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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)

)

)

)

) EXHIBITS IN SUPPORT OF  
) PLAINTIFFS' RESPONSE TO  
) DEFENDANTS' FIRST JUVENILE  
) COORDINATOR REPORTS  
) VOLUME 5 OF 12 [REDACTED  
) VERSION OF DOCUMENT  
PROPOSED TO BE FILED UNDER  
SEAL]

[HON. DOLLY M. GEE]

Hearing: July 27, 2018

Time: 10 AM

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# Exhibit 51

## Declaration of Fanny D [REDACTED]

I, Fanny 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 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 L. [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]

399  
6/27/18

# Certificate of Translation

I, ~~ESTELLA~~ <sup>Galvan</sup> 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 52



## Declaration of Nery B [REDACTED]

I, Nery B [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 Nov. 7, 2001 and I am from Jalapa, Guatemala.
2. I left Guatemala because the gangs in my neighborhood told me that they would kill me and my father if I did not join the gang. They threatened me multiple times, so my father and I left.
3. My father and I crossed the border near Mexicali on Tuesday June 26, 2018. We were taken directly to this facility.
4. ~~While~~ On ~~our~~ my second day in custody my father and I were interviewed by an immigration official who asked questions about where we were from in Guatemala, what school I attended and what religion ~~they~~ we belonged to. The official filled out papers and told us that if ~~we~~ ~~the~~ signed <sup>my dad</sup> the papers, we would be able to go <sup>signed</sup> to my father's friend in Tennessee. We did not get copies of the papers. There were about ten pages and they asked ~~us~~ to sign on each page.  
my father



Page 2

5. While here, I have been in a room with three other young men about my age ~~and~~ we are not allowed to leave the room at all. There is one toilet and I have been allowed to shower only one time.
6. We are fed two times per day. In the morning I am given a bean burrito and cracker and juice. At night, ~~we~~ I get a burrito and cracker. It is not enough food.
7. The lights are left on all night which makes it very hard to sleep. I am sleeping about 3 hours a day.

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

Flor Sanchez = 1875 20th AVE. CT. CHULA VISTA CAL 91913

DATE 6/27/18

# 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

± Martha Ramirez certifies 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 54

A #

43

Declaration of Victor A [REDACTED]

I, Victor 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 4, 2000. I am 17 years old. I am from Honduras.
2. I left Honduras because my mother, Maria Orfelina Salazar, was killed on May 27. I cannot go back to Honduras because I am afraid. The person who killed my mother is still around, and my father is in jail. I have no protection.
3. I entered through a port of entry <sup>by myself</sup> ~~on the U.S. Mexico border yesterday, June 26, 2018.~~ on the U.S. Mexico border yesterday, June 26, 2018. Upon entry, I showed my papers to CBP. The papers included my mother's gov't-issued death certificate, and gov't issued document stating that I am an orphan. I was transferred directly to this facility.
4. When I arrived at approximately 7am, I was given 1 burrito and 1 juice. The burrito was small, and appeared to be a bean burrito with flour tortilla.



I was given another burrito at night. Today, I have only eaten 1 burrito and 1 juice cup. Yesterday, I was also given very salty crackers as a snack, but it gave me a stomach ache. Everyone got sick. I have access to water in the room, but it doesn't taste good. We don't have water cups so have to use the cups from our juice drink.

5. The temperature at the facility is very cold.
6. The lights are on all night. Last night, there were 10 of us kids in the room, but only 3 mattress pads available. ~~so~~ We had to take turns ~~and~~ sleeping.
7. I have not received any legal notices in writing. I have not received any ~~info~~ verbal info. about my rights. I have not seen any written notices <sup>posted</sup> on the wall about my rights.
8. I have not received any info. about ~~to~~ my current case or release status. I wonder what will happen to me. When I told the CBP officer that my mother ~~has~~ was killed, they made fun of me and said I was "weak." I didn't feel comfortable after that ~~to~~ sharing my fear.



3/3

9. I was allowed to make a phone call to a friend, but I called very late. When my friend didn't pick up, a CBP officer said, "This is it for you. You're fucked."

I, Victor A. [REDACTED] do 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]

27 de Junio de 2018

Name

Date

Certificate of Translation

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

Martha Ramirez  
Name

6/27/18  
Date

# Exhibit 55



Declaration of  
YEIMIN B [REDACTED]

I, Yeimin 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 November 10, 2000. I am from Guatemala.
2. I left Guatemala because I am afraid of gang violence and there are no jobs.
3. I was apprehended at the border by border patrol agents on Monday, June 25 around 11:00 pm. I was taken to El Centro Border Patrol Facility.
- ~~4. I have not rec~~
4. I did not receive a verbal, nor a written, description of my legal rights when I was apprehended. I have not received a written or verbal description of my legal rights since arriving at this facility.

5. About 2 hours after I arrived I received a cookie and a small, sugary drink. For breakfast, I have been given a cookie and a small, sugary drink at around 6:00 a.m. At around 9:00 a.m. I have been given a small burrito. I have not been given food aside from these items and at these times.
6. There is drinking water available in the room I am kept in. There are no cups. I share one or two cups with the other boys or I put my head under the spigot.
7. I am staying in a room that is about 15 feet by 10 feet with 10 other boys who are between 16 and 17 years old.
8. There are 3 mattresses, about 6 inches thick, and twin-sized on the floor in our room. About 6 or 7 boys can fit on these mattresses. The others sleep on the ~~floor~~ <sup>bench</sup> ~~or~~ on a metal bench. There are no pillows. We have mylar blankets.
9. During the day our room is warm. At night it is a bit cold.



10. At present, and during the day my stomach growls or hurts because I am hungry.

11. The lights are on all day and night.

12. I have not been allowed outside since arriving.

13. I have access to a bathroom located in the room I am kept in. There is a short, approximately 4 foot, wall for privacy. There is a sink to wash hands. It is clean.

~~14. I receive~~

14. I had <sup>first</sup> ~~the~~ opportunity to shower today, Wednesday, June 27.

15. I have not been allowed to use the phone since I arrived. I have told border patrol agents that I have a nephew in Chattanooga, Tennessee who I can stay with.

16. I have not been offered access to a lawyer.

~~17.~~

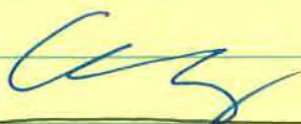
I, Yeimin B [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

[REDACTED]

June 27, 2018



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



CLARA LONG

Clara Long  
350 Sansome st Ste 1000  
San Francisco CA 94109

6-27-2018

June 27, 2018



# Exhibit 56

ANGHELO

Declaration of

A NUMBER

I, ANGHELO 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 May 9, 2001. I am from Guatemala. I am 17 years old.
2. ~~I~~ We left Guatemala because I am afraid for my life because a gang kidnapped and killed my father in 2011. My brother, brother and I fled to Mexico about 2 or 2.5 years ago. My mom and brother came to the U.S. last November, about.
3. ~~I~~ ~~We presented ourselves at the border~~ <sup>was</sup> ~~were~~ apprehended at around 6:00 am (time). I believe that it was on or about June 26, 2018 (date). ~~We were taken to~~ <sup>I was</sup> El Centro Border Patrol Facility (facility). I crossed the border <sup>over one wall and</sup> through a hole in the wall. The Border Patrol caught me when I crossed. They asked "What are you doing?" I said "Trying to get to my mom."
4. I have had one chance to try to contact my family. They called all 3 numbers I had. No one answered. When I asked again later to call again they told me they tried once and no one answered. They acted very annoyed with me when I asked.
5. A guard told me he was going to try to call my mom but I haven't heard back. I am afraid and sad that I haven't been able to talk to my mom.

6. I told the guard in my interview that I am afraid to go back to Guatemala because a gang kidnapped and killed my father and I am afraid the gangs will kill me.
7. I do not speak English.
8. I have not been told that I have legal rights.
9. I filled out and signed a form that was in English. The guard told me it was for the judge or the lawyers. There was a Spanish form but they didn't give me time to read it.
10. I haven't asked for a lawyer because I filled out the forms.
11. My room is 5 meters by 4 meters and very small. There are 8 or 9 teenage boys there.
12. It is very cold. I don't have a sweater. I don't have a blanket and I borrow my friends. I am afraid to ask for a blanket because the guards yelled at me when I asked for a phone call.



13. There are 3 mattresses in my room but it's not enough. One time I slept on a bench and one time I slept on a mattress.
14. It's very hard to sleep because the lights are always on.
15. I got to shower on Wednesday morning. I think they let us shower because the lawyers came to talk to us.
16. I am afraid to ask for a blanket or anything else.
17. When I arrived on Tuesday in the morning, I did not get any food until that night. They gave me a burrito.
18. On Wednesday, I ate 3 times. Each time I got a burrito and some crackers. Twice I got juice. The food is hot but it makes my stomach ache.
19. Water is available but it seems bad and not clean. I haven't been drinking any water. There are no cups. I am dehydrated.

20. I feel safe in my room but I am afraid of the guards.
21. There is a bathroom in the room but there is no privacy and it feels weird. I think it's dirty. There is no soap.
22. They clean the room every day.  
said there are no cups.
23. When I first arrived I asked for a cup to drink water and the guard yelled at me and <sup>he</sup> didn't give me a cup. I didn't drink any water.
24. The first person who interviewed ~~to~~ me when I got here was wearing street clothes. I was cold and sleepy and I crossed my arms. The person said "You are lying to me! You're crossing your arms - that means you're lying! Why are you here?" I was afraid.

I, ANGHELO IV [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, FLOR SANCHEZ, certify that I am fluent in English and Spanish and that I read the above declaration to ANGHELO M [REDACTED] in Spanish.

Flor Sanchez

Name: Flor Sanchez

Organization:

Address: 1875 Loyola Ct.  
Chula Vista, CA 91913

June 28, 2018

Date

# Exhibit 58



**Declaration of Sergio C [REDACTED]**

1. My name is Sergio C [REDACTED] my birthday is December 6, 2001. I am from Guatemala.
2. I came to the U.S. with my father. My mother passed away 8 years ago. We presented ourselves at the border in McAllen, Texas, in the night, approximately 45 days ago. After we had been in Texas for half an hour, my father and I were detained. Very soon after we were detained, we were taken to a facility. Within half an hour of arriving at that facility I was separated from my father. First, they took away all of our belongings that we had with us. Then, we were separated into groups. I could see my father but we were in different groups. I was worried when we weren't in the same group. Then they started putting us into vehicles. When I left, and my dad wasn't with me, they told me not to worry that he would be coming in a moment. I went in the car and felt very relieved and happy that he would follow. But it wasn't like that. He didn't come. I haven't seen him since then.
3. The second day, they put me in the "hielera." That is when I found out I would not be seeing my father. They told me that I was going to a better place than my father was – that where my father was going he they don't give you clothes and look after you like they do at Casa Padre. I was very sad when they told me this. I never knew I could be separated from my father. I am also very worried about him because I do not know where he is. I was also very worried because I did not know what the conditions are where he is located.
4. I was not able to speak with my father until I had been at Casa Padre for about one month. I have now spoken with him twice. Since I only have ten minutes to talk with him, it is not enough time to talk about what I can do to help him and myself. He told me Monday last week that he is miserable and all of his belongings are gone – he has nothing. The clothes he has left are torn and he is not given anything to eat. I worry about him every day and every night. I do not want him to suffer any longer. I can't sleep very well at all because I worry so much about my family. I have only spoken with my father a total of 20 minutes in these 45 days, and did not speak with any family at all for one month. I had absolutely no idea what was going on and have been very scared.
5. My grandmother is taking care of my four little brothers and sisters in Guatemala. I also have an aunt that lives in Guatemala. Because my grandmother does not have a telephone, I have to call my aunt to get in touch with my family. I have only spoken to my aunt once. For a long time, I had no contact with them because I didn't know their phone number. I cannot read or write. Remembering numbers is hard. Recently my case worker said they had my aunt's phone number, and I was very happy to talk to her. But I am also sad, because I found out that now my grandmother is sick and my little brothers and sisters are crying for me and our dad.
6. One night I was crying in the bathroom because I was so worried about my family and I didn't know where my dad was or how he was. A staff member here at Casa Padre came in and asked me why I was

being such a cry baby. Then he said some words in English that I didn't understand but other young men who where there told me he said swear words. It made me feel very bad and very ashamed.

7. Nobody has every talked about my legal rights as to my own case with me. I had never heard of the Flores case until today when attorneys spoke with me about it. I have never been told I have options to leave. I was given a folder with some papers in it after I agreed to speak with attorneys, but since I cannot read I did not understand any of it.
8. When I first got to Casa Padre, the food was not very good. Mostly beans and soup. After a week or so, we started having more variety of food to eat.
9. When I last spoke with my father, he told me that his case had not gone well. He told me that he was going to have to leave but he wants me to go with him. We want to leave the U.S. together. That conversation was last week and I have not heard anything new. I have no idea what is going on. I feel helpless and have no idea what to do. I just know that as soon as possible I want to be out of here and with my family. I do not want to be here anymore, especially since I know how much my father is suffering. The way I have been treated makes me feel like I don't matter, like I am trash.

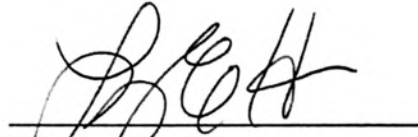
I, Sergio C [REDACTED], swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

[REDACTED]

7/13/18  
Date

#18763  
Certificate of Translation

I, LUZ E. HERRERA, certify that I am fluent in English and Spanish and that I read the above declaration to Sergio C [REDACTED] in Spanish.



Luz E. Herrera  
1515 Commerce Street  
Fort Worth, TX 76102

7/13/18

Date



# Exhibit 59

Dennis M [REDACTED] Declaration of  
A NUMBER [REDACTED]

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

1. My date of birth is 8/2/2002. I am from Honduras. I want to continue with schooling and to ~~continue in my~~ ~~to~~ help my uncle who is a painter.
2. I/we left Honduras because I was being harassed by the gangs in the area. I have a tattoo of the name of my hometown on my arm. The gangs think that means I belong in a gang. I have not been in a gang and have no wish to be in one. I was afraid the gangs would kill me if I didn't join the gang.
3. We presented ourselves at the border/were apprehended at around Mexicali (time). I believe that it was on or about June 22, (date). We were taken to El Centro Border Patrol station (facility).
4. I was not given any food when I arrived. The morning after I arrived I was given a burrito to eat. The burrito has only beans in it. There is not enough food. I am hungry. The room I am in has about 13 boys. There are not enough blankets for us all to use when we try to sleep. I was very cold at night and there was nowhere to sleep.
5. The lights are kept on all the times ~~which~~ I have not been able to shower and I need one.
6. I have not been given any papers about ~~my~~ any rights I may have. I have not been told about the availability of or right to an attorney. There are no postings of any of these issues on the walls.

I, Dennis M. [REDACTED] wear 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.

28/05/2019  
Date



Certificate of Translation

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

ESTELLA GALVAN

Name:

Organization:

Address: 28132 Telon Ct  
Laguna Niguel Calif 92677

06-28-18

Date

# Exhibit 60

Emilson E

#18769

[FULL NAME], A NUMBER XXX XXX XXX

Emilson E

I, [NAME] (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 [DATE OF BIRTH] *10/8/2018*. My son/daughter's name is XXXX. He is [YEARS OLD] *I am 16 years old.* and he was born on [SON'S DOB]. My son and I are from [COUNTRY OF ORIGIN] *I am Honduran.*
2. Describe Reason for leaving country of origin. *I left Honduras because gangs were threatening me. 15 hours ago*
3. We presented ourselves at the border about [TIME SINCE APPREHENSION]. I believe that it was on or about [APPROXIMATE DATE] *I crossed June 27, 2018*. We were taken to [FACILITY] *El Centro, LBP*. [DESCRIBE CONDITIONS AT THIS FACILITY]
4. [FOOD AT FACILITY] *Since I arrived they only gave me food this morning around 9am. It was not enough and I am*
5. [TEMPERATURE AT FACILITY] *hungry*
6. [LIGHTS, HYGENE ETC.] *The temperature is okay but the lights are on all the time and there are not enough mattresses to sleep on. There are only 3 mattresses in my cell*
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 *and about 8 people*
8. [DESCRIBE CONDITIONS LIKE ABOVE]
9. [DESCRIBE LEGAL NOTICE AND ACCESS TO COUNSEL ISSUES]
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 do not know what will happen next. I want to go home*
12. [DESCRIBE CURRENT CASE AND RELEASE STATUS] *with my friend in Ohio, FL. I miss my family.*

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

Spa

Emilson E

[NAME]

Date

*6/28/2018.*



#18770  
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  
350 Sansome St. Ste 1000  
San Francisco, CA 94104

6/28/2018

Date

# Exhibit 61

Declaration of  
ERICK L [REDACTED], A NUMBER [REDACTED]

I, ERICK L [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 20, 2002. I am from Guatemala. I came to the United States alone. I am 16 years old.

2. I ~~was~~ left Guatemala because I am afraid <sup>for my life because</sup> of gangs and La Marra. The gangs were trying to get me to join and hurting me. Two months ago I left my parents and 3 sisters and went to Mexico and then came here. I was

3. ~~We presented ourselves at the border~~ <sup>I</sup> ~~was~~ <sup>was</sup> apprehended at around 7:00 am (time). I believe that it was on or about June 25, 2018 (date). ~~We were~~ taken to El Centro Border Patrol Facility (facility). This is the only location I have been in since arriving.

4. I came over the wall at the border and was captured by Border Patrol.
5. I told the Border Patrol that captured me that I am afraid to go back to Guatemala.
6. When I ~~came~~ here I was kept in a small room with 12 boys for 5 hours.
7. When I came here, I did not get any food until midnight, about 17 hours after I was captured.



8. I am hungry and I am not getting enough food.

9. Since I came here, I have been given <sup>over</sup> 3 small burritos to eat, ~~for~~ three days. I have also gotten salty crackers and 2 juice drinks.

10. I have been allowed to make one phone call at 1:00 a.m. <sup>on Tuesday, June 26, 2015.</sup> I called my <sup>friend</sup> ~~uncle~~ in Los Angeles. There was no list of legal services near the phone.

11. I have not asked for ~~or been offered~~ a lawyer. I was told that I could see a judge or a lawyer. I was not told that I have legal rights.

12. A female guard gave me papers to sign. They were in English. I do not understand English. She said "Don't worry. Sign this. You can see a judge or lawyer." I signed it.

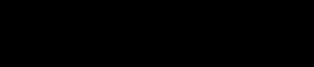
13. I told the guard I am afraid to return to Guatemala.

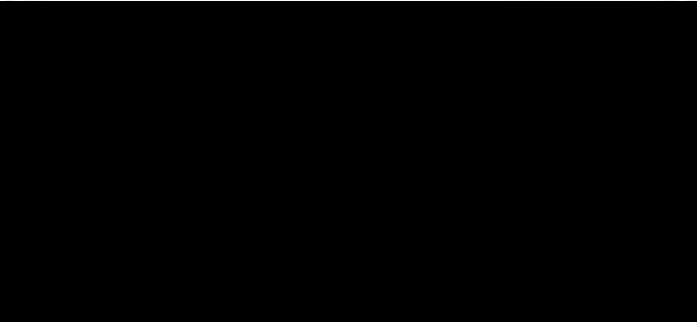
14. I am kept in a room that is about 3 meters by 3 meters. There are 13-15 teenage boys in the room at a time.
15. The bathroom is in our room. There is no privacy. It is dirty and they don't clean it. They come and clean the floors every day, but they don't clean the toilet. There is no soap to wash hands or face.
16. I have not been offered clean clothes. I got a shower on Wednesday, two days after coming here. There was shampoo but no towel to dry off.
17. There is <sup>a</sup> water in a container in the room. It tastes bad - like chlorine. There are no cups. I use ~~to~~ my juice container. When it's empty sometimes they don't fill it right away.
18. The room is always <sup>very</sup> cold. The guards took my sweater.
19. I sleep on the floor. There are 3 mattresses, but the boys from Honduras have taken them. All the other boys sleep on the floor. I have a nylon blanket but I am cold.



20. I cannot sleep because the lights are on all the time. The boys from Honduras talk at night and say "if you fall asleep we'll stab you." They don't like me because they are light skinned and I am dark.
21. I feel afraid of the other boys. They talk bad and say bad things. I don't talk to anyone. Some of them have tattoos & like gang members.
22. I feel weak because there is not enough to eat.
23. The <sup>guards</sup> ~~other boys~~ call all the Guatemalans "burros" or stupid or they say we don't understand anything. They yell at us. They say "Get up!" or "Eat this!" Sometimes the burritos they give us are not warm, or not cooked.
24. I eat the burritos because I'm hungry but they make me feel terrible and sick.




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



June 28, 2018  
Date

Certificate of Translation

I, FLOR SANCHEZ certify that I am fluent in English and Spanish and that I read the  
above declaration to ERICK BL  in Spanish.

*Flor Sanchez*

Name:

Organization:

Address:

June 28, 2018

Date

# 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 sleep 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 they 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] - [REDACTED] - [REDACTED]), declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is 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 called Salvatrucha. 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, 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 ~~of~~ 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 ~~or~~ 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 F. [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, Estela Salvan, 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 ~~at~~ 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 Teton Ct  
Laguna Niguel, Calif 92677

06-28-18

Date

# Exhibit 66



## Declaration of

Elmer S [REDACTED]

I, Elmer 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 February 4, 2003, and I was born in Choluteca, Honduras. I am fifteen years old.
2. I arrived at the border by myself about January 20, 2018 and swam across the river into Brownsville, Texas. Twenty minutes after I crossed into the United States, an immigration official apprehended me and took me to a very cold facility. I spent the night there and then immigration officials took me to a facility where they put me in a cage. After some hours, immigration officials transferred me to IES Los Fresnos. I spent twenty-eight days in IES Los Fresnos, and then on about February 20, 2018, immigration officials transferred me to Casa Esperanza. On June 8, 2018, immigration officials brought me to Casa Padre.
3. Even though Casa Esperanza is a staff secure facility, the conditions at Casa Esperanza were better than the conditions here at Casa Padre. For example, here at Casa Padre, they do not give us enough food and I am always hungry. Also, here at Casa Padre, they do not let us go to the doctor when we ask. Today, I asked to go to the doctor at 7:30 a.m. during physical education because I have a sore throat, I had a headache and feel a cough coming. I didn't sleep last night because I felt sick, but they did not let me go to the doctor and made me continue exercising for an hour.
4. I have also needed to go to the dentist since I have gotten here because I have cavities on the right side of my mouth that have not been filled. Because of the cavities, I am not able to eat well because I can only chew on the left side of the mouth and the cavities are very painful. I had an appointment to see the dentist when I was at Casa Esperanza, but Casa Padre canceled it when I got here and have not rescheduled. I am still waiting to see the dentist since I got here over a month ago.
5. One reason that we get sick so much here at Casa Padre is because we are constantly being taken out of a very cold facility and then sent outside in the hot sun where there is no shade. We are taken out from 7:00 a.m. to 8:00 a.m., and then from 4:00 p.m. to 5:00 p.m. Though we should be able to spend more time outside for our wellbeing, the 2 hours that we do spend are unbearable because due to the scorching heat and lack of shade. We are not provided any sunscreen and when we ask to stay inside to protect ourselves from the sun we are not allowed.
6. The clothes that we receive here are not suitable to the temperatures in the facility. Because I came to the United States in the winter, I have a sweat shirt, but most kids do not have sweaters. The blankets we have in our room are very thick and not sufficient to keep us comfortable at night when the facility is the coldest.
7. Since I have been in detention, I have been able to speak to my mother for about ten minutes each call, twice a week. I speak to my mother in a small booth with a window. Although the door to the booth is closed, center staff wait outside, and I do not feel completely at ease speaking with my mother.
8. Speaking to my mother for ten minutes a week is not enough. It takes me four or five minutes just to ask her how she is doing, but then I do not have enough time to get to speak with my father.
9. If I go over the ten minutes I'm given to speak with my parents, I will get in trouble with the center staff. The center staff have told me that they will write me up. The staff has told me that all write ups will



#18791

delay reunification with our relatives. All write ups are also placed in a portal, and center staff have told me that the immigration judge can see the reports in the portal. I am afraid that if I speak longer than 10 minutes or get any type of write up the immigration judge will see the write up in the portal and will not look favorable on my immigration case.

10. I am also able to speak with my sponsor, my uncle [REDACTED] but I have to choose whether I speak to my parents or my sponsor. If I were able to speak more to my sponsor, I'd feel more at ease because I could speak to him about my reunification.
11. I have never tried to leave the facility because if you try to escape, center staff have said that you will not receive any help from ORR. This means that you will not receive help getting a job or other services that ORR offers. They also have told me that they will send you to a juvenile detention center that is not operated by ORR. We were told that if we escape we will be considered a criminal and that the police will come looking for us.
12. When I was at Casa Esperanza, they would take me to church on Sunday. Since I've been here, I have not been allowed to go to church, even though some of the other children have been allowed to go church.
13. Up until today, nobody had explained my rights under the Flores Settlement. Before my meeting today, center staff gave us a folder with documents in English that we did not understand and told us that the purpose for meeting today was to talk about the conditions in the center. They did not explain to us any of the documents or our rights. For instance, Center staff did not tell us that we had a right to reunify with our family without unnecessary delay.
14. Center staff can also be brusque. Many do not say "please" and they yell at us. They also write us up for any little thing when they are in a bad mood. One day, another kid in the facility told a member of the staff, "Next time, say 'please.'" The staff member replied, "shut up."
15. Center staff does not give me enough alone time before bed. I like to read the Bible, write in my diary, but staff only gives us thirty minutes of alone time before bedtime to engage in these kinds of activities.
16. I have asked center staff to give me more alone time—time to be by myself—but it is difficult. One day I did not feel emotionally well. I had just received news from my mother that my aunt had become very sick, and I was feeling lonely, anxious, and worried. I wanted to be alone to process what I was feeling so I asked the center staff that I wanted to go to my room to be alone. The center staff did not let me go to my room, so I started crying out of frustration. After I started crying, I had to speak to a supervisor to be allowed to go to my room accompanied by a staff member. They only allowed me to be in my room for 30 minutes which was not sufficient for my wellbeing. We should not have to get to tears before we are given space.

17. There is no freedom here. I understand that they have to follow a schedule, but they should give us alternatives of things to do, especially for those of us who have been locked up for so long. They are very rigid with the schedule they force us to follow and sometimes we just don't want to participate in the activities that they have for us, but they do not respect that. They do not allow us to pick which activities we would like to participate in or what areas of the facility we would like to spend time at.

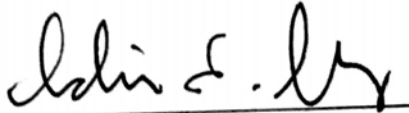
I, Elmer S. [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

07/13/18  
Date

#18793

Certificate of Translation

I, Adrian Enrique Alvarez, certify that I am fluent in English and Spanish and that I read the above declaration to Elmer S [REDACTED] in Spanish.



Adrian Enrique Alvarez  
4300 Nebraska Ave NW  
Washington, DC 20016

7-13-18

Date

# Exhibit 67



**Declaration of**  
**Yonain G [REDACTED] A [REDACTED]**

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

1. I was born on August 9, 2004 in Guatemala. I was arrested yesterday morning with my father at Sonoita. We were taken together to this Tucson CBP facility where I was separated from my father.
2. I am staying with 12 other boys. The room is clean. There are two toilets, toilet paper, a sink, and soap. I used a toothbrush. I had a shower last night.
3. I sleep on a mattress on the floor with an aluminum blanket. I wear the blanket all the time and I'm still cold. The lights are never turned off.
4. I am fed at 8, 10, 12, 2, 4, and 8. Each meal is a burrito, a cookie, and juice. There is water with paper cups in the room I am held in.
5. I was not told my rights or that I could have an attorney. I was not given any paper when I was arrested.

I, Yonain G [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]

0673 2078  
Date

Certificate of Translation

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

  
\_\_\_\_\_  
Betsy Aguirre

Center for Human Rights & Constitutional Law

06.18.2018  
Date

# Exhibit 68

**Declaration of**  
**Juan M [REDACTED] A [REDACTED]**

I, Juan 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. I was born on February 19, 2001 in Colombia. I am 17 years old.
2. I was apprehended with my mother at about 7am on Tuesday June 12, 2018. We were taken to somewhere similar to this Tucson CBP, close to the place where we were arrested. When we arrived, I was given a burrito, cookie, juice, and bottled water. We spent 6-7 hours there.
3. I was with my mother until we came here late yesterday. I am housed with 8 other boys. The room has two toilets, toilet paper, sink, and soap. I have not been offered a shower.
4. I am not eating much. The burrito is too spicy and upsets my stomach. The cookie is peanut butter which I don't eat.

I, Juan Manuel Loiza Mejia, 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.

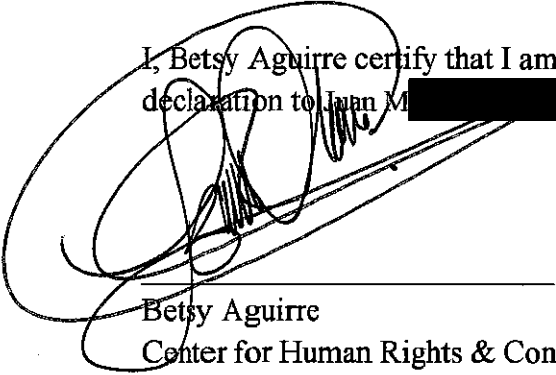
[REDACTED]

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 Juan M. [REDACTED] in Spanish.



\_\_\_\_\_  
Betsy Aguirre

Center for Human Rights & Constitutional Law

06.13.2018

Date

# Exhibit 69

**Declaration of  
Ivania L [REDACTED], A [REDACTED]**

I, Ivania L [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 September 16, 2002 in El Salvador. I came to the U.S fleeing gang violence.
2. I was apprehended with my mom close to Sonora on June 10<sup>th</sup> 2018, Sunday, at 11pm. We were taken to a facility about an hour away where we stayed together.
3. Someone told us why we were arrested but they spoke a mixture of Spanish and English so we didn't understand. We were not given any paper or told anything about my rights.
4. At the first place there were 8 other people in the same room as us. We had mattresses to sleep on and aluminum blankets. There was one bathroom that had a toilet a sink, toilet paper and soap. It was really cold in the room. I kept my blanket on all the time. The lights were left on all the time.
5. We were given a burrito, cookie, juice and water an hour after we arrived. We received a burrito, cookie and juice again at 7am, 10am, 1pm, 8pm, and 12am on Monday. We were given a juice before we left on Tuesday
6. We were transported together to the Tucson CBP detention on Tuesday at 5am. It took 4-hours to go from the first place to here. Once we got here we were separated and I have not seen my mother until now. I asked where she was once and was told she was in court.
7. I stay in a room with a woman and an 8-year old boy. We each have a mattress to sleep on and an aluminum blanket. It is very cold so I wear my blanket all the time. When I first get it it keeps me warm but pretty soon it doesn't anymore. It was the same exactly at the first place.
8. There is a bathroom with a toilet, toilet paper, a sink and soap. The toilet has a short door. I cover myself with my aluminum blanket because there is a camera pointed right at the toilet.
9. I took a shower yesterday in the early evening. The shower has 2 spouts- the top one cold and the bottom hot. They are operated with separate buttons. I had to be naked because I have only the clothes I am wearing. There is no shower curtain and the camera which points at the toilet also shows the shower. I did not have soap but I did have shampoo.

10. I get a burrito, cookie and juice an 7am, 10am, 1pm, 8pm, and 12am. There is a water dispenser with cups in the room where I stay.

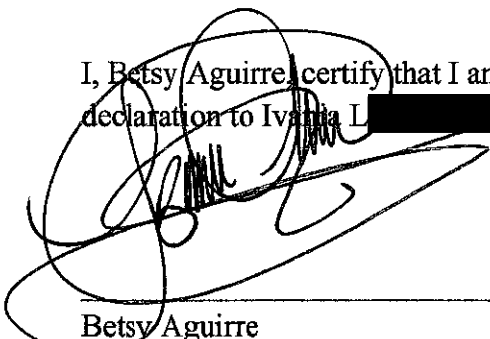
I, Ivania L [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was read to me in Spanish, a language in which I am fluent.

[REDACTED]

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 Ivania L [REDACTED] in Spanish.

  
\_\_\_\_\_  
Betsy Aguirre

Center for Human Rights & Constitutional Law

06-18-2018  
Date



# Exhibit 70

#18804  
Declaration of

Geovany D [REDACTED], A [REDACTED]

I, Geovany 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. I was born in Guatemala on April 24, 2002. I am 16 years old.
2. I came alone. I got arrested last night in Altar around 9pm. I arrived at the Tucson CBP around 11pm. I was given a burrito, cookie, juice, and water. I am given the same meal periodically during the day.
3. I stay in a room with 7-8 other boys. It is clean. The temperature is cold. There are 2 toilets with toilet paper, sink, and soap. I was offered a shower but did not take it.
4. I was not told my rights or given any paper describing them. I was not told I could consult a lawyer nor was I given a list of lawyers.

I, Geovany D [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.

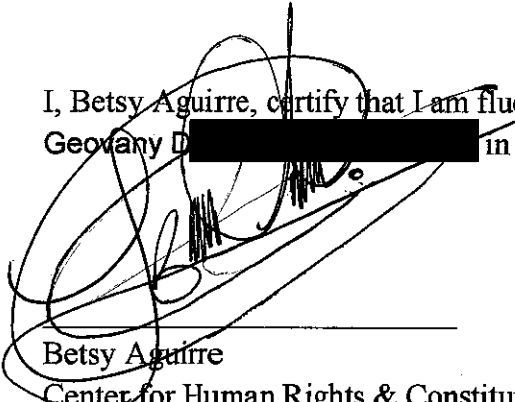
[REDACTED]

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 Geovany D. [REDACTED] in Spanish.

  
\_\_\_\_\_  
Betsy Aguirre  
Center for Human Rights & Constitutional Law

06.13.2018  
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 5 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*