I never got to see my mom until we left the facility and I was put on a bus with my mom.
13. My mom says I left this facility on May 28, 2018 and that we have been at the ICE Dilley, Texas facility for over a month. I got chicken pox at this facility. They have given me medication for the chicken pox, as well as for an infection I had in my molar.

I, **DIXIANA 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.

06/29/18

Date

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



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

06/29/18

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.

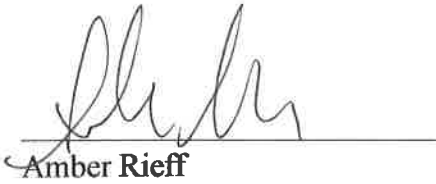
1. My date of birth is January 15, 1985. My son name is [REDACTED] He is four years old and he was born on March 15<sup>th</sup>, 2014. My son and I are from Honduras.
2. I left because I was living in a house and a gang came to my house and asked me if they could store guns in my house and they asked 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 4<sup>th</sup>, 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 6<sup>th</sup> 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.

29.06.2018  
Date

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

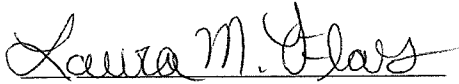
the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.



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

CERTIFICATE OF SERVICE

I, Peter Schey, declare and say as follows:

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

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

- EXHIBITS IN SUPPORT OF PLAINTIFFS' RESPONSE TO DEFENDANTS' THIRD JUVENILE COORDINATOR REPORTS VOLUME 1 OF 12 [REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL]

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

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

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