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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

Jenny Flores, *et al.*,

Plaintiffs,

v.

Pamela Bondi, Attorney General of the
United States, *et al.*,

Defendants.

Case No. CV 85-4544-DMG-AGRx

**NOTICE OF MOTION TO ENFORCE THE
FLORES SETTLEMENT AGREEMENT**

Hearing: July 18, 2025

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To all Parties and their attorneys of record:

Please take notice that on July 18, 2025, at 9:30 a.m., or as soon thereafter as counsel may be heard, Plaintiffs will and do hereby move the Court for a classwide order requiring Defendants to cure breaches of the settlement approved by this Court on January 28, 1997 (“Settlement”), as described in the accompanying memorandum of law.

This motion is based upon the memorandum of law and exhibits filed concurrently herewith, and all other matters of record; it is brought following a meeting of counsel pursuant to Local Rule 7-3 and Paragraph 37 of the Settlement on June 12, 2025.¹

Dated: June 17, 2025

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¹ Over the past year, the Parties met five times about conditions in CBP detention and Plaintiffs sent six letters outlining alleged violations of the Settlement. Plaintiffs requested a meet and confer on this motion on May 30, 2025 and the Parties met and conferred on June 12, 2025. (“Kahn Dec.”) ¶¶ 3-4.

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1	Declaration Sarah Kahn, June 15, 2025	Kahn Dec.
2	Declaration of Diane De Gramont, June 12, 2025	de Gramont Dec.
3	Declaration of T.M. (New York), June 5, 2025	T.M. Dec.
4	Declaration of K.V.L (Ohio CBP Office), May 2, 2025	K.V.L. Dec.
5	Declaration of A.B (San Diego SSF), March 7, 2025	A.B. Dec.
6	Declaration of G.A.D (San Diego SSF), March 7, 2025	G.A.D. Dec.
7	Declaration of L.G.C.G (San Diego SSF), March 7, 2025	L.G.C.G. Dec.
8	Declaration of R.S.R (San Diego SSF), February 13, 2025	R.S.R. Dec.
9	Declaration of M.I.J (San Diego), March 26, 2025	M.I.J. Dec.
10	Declaration of V.I.B.G (New York), March 26, 2025	V.I.B.G. Dec.
11	Declaration of F.Y (El Paso), May 1, 2025	F.Y. Dec.
12	Declaration of M.M (El Paso), May 2, 2025	M.M. Dec.
13	Declaration of M.P.C. (El Paso), May 2, 2025	M.P.C. Dec.
14	Declaration of A.T. (O'Hare Airport), May 1, 2025	A.T. Dec.
15	Declaration of F.O. (Ursula), April 30, 2025	F.O. Dec.

16	Declaration of G.B.A. (Ursula), April 30, 2025	G.B.A. Dec.
17	Declaration of M.H. (Ursula), April 30, 2025	M.H. Dec.
18	Declaration of M.L.R.L. (Ursula), April 30, 2025	M.L.R.L. Dec.
19	Declaration of L.N (Chula Vista), April 10, 2025	L.N. Dec.
20	Declaration of W.J. (Chula Vista), April 10, 2025	W.J. Dec.
21	Declaration of S.G. (Chula Vista), April 10, 2025	S.G. Dec.
22	Declaration of A.K. (Otay Mesa), March 26, 2025	A.K. Dec.
23	Declaration of S.K. (Otay Mesa), May 22, 2025	S.K. Dec.
24	Declaration of I.G. (Otay Mesa), May 22, 2025	I.G. Dec.
25	Declaration of L.Q.A (Buffalo), May 2, 2025	L.Q.A. Dec.

I. INTRODUCTION

U.S. Customs and Border Protection (“CBP”) detention facilities are harsh, prison-like, unsafe, and unsanitary and were never intended for prolonged detention of any person, much less a child. Plaintiffs bring this motion to enforce the Flores Settlement Agreement (“FSA” or “Settlement”) and address that children now languish for weeks in CBP custody, during which time they are not even considered for release, until, in many cases, they are transported to Immigration and Customs Enforcement (“ICE”) custody and detained for weeks or months more.

At the heart of the FSA is an agreement between the parties that children should not be detained in prison-like conditions. However, despite a decrease in border encounters, CBP increasingly holds children for prolonged periods of time while refusing to consider individuals in its custody for release. Compounding this cruelty, CBP frequently then transfers children to recently reopened ICE Family Detention Centers for weeks of *additional* detention, where ICE “restarts the clock” for children’s time spent in custody.

During their extended detention, CBP holds children in increasingly harsh conditions, including in Ports of Entry (“POE”), which are meant to hold individuals for only a few hours, in violation of ¶ 12A of the Settlement. Children are particularly vulnerable to the trauma caused by the confusion, cruelty, and deprivation endemic to CBP custody.

CBP’s widespread, consistent, and ongoing violations of the FSA throughout its nationwide system of detention, as well as Defendants’ repeated failure to provide accurate data on time in custody to Plaintiffs, justify the appointment of an Independent Monitor to validate Defendants’ data, ensure compliance with the Settlement’s requirement that children be expeditiously processed, and ensure that during processing, children are detained only in safe and sanitary facilities.

II. SUMMARY OF RELEVANT FACTS

A. *CBP Detention Conditions are Prison-Like, Unsafe, and Unsanitary.*

In CBP facilities across the country, including in cases documented by class counsel in New York, Maine, Illinois, Ohio, Arizona, Texas, and California, Plaintiffs report being held for days and sometimes weeks in restrictive, traumatic conditions. Kahn Dec. ¶ 5. CBP often leaves blinding lights on 24 hours a day in cells or rooms with no windows and no access to natural light, so that children do not even know whether it is day or night. *See, e.g.,* S.K. Dec. ¶ 14 (“For five days we were without a window, without sun. There was a light on 24 hours.”) M.R.L. Dec. ¶ 18 (“we cannot go outside. We cannot see the sun or breathe the air outside.”).

Children frequently report they do not have access to soap to wash their hands or regular showers. A.K. Dec. ¶ 20 (“I was washing her clothes in the sink and having them dry out. There was not even soap to clean them with. It was horrible.”); G.B.A. Dec. ¶ 11 (“There is water but no soap to wash our hands.”); K.V.L. Dec. ¶ 11 (“It was four days before my son or I could shower or change clothes. They didn’t even let my son change his underwear. Now he has a rash.”); S.G. Dec ¶ 11 (“For the first five days we were here, they offered to let us take a shower, but it was in the middle of the night at eleven, one and two AM and the showers were cold, so we didn’t take them because we were sleeping. Only in the last three days [before the scheduled *Flores* interviews] have we been allowed to bathe at a normal time.”).

In POEs, which include CBP offices, airports, and other spaces meant for interviews or detention of only a few hours, conditions are especially unsafe for children. S.K. Dec. ¶¶ 9, 11 (“They took us to a white room with a chair and table, a small room, and began asking us questions, interrogating us about how we made it to the border . . . for days I slept in that small room.”); A.T. Dec. ¶ 10 (11-year-old boy held in O’Hare airport for five days was “not permitted to flush the toilet” and “had to ask an agent to come and flush the toilet for” him); K.V.L. Dec. ¶¶ 7, 8 (“It was not suited for children . . . there was a large window that looked out on the office space and agents working on

1 their computers. All the agents were men. The room had a toilet that was completely
2 visible to anyone walking by the room. We could only go pee because it was so
3 uncomfortable to go to the bathroom within the view of all those men.”).

4 CBP fails to treat children in its facilities with concern for their particular
5 vulnerability as minors. As one parent shared:

6 The rooms have hard walls, like cement, and there is a window facing the hall but
7 you cannot go out or see the sun. We are never allowed to go out. The children
8 keep telling us, “This is not America.” They feel imprisoned and confused. They
9 are seeing the sun for the first time in this interview room. They both ran to the
window and stared out, and my son asked, “Is that America?”

10 F.O. Dec. ¶¶ 6-7.

11 Prolonged detention in prison-like conditions is causing children significant harm.
12 L.N. Dec. ¶ 20 (“My children are deteriorating psychologically. My son has started
13 hitting himself in the head and complaining of boredom. My daughter is always crying. I
14 am very scared that my children are going to hurt themselves.”); S.K. Dec. ¶ 16 (“There
15 was not even a single toy. They were not allowed even to jump, to move, to play with
16 each other. Can you imagine being three years old and told not to move for five days?
17 Officers would stop by the room and if the children were moving, the officer would tell
18 them that if they didn’t stop, they would be taken away.”).

19 Children also increasingly report cruel behavior by CBP agents, including refusing
20 to let them change their clothes or shower and then sneering that they smell bad, or
21 threatening children with separation or deportation if they try to play. *See e.g.* S.G. Dec. ¶
22 4, 6, 8-9 (“They told us to ‘shut the f--k up’ and that asylum had been canceled by
23 President Trump and that there would be no asylum for five years. They handcuffed my
24 mom and they ordered us into a car and took us to Chula Vista detention center. We were
25 still soaking wet and dirty and cold and stinky . . . They talk in English thinking we can’t
26 understand the rude things they say, but I understand a lot of English so I can understand
27 what they say. I heard one officer say about us ‘they smell like sh--,’ and another officer
28 responded ‘they are sh--.’ . . . They treat us like we are not human beings.”); V.I.B.G.

Dec. ¶¶ 15-16, 24 (“They yelled at me ‘f---ing bi---, shut up!’ They treated us like animals.” “The staff told us we were criminals; they said you can ask your God to save you, see if they exist.”); M.H. ¶ 20 (“you can see the hate in their eyes”); S.K. Dec. ¶¶ 20-22 (“The switch to flush the toilet was outside the room. Every thirty minutes they would flush it. It was extremely loud, we could not sleep. There were a few kind officers, four, but the rest of them tortured us.”).

In addition to harsh facilities and cruel treatment, children are regularly forced to use the restroom in full view of other detained families and guards, which is especially traumatizing because of their particular vulnerability as minors. L.N. Dec. ¶ 14 (“There are no doors on the toilet, so everyone can see you using the bathroom. It is completely humiliating. My older children are having a hard time using the bathroom because they are embarrassed. There are beds right next to the toilet...”); A.K. Dec. ¶ 25 (“There was one toilet in the room for 23 people. There was a panel on one side of the toilet, but it wasn’t fully covered, so if someone was in front of you, they could see you going to the bathroom.”); S.G. Dec. ¶ 5 (“The sleeping place was actually a prison cell. It is very, very cold. There is no door for the toilet, and the floor is very dirty. It’s very embarrassing to not have privacy to use the toilet.”); A.L.W. ¶ (“There was a toilet in the corner of the cell, but it wasn’t private, it was out in the open. There were so many cameras around the cells that I was afraid to go to the bathroom because I didn’t want to undress in front of a camera. I developed a kidney infection.”).

Children are given no reassurance or information about what is happening to them, causing confusion and fear. *See, e.g.*, A.T. Dec. ¶¶ 23-34 (“We learned we were being transferred to another facility. We had no idea where we were going or who these people were. We were already paranoid because of the persecution we faced in [our home country]. We didn’t know what they would do to us or where they would take us and we were disoriented and exhausted. It was terrifying.”); V.I.B.G. Dec. ¶ 19 (They “could hear the chain of the handcuffs on the floor from down the hall; they’d shake their heads, cry, and put their hands over their ears. They’d say mom they are going to kill us.”).

Fathers are routinely detained apart from their families with little visitation. *See, e.g.,* M.M. Dec. ¶¶ 15, 17 (“We were allowed only twenty minutes every five days in a freezing room to see each other . . . [officers] would not speak to us. If we spoke to an officer, if we asked for water or to see our family, if we asked for a phone call or lawyer or even to know what was happening, they would shut the door on us.”); M.I.J. Dec ¶ 8 (“I didn’t see my children for two weeks. It was so hard . . . it felt like many years.”). CBP separates children from accompanying adults who are not the child’s biological parent with no explanation. *See, e.g.,* R.S.R Dec. ¶ 27 (“I was able to see [my husband] again when we were called for this interview, and he informed me that agents called my father from their cell last night and took him. They did not say where. He has not been brought back. We do not know where he is. [My husband] is distraught not knowing anything about it. I don’t know how I will tell [my son].”); A.B. Dec. ¶ 5-10 (“I am desperate to know where my children are and if they are ok . . . I have been here 10 days, they won’t tell me where my [older] kids are, if they are ok or if they are even in this facility . . . My [younger] children are worried about me and they are worried about their siblings.”).

This separation is even scarier for children because many are not allowed to make a phone call. K.V.L Dec. ¶ 16 (“They didn’t let us make any phone calls. They could have done anything to us or sent us anywhere and no one would have known. It was quite a few days before anyone knew what happened to us.”); L.C.G. Dec. ¶¶ 15-16 (“I have not been allowed to use a phone, not even at the first station. I haven’t spoken to my mom . . . I don’t know if my family is ok . . . they don’t know whether I am alive . . . I begged him to help me call my mom but he only told me that he doesn’t speak Spanish.”); L.N. Dec ¶ 23 (“We have not been allowed to use the phone even once since we arrived here eight days ago . . . I asked if at least my children could call their father, even for one minute, but the officers refused.”).

CBP also routinely denies children and families the opportunity to contact a lawyer, even in the few facilities that allow calls to loved ones. M.L.R.L. Dec. ¶ 19

1 (“They give us one call per day. I cannot call a lawyer. They did not give us a list of legal
2 service providers. There is an agent outside listening to our phone calls.”); S.G. Dec. ¶ 12
3 (“they haven’t given us a list of lawyers and no one told us we can have a lawyer. My
4 father has a lawyer but we haven’t been able to contact him to even let him know we’re
5 here or that we are alive.”); S.K. Dec. ¶ 25 (“We got only one call at 3am. No other calls
6 in the five days.”); M.H. Dec. ¶¶ 11-12 (“We weren’t able to sleep much. Around 1am
7 they took us to a room and . . . made me sign this form. Around 2am they woke me and
8 my son again. They took us to a room and asked me to sign a paper. I was so tired I could
9 barely see. I asked why they woke my son, who is very young.”).

10 Finally, children in CBP custody lack adequate access to medical care. Freezing air
11 makes many of the children sick. See, e.g. T. M. Dec. ¶ 7 (“The cell was freezing cold,
12 and there was a fan in the ceiling that constantly blew cold air on all of us. We asked the
13 guards to turn off the fan, because we were worried about the baby getting sick, but they
14 just laughed at us.”); M.P.C. Dec. ¶ 5 (“Both of my kids got sick while we were in there.
15 I think they got sick because of the cold.”); A.K. Dec. ¶ 16 (“Many kids in the room got
16 sick because of the cold, including fever, diarrhea, and vomiting.”).

17 Prolonged detention is especially harmful to children with disabilities, who often
18 do not receive medication or individualized care in custody. R.S.R. Dec. ¶¶ 6-10 (“[My
19 son] has been diagnosed with autism and ADHD. We have medication . . . I gave his
20 medications to the doctors, but they have not given them to [him] . . . Without the
21 medicine, [my son] only eats the chips here . . . I am very worried about [him] . . . his
22 medication helps calm him down . . . I have asked so many times but they will not give it
23 . . .”). CBP agents with no medical training often make their own assessment of an
24 injured child and deny them access to a medical professional. S.G. Dec. ¶ 7 (“my tonsils
25 were very swollen and painful . . . They just said to see a throat doctor when I get to
26 where I’m going, once I’m out of this place.”); S.K. Dec. ¶ 27 (“His face and head were
27 so badly injured that he became dizzy and was vomiting. I was terrified that he had a
28 concussion or could be seriously hurt. I asked them to x ray him or give him a test or scan

1 or to take him to a hospital but they refused.”); A.K. Dec. ¶19 (“When my daughter was
2 sick, a member of medical staff said it’s my own fault that my daughter was sick, because
3 it was my decision to bring her here. When I asked for medication, staff told us to go
4 home and we’d get it there.”).

5 B. *CBP Detains Children for Extended Periods.*

6 CBP has adopted a policy of refusing to consider arriving non-citizens for release,
7 including families who cannot be returned to their home country or who may have some
8 pathway to lawful status.² CBP, like ICE, has discretion to parole individuals in its
9 custody, including those placed in expedited removal proceedings, “on a case-by-case
10 basis for urgent humanitarian reasons or significant public benefit.”³ 8 U.S.C. §
11 1182(d)(5)(A). Instead, CBP keeps accompanied children in its custody until it removes
12 them from the United States or transfers them to ICE custody where they can request
13 parole from ICE.⁴

14 In December 2024, Border Patrol (“BP”) reported that among 47,324 individuals
15 processed, CBP released 7,041 with a notice to appear (about 15%); in April 2025, BP
16 reported that among the 8,383 individuals processed, it released only 2 with a notice to
17
18

19 ² See Executive Order, *Securing our Borders* (January 20, 2025), Sec. 5., available at
20 <https://www.whitehouse.gov/presidential-actions/2025/01/securing-our-borders/> (last
21 visited June 15, 2025) (ordering “termination of the practice commonly known as ‘catch-
22 and-release,’ whereby illegal aliens are routinely released into the United States shortly
23 after their apprehension”).

24 ³ By entering the FSA, the Executive Branch recognized, and Congress has since re-
25 affirmed, that the extreme harm of imprisonment to traumatized children who frequently
26 had no or little agency in the decision to cross the border creates a presumption that
27 release of a minor is for urgent humanitarian reasons and a significant benefit to the
28 public. See, e.g. 8 C.F.R. 212.5(b)(3) (establishing that parole of noncitizens in expedited
removal “would generally be justified” on a “case-by-case” basis, and that “[m]inors may
be released with an accompanying parent or legal guardian who is in detention”); 8
U.S.C. § 1232(b)(3) (DHS “shall transfer the custody of [any] child to[HHS] not later
than 72 hours after determining that such child is an unaccompanied [] child.”).

⁴ There are now about 500 individuals detained at Dilley. Kahn Dec. ¶ 10.

1 appear (about 0.0002%).⁵ While children await transfer, CBP does not make prompt and
2 continuous efforts towards release with their family, to a sponsor, or to a licensed facility,
3 violating FSA ¶ 18.

4 CBP detention is intended only to accommodate short lengths of stay between
5 apprehension at the border and the next step in a person's immigration case. Indeed,
6 CBP's own written policy directs it to release or transfer those in its custody within 72
7 hours.⁶ Yet its no-release policy, in combination with its violation of FSA ¶ 18, results in
8 a greater proportion of children in CBP custody experiencing prolonged detention—in
9 the punishing conditions described above—despite a significant decrease in the number
10 of children apprehended. In May 2024, CBP encountered 92,063 individuals in family
11 units and unaccompanied children. *See* Exh. 2, Declaration of Diane de Gramont ¶ 30
12 (“de Gramont Dec.”). According to Defendants’ monthly data provided under FSA
13 Paragraph 28A, CBP detained 2,240 of those children for over 72 hours in CBP custody.
14 *Id.* ¶ 21. About 7% (156) of them were held for over 7 days and less than half a percent
15 (9) were held over 14 days. *Id.*, Ex. A. By contrast, CBP encountered only 2,931
16 individuals in family units and unaccompanied children in February 2025. *Id.* ¶ 30.
17 Despite these significantly lower encounter numbers, 301 children were detained in CBP
18 custody for over 72 hours that month. Of these 301 children, nearly 60% (179) were
19 detained for over 7 days and approximately 23% (69) were held for over 14 days, more
20 than 7 times the number of children held over 14 days in May 2024. *Id.* ¶ 30 & Ex. A.

21 CBP has continued to detain children for prolonged periods in March and April
22 2025, despite continued low encounter numbers and the opening of ICE family detention
23 centers; 213 children were held for over 72 hours and 14 children were held for over 20
24 days in April, including toddlers. *Id.* ¶¶ 25-26, 30, Ex. A.

25
26 ⁵ Kahn Dec. ¶ 13.

27 ⁶ U.S. Customs and Border Protection, National Standards on Transport, Escort,
28 Detention, and Search (“TEDS”) § 4.1 (October 2015), *available at*
<https://www.cbp.gov/sites/default/files/assets/documents/2020-Feb/cbp-teds-policy-october2015.pdf> (last visited June 15, 2025).

1 Prolonged CBP detention is only the start of the imprisonment most will endure.
2 For children in families not deported after weeks in CBP custody, CBP eventually
3 transfers them to recently reopened ICE family detention centers, where ICE detains
4 them for an additional period of weeks or longer. *Id.* ¶ 17; *see also, e.g.*, A.K. Dec. ¶ 6
5 (42 days in CBP custody at Otay Mesa before transfer to ICE); F.Y. Dec. ¶ 6 (30 days in
6 CBP custody in Texas before transfer to ICE); M.I.J. Dec. ¶ 7 (over 23 days in CBP
7 custody in Texas and California before transfer to ICE); M.M Dec. ¶ 7 (21 days in CBP
8 custody in Texas before transfer to ICE); V.I.B.G. Dec. ¶ 4 (13 days in CBP custody in
9 Vermont, New York, Michigan, and Texas before transfer to ICE).

10 C. *Time in Custody is Likely Longer than the Data Shows.*

11 Further, time in custody (“TIC”) is likely even longer than Defendants’ data
12 shows. Defendants have long been required to “provide Class Counsel on a monthly basis
13 statistical information collected pursuant to Paragraph 28A of the [Flores] Agreement.”
14 Order Re Response to Order to Show Cause at 15, August 21, 2025 [Doc. #189]. In
15 December 2024, Defendants acknowledged significant errors in CBP’s monthly reporting
16 that led to an undercount of children in custody longer than 72 hours. de Gramont Dec. ¶
17 5. In January 2025, Defendants represented to the Court that, going forward, CBP’s
18 monthly data would include “all minors, including both accompanied and unaccompanied
19 children, who remained in CBP custody for more than 72 hours, regardless of their
20 transfer location.” Defs. Surreply in Opposition to Plaintiffs’ Motion to Modify at 5,
21 January 23, 2025 [Doc. #1543].

22 Then, based on March 2025 interviews with individuals at the Karnes family
23 detention facility, Plaintiffs’ counsel identified several class members missing from
24 Defendants’ monthly CBP and ICE reports. de Gramont Dec. ¶¶ 10-19. In response,
25 Defendants acknowledged several errors that resulted in undercounting the number of
26 children with TIC over 72 hours. *Id.* ¶¶ 11–19. Given these numerous errors that came to
27 light only after Plaintiffs identified specific missing children, Plaintiffs requested a
28 mechanism to review Department of Homeland Security (“DHS”) search parameters. *Id.*

¶ 18. Defendants have not responded to that request. *Id.*

Similarly, the Juvenile Care Monitor (“JCM”) has reported data veracity issues as far back as summer of 2024 regarding Juvenile Processing Facilities subject to the 2022 CBP Settlement Agreement. JCM Final Report (Dec. 13, 2024) at 4 [Doc. # 1522] (“recent JCM visits to the RGV and El Paso facilities raised questions as to whether the data provided actually captured all children in families with TIC times over 72 hours.”). These problems persisted in May 2025. Status Report by Juvenile Care Monitor (May 27, 2025) at 14 [Doc. # 1570] “the JCM cannot yet express confidence in the monthly TIC data.”); *see also* Motion to Modify 2022 Settlement (December 20, 2024) [Doc. #1526-1] at 20.

Accordingly, prolonged CBP custody is likely more prevalent than the data reflects.

III. ARGUMENT

A. CBP Holds Minors in Custody for Extended Periods in Violation of the FSA’s Requirement of Prompt Release.

The FSA requires that, whenever DHS “takes a minor into custody, it shall expeditiously process the minor.” FSA ¶ 12A. The Settlement further requires that DHS must ordinarily “release a minor from its custody without unnecessary delay” to a parent, a legal guardian, or other qualified adult custodian, or transfer them to a licensed facility within five days of apprehension.⁷ FSA ¶¶ 12A, 14. In furtherance of this release requirement, DHS must “make and record prompt and continuous efforts on its part toward family reunification and the release of the minor.” FSA ¶ 18. The Settlement is clear that prompt and continuous efforts toward release must begin “upon taking a minor into custody.” *Id.* The FSA explicitly requires that minors be provided an individualized determination of their eligibility for bond. FSA ¶ 24A.

⁷ Even during influx exceptions under FSA ¶¶ (12)(A)(3), (B), the FSA permits only the amount of delay necessary for processing children “as expeditiously as possible.” FSA ¶ 12(b).

Defendants’ prolonged detention of children in CBP custody violates the FSA in at least three ways. First, CBP appears to have adopted a blanket policy of refusing to consider families for parole or release, in violation of FSA ¶¶ 14 and 24A. The FSA forbids DHS from indefinitely detaining children because one of its subcomponents has implemented a blanket policy against release. *Flores v. Barr*, 934 F.3d 910, 916-917 (9th Cir. 2019) (holding that the INA allows and the FSA “requires the government to consider releasing [minors] subject to expedited removal”). CBP does not consider alternatives to detention, although a DHS-operated “Family Case Management Program... had a 100 percent attendance record at court hearings;” Defendants discontinued the program in 2017 purportedly “for cost reasons, while acknowledging that the program was generally less expensive than detention.” *Flores v. Rosen*, 984 F.3d 720, 743 (9th Cir. 2020).

Second, CBP does not begin prompt and continuous efforts towards release when it takes a child into custody. Instead, it warehouses families in limbo awaiting transfer to ICE family detention centers, where Defendants consider eligible children for parole for the *first* time. *See* Defendants’ Notice of Motion to Terminate Settlement Agreement at 17, May 22, 2025 [Doc. #1567] (“MTT”). Further, DHS restarts the TIC clock upon transfer, ignoring the time children have already endured in CBP. Kahn Dec. ¶ 11; *see, e.g.,* L.Q.A. Dec. ¶ 7 (stating agents “told me that they could not tell me how long we would be in custody, but that the five days in CBP did not count towards that time and it would be a fresh start in terms of my time in detention when we arrived at the new center.”).

Just one year ago, the Court held that expeditious processing requires “that the ‘clock’ begins ticking as soon as minors are ‘in custody’ of CBP,” regardless of the facility or location where they are detained, not at the time the child is transferred between unlicensed, secure locations. Order re Plaintiffs’ Motion to Enforce Settlement re “Open Air Detention Sites” at 11, April 3, 2024 [Doc. # 1406] (“OADS Order”).

Third, Defendants fail to expeditiously transfer children to a safe and sanitary

1 facility, in violation of FSA ¶ 12. CBP detention is not safe and sanitary—certainly not
2 for more than 72 hours. Prolonging detention exacerbates the harm caused by violations
3 of the FSA’s safe and sanitary provision. *See* September 2024 JCM Report at 14 [Doc #
4 1468] (the “issue [of inadequate age-appropriate food] becomes increasingly problematic
5 as time in custody rises, as some families with young children had been in custody for
6 longer than a week.”); Dec. 2024 JCM Rep. at 14 (“[H]olding children at elevated
7 medical risk in custody for what appears to be increasingly longer times in custody will
8 inevitably place additional stress on the ability of the CBP medical system to ensure the
9 well-being of children at elevated medical risk while in custody.”).

10 Even a few days in an unsafe or unsanitary facility violates the Settlement, and this
11 Court has previously ordered Defendants to transfer children subjected to such conditions
12 to a safe and sanitary facility. Order Re Plaintiffs’ Motion to Enforce Settlement as to
13 Title 42 Class Members at 12, September 4, 2020, [Doc. # 976] (“Hotelling Order”)
14 (holding that detaining children in unlicensed hotels for “approximately five days” on
15 average “prior to expulsion”, where “hoteling is *not* part of a good faith effort towards
16 placing children in licensed programs,” violated the FSA); OADS Order at 11 (ordering
17 that, because conditions in OADS violate the FSA, CBP must “process[] Class Members
18 as expeditiously as possible” and “place Class Members in facilities that are safe and
19 sanitary and that are consistent with DHS’s concern for the particular vulnerability of
20 minors.”).

21 CBP may not detain children for weeks in conditions that violate the FSA while
22 refusing to expeditiously process them for release and family reunification.⁸ If CBP
23 refuses to promptly release children, it must transfer them to a safe and sanitary facility

24 ⁸ Nor may they release *Ms. L.* class members without their parents. The settlement in that
25 case requires that “DHS [be] committed to protecting family unity by ensuring that
26 noncitizen children in DHS custody are not separated from their accompanying
27 noncitizen parent or Legal Guardian, except in limited permissible circumstances.” *Ms.*
28 *L. Settlement*, Case 3:18-cv-00428-DMS-AHG, Dkt. 721-1 (S.D. Cal. Dec. 1, 2023) at
V(B); *see also* In Chambers Order re Defendants’ Ex Parte Application to Stay at 2, July
25, 2020 [Doc. # 887].

1 where they will be expeditiously processed and provided an individualized determination
2 of their eligibility for release. FSA ¶¶ 12A, 14, 18, 24A.

3 *B. Conditions in CBP Custody are not Safe and Sanitary, in Violation of the*
4 *FSA.*

5 The Settlement guarantees class members a minimum level of care while they
6 await release or transfer to a licensed placement. FSA ¶ 12(A) (“[e]very effort must be
7 taken to ensure [] the safety and well-being of the minors detained in these facilities”).
8 However, class members frequently report that CBP detention imposes (1) unsafe and
9 unsanitary conditions, (2) harsh treatment inconsistent with their vulnerability as minors,
10 (3) denial of access to phone calls, (4) separation from accompanying parents and
11 relatives with minimal visitation, and (5) inadequate medical care. If CBP cannot
12 promptly release a child, it must expeditiously transfer the child to a facility that is safe
13 and sanitary and consistent with DHS’s concern for the particular vulnerability of minors.

14 1. Children Are Held in Unsafe and Unsanitary Conditions.

15 The FSA requires CBP to “hold minors in facilities that are safe and sanitary” and
16 provide “access to toilets and sinks, drinking water and food . . . adequate temperature
17 control and ventilation.” FSA ¶ 12.A. The safe and sanitary provision further requires
18 adequate access to hygiene items, including “soap, towels, showers, dry clothing, [and]
19 toothbrushes.” *Flores v. Sessions*, 394 F. Supp. 3d 1041, 1057 (C.D. Cal. 2017).
20 Paragraph 12.A encompasses safeguards that “reflect a commonsense understanding” of
21 what constitutes safe and sanitary conditions, with concern for the particular vulnerability
22 of minors. *Flores v. Barr*, 934 F.3d 910, 916 (9th Cir. 2019).

23 As described above, CBP fails to provide safe and sanitary conditions. Class
24 members report being denied access to soap, regular showers, and clean clothes. *See, e.g.*,
25 G.B.A. Dec. ¶ 11; S.G. Dec. ¶ 11; F.Y. Dec. ¶ 13; G.A.D. Dec. ¶ 15; L.N. Dec. ¶13; M.H.
26 Dec. ¶ 14; M.L.R.L. Dec. ¶ 14.

27 Further contributing to the violations of ¶ 12A, CBP detains children in POE
28 facilities not intended for detention, including a glass-walled cell in the back of an office,

1 POE interview rooms with only metal furniture, and airports. These locations have no
2 apparent adult qualified to care for children. *See, e.g.* G.B.V. Dec. ¶¶ 7-11; A.T. Dec. ¶
3 10; V.I.B.G. Dec. ¶ 12; K.V.L. Dec. ¶¶ 7, 8; S.K. Dec. ¶¶ 9-11; A.K. Dec. ¶ 22. As this
4 Court has held, facilities may be unsafe in violation of the FSA if they are operated with a
5 “lack of qualified, specialized supervision” and run by “an adult who has no
6 qualifications or training in childcare,” especially when there is “vague and minimal”
7 oversight. Hotelling Order at 14.

8 Further, although at least some class members held in POEs appear on Defendants’
9 monthly data, their location is not clearly identified and class members report they were
10 not able to use a phone while in the facilities, making it “unusual[ly] difficult[] [to]
11 locat[e] children.” *Id.*; *see* K.V.L. Dec. ¶ 16. This “process is woefully inadequate and not
12 substantially compliant with Paragraph 32,” which contemplates “attorneys having near-
13 unfettered access to minors in custody.” Hoteling Order at 10.

14 2. CBP Detention Violates the FSA’s Requirements to Treat Minors
15 with Dignity and Concern for Their Particular Vulnerability.

16 Under the FSA, “[f]ollowing arrest, the INS shall hold minors in facilities that are
17 ... consistent with the INS’s concern for the particular vulnerability of minors.” FSA ¶
18 12.A; FSA Exh. 2(b) (DHS shall “treat and shall continue[] to treat minors with dignity,
19 respect and special concern for their particular vulnerability.”). The FSA requires DHS to
20 “place each detained minor in the least restrictive setting appropriate to the minor’s age
21 and special needs.” FSA ¶ 11.

22 In 2022, parties reached a Settlement “clarifying the Parties’ understanding of the
23 meaning of certain provisions of the Flores Settlement Agreement (‘Settlement’), as they
24 apply to conditions of CBP detention.” CBP Settlement. [Dkt. 1254-1] (May 21, 2022) at
25 1. The settlement, pursuant to parties’ interpretation of FSA ¶ 11’s requirement to treat
26 children with concern for their particular vulnerability, requires CBP to provide a “child-
27 appropriate environment,” to take a “trauma-informed approach to class members in
28 custody,” and to “foster reassurance, resilience, orientation, recreation, and distraction”

1 for class members. CBP Settlement §§ VII.3.D.7, VII.8. The JCM reports that even in the
2 covered RGV and El Paso sectors, CBP staff and caregivers have failed to inform,
3 reassure, or orient class members, leading children to consistently express anxiety
4 because of a lack of information. *See* Apr. 2024 JCM Rep. 22-24; Aug. 2024 JCM 18-19;
5 Dec. 2024 JCM Rep. 10.

6 Since January 2025, families and children detained by CBP have increasingly
7 reported cruel, aggressive, and harmful behavior by agents who have near complete
8 authority over them. *See e.g.* V.I.B.G. Dec. ¶¶ 15-16, 24; S.G. Dec. ¶ 9; S.K. Dec. ¶¶ 20-
9 22.

10 Furthermore, CBP fails to provide basic information to children about what is
11 happening to them, which can be especially traumatizing for children fleeing persecution
12 who have been detained and/or transferred without any explanation. *See, e.g.*, V.I.B.G.
13 Dec. ¶ 27; M.H. Dec. ¶¶ 11-12; A.T. Dec. ¶¶ 23-34.

14 Prolonged detention in CBP’s inhumane conditions causes children to experience
15 profound fear, discomfort, and disorientation, often going weeks without seeing the sun
16 or being able to play. *See, e.g.*, L.N. Dec. ¶ 20; S.K. Dec. ¶ 16; F.O. Dec. ¶¶ 6-7.

17 Such treatment disregards children’s basic developmental needs and the particular
18 vulnerability of minors.

19 3. CBP Denies Access to Telephones.

20 Under Paragraph 24.D, CBP must “promptly provide each minor not released”
21 with a “list of free legal services” and a form I-770, which includes “a statement that the
22 minor or UAC may make a telephone call to a parent, close relative, or friend.” 8 C.F.R.
23 § 236.3(g)(i).

24 CBP’s failure to provide phone access impermissibly frustrates the purpose of
25 providing the legal service provider phone list and notice of the right to call a trusted
26 friend or family member required by ¶ 24.D. Because “[t]he implied covenant of good
27 faith prevents one contracting party from ‘unfairly frustrating the other party’s right to
28 receive the benefits of the agreement actually made,’” it thus violates the Settlement. *See*

1 *Serpa v. Cal. Sur. Investigations, Inc.*, 215 Cal. App. 4th 695, 706, (2013) (citation
2 omitted). Because “[c]ourts must interpret contractual language in a manner that gives
3 force and effect to every provision, and not in a way that renders some clauses nugatory,
4 inoperative or meaningless,” denial of phone access also violates the rights established in
5 the notices required by Paragraph 24.D. *Pinel v. Aurora Loan Servs., LLC*, 814 F. Supp.
6 2d 930, 943 (N.D. Cal. 2011).

7 Many class members report that CBP fails to provide them phone calls or, in some
8 facilities, provides only occasional, two- to five-minute supervised calls. *See, e.g.*, S.K.
9 Dec. ¶ 25. For young children who have fled their home and community, the sudden loss
10 of contact with family on the outside magnifies the trauma of imprisonment. *See*
11 L.G.C.G. Dec. ¶¶ 15-16; L.N. Dec. ¶ 23; R.S.R. Dec. ¶ 16.

12 Even for families who are able to call a loved one, CBP denies them the
13 opportunity to contact a lawyer. M.L.R.L. Dec. ¶ 19; S.G. Dec. ¶ 12; F.Y. Dec. ¶ 15.

14 4. CBP Fails to Ensure Contact with Family Members.

15 The FSA requires the government to ensure “contact with family members who
16 were arrested with the minor.” FSA ¶ 12.A. This requirement is critical. As the JCM has
17 noted, “to hold a child separately while in custody is bad for children,” because
18 “[s]eparating a child from a parent can be profoundly traumatic for children and can have
19 lasting, harmful effects.” JCM Report September 2023 [Doc. #1360] at 28.

20 Children reported being held separately from their parent while in CBP custody,
21 often with extremely limited visitation, and children are permanently separated from
22 accompanying adults who are not their biological parent. *See, e.g.*, R.S.R Dec. ¶ 27; A.B.
23 Dec. ¶ 5-10; M.M. Dec. ¶ 15; M.I.J. Dec. ¶ 8; A.K. Dec. ¶ 10.

24 5. CBP Fails to Provide Children with Adequate Medical Care.

25 The FSA requires CBP to “provide access to . . . medical assistance if the minor is
26 in need of emergency services.” FSA ¶ 12.A. Additionally, the Ninth Circuit has affirmed
27 this Court’s orders establishing that “assuring ‘safe and sanitary’ conditions includes
28 protecting children from developing short- or long-term illnesses as well as protecting

1 them from accidental or intentional injury.” *Flores v. Barr*, 934 F.3d 910, 916 (9th Cir.
2 2019).

3 The JCM has specifically found that quicker transfer of youth from CBP custody
4 could protect them from preventable harm and death: “The most effective, immediate
5 step to prevent adverse child outcomes in CBP custody is to reduce the clinical burden on
6 the CBP medical system by expediting the transfer of children at elevated medical risk
7 out of CBP custody.” Juvenile Care Monitor Report July 2023 at 42 [Doc. #1352] (July
8 2023 JCM Report).

9 As length of detention increases, CBP is rescinding protections for medically
10 vulnerable people. Despite the CBP medical system’s limited capacity to treat acute and
11 complex medical issues, CBP recently issued a memorandum rescinding four policies
12 aimed at protecting medically at-risk people in its custody, including a 2023
13 memorandum directing DHS to “minimize the length of time in CBP custody” for
14 injured, ill, and medically at risk individuals, elderly people, and families with minors
15 under 12, and to “ensure timely medical assessments, recurring wellness checks, and
16 follow up assessments by medical providers.”⁹

17 Further, CBP agents without medical training frequently assess medical complaints
18 and make decisions to deny care when they conclude the matter is not urgent. *See, e.g.*,
19 S.G. Dec. ¶ 7; S.K. Dec. ¶ 27; A.K. Dec. ¶19; M.P.C. Dec. ¶ 13.

20 Some parents reported their children being denied medication they had been using
21 previously, and children with disabilities, especially mental health needs, decompensate
22 in custody. *See, e.g.*, R.S.R. Dec. ¶¶ 6-9, 18.

23 *C. Due to Defendants’ Repeated and Ongoing Violations, Appointment of a*
24 *Monitor is Appropriate.*

25 The FSA provides vital protections for vulnerable children. As Defendants note,
26 the parties have disputed Defendants’ compliance with the Settlement numerous times

27 ⁹ Pete Flores, Acting Commissioner, *Rescission of Legacy Policies Related to Care and*
28 *Custody*, (May 5, 2025) Exhibit 3 rescinding Raul Ortiz, Chief of U.S. Border Patrol,
Custodial Considerations for Medically At-Risk Individuals (May 19, 2023) Exhibit 1-A.

1 over its history. MTT at 15-18. Those disputes clearly continue, and Defendants now
2 bemoan their resolution through motions to enforce after robust monitoring by class
3 counsel. *Id.* at 5-6, 15-17.

4 Accordingly, to reduce the burden on the parties and the Court, appointment of an
5 Independent Monitor who can examine Defendants' compliance with the Settlement and
6 validate Defendants' data is warranted. *See* Fed. R. Civ. P. 53(a); *Franco-Gonzalez v.*
7 *Holder*, Case No. 2:10-cv-02211-DMG-DTB (C.D. Cal. March 2, 2015) ("Because of the
8 complexities of the Injunction and the Implementation Plan Order and because of the
9 importance of Defendants' compliance with them," appointing a Monitor "is necessary
10 pursuant to Fed. R. Civ. P. 53 and this Court's inherent powers to enforce its Orders.").
11 As this Court has explained, "[b]ecause of the complexity of the Flores Agreement, the
12 Court's findings of non-compliance, and ongoing disputes between the parties relating to
13 the implementation of the Flores Agreement . . . appointment of a Special Master and
14 Independent Monitor is warranted." Order Appointing Special Master (Oct. 5, 2018)
15 [Doc. # 494] at 3 ("Oct. 2018 Order").

16 This Court has recognized that effective enforcement of the FSA's requirements
17 may require independent monitor intervention. This is especially important because
18 limitations to Plaintiffs' counsel's access sometimes make it difficult to identify and
19 interview class members. Kahn Dec. ¶¶ 6-9. In 2018, the Court appointed Special Master
20 Andrea Ordin and empowered her to hire expert Independent Monitors, whose
21 appointment Defendants agreed to renew in the 2022 CBP Settlement. October 2018
22 Order at 3; CBP Settlement ¶ IX.

23 The monitoring and guidance of Special Master Ordin and Independent Monitors
24 Dr. Paul Wise and Dr. Nancy Wang have led to some important improvements to
25 conditions and medical care in the RGV and El Paso Sectors of Border Patrol. *See, e.g.,*
26 Dec. 2024 JCM Final Report at 7 ("For the first time this year, the attached child
27 appropriate menus for toddlers have been implemented in both JPF's;" JCM Report at 13,
28 September 10, 2024 [Doc. # 1468] (Raising the minimum age of children held separately

1 from parents from 6 to 12 years old); Dec. 2024 JCM Report at 11-28 (noting
2 improvements to provision of medical care). Though these modest steps do not amount to
3 substantial compliance with the Settlement, they demonstrate the positive impact the
4 monitors' involvement likely had on many children.

5 A monitor should have authority to monitor TIC and Defendants' prompt and
6 continuous efforts to release or transfer children and to access and validate Defendants'
7 data. In cases involving complex detention conditions issues, courts have appointed data
8 experts to resolve disputes in the accuracy and methods of reporting compliance with
9 court orders. *Coleman v. Newsom*, No. 2:90-CV-0520 KJM DB, 2023 WL 8444377, at
10 *2 (E.D. Cal. Sept. 21, 2023), *report and recommendation adopted*, No. 290CV0520K
11 JMDBP, 2023 WL 8433698 (E.D. Cal. Dec. 5, 2023). As noted above, *supra* § II(C),
12 discrepancies in reported data have been consistently identified since the summer of
13 2024. de Gramont Dec. ¶¶ 5-19; Dec. 2024 JCM Report at 4. To meaningfully assess
14 Defendants' compliance with the FSA, Plaintiffs must have access to complete and
15 accurate ICE and CBP data.

16 IV. CONCLUSION

17 For the foregoing reasons, this Court should grant this motion and enter an order in
18 the form lodged concurrently herewith.

19
20 Dated: June 17, 2025

CENTER FOR HUMAN RIGHTS AND
CONSTITUTIONAL LAW

21 Carlos Holguín
22 Bardis Vakili
23 Sarah Kahn

24 NATIONAL CENTER FOR YOUTH LAW
25 Mishan Wroe
26 Diane de Gramont
27 Rebecca Wolozin

28 CHILDREN'S RIGHTS
Leecia Welch

Eleanor Roberts

/s/ Sarah Kahn

Sarah Kahn

Attorney for Plaintiffs

“The undersigned, counsel of record for Plaintiffs, certifies that this brief contains 6,967 words, which complies with the word limit of L.R. 11-6.1.

Dated: June 17, 2025

/s/ Sarah Kahn

Sarah Kahn

Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2025, I caused a copy of Plaintiffs' Motion to Enforce Settlement to be served to all counsel through the Court's CM/ECF system.

Dated: June 17, 2025

/s/Sarah Kahn
Sarah Kahn
Attorney for Plaintiffs

Jenny L. Flores, et al. v. Pamela Bondi, et al.

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

Exhibit Index to Plaintiffs' Motion to Enforce

Exhibit	Exhibit Description
1	Declaration Sarah Kahn, June 15, 2025
2	Declaration of Diane De Gramont, June 12, 2025
3	Declaration of T.M. (New York), June 5, 2025
4	Declaration of K.V.L (Ohio CBP Office), May 2, 2025
5	Declaration of A.B (San Diego SSF), March 7, 2025
6	Declaration of G.A.D (San Diego SSF), March 7, 2025
7	Declaration of L.G.C.G (San Diego SSF), March 7, 2025
8	Declaration of R.S.R (San Diego SSF), February 13, 2025
9	Declaration of M.I.J (San Diego), March 26, 2025
10	Declaration of V.I.B.G (New York), March 26, 2025
11	Declaration of F.Y (El Paso), May 1, 2025
12	Declaration of M.M (El Paso), May 2, 2025
13	Declaration of M.P.C. (El Paso), May 2, 2025
14	Declaration of A.T. (O'Hare Airport), May 1, 2025

15	Declaration of F.O. (Ursula), April 30, 2025
16	Declaration of G.B.A. (Ursula), April 30, 2025
17	Declaration of M.H. (Ursula), April 30, 2025
18	Declaration of M.L.R.L. (Ursula), April 30, 2025
19	Declaration of L.N (Chula Vista), April 10, 2025
20	Declaration of W.J. (Chula Vista), April 10, 2025
21	Declaration of S.G. (Chula Vista), April 10, 2025
22	Declaration of A.K. (Otay Mesa), March 26, 2025
23	Declaration of S.K. (Otay Mesa), May 22, 2025
24	Declaration of I.G. (Otay Mesa), May 22, 2025
25	Declaration of L.Q.A (Buffalo), May 2, 2025

EXHIBIT 1

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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

Jenny Flores, *et al.*,

Plaintiffs,

v.

Pamela Bondi, Attorney General of
the United States, *et al.*

Defendants.

Case No. CV 85-4544-DMG-AGRx

**DECLARATION OF SARAH KAHN IN
SUPPORT OF MOTION TO ENFORCE
THE FLORES SETTLEMENT
AGREEMENT**

Hearing: July 18, 2025

Additional Counsel for Plaintiffs:

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**Declaration of Sarah Kahn
In Support of Plaintiffs' Motion to Enforce Settlement**

I, Sarah Kahn, declare as follows:

1. I am a staff attorney at the Center for Human Rights & Constitutional Law. I am counsel of record for the Plaintiffs in the above-captioned case. I execute this declaration in support of Plaintiffs' Motion to Enforce the Settlement.

2. This declaration is based on my personal knowledge and if called to testify in this case, I would testify competently about these facts.

3. Since June, 2024, Plaintiffs' counsel have met and conferred with Defendant's counsel regarding conditions in CBP facilities on the following dates:

- a. May 7, 2025;
- b. November 20, 2024;
- c. November 8, 2024;
- d. July 2, 2024; and
- e. June 7, 2024.

4. Since 2024, Plaintiffs' counsel has sent Defendants' counsel letters detailing FSA violations in CBP facilities identified during Flores attorney-client visits on the following dates:

- a. May 5, 2025;
- b. April 18, 2025;
- c. November 25, 2024;
- d. October 16, 2024;
- e. August 9, 2024; and
- f. May 10, 2024.

5. Plaintiffs' counsel have visited CBP facilities in several sectors and have also interviewed children and families in Karnes and Dilley who reported being detained for prolonged periods in CBP facilities in several states, including

1 New York, Illinois, Maine, Arizona, Texas, California, and Ohio. Plaintiffs’
2 counsel conducted *Flores* attorney-client visits on the following dates, with
3 locations in parentheses, in 2025:

- 4 a. June 4-5, 2025 (Dilley ICE Family Detention Center)
- 5 b. May 21, 2025 (Otay Mesa Port of entry);
- 6 c. May 1-2, 2025 (Dilley ICE Family Detention Center)
- 7 d. April 30, 2025 (Ursula Station);
- 8 e. April 10, 2025 (Chula Vista Station);
- 9 f. March 26, 2025 (Karnes ICE Family Detention Center)
- 10 g. March 7, 2025 (San Diego Soft Sided Facility); and
- 11 h. February 13, 2025 (San Diego Soft Sided Facility).

12 6. On several of our visits to detention facilities, Defendants’ counsel
13 informed us that there were limited hours for attorney client visits based on staff
14 schedules and availability, or that transportation schedules might impact client
15 availability. These limitations sometimes resulted in Plaintiffs’ Counsel not having
16 access to class members, and several interviews were rushed or cut short.

17 7. DHS provides only the A number and name of children in a facility,
18 but not the age, accompanying adult information, or country of origin. This makes
19 it difficult to identify languages in advance so that counsel may coordinate
20 translation, or to plan to visit class members with a broad range of factual
21 circumstances to ensure compliance with the agreement.

22 8. Defendants’ counsel have asked that we provide fourteen days notice
23 prior to any site visit. When Plaintiffs’ counsel has not provided fourteen days
24 notice, Defendants have been unable to facilitate *Flores* visits.

25 9. Plaintiffs’ counsel does not have access to census data ahead of our
26 visits, which sometimes makes it difficult to identify the location of class members
27 and has sometimes resulted in trips to facilities that were not holding class
28

1 members at the time of the trip. On these occasions, Plaintiffs' counsel were
2 unable to conduct interviews.

3 10. ICE began detaining families in Karnes Immigration Processing
4 Center in March 2025. In April 2025, ICE then transferred individuals detained in
5 Karnes to Dilley ICE Family Detention. In May 2025, when Plaintiffs' counsel
6 conducted *Flores* interviews in Dilley, there were over 80 children detained in the
7 Dilley Family Detention. There are now about 500 individuals detained at Dilley
8 Family Detention.

9 11. Advocates representing families in Dilley reported to us that ICE
10 calculates families' time in custody ("TIC") from the day they arrive in ICE
11 custody, not the day of their apprehension by CBP. On June 4, 2025, Plaintiffs'
12 Counsel sent a letter confirming this understanding by email with Defendants'
13 Counsel.

14 12. On June 12, 2025, Plaintiffs' counsel met with Defendants' counsel to
15 confer about this motion.

16 13. To obtain data related to release from CBP, I navigated to the CBP
17 Custody and Transfer Statistics, available at
18 <https://www.cbp.gov/newsroom/stats/custody-and-transfer-statistics> (last visited
19 June 16, 2025). The chart labeled "USBP Monthly Southwest Border Encounters
20 by Processing Disposition" table reflects the disposition of individuals after
21 apprehension and processing. I printed this webpage to PDF. A true and correct
22 copy of the webpage is attached as Exhibit A. There are three categories that
23 reflect individuals who may have been released: Notice to Appear/Own
24 Recognizance (NTA-OR); Paroles; and Notice to Report (NTR). The table shows
25 the following numbers:

26 a. December, 2024:

27 i. Title 8 Apprehensions: 47,324
28

1 ii. Paroles: 0

2 iii. Notice to Report: 0

3 iv. Notice to Appear: 7,041 (15% of total apprehensions)

4 b. February, 2025:

5 i. Title 8 Apprehensions: 8,346

6 ii. Paroles: 0

7 iii. Notice to Report: 0

8 iv. Notice to Appear: 0 (0% of total apprehensions)

9 c. March, 2025:

10 i. Title 8 Apprehensions: 7,184

11 ii. Paroles: 0

12 iii. Notice to Report: 0

13 iv. Notice to Appear: 5 (0.0007% of total apprehensions)

14 d. April, 2025:

15 i. Title 8 Apprehensions: 8,383

16 ii. Paroles: 0

17 iii. Notice to Report: 0

18 iv. Notice to Appear: 2 (0.0002% of total apprehensions)

19 14. I requested the number of people paroled or released from CBP in
20 February, March, and April, 2025, during the June 12, 2025 conference with
21 Defendants' counsel, but they were unable to provide any confirmation or
22 information.

23 15. On May 15, 2025, CBP posted a memo titled *Rescission of Legacy*
24 *Policies Related to Care and Custody* to its document library, available at
25 [https://www.cbp.gov/document/foia-record/rescission-legacy-policies-related-care-](https://www.cbp.gov/document/foia-record/rescission-legacy-policies-related-care-and-custody)
26 [and-custody](https://www.cbp.gov/document/foia-record/rescission-legacy-policies-related-care-and-custody). That memo lists four policies that it states are rescinded pursuant to
27 the memo. I printed this memo to PDF. A true and correct copy of the memo is
28

1 attached as Exhibit B. One of these policy memos, *Custodial Considerations for*
2 *Medically At-Risk Individuals* (May 19, 2023), is available in CBP's document
3 library at [https://www.cbp.gov/document/directives/cbp-memorandum-custodial-](https://www.cbp.gov/document/directives/cbp-memorandum-custodial-considerations-medically-risk-individuals)
4 [considerations-medically-risk-individuals](https://www.cbp.gov/document/directives/cbp-memorandum-custodial-considerations-medically-risk-individuals). I printed this memo to PDF. A true and
5 correct copy of this memo is attached as Exhibit C.

6
7 I declare under penalty of perjury that the foregoing is true and correct. Executed
8 June 16, 2025, Anaheim, California.

9
10 
11 Sarah Kahn

EXHIBIT A

U.S. Customs and
Border Protection

Custody and Transfer Statistics

Fiscal Year 2025 runs from October 1, 2024 to September 30, 2025.

[Close all](#)
[Open all](#)

Office of Field Operations - Dispositions and Transfers

+

OFO Monthly Southwest Border Credible Fear Inadmissibles by Disposition

Disposition	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25
Expedited Removal-Credible Fear (ERCF)¹	917	831	904	524	14	18	8	-	-
Notice To Appear (NTA)²	40,200	38,110	38,709	24,402	56	33	24	-	-
Notice To Appear	0	0	0	0	0	0	0	-	-

Disposition	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25
(NTA)-Person Released									
Notice To Appear (NTA)-Person Detained	0	0	0	0	0	0	0	-	-
Visa Waiver Program (VWP)-Removal-Limited Review ³	0	0	0	0	0	0	0	-	-
Visa Waiver Program (VWP)-Refusal Limited Review ³	0	0	0	0	0	0	0	-	-
Stowaway-Limited Review ³	0	0	0	0	0	0	0	-	-

Disposition	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25
Total Credible Fear Inadmissibles	41,117	38,941	39,613	24,926	70	51	32	-	-
Total Title 8 Inadmissibles	49,801	47,574	48,713	32,343	3,363	3,836	3,652	-	-

Title 8 Inadmissibles

Field Office	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25
El Paso	7,828	7,553	7,847	5,344	513	510	557	-	-	-
Laredo	22,175	21,104	21,362	14,274	1,18	1,326	1,292	-	-	-
San Diego	16,058	15,410	15,889	10,217	1,325	1,439	1,273	-	-	-
Tucson	3,740	3,507	3,615	2,508	407	560	530	-	-	-
Total	49,801	47,574	48,713	32,343	3,363	3,835	3,652	-	-	-

OFO Monthly Southwest Border Credible Fear Inadmissibles by Program

Program	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25
Migrant Protection Protocols (MPP)- Initial returns	0	0	0	0	0	0	0	-	-	-	-
Asylum Cooperative Agreement (ACA) Program - Expedited Removal - Credible Fear (ERCF)	0	0	0	0	0	0	0	-	-	-	-
ACA - Notice to Appear (NTA)	0	0	0	0	0	0	0	-	-	-	-
Humanitarian Asylum Review Process (HARP) Program -	0	0	0	0	0	0	0	-	-	-	-

Program	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25
Expedited Removal - Credible Fear (ERCF)											
HARP - Notice to Appear (NTA)	0	0	0	0	0	0	0	-	-	-	-
Total	0	0	0	0	0	0	0	-	-	-	-

OFO Monthly Southwest Border Credible Fear by Transfer Destination

Destination	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25
Federal/State/Local Facility	101	100	73	65	8	15	7	-	-	
ICE/ERO	1,280	1,228	1,348	732	38	31	18	-	-	
ICE/HSI	0	0	2	0	0	2	1	-	-	
OFO	0	0	0	0	0	0	0	-	-	
Return to Foreign	0	0	0	1	0	0	0	-	-	

Destination	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25
USBP	363	332	353	228	24	1	4	-	-	
Total	1,744	1,660	1,776	1,026	70	49	30	-	-	

¹ Includes subjects who indicated a desire to seek asylum or a fear of persecution in Office of Field Operations' (OFO) custody at a port of entry. OFO refers all such claims to USCIS for a credible fear interview. Credible fear may be claimed at any time prior to removal.

² This number reflects instances where OFO exercises its discretion and issues a Notice to Appear (NTA) to initiate removal proceedings before an immigration judge. This does not include NTAs issued at the discretion of other DHS components with authority to issue NTAs.

³ The term "limited review" refers to the process of an immigration judge considering claims of US citizenship, Lawful Permanent Residence, Asylum or Refugee status.

Office of Field Operations - In Custody



Field Operations - Southwest Border in Custody¹

Detention Capacity	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25
In Custody	902	902	902	902	902	902

Detention Capacity	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25
Capacity						
%	661 (73.28%) ²	700(77.61%) ²	652 (72.28%) ²	428 (47.45%) ²	120 (13.30%) ²	44 (4.88%) ²

¹ Represents an estimate of each cell's coded occupancy limit, as outlined in technical design standards when constructed, multiplied by the total number of cells for all ports of entry within each field office. This number does not account for the unique circumstances that may limit the occupancy of a given cell (e.g., high risk, nursing/pregnant, transgender, unaccompanied minor, etc.) nor does it reflect operational limitations that affect a port's capacity to detain. CBP's capacity to detain individuals in its short-term facilities depends on many factors, including: demographics of the individual in custody; medical or other needs of individuals in custody; ability of ICE ERO (or, if an unaccompanied child, the U.S. Department of Health and Human Services) to transfer individuals out of CBP custody; and OFO's available resources to safely process and hold individuals.

² Represents the average number of travelers in custody on a daily basis averaged over the 30-day period, at all Southwest Border Field Office locations. Travelers include inadmissible individuals, lawful permanent residents, asylees, refugees, and United States Citizens who are being detained to verify wants, warrants, criminal, administrative or other judicial process.

U.S. Border Patrol - Dispositions and Transfers

USBP Monthly Southwest Border Encounters by Processing Disposition

The processing disposition decision related to each apprehension is made on a case-by-case basis. The processing dispositions below are representative of the time data was aggregated. As dispositions are subject to change throughout the immigration process, the data does not necessarily reflect final dispositions or removals.

Processing Disposition	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25
Notice to Appear/Own Recognizance (NTA-OR)	10,011	7,183	7,041	2,558	0	5	2	-	-
Paroles	5	3	0	1	0	0	0	-	-
Notice to Report (NTR)	0	0	0	0	0	0	0	-	-
Expedited Removal (ER)	320	183	212	223	99	269	727	-	-
Expedited Removal (ER) - per Interim Final Rule "Securing the Border" ¹	28,236	23,399	24,595	16,308	4,712	3,802	4,109	-	-
Reinstatement of Prior Order of Removal	8,969	7,926	6,187	4,330	1,793	1,794	2,083	-	-
Warrant of Arrest/Notice	7,086	5,284	7,694	3,747	745	601	616	-	-

Processing Disposition	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25
to Appear - (Detained)									
Voluntary Return	1,604	1,395	1,359	1,055	451	529	666	-	-
MPP	0	0	0	0	0	0	0	-	-
Other ²	289	242	223	884	546	184	180	-	-
Total Title 8 Apprehensions	56,520	46,615	47,324	29,101	8,346	7,184	8,383	-	-

¹ Subjects enrolled in multiple programs are only counted once based on the following order: PACR, ACA, HARP, MPP

² Processing dispositions may include subjects that do not yet have a final disposition at the time the data was collected or subjects processed under the visa waiver program, turned over to, paroled, etc.

USBP Monthly Southwest Border Apprehensions by Transfer Destination

Following processing, U.S. Border Patrol arranges transfer of individuals to the appropriate entity based on disposition and other factors such as criminal charges. The transfer destinations below are representative of the time data was aggregated. The data does not reflect subsequent transfer destinations after subjects leave Border Patrol custody and are subject to change if an individual returns to U.S. Border Patrol custody during the same event.

Transfer Destination	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25
Provisional Releases (OR, P, REL)	10,071	7,235	7,080	2,592	20	25	24	-	-
Federal (ERO, ORR, Other)¹	23,191	19,795	23,120	12,033	4,649	5,113	5,465	-	-
Federal - Northern Triangle Repatriation Flights (ENV)	1,956	2,163	1,333	571	16	17	1	-	-
Federal - Mexican Repatriation Flights (IRI/IFP)	634	684	771	457	10	0	0	-	-
Transferred Port of Entry (Non-MPP)	18,747	15,383	12,358	11,988	3,364	1,525	1,847	-	-
Transferred Port of Entry (MPP)	0	0	0	0	0	0	0	-	-

Transfer Destination	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25
State and Local Law Enforcement Agencies (Other)	1,179	979	669	421	151	209	487	-	-
Transferred BookOut/TOT-Other²	735	357	1,989	1,038	124	273	224	-	-
Total Title 8 Transferred Out of Custody	56,513	46,596	47,320	29,100	8,334	7,162	8,048	-	-

¹ Manifested as turned over to other Federal agencies, to include Immigration and Customs Enforcement, Health and Human Services, U.S. Marshals, etc.

² Includes subjects that have not been transferred out of USBP custody at the time the data was collected or subjects manifested as transferred to hospital, paroled, etc.

U.S. Border Patrol - Southwest Border In Custody



USBP Average Daily Subjects In Custody by Southwest Border Sector

*U.S. Border Patrol facilities, such as stations and central processing centers, provide short-term holding capacity for the processing and transfer of individuals encountered by agents. Maximum facility capacity along the southwest border is approximately **12,000** which assumes a homogenous population and full operating status at all facilities. Actual capacity fluctuates constantly based on characteristics of in-custody population, to include demographics, gender, criminality, etc.*

Sector	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25
Big Bend	6	4	7	7	4	6	9	-	-	-	-
Del Rio	403	449	397	202	34	48	70	-	-	-	-
El Centro	162	68	46	43	5	4	5	-	-	-	-
El Paso	911	1,170	1,424	796	175	133	113	-	-	-	-
Laredo	639	643	526	470	60	68	68	-	-	-	-
Rio Grande	508	428	782	691	206	170	134	-	-	-	-
San Diego	1,205	1,249	1,165	1,010	558	115	74	-	-	-	-
Tucson	605	467	478	270	31	30	37	-	-	-	-
Yuma	488	421	372	276	61	15	17	-	-	-	-

Sector	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25
Total	4,927	4,901	5,198	3,764	1,134	589	529	-	-	-	-

SPP Program Overview



USBP Southwest Border SPP Program Apprehensions Since Program Inception through April 2025

Apprehension data includes deportable migrants only.

Data Source: EID through BPERT (Unofficial) as of 5/02/2025 09:56:13 AM

SPP Program	SPP Program Type	Inception Date	Apprehensions Since Inception
MPP	NTA Program	1/28/2019	82,227
ENV	Removal Modality	8/5/2019	106,492
PACR	ER Program	10/7/2019	3,081
HARP	ER Program	10/28/2019	691
ACA_GUAT	ER Program	11/19/2019	1,493
IRI/IFP	Removal Modality	12/19/2019	37,339

Pathways and Programs Definitions



Migrant Protection Protocols (MPP)

The Migrant Protection Protocols (MPP) is an exercise of the Department of Homeland Security's express statutory authority under the Immigration and Nationality Act (INA) to return certain applicants for admission, or those who enter illegally between the ports of entry, who are subject to removal proceedings under INA Section 240 Removal Proceedings to Mexico pending removal proceedings.

Prompt Asylum Claim Review (PACR)

The Prompt Asylum Claim Review (PACR) pathway was developed by U.S. Border Patrol (USBP), in coordination with U.S. Immigration and Customs Enforcement (ICE), U.S. Citizenship and Immigration Services (USCIS), and the Executive Office for Immigration Review (EOIR) to promptly address credible fear claims of amenable individuals.

Asylum Cooperative Agreement (ACA)

U.S. Customs and Border Protection (CBP), in coordination with U.S. Immigration and Customs Enforcement (ICE) Enforcement Removal Operations (ERO), and U.S. Citizenship and Immigration Services (USCIS), have executed Asylum Cooperative Agreements (ACAs) to facilitate the transfer of individuals to a third country where they will have access to full and fair procedures for determining their protection claims, based on the ACAs.

Humanitarian Asylum Review Process (HARP)

The Humanitarian Asylum Review Process (HARP), was developed by U.S. Customs and Border Protection (CBP), in coordination with U.S. Immigration and Customs Enforcement (ICE), U.S. Citizenship and Immigration Services (USCIS), and the Executive Office for Immigration Review (EOIR) to promptly address credible fear claims of amenable

Mexican nationals.

Electronic Nationality Verification

Under the Electronic Nationality Verification (ENV) program U.S. Customs and Border Protection (CBP), in coordination with U.S. Immigration and Customs Enforcement (ICE) Enforcement and Removal Operations (ERO), remove eligible noncitizens with a final order of removal to their native countries.

Interior Repatriation Initiative (IRI)

Under the Interior Repatriation Initiative (IRI), U.S. Customs and Border Protection (CBP), in coordination with U.S. Immigration and Customs Enforcement (ICE) Enforcement Removal Operations (ERO) and the Mexican Ministry of the Interior, remove eligible noncitizens from Mexico to the interior of Mexico.

Additional Statistics



USBP's methodology for reporting apprehensions attributes encounters to various enforcement zones throughout the sectors. Due to a unique alignment of enforcement zones in the state of New Hampshire, all apprehensions made in the state would be attributed to stations in Vermont using this methodology. As New Hampshire is the only state that this methodology impacts in such a way, CBP is releasing the number of encounters that took place within the state's boundaries on the below table. Data for New Hampshire reflected on the Nationwide Encounter page's [Encounters by State](#) table only includes OFO encounters.

New Hampshire FY21 - FY24 USBP Apprehensions by Month

Fiscal Year 2021

Region	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21
Swanton	0	2	0	0	0	1	0	0	0	0	3
Houlton	0	0	0	0	0	0	0	0	0	0	0
Total	0	2	0	0	0	1	0	0	0	0	3

Fiscal Year 2022

Region	Oct-21	Nov-21	Dec-21	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22
Swanton	1	0	0	0	0	0	0	0	0	1	1
Houlton	0	0	0	0	0	0	0	0	0	0	0
Total	1	0	0	0	0	0	0	0	0	1	1

Fiscal Year 2023

Region	Oct-22	Nov-22	Dec-22	Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23
Swanton	0	0	0	1	0	0	0	0	9	1	3
Houlton	0	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	1	0	0	0	0	9	1	3

Fiscal Year 2024

Region	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24
Swanton	0	0	0	0	0	0	0	2	0	0	0
Houlton	0	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	2	0	0	0

Fiscal Year 2025

Region	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25
Swanton	1	0	0	1	2	0	1	-	-	-	-
Houlton	0	0	0	0	0	0	0	-	-	-	-
Total	1	0	0	1	2	0	1	-	-	-	-

Related Resources

Title 8 and Title 42 Statistics +

[Title 8 Enforcement Actions and Title 42 Expulsions](#)

Previous Year Statistics



[FY 2024](#)

[FY 2023](#)

[FY 2022](#)

[FY 2021](#)

Last Modified: May 12, 2025

EXHIBIT B

1300 Pennsylvania Avenue, NW
Washington, DC 20229



**U.S. Customs and
Border Protection**

Commissioner

MAY 05 2025

MEMORANDUM FOR: See Distribution
FROM: Pete Flores (b) (6), (b) (7)(C)
Acting Commissioner
SUBJECT: **Rescission of Legacy Policies Related to Care and Custody**

Upon review it has been determined that the following policies are either obsolete or misaligned with current Agency guidance and immigration enforcement priorities. As such, the following policies are hereby rescinded, effective immediately:

1. *Processing of Pregnant, and Postpartum Noncitizens and Infants*, January 28, 2022.
2. *Custodial Considerations for Medically At-Risk Individuals*, May 19, 2023.
3. *Additional Guidance on Custodial Considerations for Medically At-Risk Individuals*, October 12, 2023.
4. *Monitoring of Vulnerable Individuals in CBP Custody*, March 19, 2024.

Agency personnel are to continue processing aliens in custody in accordance with the requirements of CBP's *National Standards on Transport, Escort, Detention and Search* and the *Clarification of At-Risk Population and Hold Room Monitoring Provisions in TEDS* while working to transfer aliens from CBP custody as quickly as possible. This rescission does not change the requirement for regular and frequent hold-room checks in accordance with each operational office's policies and procedures. CBP personnel must also continue to follow all established policies and procedures regarding medical care and the requirements set forth within the *Flores Settlement Agreement*, related to juveniles and including infants.

The safety of all who we encounter during operations remains a top priority. All CBP personnel are expected to treat those in Agency custody in a professional and respectful manner.

Questions related to the guidance above shall be directed to the Office of the Commissioner-Policy Directorate at (b) (7)(E)

Rescission of Legacy Policies Related to Care and Custody
Page 2

Distribution: Acting Deputy Commissioner
Chief Operating Officer
All Executive Assistant Commissioners
Chief, U.S. Border Patrol
Chief Counsel
Chief Financial Officer
Assistant Commissioner, Congressional Affairs
Assistant Commissioner, Office of Professional Responsibility
Assistant Commissioner, Public Affairs
Assistant Commissioner, Office of Intelligence
Executive Director, Policy Directorate
Executive Director, Trade Relations
Executive Director, Privacy, FOIA, and EEO
Executive Director, Intergovernmental Public Liaison
Director, Executive Secretariat
Chief of Staff
Deputy Chiefs of Staff

EXHIBIT C

1300 Pennsylvania Avenue, NW
Washington, DC 20229



U.S. Customs and Border Protection

Commissioner

May 19, 2023

MEMORANDUM FOR: Raul Ortiz
Chief
U.S. Border Patrol

Pete Flores
Executive Assistant Commissioner
Office Of Field Operations



FROM: Troy A. Miller 
Acting Commissioner

SUBJECT: Custodial Considerations for Medically At-Risk Individuals

The safety of U.S. Customs and Border Protection (CBP) employees, individuals in our custody, and the public is the top priority during all aspects of CBP operations. CBP's National Standards on Transport, Escort, Detention, and Search (TEDS) guidance directs that individuals should generally not be held for longer than 72 hours in CBP holding facilities. Every effort must be made to hold individuals for the least amount of time required for their processing, transfer, release, or repatriation as appropriate and as operationally feasible.

At-risk or medically fragile individuals, which includes but is not limited to individuals with a chronic illness; infants or elderly; minors with an acute injury, medical or mental health condition; pregnant women or post-partum mothers with complications; and individuals with a disabling mental disorder, should be expeditiously processed to minimize the length of time in CBP custody. While such individuals are in our custody, it is imperative to ensure timely medical assessments, recurring wellness checks, and follow up assessments by medical providers are conducted pursuant to CBP policies and documented via appropriate systems.

It is appropriate for CBP to take steps to consider the impact of custodial conditions, including the length of time-in-custody, the number of individuals in custody, and medical issues for individuals in its custody. As a result, I direct that all Sectors and Field Offices should immediately:

1. Ensure that at-risk or medically fragile individuals in CBP custody, as determined in consultation with medical providers, are considered for processing or reprocessing 
- 

2. Ensure that individuals in CBP custody for whom extended time-in-custody may have greater adverse impacts, such as family units containing minors under the age of 12, pregnant individuals or the elderly have been considered for processing via a pathway that appropriately limits the amount of time they may spend in custody. Such individuals should not be processed in a pathway where their time in custody may exceed 120 hours. CBP will continue to follow the requirements of the *Flores* Settlement Agreement.

In making these decisions, particular consideration shall be given to whether individuals have been or are likely to be in custody for more than 72 hours or the facility is over capacity. All Unaccompanied Children should continue to expeditiously be transferred to HHS as obligated under the law and CBP policies. Moreover, Sectors and Field Offices are reminded to ensure all current laws and policies are followed, including requirements with respect to family unit separation and family group unity.

Finally, it is critical that all monitoring systems in holding facilities used for at-risk individuals, such as Closed-Circuit Television and Incident Driven Video Recording Systems, are fully functioning and used appropriately to enhance transparency and documentation of events.

CC: Executive Assistant Commissioner, Enterprise Services
Executive Assistant Commissioner, Operations Support
Chief Council
Executive Director, Policy Directorate

EXHIBIT 2

CENTER FOR HUMAN RIGHTS &
CONSTITUTIONAL LAW
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Attorneys for Plaintiffs

Additional counsel listed on following page

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

JENNY LISETTE FLORES, *et al.*,

Plaintiffs,

v.

MERRICK GARLAND, Attorney General of
the United States, *et al.*,

Defendants.

No. CV 85-4544-DMG-AGR_x

DECLARATION OF DIANE DE
GRAMONT IN SUPPORT OF
PLAINTIFFS' MOTION TO ENFORCE

JUDGE: Hon. Dolly M. Gee

1 NATIONAL CENTER FOR YOUTH LAW

2 Mishan Wroe (Cal. Bar No. 299296)

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DECLARATION OF DIANE DE GRAMONT

I, Diane de Gramont, declare as follows:

1. I am counsel of record for Plaintiffs in the above-captioned case.

2. This declaration and the attached exhibits are based on my personal knowledge. If called to testify in this case, I would testify competently about these facts and those included in the exhibits described below.

3. Under the Court's August 21, 2015 order [Doc. # 189], Defendants Immigration and Customs Enforcement ("ICE") and Customs and Border Protection ("CBP") are required to provide Plaintiffs' counsel with monthly statistical reports on all class members in their custody collected under Paragraph 28A of the *Flores* Settlement Agreement.

4. Attached hereto is a true and correct copy of Exhibit A ("CBP Data Analysis"). I authored Exhibit A, which includes an analysis of monthly CBP data provided by Defendants in 2024 and 2025.

DHS Data Discrepancies

5. As discussed in my prior declaration, Defendants disclosed in December 2024 that the monthly CBP data previously provided to Plaintiffs included an incorrect data parameter that resulted in a significant undercount of class members in CBP custody. *See* Declaration of Diane de Gramont ¶¶ 7-9, 14-17, January 14, 2025 [Doc. # 1538]. For example, the original CBP data report for October 2024 indicated that 1,205 children were in CBP custody for over 72 hours that month, whereas the corrected report for October 2024 indicated that 2,489 children were in CBP custody for over 72 hours that month. *Id.* ¶ 15.

6. Defendants indicated that they would produce corrected data reports for 2024 and expected the new reports to correct the issue. *Id.* ¶ 9 & Ex. 2.

7. On January 17, 2025, Defendants provided Plaintiffs with corrected CBP

1 monthly data for January through September 2024. Defendants had previously
2 provided the corrected data for October and November 2024.

3 8. On February 25, 2025, Defendants produced monthly data for January 2025.
4 On March 24, 2025, Defendants produced monthly data for February 2025.

5 9. On March 26th and 27th, 2025, Plaintiffs' counsel met with accompanied
6 children detained at the Karnes family detention facility in Karnes City, Texas.

7 10. On April 7, 2025, I emailed Defendants' counsel with concerns that—
8 despite Defendants' representation that the CBP data issues had been resolved—
9 the February 2025 monthly data continued to undercount class members detained
10 by CBP for over 72 hours. Based on a review of the February ICE data and
11 Plaintiffs' counsel's interviews at Karnes, Plaintiffs identified six class members
12 who were in CBP custody for well over 72 hours in February 2025 but did not
13 appear in the data report. For example, a 2-year old child entered CBP custody in
14 late January and remained detained by DHS as of March 26, 2025, but did not
15 appear in either the CBP or ICE February data reports. A true and correct copy of
16 this correspondence is attached as Exhibit B, with redactions for references to the
17 last three digits of the children's A#.

18 11. On April 16, 2025, Defendants' counsel responded stating that class
19 members were missing from the February 2025 CBP report because CBP's search
20 parameters were set to include only children "who entered custody in that month"
21 and CBP "had erroneously included a search parameter that included only
22 individuals who had been released from custody at the time the report was run."
23 Defendants produced updated monthly data for January and February 2025. This
24 updated data corrected the second issue but remained limited to children who
25 entered custody during the reporting month. A true and correct copy of this
26 correspondence is attached as Exhibit C, with redactions for references to the last
27 three digits of the children's A#.

28 12. On April 23, 2025, I emailed Defendants' counsel to express Plaintiffs'

1 concern at CBP's continued erroneous search parameters and stated Plaintiffs'
2 position that Defendants have no legal basis to exclude children from the monthly
3 CBP data report simply because they entered custody the prior month. On April 25,
4 2025, Defendants' counsel responded and stated that CBP would provide
5 additional information in the future to account for children who entered custody
6 the prior month. A true and correct copy of this correspondence is attached as
7 Exhibit D.

8 13. On April 22, 2025, Defendants produced monthly data for March 2025. I
9 cross-referenced the March 2025 data with records of Plaintiffs' counsel's
10 interviews at the Karnes detention facility and again identified numerous children
11 missing from the March 2025 data reports.

12 14. On April 29, 2025, I emailed Defendants' counsel and attached a
13 spreadsheet of children that class counsel met at the Karnes family detention
14 facility but who were missing from the CBP and/or ICE monthly data for March
15 2025. I noted that while some of the missing children were likely omitted because
16 of the incorrect CBP data parameter related to children who entered the prior
17 month, this did not explain all the issues. The spreadsheet also identified 20
18 children who were at Karnes for over 72 hours in March 2025 but did not appear
19 on the ICE data report. A true and correct copy of this correspondence is attached
20 as Exhibit E.

21 15. On May 5, 2025, Defendants' counsel responded by email to state that one
22 class member with a time in custody of 164.2 hours (nearly 7 days) was excluded
23 from the CBP monthly data because CBP's search parameters were "set to include
24 only Deportable Apprehension (USBP) and Inadmissible (OFO) minors" and
25 excluded the class member who was tagged "other." Defendants indicated that this
26 parameter would be eliminated going forward. A true and correct copy of this
27 correspondence is attached as Exhibit F, with the last three digits of the child's A#
28 redacted.

1 16. On May 12, 2025, Defendants' counsel emailed with a spreadsheet
2 containing notes from ICE on the class members Plaintiffs identified as missing
3 from the March 2025 monthly ICE data. Defendants indicated that ICE had
4 identified why the class members were missing and had corrected the issue going
5 forward. Defendants did not identify what the issue was or if other class members
6 were affected. A true and correct copy of this correspondence is attached as
7 Exhibit G.

8 17. I reviewed the spreadsheet attached to Defendants' May 12, 2025, email.
9 The spreadsheet contained the information Plaintiffs provided regarding the class
10 members missing from the March 2025 data as well as two additional columns
11 labeled "ERO Comments" and "ERO Additional Comments." These columns did
12 not include an explanation for why the class members were missing from the
13 March 2025 data. The "ERO Comments" column did note that, of the twenty
14 children Plaintiffs' previously identified as missing from the data reports, one was
15 at Karnes for 15 days, seven were at Karnes for 19 days, ten were at Karnes for 20
16 days, and two were at Karnes for over 20 days. The "ERO Additional Comments"
17 column indicated that many of these class members spent significant time in CBP
18 custody before being transferred to Karnes. For example, the 2-year old child
19 discussed my April 7, 2025, email, was encountered by CBP on January 28, 2025,
20 was transferred to Karnes on March 13, 2025, and remained in DHS custody until
21 April 1, 2025. Two other children were detained by CBP on February 12, 2025,
22 were booked into Karnes on March 12, 2025, and remained in DHS custody until
23 April 4, 2025.

24 18. On May 12, 2025, I responded to Defendants and asked for an explanation
25 of the reason these class members were omitted from the March 2025 monthly ICE
26 data. Given the multiple search parameters mistakenly excluding class members
27 from the monthly CBP and ICE reports, I requested a complete list of the CBP and
28 ICE search parameters or an alternative mechanism for Plaintiffs to inspect the

1 search parameters. A true and correct copy of this correspondence is attached as
2 Exhibit G. I did not receive a response to this request.

3 19. On June 12, 2025, the Parties met and conferred regarding Plaintiffs' motion
4 to enforce. Defendants indicated that they were working with the CBP Juvenile
5 Care Monitor, Dr. Paul Wise, regarding the CBP data parameters. I expressed that
6 Plaintiffs continue to have concerns given that the most recent Juvenile Care
7 Monitor report indicated that the data issues were not yet resolved, Dr. Wise's term
8 is ending soon, and Dr. Wise's mandate does not include ICE data.

9
10 CBP Data Analysis

11 20. As described in Exhibit A, I analyzed children's length of stay in CBP
12 custody based on Defendants' data reports. Although I used Defendants' corrected
13 data when a corrected data set was available, the corrected data sets do not account
14 for all of CBP's erroneous search parameters. In particular, based on Defendants'
15 explanations, it is my understanding that the data reports prior to April 2025 still
16 exclude children who entered custody the prior month. *See* Exhibit C. This analysis
17 therefore likely continues to undercount children's length of stay in CBP custody.

18 21. The corrected May 2024 report indicated that 2,240 children were in CBP
19 custody for over 72 hours that month, including 156 children in custody for over 7
20 days, 9 children in custody for over 14 days, and 4 children in CBP custody for
21 over 20 days.

22 22. The corrected June 2024 report indicated that 3,447 children were in CBP
23 custody for over 72 hours that month, including 978 children in custody for over 7
24 days, 211 children in custody for over 14 days, and 43 children in custody for over
25 20 days.

26 23. The corrected January 2025 report indicated that 1,334 children were in CBP
27 custody for over 72 hours that month, including 494 children in custody for over 7
28 days, 93 children in custody for over 14 days, and 54 children in custody for over

1 20 days.

2 24. The corrected February 2025 report indicated that 301 children were in CBP
3 custody for over 72 hours that month, including 179 children in custody for over 7
4 days, 69 children in custody for over 14 days, and 30 children in custody for over
5 20 days.

6 25. The March 2025 report indicated that 157 children were in CBP custody for
7 over 72 hours that month, including 63 children in custody for over 7 days, 16
8 children in custody for over 14 days, and 4 children in custody for over 20 days.

9 26. The April 2025 report indicated that 213 children were in CBP custody for
10 over 72 hours that month, including 88 children in custody for over 7 days, 24
11 children in custody over 14 days, and 14 children in custody over 20 days.

12 27. The information contained in Exhibit A is true and correct to the best of my
13 knowledge and belief.

14
15 CBP Nationwide Encounters

16 28. CBP posts monthly statistical data regarding individuals encountered by
17 CBP on its website at [https://www.cbp.gov/newsroom/stats/nationwide-](https://www.cbp.gov/newsroom/stats/nationwide-encounters)
18 encounters.

19 29. This website allows a user to sort the data by demographic. According to
20 the website, demographics include: Accompanied Minors (AM), Individuals in a
21 Family Unit (FMUA), Single Adults, and Unaccompanied Alien Children
22 (UAC)/Single Minors. It is my understanding that the FMUA category includes
23 parents of accompanied children. I am unaware of any publicly available CBP
24 data that separates out children in family units.

25 30. On June 12, 2025, under the header titled "U.S. Border Patrol and Office of
26 Field Operations Encounters by Area of Responsibility and Component," I
27 selected "Nationwide" and filtered the Demographic to include Accompanied
28 Minors, FMUAs, and UACs. I excluded Single Adults. I printed the results to

1 PDF. A true and correct copy of this PDF printout is attached as Exhibit H. The
2 results indicated as follows:

- 3 a. In May 2024, there were 92,063 total encounters of AMs, FMUAs,
4 and UACs.
5 b. In June 2024, there were 75,079 total encounters of AMs, FMUAs,
6 and UACs.
7 c. In January 2025, there were 26,175 total encounters of AMs,
8 FMUAs, and UACs.
9 d. In February 2025, there were 2,931 total encounters of AMs,
10 FMUAs, and UACs.
11 e. In March 2025, there were 2,358 total encounters of AMs, FMUAs,
12 and UACs.
13 f. In April 2025, there were 2,827 total encounters of AMs, FMUAs,
14 and UACs.
15

16 I declare under penalty of perjury that the foregoing is true and correct. Executed
17 June 12, 2025, Santa Barbara, California.
18

19
20 

21 Diane de Gramont
22
23
24
25
26
27
28

EXHIBIT A

Flores Monthly Reporting – CBP Data Analysis

1. INTRODUCTION

This Data Analysis includes a description of the data Defendants provided to Plaintiffs on the lengths of stay of children in U.S. Customs and Border Patrol custody in 2024 and 2025.

2. SOURCES OF DATA

Defendants produced to Plaintiffs’ counsel the following data regarding class members in custody:

Date Produced	Original File Name	Name Used in this Exhibit
1/17/2025	Copy of CBP NON-ToT Children with TIC greater than 72 hours_MAY2024	May 2024 Corrected CBP Data Report
1/17/2025	Copy of CBP NON-ToT Children with TIC greater than 72 hours_JUN2024	June 2024 Corrected CBP Data Report
4/16/2025	CBP NON-ToT Children with TIC greater than 72 hours_JAN2025 as of 041525	Jan. 2025 Corrected CBP Data Report
4/16/2025	CBP Children with TIC greater than 72 hours_FEB2025 as of 41125	Feb. 2025 Corrected CBP Data Report
4/22/2025	CBP Children with TIC greater than 72 hours_MAR2025.xlsx	March 2025 Original CBP Data Report
5/27/2025	CBP Children with TIC greater than 72 hours_APR2025.xlsx	April 2025 Original CBP Data Report

3. CBP DATA REPORTS METHODOLOGY BACKGROUND

I compiled the following information by analyzing the corrected CBP data reports Defendants provided Plaintiffs for May 2024, June 2024, January 2025, and February 2025, and the original CBP data reports Defendants provided for March and April 2025 in Microsoft Excel. These data reports include only children with a time in custody (“TIC”) over 72 hours.

When producing the May 2024 Original CBP Data Report on June 25, 2024, Defendants informed Plaintiffs’ counsel that seven highlighted rows (corresponding to seven individual class members) were data errors. The May 2024 Corrected CBP Data Report does not have five of those class members and does not highlight the two class members that do appear, but it is my understanding that the row remains a data error and the class members in question were not held for over 72 hours. For purposes of the below analysis, I deleted the two class members from the May 2024 Corrected Data Report. I am not aware of other data errors in the reports analyzed.

The CBP Data Reports designate class members as “AM,” “FMUA,” and “UC.” I understand these terms to signify accompanied minor, family unit, and unaccompanied child, respectively.

To identify the number of unaccompanied children, I used the Filter tool to limit the inquiry to children listed as “UC” in the “Demographic” column. To identify the number of accompanied children in a family unit, I used the Filter tool to limit the inquiry to children listed as “FMUA” in the “Demographic” column. To identify the number of accompanied children, I used the Filter tool to limit the inquiry to children listed as “AM” in the “Demographic” column.

To identify the ages of class members at the time of CBP encounter, I created a new column titled “Age” (Column F) and used the following formula: =DATEDIF(E8,B8, “y”). E is the “Date of Birth” column and B is the “Encounter Date” column.

4. LENGTH OF STAY

a. Class Members in CBP Custody Over 72 Hours

I calculated the total number of children in custody over 72 hours by selecting all the class member rows and using the Count automatically provided in Microsoft Excel.

	May 2024 Corrected CBP Data Report	June 2024 Corrected CBP Data Report	Jan. 2025 Corrected CBP Data Report	Feb. 2025 Corrected CBP Data Report	March 2025 Original CBP Data Report	April 2025 Original CBP Data Report
FMUA	2,056	3,371	1,320	297	152	188
UC	184	76	14	4	3	22
AM	0	0	0	0	2	3
Total	2,240	3,447	1,334	301	157	213

b. Class Members in CBP Custody Over 7 Days

I calculated the number of children in custody for over 7 days (168 hours) by using the Filter tool to limit the inquiry to children with a TIC time greater than 168 hours and then using the automatic Count in Microsoft Excel.

	May 2024 Corrected CBP Data Report	June 2024 Corrected CBP Data Report	Jan. 2025 Corrected CBP Data Report	Feb. 2025 Corrected CBP Data Report	March 2025 Original CBP Data Report	April 2025 Original CBP Data Report
FMUA	149	968	492	178	63	78
UC	7	10	2	1	0	7
AM	0	0	0	0	0	3
Total	156	978	494	179	63	88
Percentage of Total Over 72 Hours	6.96%	28.37%	37.03%	59.47%	40.13%	41.31%

c. Class Members in CBP Custody Over 14 Days

I calculated the number of children in custody for over 14 days (336 hours) by using the Filter tool to limit the inquiry to children with a TIC time greater than 336 hours and then using the automatic Count in Microsoft Excel.

	May 2024 Corrected CBP Data Report	June 2024 Corrected CBP Data Report	Jan. 2025 Corrected CBP Data Report	Feb. 2025 Corrected CBP Data Report	March 2025 Original CBP Data Report	April 2025 Original CBP Data Report
FMUA	7	207	93	68	16	21
UC	2	4	0	1	0	3
AM	0	0	0	0	0	0
Total	9	211	93	69	16	24
Percentage of Total Over 72 Hours	0.4%	6.12%	6.97%	22.92%	10.19%	11.27%

d. Class Members in CBP Custody Over 20 Days

I calculated the number of children in custody for over 20 days (480 hours) by using the Filter tool to limit the inquiry to children with a TIC time greater than 480 hours and then using the automatic Count in Microsoft Excel.

	May 2024 Corrected CBP Data Report	June 2024 Corrected CBP Data Report	Jan. 2025 Corrected CBP Data Report	Feb. 2025 Corrected CBP Data Report	March 2025 Original CBP Data Report	April 2025 Original CBP Data Report
FMUA	2	42	54	30	4	11
UC	2	1	0	0	0	3
AM	0	0	0	0	0	0
Total	4	43	54	30	4	14
Percentage of Total Over 72 Hours	0.18%	1.25%	4.05%	9.97%	2.55%	6.57%

e. Longest Times in Custody

To identify the 5 children with the longest times in custody in January, February, March, and April 2025, I sorted the data by greatest TIC time and recorded the information in the five top rows. I calculated days by dividing the hours by 24. I rounded down to the nearest day for all the TIC times except 550 hours, which is 22.92 days and I rounded up to 23 days.

	Jan. 2025 Corrected CBP Data Report	Feb. 2025 Corrected CBP Data Report	March 2025 Original CBP Data Report	April 2025 Original CBP Data Report
1.	1,109 Hours (42 Days) 10-year-old A.G., FMUA, SAN DIEGO Field Office	854 Hours (35 Days) 4-year-old A.T., FMUA, SDC Sector	550 Hours (23 Days) 3-year-old G.T., FMUA, EPT Sector	578 Hours (24 Days) 2-year-old E.N.F., UAC, SDC Sector
2.	1,109 Hours (42 Days) 15-year-old A.G., FMUA, SAN DIEGO Field Office	854 Hours (35 Days) 8-year-old A.T., FMUA, SDC Sector	550 Hours (23 Days) 5-year-old M.T., FMUA, EPT Sector	578 Hours (24 Days) 4-year-old D.F., UAC, SDC Sector
3.	966 Hours (40 Days) 2-year-old M.B., FMUA, SAN DIEGO Field Office	760 Hours (31 Days) 6-year-old V.Y., FMUA, SAN DIEGO Field Office	550 Hours (23 Days) 7-year-old A.P., FMUA, EPT Sector	578 Hours (24 Days) 10-year-old S.D.F., FMUA, SDC Sector
4.	915 Hours (38 Days) 2-year-old A.E.S., FMUA, SDC Sector	760 Hours (31 Days) 9-year-old L.Y., FMUA, SAN DIEGO Field Office	550 Hours (23 Days) 8-year-old N.P., FMUA, EPT Sector	578 Hours (24 Days) 12-year-old M.I.F., FMUA, SDC Sector
5.	874 Hours (36 Days) 14-year-old M.H., FMUA, SAN DIEGO Field Office	692 Hours (28 Days) 11-year-old K.B., FMUA, SAN DIEGO Field Office	471 Hours* (19 Days) 11-year-old N.M., FMUA, EPT Sector	578 Hours (24 Days) 14-year-old I.E.F., FMUA, SDC Sector

*Please note two other class members had the same TIC.

EXHIBIT B



Diane de Gramont <ddegmont@youthlaw.org>

Flores CBP Data Discrepancies

Diane de Gramont <ddegmont@youthlaw.org>

Mon, Apr 7, 2025 at 2:32 PM

To: "Gieger, Christopher G. (CIV)" <Christopher.G.Gieger@usdoj.gov>

Cc: Mishan Wroe <mwroe@youthlaw.org>, Becky Wlozin <bwlozin@youthlaw.org>, Carlos Holguin <crholguin@centerforhumanrights.org>, Sarah Kahn <sarah@centerforhumanrights.org>, Leecia Welch <lwelch@childrensrights.org>, "Masetta Alvarez, Katelyn (CIV)" <Katelyn.Masetta.Alvarez@usdoj.gov>, "McCroskey, Joshua C. (CIV)" <Joshua.C.McCroskey@usdoj.gov>, "Parascandola, Christina (CIV)" <Christina.Parascandola@usdoj.gov>, "Silvis, William (CIV)" <William.Silvis@usdoj.gov>, "Celone, Michael A. (CIV)" <Michael.A.Celone@usdoj.gov>, Andrea Sheridan Ordin <aordin@strumwooch.com>, "Paul H. Wise" <pwise@stanford.edu>

Hi Christopher,

Plaintiffs have reviewed the February 2025 data reports and it appears that the February 2025 CBP monthly data does not accurately reflect all class members held in CBP custody for over 72 hours in February. I have copied Ms. Ordin and Dr. Wise given that they previously raised similar data issues within the context of the CBP Settlement.

Last December, Defendants represented that going forward the monthly CBP data report (CBP NON-ToT Children with TIC greater than 72 hours) would include all children in CBP custody for over 72 hours during the reporting month, regardless of whether the child was later transferred to ICE or ORR custody. This change was made to fix a severe undercount in the number of class members reported in the monthly CBP data reports.

The February ICE data indicates that 12-year old class member J.S.A.R. (A# [REDACTED]) was detained at the CBP San Ysidro PO from 1/26/25 to 2/13/25 before being transferred to ICE custody. Despite this extended stay in CBP custody in February, J.S.A.R. does not appear on the February CBP data report.

Even more concerning, some class members in DHS custody for over 72 hours in February appear on neither the ICE nor the CBP report. For example, 2-year old class member M.B. (A# [REDACTED]) appears on the January CBP report as entering CBP custody on 1/29/25. Plaintiffs counsel met with M.B. at Karnes on 3/26/25 and her parents reported that they were detained continuously since 1/29/25. Despite being in DHS custody for the entire month of February, M.B. does not appear on the ICE or CBP data reports for February.

Based on interviews with class members at Karnes on March 26 and 27, we also have reason to believe that other class members were in DHS custody for well over 72 hours in February, including class members M.A.J. (A# [REDACTED]), B.J. (A# [REDACTED]), B.B.J. (A# [REDACTED]), and H.J. (A# [REDACTED]). These children do not appear on the ICE or CBP data reports for February.

We are concerned that the data issues that led to an underreporting of class members in CBP custody have not been fully resolved. As with the missing children in the HHS data, we were able to identify some of these missing children only because we happened to conduct a site visit to a facility where these children were held. We have no way of knowing whether additional class members are similarly missing from CBP's data.

Can you please verify why the above class members were not included in the February CBP data report and inform us why this error occurred and how CBP will avoid these errors going forward?

We look forward to hearing back from you on this and the outstanding HHS data issues. Please provide a response by Monday, April 14. If we cannot be confident that the data reports are accurate and complete, we may have to seek additional monitoring from the Court.

Best,
Diane

On Mon, Mar 24, 2025 at 2:17 PM Gieger, Christopher G. (CIV) <Christopher.G.Gieger@usdoj.gov> wrote:

Hi Diane,

Attached please find the February Flores monthly reporting. I've reattached the HHS report for convenience. And I will be getting back to you about your outstanding concerns.

Best,
Christopher

Christopher G. Gieger

Trial Attorney

U.S. Department of Justice, Civil Division

Office of Immigration Litigation

P.O. Box 878, Ben Franklin Station

Washington, DC 20044

(202) 742-7114



Diane de Gramont (Pronouns: she/her)

Attorney, Immigration & Legal Advocacy

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Oakland, CA 94612

(510) 920-3508

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EXHIBIT C



Diane de Gramont <ddegmont@youthlaw.org>

Flores CBP Data Discrepancies

McCroskey, Joshua C. (CIV) <Joshua.C.McCroskey@usdoj.gov>

Wed, Apr 16, 2025 at 1:59 PM

To: Diane de Gramont <ddegmont@youthlaw.org>

Cc: Mishan Wroe <mwroe@youthlaw.org>, Becky Wolozin <bwolozin@youthlaw.org>, Carlos Holguin <crholguin@centerforhumanrights.org>, Sarah Kahn <sarah@centerforhumanrights.org>, Leecia Welch <lwelch@childrensrights.org>, "Masetta Alvarez, Katelyn (CIV)" <Katelyn.Masetta.Alvarez@usdoj.gov>, "Parascandola, Christina (CIV)" <Christina.Parascandola@usdoj.gov>, "Silvis, William (CIV)" <William.Silvis@usdoj.gov>, "Celone, Michael A. (CIV)" <Michael.A.Celone@usdoj.gov>, "Vick, Lindsay (CIV)" <Lindsay.Vick@usdoj.gov>, Andrea Sheridan Ordin <aordin@strumwooch.com>, "Paul H. Wise" <pwise@stanford.edu>

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This message has not been virus scanned because it contains encrypted or otherwise protected data. Please ensure you know who the message is coming from and that it is virus scanned by your desktop antivirus software.

Hi Diane,

Thank you again for your patience. I have the following information in response to your inquiry.

The CBP data report for a given month reflects individuals who entered custody in that month. CBP STATS generally runs the report around the 10th of the following month, and had erroneously included a search parameter that included only individuals who had been released from custody at the time the report was run. This means that some individuals who entered Border Patrol custody late in the reporting month, and had not been released by the report date, were excluded. CBP STATS has now eliminated that parameter, which should eliminate that issue going forward.

CBP re-ran the January and February reports. They are attached. Password to follow. The February report now reflects M.A.J. (A# ending in [REDACTED]), B.J. (A# ending in [REDACTED]), B.B.J. (A# ending in [REDACTED]), and H.J. (A# ending in [REDACTED]), all of whom entered CBP custody in February but were still in custody when the February report was run on or around March 10.

For JSAR, he would not appear in the February report because he entered custody in January. JSAR appeared on the original January report with his correct apprehension and book-out dates. He also appears on the updated January report attached.

For MB, he properly appeared on the January CBP report because he entered CBP custody in January. He did not have a book-out date when the original January report was run, but he was not excluded because individuals in OFO custody were not affected by the erroneously included search parameter. He did not appear on the February CBP report because his intake date was in January.

Now that CBP STATS has corrected the search parameters, each child who enters CBP custody in a certain month and remains in custody at least 72 hours will appear on that month's report with the intake date, the book-out date (if they have been booked-out by the date the report was run), and the TIC as of the book-out date or as of the time the report was run. The child would not appear on the second month's report because the reports are run based on the intake date. That means that Plaintiffs' counsel may not see on the CBP report the ultimate release date for a child who remains in custody past the date (usually around the 10th) when the report for the previous month is run. CBP STATS could run the report later in the month, which would allow CBP to report more book-out dates and provide a final total time in custody for more minors. But that approach would delay receipt of the monthly reports. This is a difficulty with running backward-looking reports on a monthly basis.

Please let me know if you would like to discuss. Unfortunately, I am not available during the HHS data call scheduled later this week, but I will be available next week.

Best regards,

Joshua

Joshua C. McCroskey

Trial Attorney

United States Department of Justice

Office of Immigration Litigation

General Litigation & Appeals Section

P.O. Box 878, Ben Franklin Station

Washington, DC 20044

(202) 305-1540

From: Diane de Gramont <ddegmont@youthlaw.org>
Sent: Monday, April 14, 2025 8:59 PM
To: McCroskey, Joshua C. (CIV) <Joshua.C.McCroskey@usdoj.gov>
Cc: Mishan Wroe <mwroe@youthlaw.org>; Becky Wolozin <bwolozin@youthlaw.org>; Carlos Holguin <crholguin@centerforhumanrights.org>; Sarah Kahn <sarah@centerforhumanrights.org>; Leecia Welch <lwelch@childrensrights.org>; Masetta Alvarez, Katelyn (CIV) <Katelyn.Masetta.Alvarez@usdoj.gov>; Parascandola, Christina (CIV) <Christina.Parascandola@usdoj.gov>; Silvis, William (CIV) <William.Silvis@usdoj.gov>; Celone, Michael A. (CIV) <Michael.A.Celone@usdoj.gov>; Vick, Lindsay (CIV) <Lindsay.Vick@usdoj.gov>; Gieger, Christopher G. (CIV) <Christopher.G.Gieger@usdoj.gov>; Andrea Sheridan Ordin <aordin@strumwooch.com>; Paul H. Wise <pwise@stanford.edu>
Subject: Re: [EXTERNAL] Flores CBP Data Discrepancies

Hi Joshua,

Thank you for the update, we look forward to the written response.

Best,

Diane

[Quoted text hidden]

[Quoted text hidden]

2 attachments



CBP NON-ToT Children with TIC greater than 72 hours_JAN2025 as of 041525.xlsx
246K



CBP Children with TIC greater than 72 hours_FEB2025 as of 41125.xlsx
142K

EXHIBIT D



Diane de Gramont <ddegmont@youthlaw.org>

Flores CBP Data Discrepancies

McCroskey, Joshua C. (CIV) <Joshua.C.McCroskey@usdoj.gov>

Fri, Apr 25, 2025 at 12:20 PM

To: Diane de Gramont <ddegmont@youthlaw.org>

Cc: Mishan Wroe <mwroe@youthlaw.org>, Becky Wlozin <bwlozin@youthlaw.org>, Carlos Holguin <crholguin@centerforhumanrights.org>, Sarah Kahn <sarah@centerforhumanrights.org>, Leecia Welch <lwelch@childrensrights.org>, "Masetta Alvarez, Katelyn (CIV)" <Katelyn.Masetta.Alvarez@usdoj.gov>, "Parascandola, Christina (CIV)" <Christina.Parascandola@usdoj.gov>, "Silvis, William (CIV)" <William.Silvis@usdoj.gov>, "Celone, Michael A. (CIV)" <Michael.A.Celone@usdoj.gov>, "Vick, Lindsay (CIV)" <Lindsay.Vick@usdoj.gov>, Andrea Sheridan Ordin <aordin@strumwooch.com>, "Paul H. Wise" <pwise@stanford.edu>, "Dr. Nancy E. Wang" <ewen@stanford.edu>, Eleanor Roberts <ERoberts@childrensrights.org>

Hi Diane,

CBP STATS has explained that if they run the report to just include everyone in custody for over 72 hours, they have no way to date limit the report to a particular month. The only ways to date limit the report are to limit by apprehension date or by book out date.

To address your concerns about receiving release dates and total lengths of stay, CBP STATS will do the following. First, STATS will pull the data later in the month. The front page of the report will then include everyone who entered custody in the prior month (i.e., March) and who has been booked out prior to the date the report was pulled (i.e. April 21). CBP STATS will then add a second tab to the report that will list everyone who entered custody the prior month but who has not been booked out on the date the report is pulled (for the March report this second page would have been blank because everyone was booked out by the report date, and we generally expect it to be a low number of individuals). When the following month's report is pulled (i.e. on May 21 when they pull the April data), CBP STATS will also update the data for any individuals on that second tab from the prior month to include book out dates. And CBP STATS will include a tab for any individuals who entered in April and remain in custody in May. Thus, the first page of the report will remain as it has been in the past, but CBP STATS will add additional tabs to track and update data for any individuals who are still in custody as of the report dates.

Best regards,

Joshua

Joshua C. McCroskey

(202) 305-1540

From: Diane de Gramont <ddegmont@youthlaw.org>**Sent:** Wednesday, April 23, 2025 3:02 PM**To:** McCroskey, Joshua C. (CIV) <Joshua.C.McCroskey@usdoj.gov>

Cc: Mishan Wroe <mwroe@youthlaw.org>; Becky Wlozin <bwlozin@youthlaw.org>; Carlos Holguin <crholguin@centerforhumanrights.org>; Sarah Kahn <sarah@centerforhumanrights.org>; Leecia Welch <lwelch@childrensrights.org>; Masetta Alvarez, Katelyn (CIV) <Katelyn.Masetta.Alvarez@usdoj.gov>; Parascandola, Christina (CIV) <Christina.Parascandola@usdoj.gov>; Silvis, William (CIV) <William.Silvis@usdoj.gov>; Celone, Michael A. (CIV) <Michael.A.Celone@usdoj.gov>; Vick, Lindsay (CIV) <Lindsay.Vick@usdoj.gov>; Andrea Sheridan Ordin <aordin@strumwooch.com>; Paul H. Wise <pwise@stanford.edu>; Dr. Nancy E. Wang <ewen@stanford.edu>; Eleanor Roberts <ERoberts@childrensrights.org>

Subject: Re: [Not Virus Scanned] [Not Virus Scanned] RE: [EXTERNAL] Flores CBP Data Discrepancies

Dear Joshua,

Thanks again for this response. We are very concerned to learn of CBP's continued restrictive search parameters, especially after CBP represented to Plaintiffs and the Court that going forward CBP monthly reports would include "all minors, including both accompanied and unaccompanied children, who remained in CBP custody for more than 72 hours, regardless of their transfer location, for all USBP Sectors and OFO Field Offices nationwide." Doc. # 1543 at 5 & Doc. # 1543-1 ¶ 9.

In particular, there is no legal basis for CBP to exclude children from monthly reports simply because they entered custody during the prior month. Paragraph 28A of the Settlement requires that Defendants report, among other things, the date a child is "removed or released." Consistent with this requirement, the HHS and ICE data reports include children in custody during the reporting month regardless of their month of intake. CBP's current practice fails to include the date some children are removed or released, severely understates some children's length of stay, and prevents Plaintiffs' counsel from identifying children who remain in CBP custody for the longest periods of time. Please confirm that CBP will correct its search parameters to include all children who remain in CBP custody for more than 72 hours during the reporting month, regardless of the date of intake.

We have discussed these issues and our continued concerns with the Monitoring team and they will follow up separately.

Best,

Diane

On Wed, Apr 16, 2025 at 1:59 PM McCroskey, Joshua C. (CIV) <Joshua.C.McCroskey@usdoj.gov> wrote:

EXHIBIT E



Diane de Gramont <ddegmont@youthlaw.org>

Class members missing from CBP and ICE data reports

Diane de Gramont <ddegmont@youthlaw.org>

Tue, Apr 29, 2025 at 8:35 AM

To: "McCroskey, Joshua C. (CIV)" <Joshua.C.McCroskey@usdoj.gov>

Cc: Mishan Wroe <mwroe@youthlaw.org>, Becky Wolozin <bwolozin@youthlaw.org>, Carlos Holguin <crholguin@centerforhumanrights.org>, Sarah Kahn <sarah@centerforhumanrights.org>, Leecia Welch <lwelch@childrensrights.org>, "Masetta Alvarez, Katelyn (CIV)" <Katelyn.Masetta.Alvarez@usdoj.gov>, "Parascandola, Christina (CIV)" <Christina.Parascandola@usdoj.gov>, "Silvis, William (CIV)" <William.Silvis@usdoj.gov>, "Celone, Michael A. (CIV)" <Michael.A.Celone@usdoj.gov>, "Vick, Lindsay (CIV)" <Lindsay.Vick@usdoj.gov>, "Gieger, Christopher G. (CIV)" <Christopher.G.Gieger@usdoj.gov>, Eleanor Roberts <ERoberts@childrensrights.org>

Joshua,

We've reviewed the March CBP and ICE data reports and we noticed that numerous children who met with class counsel at Karnes on 3/26/25 and 3/27/25 do not appear on the reports, despite spending well over 72 hours in both CBP and ICE custody.

Most of the children missing from the CBP data report appear to be missing because of the previously-discussed issue relating to entry dates the prior month. But Plaintiffs have reason to believe that at least two class members (CCBC and LG) spent over 72 hours in CBP custody on the northern border and do not appear in any report.

The ICE data is missing at least 20 children who were at Karnes for over 72 hours in March, including class members who appear in the CBP data with Karnes as the book out location. This also includes MB, MAJ, BJ, BBJ, and HJ discussed in my email about CBP data discrepancies.

I have attached a spreadsheet with the class members missing from the March reports, along with notes as to the information we have on these class members. I will send a password separately. Please provide an explanation for these missing class members by Monday, May 5, 2025.

In addition, could CBP please provide a key to the codes used in the report, in particular the disposition codes (e.g. ERCFBC, EREBC) and less common sector codes (e.g. NLL)?

Best,
Diane



Diane de Gramont (Pronouns: she/her)
Attorney, Immigration & Legal Advocacy
1212 Broadway, Suite 600
Oakland, CA 94612
(510) 920-3508
youthlaw.org



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 Flores class members missing from March 2025 reports.xlsx
25K

EXHIBIT F



Diane de Gramont <ddegramont@youthlaw.org>

Class members missing from CBP and ICE data reports

McCroskey, Joshua C. (CIV) <Joshua.C.McCroskey@usdoj.gov> Mon, May 5, 2025 at 2:26 PM
To: Diane de Gramont <ddegramont@youthlaw.org>
Cc: Mishan Wroe <mwroe@youthlaw.org>, Becky Wolozin <bwolozin@youthlaw.org>, Carlos Holguin <crholguin@centerforhumanrights.org>, Sarah Kahn <sarah@centerforhumanrights.org>, Leecia Welch <lwelch@childrensrights.org>, Masetta Alvarez, Katelyn (CIV) <Katelyn.Masetta.Alvarez@usdoj.gov>, "Parascandola, Christina (CIV)" <Christina.Parascandola@usdoj.gov>, "Silvis, William (CIV)" <William.Silvis@usdoj.gov>, "Celone, Michael A. (CIV)" <Michael.A.Celone@usdoj.gov>, "Vick, Lindsay (CIV)" <Lindsay.Vick@usdoj.gov>, Eleanor Roberts <ERoberts@childrensrights.org>

Hi Diane,

Thank you for your email and the spreadsheet. Regarding your questions as to CBP: CCBC does not appear on the report because he spent just under 72 hours in CBP custody. CBP has provided the following information about LG:

Alien File Number	Calendar Date (mm/dd/yyyy)	NAME	DOB	TIC
XXXXXX [REDACTED]	03/19/2025	L.G.	XX/XX/2023	164.20

LG was excluded because the report contained a parameter that was set to include only Deportable Apprehension (USBP) and Inadmissible (OFO) minors. When OFO encountered this minor, he had an NTA and a pending immigration court date and was seeking to enter Canada but was turned around and returned to the U.S. For aliens in this situation, OFO does not flag them as a new encounter but rather uses an "other" tag and places them back into the status they were already in (here an NTA with a pending immigration court date). The "other" flag does not show as "positive" in the "Inadmissible" category, which is why he was excluded. To avoid this situation in the future, CBP STATS will eliminate the use of the parameter for Deportable Apprehension (USBP) and Inadmissible (OFO) minors.

Regarding your request for a key to the codes used in the CBP reports, will you please identify which disposition codes and which sector codes you have questions about? Are you uncertain about any codes other than ERCFBC, EREBC, and NLL?

Finally, the revised data pull procedures (discussed in my email of April 25, 2025) may result in class counsel receiving the CBP data a couple days later than you have been in the last several months. But I do not expect any substantial changes in the typical reporting schedule.

I expect to have more information regarding your inquiry as to the ICE report within the next couple days.

Best,

Joshua

Joshua C. McCroskey

(202) 305-1540

From: Diane de Gramont <ddegramont@youthlaw.org>
Sent: Tuesday, April 29, 2025 11:35 AM
To: McCroskey, Joshua C. (CIV) <Joshua.C.McCroskey@usdoj.gov>
Cc: Mishan Wroe <mwroe@youthlaw.org>; Becky Wolozin <bwolozin@youthlaw.org>; Carlos Holguin <crholguin@centerforhumanrights.org>; Sarah Kahn <sarah@centerforhumanrights.org>; Leecia Welch <lwelch@childrensrights.org>; Masetta Alvarez, Katelyn (CIV) <Katelyn.Masetta.Alvarez@usdoj.gov>; Parascandola, Christina (CIV) <Christina.Parascandola@usdoj.gov>; Silvis, William (CIV) <William.Silvis@usdoj.gov>; Celone, Michael A. (CIV) <Michael.A.Celone@usdoj.gov>; Vick, Lindsay (CIV) <Lindsay.Vick@usdoj.gov>; Gieger, Christopher G. (CIV) <Christopher.G.Gieger@usdoj.gov>; Eleanor Roberts <ERoberts@childrensrights.org>
Subject: [Not Virus Scanned] [EXTERNAL] [Not Virus Scanned] Class members missing from CBP and ICE data reports

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Joshua,

We've reviewed the March CBP and ICE data reports and we noticed that numerous children who met with class counsel at Karnes on 3/26/25 and 3/27/25 do not appear on the reports, despite spending well over 72 hours in both CBP and ICE custody.

Most of the children missing from the CBP data report appear to be missing because of the previously-discussed issue relating to entry dates the prior month. But Plaintiffs have reason to believe that at least two class members (CCBC and LG) spent over 72 hours in CBP custody on the northern border and do not appear in any report.

The ICE data is missing at least 20 children who were at Karnes for over 72 hours in March, including class members who appear in the CBP data with Karnes as the book out location. This also includes MB, MAJ, BJ, BBJ, and HJ discussed in my email about CBP data discrepancies.

I have attached a spreadsheet with the class members missing from the March reports, along with notes as to the information we have on these class members. I will send a password separately. Please provide an explanation for these missing class members by Monday, May 5, 2025.

In addition, could CBP please provide a key to the codes used in the report, in particular the disposition codes (e.g. ERCFBC, EREBC) and less common sector codes (e.g. NLL)?

Best,
Diane

—

Diane de Gramont (Pronouns: she/her)

Attorney, Immigration & Legal Advocacy
1212 Broadway, Suite 600
Oakland, CA 94612
(510) 920-3508
youthlaw.org

[Quoted text hidden]

EXHIBIT G



Diane de Gramont <ddegmont@youthlaw.org>

Class members missing from CBP and ICE data reports

Diane de Gramont <ddegmont@youthlaw.org>

Mon, May 12, 2025 at 2:48 PM

To: "McCroskey, Joshua C. (CIV)" <Joshua.C.McCroskey@usdoj.gov>

Cc: Mishan Wroe <mwroe@youthlaw.org>, Becky Wlozin <bwlozin@youthlaw.org>, Carlos Holguin <crholguin@centerforhumanrights.org>, Sarah Kahn <sarah@centerforhumanrights.org>, Leecia Welch <lwelch@childrensrights.org>, "Masetta Alvarez, Katelyn (CIV)" <Katelyn.Masetta.Alvarez@usdoj.gov>, "Parascandola, Christina (CIV)" <Christina.Parascandola@usdoj.gov>, "Silvis, William (CIV)" <William.Silvis@usdoj.gov>, "Celone, Michael A. (CIV)" <Michael.A.Celone@usdoj.gov>, "Vick, Lindsay (CIV)" <Lindsay.Vick@usdoj.gov>, Eleanor Roberts <ERoberts@childrensrights.org>

Hi Joshua,

Thank you for the spreadsheet. I do not see an explanation in the attached spreadsheet for the reason these individuals were omitted from the March data report, although I see many references to 20 days. Was ICE not reporting children in family detention for 20 days or less?

Thanks also for the CBP data information. We are disturbed that every time we identify children missing from the data reports, CBP and ICE discover another search parameter than was mistakenly excluding class members detained over 72 hours. Plaintiffs therefore request a mechanism to inspect CBP and ICE's search parameters. Please either provide a complete list of the search parameters or an alternative way to inspect them.

Regarding the CBP codes, the ones we are uncertain about are: ERCFBC, EREBC, WD in lieu of NTA, WD in lieu of ER, and NLL.

Best,
Diane

On Mon, May 12, 2025 at 12:19 PM McCroskey, Joshua C. (CIV) <Joshua.C.McCroskey@usdoj.gov> wrote:

Diane,

Thank you for your patience on the ICE questions. ICE provided the attached information about the individuals you asked about. ICE has identified why those individuals did not appear on the March spreadsheet and has corrected the issue going forward.

Best regards,

Joshua

Joshua C. McCroskey

(202) 305-1540

From: Diane de Gramont <ddegmont@youthlaw.org>

Sent: Tuesday, April 29, 2025 11:35 AM

To: McCroskey, Joshua C. (CIV) <Joshua.C.McCroskey@usdoj.gov>

Cc: Mishan Wroe <mwroe@youthlaw.org>; Becky Wlozin <bwlozin@youthlaw.org>; Carlos Holguin <crholguin@centerforhumanrights.org>; Sarah Kahn <sarah@centerforhumanrights.org>; Leecia Welch <lwelch@childrensrights.org>; Masetta Alvarez, Katelyn (CIV) <Katelyn.Masetta.Alvarez@usdoj.gov>; Parascandola, Christina (CIV) <Christina.Parascandola@usdoj.gov>; Silvis, William (CIV) <William.Silvis@usdoj.gov>; Celone, Michael A. (CIV) <Michael.A.Celone@usdoj.gov>; Vick, Lindsay (CIV) <Lindsay.Vick@usdoj.gov>; Gieger, Christopher G. (CIV) <Christopher.G.Gieger@usdoj.gov>; Eleanor Roberts <ERoberts@childrensrights.org>

Subject: [Not Virus Scanned] [EXTERNAL] [Not Virus Scanned] Class members missing from CBP and ICE data reports

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I have attached a spreadsheet with the class members missing from the March reports, along with notes as to the information we have on these class members. I will send a password separately. Please provide an explanation for these missing class members by Monday, May 5, 2025.

In addition, could CBP please provide a key to the codes used in the report to clarify the common codes (e.g. ERCFBC, EREBC) and less common sector codes (e.g. NLL)?

Best,

Diane

--

Diane de Gramont (Pronouns: she/her)

Attorney, Immigration & Legal Advocacy
1212 Broadway, Suite 600
Oakland, CA 94612
(510) 920-3508
youthlaw.org

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Oakland, CA 94612
(510) 920-3508
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EXHIBIT H

Nationwide Encounters

Encounter data includes U.S. Border Patrol (USBP) Title 8 Apprehensions, Office of Field Operations (OFO) Title 8 Inadmissibles, and Title 42 Expulsions. Data is available for the Northern Land Border, Southwest Land Border, and Nationwide (i.e., air, land, and sea modes of transportation) encounters.

Title 8 Enforcement Actions refers to apprehensions or inadmissibles processed under CBP's immigration authority. Inadmissibles refers to individuals encountered at ports of entry (POEs) by OFO who are seeking lawful admission into the United States (U.S.) but are determined to be inadmissible, individuals presenting themselves to seek humanitarian protection under our laws, and individuals who withdraw an application for admission and return to their countries of origin within a short timeframe.

Apprehensions refers to the physical control or temporary detainment of a person by USBP between POEs who is not lawfully in the U.S. which may or may not result in an arrest.

Title 42 Expulsions refers to individuals encountered by USBP and OFO and expelled to the country of last transit or home country in the interest of public health under Title 42 U.S.C. 265 from March 21, 2020 to May 11, 2023.

Demographics for USBP and OFO include:

- Accompanied Minors (AM)
- Individuals in a Family Unit (FMUA)
- Single Adults
- Unaccompanied Alien Children (UAC) / Single Minors

To access the data used to build these dashboards, please visit the [CBP Data Portal](#).

Data is extracted from live CBP systems and data sources. Statistical information is subject to change due to corrections, systems changes, change in data definition, additional information, or encounters pending final review. Final statistics are available at the conclusion of each fiscal year.

U.S. Border Patrol At Large and U.S. Border Patrol At Entry Apprehensions

Monthly Totals



Monthly Totals	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24	Mar-24	Apr-24	May-24
Nationwide Total Apprehensions	190,454	192,357	251,178	125,440	142,104	139,124	131,078	121,646
<i>At Large</i>	2,977	2,668	4,676	2,057	2,670	2,700	2,813	2,429
<i>At Entry</i>	187,477	189,689	246,502	123,383	139,434	136,424	128,265	119,217
Southwest Border Total Apprehensions	188,749	191,106	249,740	124,215	140,641	137,473	128,895	117,905
<i>At Large</i>	2,687	2,439	4,465	1,869	2,405	2,429	2,534	2,039
<i>At Entry</i>	186,062	188,667	245,275	122,346	138,236	135,044	126,361	115,866

Monthly Totals	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24	Mar-24	Apr-24	May-24
Northern Border Total Apprehensions	1,522	1,148	1,178	926	1,267	1,480	1,940	3,399
<i>At Large</i>	240	189	143	121	182	165	166	221
<i>At Entry</i>	1,282	959	1,035	805	1,085	1,315	1,774	3,178

At Entry: Refers to an alien who has entered the United States without admission and has not yet reached his/her destination, regardless of the amount of time since entry.

At Large: Refers to an alien who has illegally entered the United States, has already reached their destination, and is encountered or who was legally admitted

U.S. Border Patrol and Office of Field Operations Encounters by Area of Responsibility and Component

Note: Internet Explorer has problems displaying the following charts. Please use another browser (Chrome, Safari, Firefox, Edge) to view. When using a mobile device, the charts are best displayed in landscape mode.



U.S. Customs and Border Protection (CBP) Encounters
Nationwide, Southwest Land Border,
and Northern Land Border Encounters by Fiscal Year (FY)

Choose Region: Nationwide Fiscal Year: (All) Component: (All) Area of Responsibility: (All)

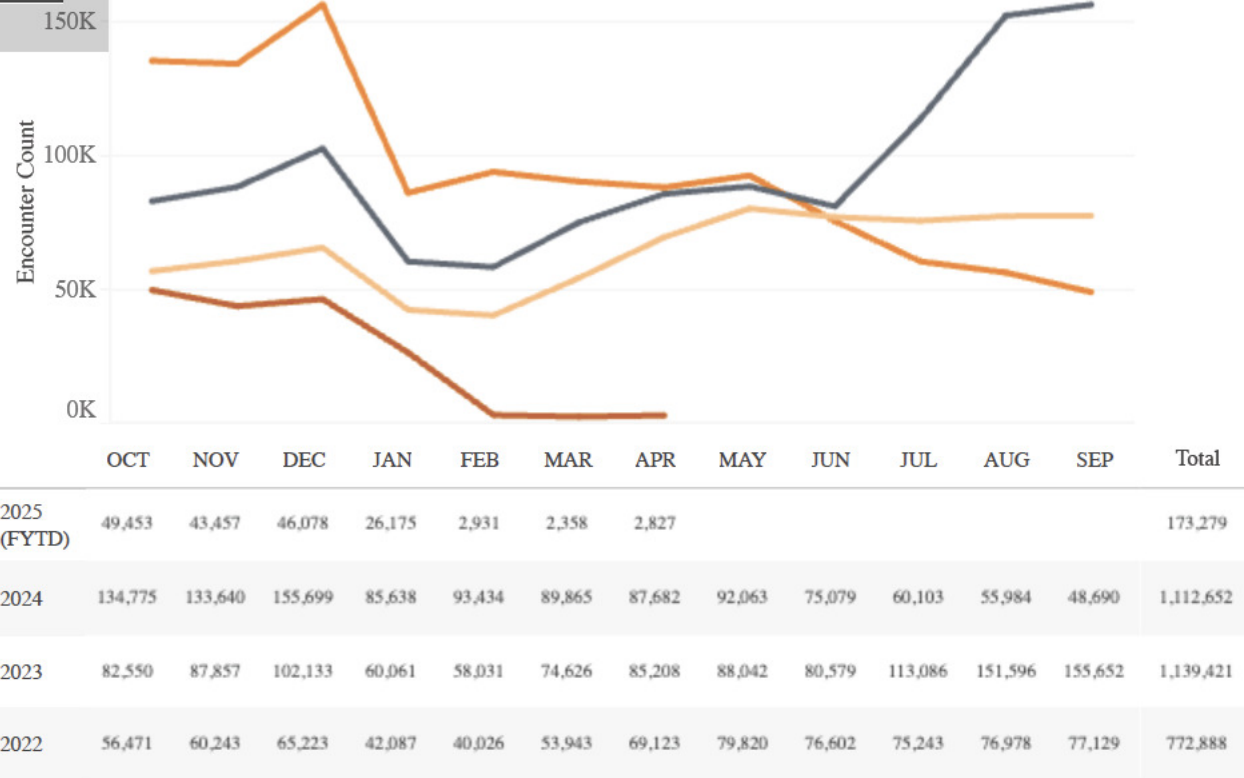
Demographic: (Multiple values) Citizenship: (All) Title of Authority: (All)

Reset Filters

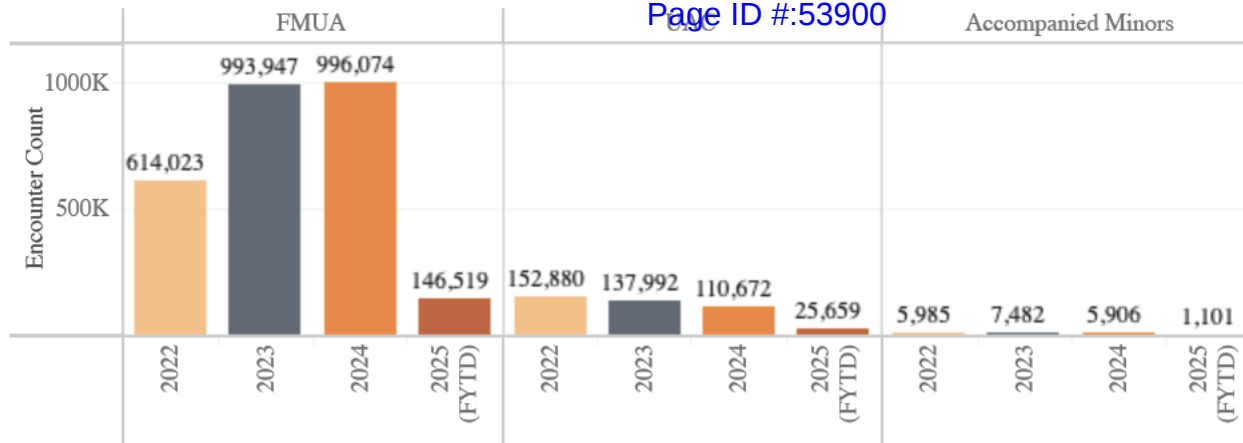
- ☐ (All)
 - ☒ Accompanied Minors
 - ☒ FMUA
 - ☐ Single Adults
 - ☒ UAC
- Cancel Apply

2022 2023 2024 2025 (FYTD)

FY Nationwide Encounters by Month



FY Comparison by Demographic



U.S. Border Patrol and Office of Field Operations Encounters by State

Note: Nationwide encounters are the sum of CBP encounters across all areas of responsibility including Northern Land Border, Southwest Land Border, OFO non-land border ports of entry (e.g., airports, seaports), and USBP sectors that do not share a land border with Canada or Mexico (e.g., Miami Sector). This data is available for further review and download on the [Nationwide Encounters Public Data Portal](#) page.



U.S. Customs and Border Protection (CBP) Encounters by State
Nationwide, Southwest Land Border,
and Northern Land Border Encounters by Fiscal Year (FY)

Choose Region: Nationwide Fiscal Year: (All) State: (All) Title of Authority: (All)

Demographic: (Multiple values) Citizenship: (All)

Reset Filters

- ☐ (All)
 - ☒ Accompanied Minors
 - ☒ FMUA
 - ☐ Single Adults
 - ☒ UAC
- Cancel Apply

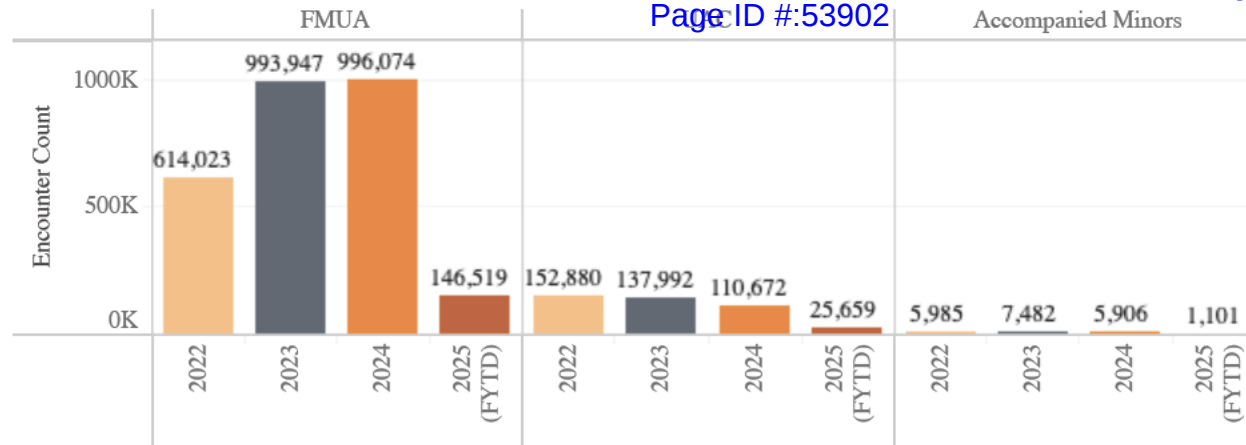
2022 2023 2024 2025 (FYTD)

FY Nationwide Encounters by Month



	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	Total
2025 (FYTD)	49,453	43,457	46,078	26,175	2,931	2,358	2,827						173,279
2024	134,775	133,640	155,699	85,638	93,434	89,865	87,682	92,063	75,079	60,103	55,984	48,690	1,112,652
2023	82,550	87,857	102,133	60,061	58,031	74,626	85,208	88,042	80,579	113,086	151,596	155,652	1,139,421
2022	56,471	60,243	65,223	42,087	40,026	53,943	69,123	79,820	76,602	75,243	76,978	77,129	772,888

FY Comparison by Demographic



U.S. Border Patrol and Office of Field Operations Encounters



U.S. Customs and Border Protection (CBP) Encounters
Nationwide Encounters for Fiscal Year (FY) 2025 to Date

Choose Region	Demographic	Citizenship	Reset Filters
Nationwide ▼	(Multiple values) ▼	(All) ▼	
	OFO	USBP	All CBP
MAR FY2025	1,235	1,123	2,358
APR FY2025	1,440	1,387	2,827
Percent Change	▲ 16.6%	▲ 23.5%	▲ 19.9%

FYTD Nationwide Demographic by Month

	Office of Field Operations				U.S. Border Patrol			FYTD Total
	FMUA	Accompanied Minors	UAC	Total	FMUA	UAC	Total	
OCT	27,096	245	744	28,085	15,470	5,898	21,368	49,453
NOV	24,382	162	710	25,254	12,427	5,776	18,203	43,457
DEC	24,621	220	731	25,572	14,375	6,131	20,506	46,078
JAN	15,570	168	502	16,240	7,176	2,759	9,935	26,175
FEB	1,185	73	91	1,349	837	745	1,582	2,931
MAR	1,063	115	57	1,235	477	646	1,123	2,358
APR	1,255	118	67	1,440	585	802	1,387	2,827
Total	95,172	1,101	2,902	99,175	51,347	22,757	74,104	173,279

Source: USBP and OFO official year end reporting for FY24; USBP and OFO month end reporting for FY25 to date. Data is current as of 5/5/2025.

To ensure that law enforcement sensitive statistics are not publicly released, modifications to data filters have been made that may alter the format of data previously obtained from this dashboard.

For additional years of Southwest Land Border encounter data, visit the [Southwest Land Border Encounters](#) webpage.

Last Modified: May 12, 2025

EXHIBIT 3

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, [REDACTED], declare as follows:

2 1. This testimony is based on my personal knowledge and the following facts are true
3 to the best of my understanding and recollection.

4 2. I am 23 years old. I am from the [REDACTED].

5 3. I speak English.

6 4. I was apprehended with my baby, [REDACTED]
7 old, and my husband, [REDACTED], when we crossed into the United States from Canada
8 and picked up by Border Patrol near Fort Covington, New York. My husband's aunt and
9 her 12-year-old son were with us at the time, and they were also apprehended.

10
11 Apprehension Prior to Dilley

12 5. My baby, husband, and I have been detained at Dilley for 13 days. My husband's
13 aunt and her son have also been detained at Dilley for 13 days. Before this we were
14 detained in two different immigration jails in New York.

15 6. We were held in the first jail for one night, about 12 hours. When we arrived, the
16 male guards told me and my husband's aunt that they had to search us, which made us
17 very uncomfortable. I asked if there was a female guard that could conduct the searches,
18 and the guards told us no, that there were only male guards at that jail. The male guards
19 patted us down, which was very upsetting.

20 7. That night my husband, myself, our baby, my husband's aunt, and son were
21 detained together in a small room. The cell was freezing cold, and there was a fan in the
22 ceiling that constantly blew cold air on all of us. We asked the guards to turn off the fan,
23 because we were worried about the baby getting sick, but the guards laughed at us and
24 said that they couldn't control the fan.

25 8. The next day, the guards moved us to a different jail. In that jail, there were several
26 very small cells lined up next to each other, and they put me in one cell and separated my
27 husband into the cell next to us. My baby was so upset that he wasn't with his father that
28 he was screaming and crying for hours. He was absolutely inconsolable, even though I

1 was doing everything I could to try and calm him down. When I told the guards that he
2 was crying because he missed his father, the guards didn't believe me. They said that I
3 was lying, and that I was only saying that because I wanted my husband to be in the same
4 cell as us. Then, when my baby kept crying, the guards opened a small window between
5 the cells so that I could hold him up and he could see his father's face. Once my baby saw
6 his father's face, he immediately stopped crying. After that, the guards let my husband
7 stay with my baby and I in the same cell. I think they were tired of the crying.

8 9. We were held in the second jail for two nights and endured very bad conditions.
9 My husband and I were very worried about our baby's health – he's so small, he's only
10 three months old.

11 10. The cell was very dirty. There was a toilet in the corner of the cell, but it wasn't
12 private, it was out in the open. There were so many cameras around the cells that I was
13 afraid to go to the bathroom because I didn't want to undress in front of a camera. I
14 developed a kidney infection and had to get medical treatment later when we were
15 detained at Dilley.

16 11. It was very hard to sleep in the cell. We were given thin sleep mats that were less
17 than an inch thick, and silver foil emergency sheets to wrap around ourselves to keep
18 warm. At first, the guards told my husband and I to sleep on the floor together with our
19 baby. I was worried that the sleep mats were so small that the baby would roll off on to
20 the cold floor. I saw a small black playpen in a nearby cell, and I asked the guards if we
21 could use it for the baby to sleep on. Initially the guards refused, but after I kept asking,
22 they got tired of me and gave in. Even when I was able to put him in the playpen, it was
23 very hard to sleep. The silver foil sheets were so noisy that they kept waking up the baby
24 throughout the night.

25 12. My baby drinks formula, and it's important to make sure that the water I mix with
26 the formula powder is clean. The cell we were detained in did not have clean water – the
27 water was visibly dirty, it wasn't clear. When I tried drinking the water it tasted terrible,
28 and the guards laughed at me when they saw me drinking it. I asked the guards for bottled

1 water for my baby's formula, and they said no, that I should use the water from the sink
2 in the cell. I actually had bottles of water in my bags, but the guards refused to let me use
3 that water for my baby's formula. I had to ask the guards multiple times over several
4 hours before they would let me use that water. My baby, like many babies his age, has to
5 eat about every four hours – it was incredibly stressful to not have access to clean water
6 for formula. No one wants their baby to drink dirty water, especially when they are only
7 a few months old and could get really sick. I was worried that if my baby got sick, that
8 the guards wouldn't take it seriously and we wouldn't be able to get medical attention in
9 time to prevent something serious from happening.

10 13. At one point, the guards tried to get my husband and I to sign a document. My
11 husband refused to sign the document, and so then the guards tried to convince me to sign
12 it. I have struggled with reading since I was a young child. Although I can read a bit, I
13 thought it was important to understand what the document said, and I asked the guards to
14 read it out loud to me. They rolled their eyes at me and said no, that they wouldn't read it
15 to me. They told me the document was just about verifying my fingerprints, and that it
16 wasn't a big deal so I should just sign it. I didn't trust them, and so I said I wasn't
17 comfortable with signing the document. Right after I said that, another guard entered the
18 room and said it didn't matter anyway because my husband had signed the document, so
19 they were sending us all back. The guard said that the document was a verification of
20 removal process, and that we would be banned from entering the United States for many
21 years if we ever tried to come back. I realized that the guard mistakenly thought my
22 husband had already signed the document. When the guard realized that my husband had
23 not signed the document – and that I wasn't going to sign it either – he got very upset.

24 14. The guards constantly taunted my husband and I while we were detained in the
25 cell. We did not feel safe and I was worried about my baby's health the entire time that
26 we were held in that cell. I didn't sleep the entire time we were there because I was so
27 worried.
28

1 Dilley Detention Facility

2 15. My baby, husband, and I have been detained at Dilley for 13 days. Staff have told
3 us that we will probably be here for between 15 to 21 days. My husband's aunt and her
4 son were transferred with us to Dilley, so they are here as well.

5 16. My husband and I want to have an asylum interview to be able to tell our story, but
6 we don't know when we'll be able to get an interview. When we first arrived here almost
7 two weeks ago, I messaged ICE on the tablets and asked for an interview, but they have
8 not responded to me. My husband messaged ICE on the tablets as well, and after he
9 messaged them a few times, he finally got a response yesterday that said that they will
10 schedule an interview. We still don't know when that interview will be. We want to
11 follow the rules and do everything the right way, but that's impossible when no one tells
12 you what the right way is.

13 17. We have not received a list of available free legal counsel. We saw a flyer with pro
14 bono legal services numbers on it, and we have called, but no one has picked up.

15 18. This place is a prison. There are a lot of rules here, and I am trying my best to
16 follow the rules. It is very hard because the rules change all the time, and staff scream
17 and yell at me if I "break" a rule – even when I don't know that such a rule existed. If I
18 don't know what the rules are, how am I supposed to follow them? If staff change a rule
19 and don't tell us, why are they screaming at me for not following it? It is so exhausting to
20 try your best to follow what you think are the rules, only to be screamed at and made to
21 feel stupid for making mistakes that you didn't even know were mistakes.

22 19. Dilley is divided into different units, and they each have a different color and
23 animal name. Me and the baby are assigned to a room in the "Yellow Frog" unit, and my
24 husband is assigned to the "Brown Bear" unit. My husband and I are not allowed to stay
25 in the same room together and can only see each other limited times during the day.

26 20. The staff say that families can be together from 8 am to 8 pm, but the reality is that
27 there aren't many common spaces where we can actually be together during the day. My
28 husband isn't allowed in my room, and me and the baby aren't allowed in his room. It's

1 very hot outside during the day – so hot that sometimes staff tells us that the outside area
2 is closed and we aren't allowed to be outside. One time we tried to sit at a table under the
3 shade tarp, and a staff member blew a whistle at us and told us to move. Aside from the
4 dining hall, the only other indoor common spaces are the library and the gym. At the
5 library, staff have started kicking people out if they're not using a computer or reading a
6 book, so it's not a place where we can just sit and be together. The gym is very loud and
7 noisy, because kids are playing with balls, and the baby gets scared, so we can't be there
8 either. I often end up just going back to my room with the baby because he needs a place
9 with air conditioning – which means that we are separate from my husband.

10 21. I am not allowed to bring the stroller into the dining hall. That means that I have to
11 hold my baby while I try to eat, which is very difficult, and means that I don't eat
12 enough. At first, the staff told me that I should ask a staff member to hold my baby while
13 I eat, but when I ask, the staff tell me that they are too busy. This morning when I went to
14 the dining hall for breakfast, the staff member at the entrance said that I had to leave my
15 baby's bottle of formula with her at the dining hall door because it was an open bottle of
16 liquid, and people aren't allowed to bring in open liquids to the dining hall. I didn't
17 understand that rule, because my baby is only three months old and he needs his formula.

18 22. My husband is a great dad. It's been hard for him to not be allowed to be with me
19 and the baby as much as he wants to be – and to not be allowed to take care of the baby
20 as much as he wants to.

21 23. It has also been hard because staff won't let my husband's aunt or son hold the
22 baby. When I need to take a shower, staff tell me that I have to put the baby in the stroller
23 and take him into the shower with me, or give him to a staff member to hold – instead of
24 letting my own family hold him. And when I do ask staff to hold the baby so that I can
25 shower, staff tell me that they are too busy, or too understaffed, and I have to stand and
26 wait with the baby in the heat until a staff member is available to take him. I don't
27 understand why I'm required to have a stranger hold my baby instead of my own family.
28

24. My room has twelve bunk beds in it. At first, my baby and I were alone in the room. A few days later, two women and their young children were placed in my room as well. I have been able to use the phone in my room to call family in [REDACTED], but it is very expensive. I made two three-minute calls and the total was about seven dollars. At first, staff gave me the wrong country code for [REDACTED], so I wasn't able to place calls for a week, but then staff gave me the correct country code. The phone in my husband's room does not work, and the phones in the phone room on his unit do not work, and they haven't worked since we arrived.

25. There is a crib that the baby can sleep in, but I worry about the young children in my room trying to pick him up at night when I'm sleeping. They are sweet children and naturally curious – they often try to pat his face, kiss him, and pick him up –and I am worried that one night they might try to pick him up and drop him. I have my baby sleep with me in my bed to make sure that he is safe, which means that usually I don't sleep very well and am exhausted during the day. We aren't allowed to turn off the lights in our room when we sleep, which makes it very difficult to sleep at night for both me and the baby. There is a big fluorescent light that shines directly on to our bed, and I can't switch it off.

26. I am not allowed to change my baby's diaper in the room where we sleep. The staff said that diapers are smelly, and that the rule is that diapers can only be changed in the restrooms (even if they are only urine). The restrooms are located at the end of a long hallway connecting the rooms in our unit. That means that if my baby needs his diaper changed in the middle of the night, I have to pick him up out of bed, walk down the brightly lit hallway, and change his diaper in the bright lit restroom. By the time I finish changing his diaper, he is wide awake and has trouble going back to sleep. Then I have to try and calm him down and soothe him back to sleep so that he doesn't wake up the other small children in our room. The other option is to let him sleep and not change his diaper – but I don't want him to get a diaper rash from lying in a wet diaper for hours – so I wake him up to change him.

27. Another rule is that if I need to use the toilet at night, I have to bring my baby to the restroom with me. I am not allowed to leave him sleeping in bed, or with another mother in my room. If I ask the staff on the night shift to watch him, they tell me “he is your responsibility,” that they are not supposed to hold him, and that I have to bring him to the toilet with me. By the time I pick him up, bring him to the toilet with me, and then bring him back to the room, he is wide awake. I started holding it instead of going to the toilet at night to avoid waking him up, which I think contributed to my kidney infection.

28. I have spoken to seven or eight other women that also have bad urinary pain and think they have kidney infections as well. They don’t want to go to medical because they don’t want to sit and wait for hours with their children to get medication – instead, they are just buying painkillers at the Commissary to get through the day. There is often a long line at medical – called the pill line – to get medications, and it usually takes 30 to 60 minutes every time you go there, every day. One time I went to get Tylenol and had to wait in the pill line to two hours. It is very hard to stand and wait in the heat in line with a baby just to take medication.

29. The showers and restrooms here are filthy and smell foul. It worries me to have to bring my baby in there all the time. I worry about the other little babies, toddlers, and other young children that have to use them as well.

30. When we arrived at Dilley, the baby formula that was provided was different than what he had been used to. I have noticed that his poop has gotten darker and looser since we had to change his formula, but I don’t have a choice in what formula to give him. If the Commissary sold formula, I would buy it myself, but the Commissary doesn’t sell baby items.

31. I have not seen or been offered a bottle sterilizer. I wash my baby’s bottles myself with hot water from the sink in the pantry room. I don’t have soap to clean the bottles. Staff gave me a bottle brush to clean the bottles that I share with another mother in my room who has a young child.

32. The staff change the rules a lot. For example, a few days ago, a staff member told me to only come bother him and ask for a new can of formula when the current can is completely empty and show him the can for proof. A few days ago, the can was empty so I went and asked for a new can, and the staff got mad at me and said that I should have come to them *before* the formula ran out. They were really upset and were screaming at me – I was just following what they told me to do.

33. It is especially hard for people that don't speak English to understand what the rules are and what staff are telling them to do. There are people from so many countries here that speak all different languages, and there aren't instructions or signs in their languages. I think each staff is supposed to have a personal translator device, but there have been a few times where I have seen staff refuse to use their devices to communicate with people that don't speak English, and tell people ask someone else on the next shift or that they'll use the device "tomorrow."

34. My baby was given three outfits when we arrived at Dilley – three babygros (long-sleeve onesies) and one babyvest (short sleeve onesie). One of the babygros was ruined soon after we arrived at Dilley because he had an explosive poop from the new formula. I asked for another babygro for my baby a few days ago, but staff have not given me one. I have to wash a babygro in the laundry every night to make sure that he has a new one for the next day. Like all babies, he spits up and gets messy, and it's stressful to have only two pieces of clothing for him.

35. It has been very difficult to access medical care for the baby. After we arrived, he developed a diaper rash. I have my own diaper rash cream in my bags that I arrived at Dilley with, but staff won't let me get the cream out of those bags. I waited for four hours at the medical unit for the doctors to prescribe my baby diaper rash cream. However, the medical team only prescribed the cream for seven days. When it ran out and I asked for more at the pill line, the staff put a tiny amount in a wax paper cup and told me that I should save it because I don't know how long we'll be here. She told me that "a little bit

1 goes a long way” and that I “have to make it last.” It’s a nightmare to have to beg for tiny
2 bits of diaper cream to make sure that your baby’s bottom isn’t red and painful.

3 36. Today, staff gave me one diaper for the day, and told me that I have to go back to
4 staff to get more diapers later if I need them. It’s very stressful to not have enough
5 diapers for my baby. There is another mother here with a young girl, she’s maybe five or
6 six years old, and she needs diapers – I think she might have special needs or a medical
7 condition. I saw this mother ask staff for diapers, and staff made fun of her for asking.
8 One staff asked another “can’t we just refuse to give her diapers? Her kid is five.” And
9 the other staff member responded “well, no, we can’t refuse her diapers because then it’ll
10 come up that we refused to give her diapers and we’ll get in trouble.” I don’t understand
11 how staff can treat people this way, these are all God’s children. It’s so hurtful. I’m
12 Catholic and I prayed for the mother and her child last night.

13 37. It has also been difficult to get baby wipes for my baby. For example, a few days
14 ago I had only two wipes left in my wipes packet, and my baby had just had a big poop. I
15 asked a staff member for more wipes, and he told me that I had enough. When I told him
16 I only had two wipes left, he told me that I had to come back to him and show him a
17 completely empty packet to get more wipes. I ended up having to clean my baby’s
18 bottom with wet toilet paper because two wipes weren’t enough. When I went back to the
19 staff member with the empty packet of wipes, he brought out a new packet of wipes but
20 then removed half of the wipes from the packet before he gave it to me.

21 38. I wish that I could buy my own diapers, diaper cream, and baby wipes at the
22 Commissary so that I didn’t have to beg for these items from staff or be stressed about
23 having them when my baby needs them, but the Commissary doesn’t sell baby items. We
24 packed many baby items in the bags that we arrived with, but staff won’t let us use them.

25 39. It is scary, exhausting, and overwhelming to be refused the basic things that I need
26 to care for my baby. Like all mothers, all I want is for my baby to be safe and healthy –
27 but in this place, that feels impossible.

1 I declare under my duty to tell the truth and penalty of perjury that to the best of my
2 knowledge, all the information I have here given is correct and complete and I understand
3 the legal consequences of testifying falsely to the authorities. Executed on this 5^m day
4 of June 2025, at Dilley, Texas.

5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [Name: [REDACTED]]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
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24 [REDACTED]
25 [REDACTED]
26 [REDACTED]
27 [REDACTED]
28 [REDACTED]

EXHIBIT 4

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, [REDACTED], declare as follows:

2 1. This testimony is based on my personal knowledge and the following facts are true
3 to the best of my understanding and recollection.

4 2. I am 23 years old. I am from [REDACTED]. I speak Spanish.

5 3. I have been detained at the Dilley facility with my 5-year-old son, [REDACTED] for six
6 days.

7 4. We've been in the United States for about a year. We were arrested after police in
8 Ohio pulled us over while we were on a family vacation. That's how we ended up in this
9 immigration facility.

10 5. My son was traumatized by the interaction with the police. They pointed their guns
11 at us and treated us like criminals for no reason at all.

12 Immigration Detention in Ohio

13 6. The Ohio police must have called ICE. Immigration agents took my son and I to an
14 office building in Ohio. We had to stay in a tiny room in that building for five days.

15 7. Staying in that room was horrible. It was not suited for children. It felt like it was
16 for prisoners. There was a very narrow mat against the wall we had to sleep on together.
17 We had to sleep on scratchy plastic that irritated my skin.

18 8. The room had no windows to the outside. We couldn't tell whether it was day or
19 night. There was a large window that looked out on the office space and agents working
20 on their computers. All the agents were men.

21 9. The room had a toilet that was completely visible to anyone walking by the room.
22 We could only go pee because it was so uncomfortable to go to the bathroom within the
23 view of all those men.

24 10. There was no soap at the sink in the room.

25 11. It was four days before my son or I could shower or change clothes. They didn't
26 even let my son change his underwear. Now he has a rash on his penis that I think is
27 because of that.

12. When they finally brought us to the shower, it was like a bathroom for employees who work in the building. That was the first time we could brush our teeth, too.

13. I was so upset that my son was being treated like that. [REDACTED] kept asking when we were going to leave, and I was crying every day.

14. My son couldn't sleep. He woke up so many times because there was an extremely bright light on the entire night.

15. There was no one to talk to and nothing for my son to do for five days inside that room. All he had was one coloring book.

16. They didn't let us make any phone calls. They could have done anything to us or sent us anywhere and no one would have known. It was quite a few days before anyone knew what happened to us.

Dilley facility

17. I've been here for six days and was able to make my first phone call at Dilley the day before yesterday. At first, I asked for a call and the staff said "Do you have money?" I said no. They said "How do you think you're going to call?" The staff keep repeating: "If you don't have money, you're not going to have calls." I don't know how I could get money on my account if I can't call anyone to ask them to put money on it.

18. It's really hot in our room here. [REDACTED] has complained a lot because he's sweating all the time.

19. Here at Dilley, we cannot drink the tap water. The tap water smells so horrible and it looks white and dirty. But you have to buy bottled water if you don't want to drink the tap water. [REDACTED] hasn't drunk any water. He's only drinking things like juice at mealtimes. This interview, when I was given a free water, was the first time I've had water here and I've been here for six days.

1 I declare under my duty to tell the truth and penalty of perjury that to the best of my
2 knowledge, all the information I have here given is correct and complete and I understand
3 the legal consequences of testifying falsely to the authorities. Executed on this 2 day
4 of May 2025, at Pilley, Texas.

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A large black rectangular redaction box covers the signature area. To the right of the box, there are two horizontal lines for a signature and one horizontal line for a name. The letter 'N' is visible to the left of the box, aligned with the second line.

CERTIFICATE OF INTERPRETATION

My name is Rachel Smith and I swear that I am fluent in both the
English and Spanish languages and I interpreted the foregoing declaration from English
to Spanish to the declarant to the best of my abilities.

Dated: May 2, 2025

RJS

EXHIBIT 5

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, [REDACTED], declare as follows:

2 1. This testimony is based on my personal knowledge and the following facts are true
3 to the best of my understanding and recollection.

4 2. I am 23 years old. I am from [REDACTED].

5 3. I speak [REDACTED] English and some Portuguese and some
6 Spanish.

7 Entry to the United States

8 4. I came to the United States with my wife and our four children, [REDACTED], who is
9 1 year and 1 month old, [REDACTED], who is 5, [REDACTED], who is 7, and [REDACTED], who is 8 years
10 old. The three oldest are my stepchildren.

11 5. Our family's journey began in 2021 when the [REDACTED] took power in [REDACTED].
12 We tried applying for legal status through UNHCR and then CBP One appointments, but
13 neither worked.

14 6. Our journey has taken four years. My children haven't been able to go to school
15 consistently or have a home, or somewhere for my wife to cook, for four years.

16 7. My family and I came into the United States around 12am on February 21st. The
17 first five days we were in CBP custody in Texas, then, we were transferred to CBP in San
18 Diego and spent 18 days there. Then we were transferred to another facility in San Diego
19 about 10 minutes away. It was like a jail.

20 8. When we were in CBP, they separated me from my children, so the children all
21 stayed with my wife. At one point I didn't see my children for two weeks. It was so hard.
22 We didn't see the sun; we were always inside. It felt like many years.

23 9. Being in CBP was worse than a jail. My children were treated like we had
24 committed a crime. They haven't done anything wrong—they should have been given a
25 proper place to sleep and a proper bathroom.

26 10. We were in CBP for so long, it was so tiring. After that, we were brought here.

27 Karnes Facility

28 11. We have been detained at the Karnes facility since March 14, for about 12 days.

1 12. The fathers are separated from the mothers and children here. I'm not allowed to
2 sleep near my children or go to their room. We can only meet up in the common areas.
3 We're allowed to be together during the day, until 8pm. My children miss me because we
4 were not ever separated like this for so long before we came to the United States.

5 13. My children go to English classes here for one hour per day.

6 14. You can make phone calls here if you have money on your account. At the
7 beginning, we got five minutes on the phone for free but now we have to pay after one
8 minute on the phone.

9 15. My kids ask me when they're going to get out of this place, when they'll be able to
10 go to school, and go to our own house. The first week, my wife and children were crying
11 a lot.

12 16. We are under mental pressure here that's causing us stress and depression because
13 we worry about our children. I have lost 17 kilos over the past few months, and I've kept
14 losing weight since I entered the United States, just from the stress and depression I feel.
15 I can eat but it doesn't digest.

16 17. We want to know when we can leave. We need more freedom, which we don't
17 have here.

18 18. Since 2021, we have lost everything. I gave up everything for my wife and
19 children. It would be better that they kill us than send us back to [REDACTED].
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1 I declare under my duty to tell the truth and penalty of perjury that to the best of my
2 knowledge, all the information I have here given is correct and complete and I understand
3 the legal consequences of testifying falsely to the authorities. Executed on this 26 day
4 of March 2025, at Karnes Texas

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8 Name: 
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CERTIFICATE OF INTERPRETATION

My name is _____ Yalda Hamidi _____ (Jeenie interpreter ID: 881358) and
I swear that I am fluent in both the English and _____ languages and I interpreted the
foregoing declaration from English to _____ on March 26, 2025 to the best of my abilities.

Dated: _____ April 1, 2025 _____




EXHIBIT 6

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, [REDACTED], declare as follows:

2
3 1. This testimony is based on my personal knowledge and the following facts
4 are true to the best of my understanding and recollection.

5 2. I am 38 years old. I am from [REDACTED]. I am [REDACTED], but on my passport it
6 is written [REDACTED].

7 3. I speak [REDACTED]

8 4. We walked across the border as a family, with my four kids. Border Patrol
9 came to us and asked us to wait for an hour outside. They checked our passports, took our
10 pictures, put us in a car and took us to Arizona. They took our pictures and fingerprints
11 there.

12 5. I came here with my four kids, the oldest son is 19, [REDACTED],
13 my daughter is 18, [REDACTED], my son 12, [REDACTED], and my
14 daughter is 8, [REDACTED]. My son who is 19 was sick. My daughter who is 18 is
15 pregnant and she was throwing up while crossing the border.

16 6. In Arizona, they separated me from my older two children. I was in a room
17 with my youngest two but didn't know where my 19- and 18-year-old were. I believe
18 they were staying in a separate pod because they are not minors.

19 7. They gave us an interview with me and my 12- and 8- year old. I asked
20 about my two older children but they told me that they are over 18 so they would not be
21 able to join my interview. The interview was about an hour or an hour and a half. I am
22 desperate to know where my children are and if they are ok.

23 8. We were there three days and then about 10 days ago, at 3:30am they took
24 us to this facility in San Diego. But my 19-year-old and 18-year-old were not with us,
25 after we were separated from me in Arizona and I have not seen them since. I do not
26 know if they are in this facility or in Arizona or have been deported, I know nothing
27 about where they are.

1 9. I have been here 10 days, they won't tell me where my kids are, if they are
2 ok or if they are even in this facility. They won't allow me to make a call, my husband
3 and sister are here in the U.S. and they need to know where I am and if our family is ok.
4 My children are worried about me and they are worried about their siblings. They are
5 terrified about what happened to their siblings and what will happen to them.

6 10. I am unable to speak about what it is like here, about my children's
7 experience, or even think about it because I am so desperate to know where my older
8 children are. They are still teenagers.

1 I declare under penalty of perjury that the foregoing is true and correct. I understand that
2 I have to tell the truth in this declaration. The interviewer read the declaration to me and
3 everything in it is true and accurate. Executed on this 7 day of March 2025, at
4 SD SSF.

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7 
8 [Signature]

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12 [Print Name]

CERTIFICATE OF TRANSLATION

My name is Sarah Kahn and I swear that I used the Jeenie translator service to translate the foregoing declaration from English to [REDACTED] and that the interpreter affirmed that they were fluent in English and [REDACTED] and had faithfully translated the foregoing declaration.

Dated: March 7, 2025



[Name]

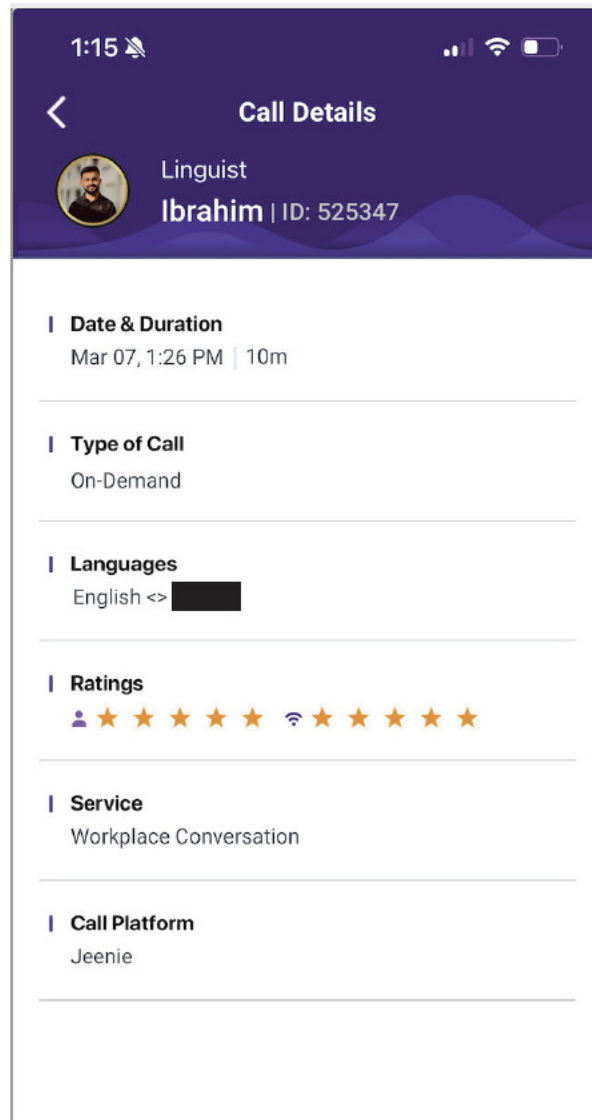


EXHIBIT 7

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, [REDACTED], declare as follows:
2

3 1. This testimony is based on my personal knowledge and the following facts
4 are true to the best of my understanding and recollection.

5 2. I am 34 years old. I am from [REDACTED]. My wife is [REDACTED]
6 [REDACTED]. My sons are [REDACTED] and [REDACTED]. They are 7 and 2 years old.

7 3. We speak Spanish.

8 4. Before arriving, we were in Mexico for about 7 months trying to reach the
9 United States. We were at a shelter in Mexico for some time. We were waiting for
10 CBPone appointed and waited for 5 months but never got an appointment. My wife is
11 pregnant and we were scared because we heard of babies being taken away from families.
12 We experienced robbery and assault in Mexico and in our home country. We were afraid
13 and we knew our lives were in danger and we could not go back.

14 5. Four of us were together when we encountered Border Patrol. I was
15 carrying my youngest son on my back. There is an electric plant we approached and my
16 wife asked for help because it was incredibly cold for our sons. We turned ourselves in.
17 We crossed around 6pm through the hills.

18 6. Once we saw the agents, we were taken to the Border Patrol base. We were
19 checked and told we'd be returned to our country. They asked why we'd cross because
20 we were going to be returned. They asked country of origin but did not ask about fear or
21 anything else. My wife said we are afraid to return. The agents did not say anything. I'm
22 not sure if there is still an option to ask for asylum. They took our photos and biometrics
23 when we arrived and we signed a form. It was supposed to be a petition to ICE to see a
24 judge. The form was in English. My wife asked what it was. The agent said it was going
25 to be sent to ICE to maybe remain in the country. We have not been asked to sign
26 voluntary departure, that I am aware of. They handcuffed me and my wife and children
27 were separated from me.
28

1 7. I arrived at Border Patrol facility about an hour later or so, I noticed it was
2 about 68 kilometers away. But I did not know what time it was as our belongings were
3 taken from us. We were not offered food or water.

4 8. Once we arrived at the detention facility, we were finally offered food and
5 water.

6 9. We arrived Wednesday night around 8pm. My kids and wife who is 34.5
7 weeks pregnant were taken to a separate facility. The day we arrived she had high blood
8 pressure and preeclampsia. At arrival, she was checked by a medic and high blood
9 pressure and was taken to hospital around 4pm. An ambulance and paramedics arrived
10 and she was taken in an ambulance. She was brought back around 3am and was a little
11 more stable. I believe the baby was checked. She had to be taken to the hospital again.
12 Around that time, I was brought in to care for my two boys while she was taken back to
13 the hospital. I don't know where she was taken, if she and the baby are okay, and I have
14 not heard from her.

15 10. Cell phones were taken from us. They are not allowed here. I'm not sure if
16 my wife has her phone back.

17 11. My family and I have been detained at the facility for 2 days.

18 12. At the facility, we are provided with thin mattresses on the floor and with
19 aluminum blankets. There are no pillows. I have an illness where my heart is swollen and
20 I've also had a hernia in the groin for about 6 months. Using the bathroom is very
21 difficult. I have not seen a doctor since I've been here. I don't know what my rights are
22 and if I can ask to see a doctor. An agent told me I could not go to the hospital with my
23 wife, so I would just wait it out.

24 13. In the all-male facility, there were about 50 people, all adult men. There is
25 little room, almost on top of one another. There was no place to shower.

26 14. Now, at the facility with my sons, I am mostly alone with my sons. The boys
27 can't sleep with the lights on all the time. There are no clocks, or access to windows or
28 daylight. We don't know what time of day or night it is. The room is small and right now

1 it is just me and the boys in the room of about a bedroom size. There are mattresses on
2 the floor and a restroom. There is a guard outside the door. The walls are made of glass or
3 plastic where we can be seen from the outside. There are no showers. Since we arrived,
4 we have not showered. We don't know if we can shower.

5 15. The room is very cold, my son tells me he feels cold. We have not been
6 offered a change of clothes. Only when my two year old had an accident, my wife asked
7 if she could change his diaper. The agent said to change his clothes. We were given a
8 pajama and a diaper for our baby. There is no soap and no toothbrushes for us. We were
9 only provided a small sponge on the first night to brush our teeth.

10 16. I have not been told if I have a right to make a call. I have not been offered a
11 call. I have not been told why we are here. I suppose it is for crossing unlawfully. They
12 have not told me anything about what happens next. I suppose we are waiting to know
13 what ICE or a judge says. We still have not had an opportunity to ask for asylum. Our
14 intention was to ask for asylum.

15 17. We have access to food. But my boys don't like it. They've only eaten
16 potatoes. We've been provided sandwiches, and they are cold. Burritos contain rice or
17 eggs with potatoes but my kids won't eat them. We have access to food 3 times per day.
18 In between, we have access to snacks. My kids don't eat them. There is no special food
19 for my two year old son. He picks out the eggs from sandwiches. My baby should be
20 drinking milk, but he hasn't received it here.

21 18. We only have access to aluminum blankets, regardless of age.

22 19. Lights are blaring at all hours. My sons can't sleep at night because of the
23 light. Through the glass doors, we can see when people go in and out all night.

24 20. When we entered the facility, my wife and sons were seen by a medic. My
25 wife was taken to the hospital twice. I have not seen a doctor. My wife was taking
26 medications before we arrived. She has not received medications since arriving, that I am
27 aware of. I've had pain in my groin, but I have not received treatment.

1 21. During the day, my sons just run or jump in the small area we are restricted
2 to. There is no access to toys or television. My son has ADHD but he has not been taking
3 medication. The agents here know he has this condition.

4 22. We don't have access to outdoors. We have not seen sunlight until today.

5 23. I had not had access to my children until I was called to care for them when
6 my wife was taken to the hospital. I was not told when I could see them or if I would see
7 them again. When we were separated, I was not told if we would be in the same facility
8 or be separated. When my wife and children were separated from me, they just took
9 them. They did not tell me when I would see them again, I just waited for them.

10 24. I have not been able to use a phone since I arrived. I have not asked because
11 I don't know if I have a right to ask for one.

12 25. I have not been provided information about how to contact lawyers. I have
13 not been told if I have a right to an attorney. I don't know if I can speak to one.

14 26. The treatment of agents has been relatively normal.

15 27. My kids have not spoke to agents.

16 28. Other children are not near us so I do not know what other children's
17 circumstances are like.

18 29. While preparing this declaration, I learned that my wife was in labor. She
19 was scheduled to have a c-section because she has high risk births, which we know from
20 the birth of my older child. She is now having a natural birth and I am not there. I am
21 worried that she does not have clothes and we do not have any clothes for the baby.

1 I declare under penalty of perjury that the foregoing is true and correct. I understand that
2 I have to tell the truth in this declaration. The interviewer read the declaration to me and
3 everything in it is true and accurate. Executed on this 7 day of March 2025, at
4 San Diego.

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CERTIFICATE OF INTERPRETATION

My name is Paulina Reyes and I swear that I am fluent in both the English and Spanish languages and I interpreted the foregoing declaration from English to Spanish to the declarant to the best of my abilities.

Dated: March 7, 2025

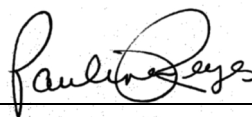
A handwritten signature in cursive script, reading "Paulina Reyes", is written over a horizontal line.

EXHIBIT 8

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, [REDACTED], declare as follows:

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3 1. This testimony is based on my personal knowledge and the following facts
4 are true to the best of my understanding and recollection.

5 2. I am 19 years old. I am from [REDACTED].

6 3. I speak Spanish.

7 4. I came with my son [REDACTED] who is 1 year 9 months.

8 5. I came through Mexico fleeing violence and then crossed with some people I
9 met. We took a train to Mexicali and took a taxi to the border. We were forced at
10 gunpoint by strangers into a house. They took our belongings from us. They told us to
11 walk across the border from there and look for Border Patrol.

12 6. We came to the wall and there was dirty water around us. Border Patrol
13 approached us and opened a gate in the wall then drove through. They got out and spoke
14 to us and then called another border patrol. Another border patrol vehicle appeared and
15 drove through the gate in the wall. I asked if we were in Mexico and the officer
16 confirmed we were, but he told us to get in the border patrol car and drove us through the
17 gate in the wall into the U.S.

18 7. The border patrol called another car that came to pick us up and we went to
19 another station. We were there for one night, from about 5pm to 3am, and then we were
20 driven here. They took our photographs, our fingerprints, and took our belongings. They
21 asked what country we were from but nothing else. They asked me to sign something but
22 they didn't tell us what I was signing.

23 8. When I arrived here, I asked an officer what was happening and he said he
24 didn't know why I was still here.

25 9. They tell us nothing. I don't know why I am still here or what will happen to
26 me and my son.

27 10. I am afraid to go back to [REDACTED].
28

1 11. One officer tried to help me call the consulate but it was too late. He said we
2 would try again later but we have not had a chance.

3 12. My son and I were taken to a pod with other children and families. It is
4 difficult because the older kids bully the younger kids. There are teenage boys and kids
5 and women in our pod.

6 13. We have mats and mylar blankets, no pillows. We have our own mat. There
7 was less space and it was crowded, but recently they deported many of us and the room is
8 emptier.

9 14. We came around the fourth, three days ago.

10 15. I have not been allowed to use a phone, not even at the first station. I haven't
11 spoken to my mom. She is in [REDACTED] with my other child and I am so worried about
12 them. I don't know if my family is ok. They must be worrying about me, they don't know
13 whether I am alive.

14 16. I wrote down my mom's number and I gave it to a guard. I begged him to
15 help me call my mom but he only told me that he doesn't speak Spanish.

16 17. [REDACTED] doesn't eat much of the food because it is for adults. They give
17 him only a sausage for kids, but sometimes when we open it looks green and he can't eat
18 it.

19 18. It is cold in the pod and a woman who is here with four kids asked for a
20 blanket. The guard screamed at us and later she threw a box of mylar blankets through
21 the door, she did not even have the kindness to hand one to us.

22 19. There are a few guards who are kind, but almost are angry and disrespectful.
23 One officer came and brought us clothes because we hadn't showered after our first
24 night. We were able to shower. I could not shower yesterday, even though I asked to
25 shower, and I haven't been allowed to shower today.

26 20. There is a bathroom with a door. We go in a group to shower and have a few
27 minutes each. We have a toothbrush but it is just a little stick with a sponge.
28

1 21. We saw a doctor at the first station but we were both healthy. My son never
2 goes outside the pod because he is afraid of the guards, because the guards are so angry.
3 We cannot go outside; we haven't seen the sun. I told a guard that I had a headache but
4 they told me they do not have medicine for me.

5 22. There was a woman in our pod who is 35 weeks pregnant. Her heart began
6 racing and her head hurt and she began asking the guard to go to the hospital. They told
7 her to wait, but I saw she was not doing well and I encouraged her to ask again. When
8 they finally came to get her from the pod she was rushed to the hospital on a gurney
9 because she was already giving birth.

10 23. The woman who gave birth is here with a seven-year-old son. She could not
11 care for her son because she is so pregnant. She asked for her son to go with his father,
12 who was held in a separate pod. Yesterday they took her in an ambulance to the hospital.
13 I don't know whether the rest of the family was able to go to the hospital with her.
14 Another woman who was very pregnant was deported. I don't know whether she is ok or
15 whether she had her kid.

1 I declare under penalty of perjury that the foregoing is true and correct. I understand that
2 I have to tell the truth in this declaration. The interviewer read the declaration to me and
3 everything in it is true and accurate. Executed on this 7 day of March 2025, at
4 SD CSF.

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CERTIFICATE OF INTERPRETATION

My name is Brisa Velazquez Oatis and I swear that I am fluent in both the English and Spanish languages and I interpreted the foregoing declaration from English to Spanish to the declarant to the best of my abilities.

Dated: March 7, 2025



EXHIBIT 9

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, [REDACTED]

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3 1. This testimony is based on my personal knowledge and the following facts
4 are true to the best of my understanding and recollection.

5 2. I am 28 years old. I am from [REDACTED] I speak Portuguese.

6 3. I was apprehended by Border Patrol agents Tuesday February 11, 2025. That
7 day, I crossed the border near San Diego in a group of 6, including my 7-year-old son
8 [REDACTED], my partner [REDACTED],
9 and my father, who is 52 years old. We came to a place in the United States that was
10 blocked by a fence where there were some provisions, and we waited for Border Patrol.

11 4. Border Patrol came after a few hours and brought us to the tent facility a
12 short drive away, which I am told is called the soft sided facility. They confiscated our
13 property, passports, and phones, and they took our fingerprints. They have not given us
14 any paperwork.

15 5. We have been detained here for two days. I am being held in the same room
16 with my son and about 35 other mothers and children. We are being held separately from
17 [REDACTED] and father, who were taken to another room. This has been very difficult for
18 [REDACTED]. His grandfather is one of [REDACTED] closest caregivers, and he asks for him
19 constantly.

20 6. [REDACTED] has been diagnosed with autism and ADHD. We have medication
21 that we provide him for it – Risperidone, Fluoxetine, and Melatonin – which he has been
22 on for about four years. They help calm him down, and they also help with his appetite.
23 When he has not been on his medication, he does not eat well and is very anxious.

24 7. When we got here, they brought us to a doctor, but the doctor only checked
25 to see if we had a fever, not to treat my son. I gave his medications to the doctors, but
26 they have not given them to [REDACTED]. I have asked so many times but they will not give
27 it.
28

1 8. Without the medicine, [REDACTED] only eats the chips here. I told them he only
2 eats the chips and the medicine will help, but still they refused to give it to him.

3 9. We have papers to prove his medical condition, but I don't think they
4 believe us. I explained this to the doctors, but they said they do not need to see that now.
5 The papers are in my bag, which the agents have in their custody.

6 10. I am very worried about [REDACTED]. It is hard for him to eat here. They bring
7 food about 3 times a day. We have had tortillas, apples, carrot, apple juice, and one time a
8 sandwich with just lettuce and tomato. The tortillas are the only things that have been
9 warm. [REDACTED] has not wanted to eat any of it. The longer he is not on his medication,
10 the less he is going to eat because the medication helps his appetite.

11 11. I am especially worried because I have seen women with children in here
12 who said they have been here for 30 days already. One had 3 children. So I am very
13 worried about [REDACTED] being off his medications for that long.

14 12. Where we are held, agents in green and black uniforms sometimes look in
15 the window to check on us, but not that often. They open the door only to tell us to leave
16 for cleaning or to eat or to call someone out.

17 13. Sleeping is very difficult here. We sleep in a crowded room on thin
18 mattresses on the floor. But the lights are on all the time. They dim it a little bit for a few
19 hours, but it is still very bright and makes it difficult to sleep. They also clean the room at
20 midnight and again at 6am. When they do that, they wake us all up, including the
21 children, and make us go to a different room while they clean. I am grateful that they
22 keep the room clean, but it makes it difficult for [REDACTED] to sleep. And then when he
23 finally sleeps again, the process starts again at 6am.

24 14. The temperature is ok during the daytime, but in the night time it is very
25 cold. They give us thin metal blankets, but no extra clothes.

26 15. Agents have not told us anything about what would happen to us or our
27 rights. We have to rely on other detainees who have been here longer to have any idea
28 what might happen.

1 16. I thought we would have access to a phone. I thought that was our right. But
2 a detainee who had been here for ten days said they would not allow it, other than when
3 we were going to be deported or released. She must be right, because I have not been
4 allowed to use the phone yet.

5 17. They have not given us any clothes here. A Colombian woman who has
6 been here for a few weeks told me they will clean your clothes only if they are dirty, but
7 they will not give you new clothes.

8 18. Other women who have been here a long time also told me they will only
9 give us showers once per week. Yesterday was the shower day, and we were able to
10 shower. The showers were in stalls, but first they took us to a room where everyone had
11 to change in front of each other, it was so embarrassing. At first, they tried to say that
12 [REDACTED] had to shower alone because he was a boy. But I told them about his condition
13 and that he would not be able to do it alone. I had to plead with them, and finally they let
14 me stay with [REDACTED] while he took his shower.

15 19. The bathrooms in the cells are stalls, where people can see your legs. The
16 doors close for privacy.

17 20. There is a television in our cell, but it is always on mute so the kids don't
18 really pay attention. There are no toys in the cell. The kids sometimes jump around on a
19 bench, but then the guards will come in and yell at them to stop it and yell at us to control
20 our children.

21 21. Once a day, for only about 20 minutes, the agents take us to another room
22 where the kids can play with toys or color on paper. There are not enough toys for
23 everyone, and the kids sometimes fight over them. And then when they take the toys
24 away after twenty minutes, the children get very upset.

25 22. It is very difficult for [REDACTED] to socialize with the other kids, both because
26 of his condition and because he does not speak their languages. It is very hard for him.
27
28

1 23. There are windows from our cell into the main building, but no windows to
2 the outside. We do not see the outside, and they do not ever take us or the children
3 outside for outdoor recreation.

4 24. After they separated us from [REDACTED] and my father when they brought us here
5 two days ago, we were not able to see them again until last night. I did not know if I had
6 a right to ask to see them. The agents did not tell us anything about our rights or our
7 families. But other women in my cell told me I could ask, so I did and that is how we
8 were able to see each other for the first time. We were brought to another room where
9 there were other families, and we were allowed to stay there together for only around 20
10 minutes.

11 25. [REDACTED] told me he asked a guard to use a phone, and they said no and told him
12 he did not have that right.

13 26. [REDACTED] also told me he was held only with about 20 other men, no children.

14 27. I was able to see [REDACTED] again when we were called for this interview, and he
15 informed me that agents called my father from their cell last night and took him. They did
16 not say where. He has not been brought back. We do not know where he is. [REDACTED] is
17 distraught not knowing anything about it. I don't know how I will tell [REDACTED].

18 28. When we got to this facility, after some hours inside the room, a guard
19 wearing a black and green uniform came and told me aggressively to sign paperwork to
20 be deported to [REDACTED] I said I did not want to sign, but he said it did not matter because
21 we would be deported anyway. He never gave me the paperwork he asked me to sign.

22 29. We are fearful to return to [REDACTED]. A family member was murdered, we were
23 threatened, our lives were in grave danger. But the agents did not ask us if we were
24 fearful and did not give us the opportunity to explain our fears. We rarely see the agents
25 in green so there is not much chance to tell them.

26 30. [REDACTED] said that when told him to sign his deportation, he told them he
27 wanted to ask for asylum and was fearful of return, but the agent told him there is no
28 judge in the United States granting asylum right now.

1 31. We have evidence for our asylum claim, like police and medical reports, but
2 it is in our confiscated property.

3 32. No agent has given us a list of lawyers we could call.
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1 I declare under my duty to tell the truth and penalty of perjury that to the best of my
2 knowledge, all the information I have here given is correct and complete and I understand
3 the legal consequences of testifying falsely to the authorities. Executed on this 13 day
4 of January ~~2024~~, at Soft Sided Facility, San Diego
5 2025

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CERTIFICATE OF INTERPRETATION

My name is Lucas Costa and I swear that I am fluent in both the English and Portuguese languages and I interpreted the foregoing declaration from English to Portuguese to the declarant to the best of my abilities.

Dated: February 13, 2025

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

EXHIBIT 10

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, [REDACTED], declare as follows:

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3 **Background:**

4 1. This testimony is based on my personal knowledge and the following facts are true
5 to the best of my understanding and recollection.

6 2. I am 34 years old. I am from [REDACTED]. I have twins who are three years old,
7 almost four, [REDACTED] and [REDACTED]. They were born in [REDACTED].

8 3. I speak Spanish.

9 4. I have been here at Karnes for about 2 weeks.
10

11 **My Experience Before Karnes:**

12 5. I crossed the Mexican-U.S. border almost 4 years ago now, with my twins and
13 their dad. This was in Texas.

14 6. We were in a CBP facility, but I don't know the name. We were outside for about
15 one day, then we entered the facility for one day. Then, they moved us to another facility.

16 7. We went to San Antonio – and then Houston. We didn't want to end up in Houston
17 long-term, but some Cubans helped us to find an apartment there and we lived there for
18 awhile.

19 8. In February of this year, I took my kids and we went to Vermont. I was at the
20 Canadian border, at a part where they said the crossing was. We ran into U.S.
21 immigration officials; they asked me why I was crossing. I said to gain asylum in
22 Canada.

23 9. First, we were in ICE detention in Vermont, then a facility in New York, then
24 another place in New York. We were in the New York facilities for 15 days total. Then
25 we took a plane to Detroit and then from Detroit to McAllen.

26 10. In McAllen, we were there for about 2 weeks. Then, we came here to Karnes.
27

28 **New York Facilities:**

11. In New York, it was very enclosed. We didn't see the sun. It was freezing.
12. I asked the workers to warm up the milk for the twins, and they told me no.
13. The room was as big as the room we're in now; just for the 3 of us.
14. I was very afraid because the twins got a cold, a bad cough.
15. They yelled at me "fucking bitch, shut up!"
16. They treated us like animals. The prison was being paid to have people.
17. I saw kids there who were less than a year old. I saw pregnant women.
18. I saw young kids with depression.
19. My kids could hear the chain of the handcuffs on the floor from down the hall;
they'd shake their heads, cry, and put their hands over their ears. They'd say mom they
are going to kill us.
20. It was a prison.
21. I also went to a hospital in New York because my heart was going too fast.

McAllen Detention Center:

22. McAllen was equally as terrible for us.
23. A staff member grabbed me and scraped me. I still have a scar.
24. The staff told us we were criminals; they said you can ask your God to save you, see
if they exist.
25. They were hitting me with a baton on the shoulder. They hit me repeatedly because I
was praying out loud with my kid, and they said I had to be quiet.
26. The food was horrible; it was old. My kids went more than a month with diarrhea and
vomiting.
27. My twins kept telling me "mom they are going to kill us; we are going to die." I fear
they will never recover.
28. I also had a horrible panic attack in McCallen. I couldn't move. They had to give me
medicine. This is why they moved us here, to Karnes. They said after the panic attack

1 and the baton incident they had to move us because if we stayed – there would be
2 problems there.

3 29. Staff yelled at me in McAllen “you’re in my country now, you have to do what I
4 say.”

5 30. For 10 days there, I didn’t eat anything. They just gave us raw and cold tortillas and
6 ham that had already gone bad. I couldn’t eat that, and my kids couldn’t either.

7 31. They tried to force me to feed the twins formula, but they don’t drink that anymore.
8 They’re almost 4 years old, they’re too old for that.

9
10 **Karnes Detention Center:**

11 32. When we came, we saw a doctor very briefly; but it was just a check-up, nothing
12 more.

13 33. They told me my twin boy would see a doctor for his autism, but they still haven’t
14 seen anyone. Both of my kids have autism, but my son has it a bit worse.

15 34. Our room is very, very hot; you don’t feel the air conditioning here. I asked if we
16 could get a fan, but they said no. Also, I am in sweatpants the whole time, they have
17 not given any of us shorts to wear.

18 35. We don’t share a room with another family. My son bites, he hits, he pulls out his
19 hair. My twins are not good with any changes and with the lights and noises. This
20 place has made him aggressive, so it’s best to not share.

21 36. The staff yell at him, and he always has to cover his ears. I have asked them to not
22 yell and not turn on high lights in his face, but they still do it.

23 37. When I ask the staff, they don’t do anything. The guards are right outside our room
24 with their walkie-talkies, and we can hear everything they say on it all night long.

25 38. The kids sleep basically all day, they can’t sleep at night.
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1 39.The clothes smell really bad. When you wash it, somehow it smells even worse. They
2 keep giving us very skinny and tight clothes, which my kids do not like. They prefer
3 loose clothing.

4 40. The towels are all black with dirt. They were white before, but I don't know when
5 they were white.

6 41. All the food is the same here; there basically are not any differences for the toddlers.

7 42. My kids are very hungry.

8 43. They just drink a lot of chocolate milk, which isn't good for them.

9 44. Sometimes there is chicken; usually there isn't. Only one time we got a hamburger.

10 Usually there is no meat. They are not eating a lot.

11 45. I am nervous what we will do because it is almost time for the kids to start
12 kindergarten, and they receive no education here.

13 46.There are never activities for the kids.

14 47. We cannot go to the library. We have to ask and get an order to go, and this takes a
15 long time.

16 48. Only once, I could use the phone over the past 2 weeks. I can't look at my phone to
17 get the numbers, though. They only let me use it for 1 minute, that was it.

18 49. No one has told me anything about leaving or how to leave here.

19 50. I have not spoken to any attorney; no one told me I could call a free attorney.
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1 I declare under penalty of perjury that to the best of my knowledge, all the information I
2 have here given is correct and complete. I understand that I have to tell the truth in this
3 declaration and the legal consequences of testifying falsely to the authorities. The
4 interviewer read the declaration to me and everything in it is true and accurate. Executed
5 on this 26 day of March, 2025, at Karnes ICE, Texas.

6 [REDACTED]
7 [REDACTED]
8 ([REDACTED]
9 [REDACTED])

CERTIFICATE OF TRANSLATION

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

Dated: 03/26/2025

Katherine Johnson

EXHIBIT 11

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, [REDACTED], declare as follows:

2 1. This testimony is based on my personal knowledge and the following facts are true
3 to the best of my understanding and recollection.

4 2. I am 28 years old. I am from [REDACTED].

5 3. I speak [REDACTED]

6
7 El Paso CBP

8 4. March 20, 2025 I walked across the border with my two sons, who are one year old
9 and just a few months, [REDACTED] and [REDACTED]. About five minutes later
10 immigration came and picked us up.

11 5. They drove us to a border patrol station in Texas - El Paso Station.

12 6. I was in CBP for one month. It was too long, any time there is too long.

13 7. It was extremely cold. My sons both got sick there because it was so cold. They
14 did not allow us extra clothes for the kids. We had only aluminum blankets.

15 8. We got only five minutes on the phone per day.

16 9. We were in a large room with other families. Every day families came and left.

17 10. Officers were usually outside the room. They didn't interact with us very much.
18 They didn't tell us anything about our case, how long we would be there, or what would
19 happen next.

20 11. The lights were on all night, they never turned off. We spent these days inside
21 without even seeing the sun.

22 12. We would go a week without being allowed to take a shower. We had to go
23 together to the restroom facilities. We had to be escorted to the restroom and wait for the
24 guards.

25 13. There was shampoo for our hair but no soap.

26 14. There was nothing for the kids, no games or toys.

27 15. They never told me that I could get a lawyer. I tried everything, I asked them if I
28 could call a lawyer and they would not allow me to.

1 16. I had an interview on the phone, but I never heard anything after that. Before the
2 interview and even to this day I have had no opportunity to speak to a lawyer.

3 17. Finally, after a month there, we were taken here. They told me they were
4 transferring me but they didn't tell me where they were taking me or what would happen.

5
6 Dilley Family Detention

7 18. I have been here 10 days.

8 19. We are three families in a room. Compared with CBP it is better, but it is still
9 extremely difficult.

10 20. I have not been able to call a lawyer since I arrived here. They haven't told me
11 anything about what is happening or what to do about my case.

12 21. The telephone here costs money and I did not come with money. I don't know
13 whether we can make any calls for free.

14 22. I am seeking asylum because my life and my children's lives would be in danger in
15 [REDACTED], but I do not know how to report that I need asylum. I still don't know what's
16 happening to us. I am afraid, most of all for my children.

1 I declare under penalty of perjury that the foregoing is true and correct. I understand that
2 I have to tell the truth in this declaration. The interviewer read the declaration to me and
3 everything in it is true and accurate. Executed on this 1 day of May 2025, at

4 Dilleys

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8 [Signature]

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12 [Print Name]

CERTIFICATE OF INTERPRETATION

My name is Fatoumata thiam and I swear that I am fluent in both the English and
[REDACTED] languages and I interpreted the foregoing declaration from English to [REDACTED] to
the declarant to the best of my abilities.

Dated: May 1, 2025

A handwritten signature in black ink, appearing to be 'MS', is written over a horizontal line. The signature is stylized with a large loop at the bottom.

EXHIBIT 12

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, [REDACTED], declare as follows:

2 1. This testimony is based on my personal knowledge and the following facts are true
3 to the best of my understanding and recollection.

4 2. I am 15 years old. I am from [REDACTED].

5 3. I speak [REDACTED] and some English.

6 Entry

7 4. We lived in the U.S. for about a year and a half in California.

8 5. My brother and sister-in-law and much of my family is here in the U.S.

9 6. While driving to Texas from California for a funeral, we ended up at a border
10 patrol check point in New Mexico and we were stopped.

11 7. They asked to pull to the side and our car was taken. They provided us some
12 papers and drove us to El Paso. We were in a CBP immigration detention in El Paso for
13 three weeks.

14
15 EL Paso CBP

16 8. It was freezing cold in the detention. My younger siblings and I were freezing. We
17 could not get a sweater or anything to keep warm. We were given only an aluminum
18 blanket.

19 9. We were in a room with many people. We could see some of the rooms from the
20 hallways. One room had about 120 people, one had about 80, and our room there were
21 about ten kids.

22 10. The windows faced only in. We could see each other but not the world.

23 11. We were never allowed outside. We did not see the sun for three weeks. Once a
24 week for twenty minutes they took us to a small cement yard surrounded by chain fences.
25 They never turned the lights off. They were on every night.

26 12. The food was horrible, we ate mostly chips. When I was eating a burrito my mouth
27 went numb. I found a ground tablet in the food. I believed that they were placing some
28 kind of medicine in the food. It tasted horrible, like poison.

1 13. They separated us from my mother; father and my youngest sibling, [REDACTED]
2 who is 10, were together. I was with my middle brother, [REDACTED] who is 12.

3 14. The conditions were unbearable.

4 15. We were allowed only twenty minutes every five days in a freezing room to see
5 each other.

6 16. We were treated horribly. We were kept closed up indoors, it was horrible.

7 17. They would not speak to us. If we spoke to an officer, if we asked for water or to
8 see our family, if we asked for a phone call or lawyer or even to know what was
9 happening, they would shut the door on us.

10 18. They were aggressive, they were so disrespectful, like we were not people.

11 19. We got a call, but only for a few minutes, sometimes they would stop us after two
12 minutes.

13 20. There was no privacy in the restroom, the door was not full, only a half wall, so
14 you could be easily seen.

15 21. They never told us anything; they didn't tell where we were going, what would
16 happen. We were afraid and felt hopeless there.

17
18
19 Dilley Family Detention

20 22. We have been at Dilley 21 days. We want to know when we will be released. We
21 have heard some rumors about families being released but no one has told us anything.

22 23. I sleep in the room with my dad and my younger siblings with my mom.

23 24. When we first got here, we got one call for five minutes. After that, we have to pay
24 for each phone call. We are lucky because our family gave us money for calls.

25 25. We were able to speak with a lawyer after some time here.

26 26. My father is diabetic. He also has a heart problem. I had a doctor's appointment to
27 treat my asthma in LA, but I have missed it. They allow me to use an inhaler but it is not
28 helping. I have been in immigration detentions for almost two months now.

1 27. We spoke to the doctor here and we go every day for medicine. There is some
2 medical care here, but we need to get to a doctor outside this facility, for better long-term
3 care.

1 I declare under penalty of perjury that the foregoing is true and correct. I understand that
2 I have to tell the truth in this declaration. The interviewer read the declaration to me and
3 everything in it is true and accurate. Executed on this 2 day of May 2025, at
4 Dilleys Lee.



EXHIBIT 13

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, [REDACTED], declare as follows:

2 1. This testimony is based on my personal knowledge and the following facts are true
3 to the best of my understanding and recollection.

4 2. I am 23 years old. I am from [REDACTED]. I speak Spanish.

5 3. I am here with my two children [REDACTED], who is 9, and [REDACTED] who is 2.

6 4. I came into the United States near Ciudad Juarez with my two children about four
7 days ago and we got to the Dilley facility last night.

8 CBP Custody in El Paso

9 5. We were in a CBP facility in El Paso. Both of my kids got sick while we were in
10 there. I think they got sick because of the cold.

11 6. The whole time we were there my child [REDACTED] was only allowed to brush her
12 teeth, shower, and change her clothes once, because that happens every three days. The
13 same thing happened to my son [REDACTED] except he got one more change of clothes
14 because he dirtied them.

15 7. There were no activities for children. They couldn't run around because the staff
16 said they would hurt themselves. But they didn't provide coloring books or toys or
17 anything for the children to do.

18 8. My children did not eat much while we were there. [REDACTED] basically only ate a
19 granola bar and an apple except for one time when they served eggs with bread.

20 9. The burritos they offered were cold. There was mortadella that was a weird color,
21 like it had been left outside, and the meat on the hamburger offered tasted bad so [REDACTED]
22 didn't want to eat it.

23 10. [REDACTED] didn't want to eat any of the food, even though he is used to eating food
24 as a 2-year-old. While we were in the facility, he only had formula and apples.

25 11. I'm not expecting a buffet, but I wish they would have provided food that kids
26 would eat. Other children who were detained there didn't want to eat the food either.

27 12. We got to make a daily phone call, but the staff would say "three minutes" or "five
28 minutes" and then come back to end the call after only a minute or two.

1 13. When we were in the station, there was a mother in our room who had fallen from
2 the border wall and been hospitalized for a few days. It hurt her a lot to walk when she
3 got back from the hospital. The staff said that we—the families—could help her. The
4 other mother in the room was pregnant so she couldn't help her. So I helped the injured
5 woman get into bed and go to the bathroom. One morning one of the staff members woke
6 me up around 3 AM and told me to help the injured mother go to the bathroom.

7 14. I don't know what is going to happen to us or when we are going to be able to
8 leave. I want to leave this place and be in a home with my children.
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1 I declare under my duty to tell the truth and penalty of perjury that to the best of my
2 knowledge, all the information I have here given is correct and complete and I understand
3 the legal consequences of testifying falsely to the authorities. Executed on this 2 day
4 of May 2025, at Dilley, Texas.
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8 Name: 
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CERTIFICATE OF INTERPRETATION

My name is Rachel Smith and I swear that I am fluent in both the
English and Spanish languages and I interpreted the foregoing declaration from English
to Spanish to the declarant to the best of my abilities.

Dated: May 2, 2025

RJR

EXHIBIT 14

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, [REDACTED], declare as follows:

2 1. This testimony is based on my personal knowledge and the following facts are true
3 to the best of my understanding and recollection.

4 2. I am 11 years old. I am from [REDACTED].

5 3. I speak [REDACTED] and English.

6 4. I was apprehended with my mom when we landed in the US by flight.
7

8 Entry to U.S.

9 5. I have been detained at the Dilley Facility for 23 days.

10 6. When we arrived, we were separated from my father, who is also in the facility but
11 is held separately. We have been able to see him every day.

12 7. We arrived here legally on a flight on April 4, 2025. We had visas when we flew
13 here. We went through South Korea and then flew to the U.S.

14 8. We arrived at O'Hare International Airport. At the airport a Border Patrol Officer
15 inspected our suitcase. She saw my school records and my grades and she accused us of
16 coming here to live here and said that we planned to overstay our visa. They wanted to
17 deport us to [REDACTED], but we are afraid to return. Our lives were in extreme danger there
18 and we cannot go back to that country.
19

20 O'Hare Airport Port of Entry

21 9. We were held by CBP at the O'Hare International Airport for five days.

22 10. They gave us only a yellow emergency blanket. We were not permitted to flush the
23 toilet. We had to ask an agent to come and flush the toilet for us. They had a camera
24 facing the room, we don't know if they were able to see the restroom also.

25 11. It was freezing all the time. We could not change the temperature.

26 12. I was alone with my mom. My father was in a separate hold room.

27 13. We were not allowed to turn on and off the lights ourselves.
28

1 14. The food was terrible. We had the same meals every day. We only could get water
2 between meals. I have a serious allergy to certain foods, spicy and citrus foods. One of
3 the meals I could not eat because of the allergy. We told the CBP officers about the
4 allergy and asked for other food, so they gave me only Kraft mac and cheese after that.
5 We got no produce or fresh food. I ate very little.

6 15. We had mats to sleep on the floor.

7 16. Sometimes the officers there were disrespectful.

8 17. They told us that if we pass the asylum interview we would be transferred to
9 another facility. My mom asked when the asylum interview was, but they didn't tell us.
10 We waited for an interview hoping we could explain our situation, but they did never
11 gave us one at that facility. They did not tell us anything else about what to do or what to
12 expect.

13 18. We were so exhausted and there is a time difference between the US and
14 [REDACTED]. We did not know if it was day or night. We were not allowed to see the sun.

15 19. After five days they took us out of that holding cell. They took us on an almost 3
16 hour flight and then drove us another few hours.

17 20. We kept asking where we were going but they told us nothing. They did not give
18 us our papers or our belongings, we did not even know if they kept our visa.

19 21. They spoke only in Spanish, occasionally in English. If we asked a question they
20 only said, "we don't know."

21 22. We learned we were being transferred to another facility. We had no idea where
22 we were going or who these people were. We were already paranoid because of the
23 persecution we faced in [REDACTED]. We didn't know what they would do to us or where
24 they would take us and we were disoriented and exhausted. It was terrifying.

Dilley Family Detention

23. We arrived here on April 9 and they took our photographs and asked some questions. We were stuck in processing from 3pm until 4am. We felt terrified, exhausted, and paranoid.

24. They told us nothing. We didn't know where we were, what the rules were, how long we would be here.

25. When we arrived here my mom and I were separated from my dad.

26. My mom and I were taken to Yellow 3 and my father was taken to Brown Bear.

27. Around 5pm staff came and woke my mom and told her that my father had had an incident. They took my mom to him. She told me later that he tried to commit suicide.

28. My mom asked him why he did this. He said he was so exhausted and confused and paranoid, he thought we were permanently separated from him and he believed our family had been deported back to [REDACTED] and he gave up.

29. My mom told me the medical staff was with him when she arrived and she tried to calm him down. They took him to the hospital. My mom came back to our room and did not sleep all night.

30. I knew something had happened to my dad but at the time I didn't know what. I was worried for him and worried about my mom.

31. I tried to comfort her when she cried telling me about what happened to my dad, but I am so shocked and scared too.

32. We had insomnia. My mom didn't sleep for days. We didn't know anything about immigration law, about how to ask for asylum.

33. We got the interview on April 14. We had had no opportunity to call a lawyer, we did not know that any legal service providers could help us and did not know any contact information for a lawyer, and we did not have an account to use the phones. We wanted a lawyer at our interview but they did not allow us to contact a lawyer.

1 34. How could we have explained our situation when we hadn't slept, we didn't know
2 what to do, we didn't understand the system, we did not even know there was internet in
3 the library, and we had no one to answer our questions?

4 35. After the interview response, they gave us a PIN number and told us we could use
5 it for phone calls, but they didn't tell us how to call or where there were phones. They
6 gave me a PIN number but did not give my mom a working number.

7 36. When she was able to, my mom bought 20 minutes to use the phone. She said to
8 the employee that it needed to go on my account because hers wasn't working. Another
9 person here who was worried for us gave 20 minutes to me. But when we checked my
10 PIN, there were no minutes.

11 37. We continued asking where is my mother's PIN number. Finally, after weeks, they
12 gave my mom her PIN number and the minutes had been on her account, not on mine
13 where we asked for them to go.

14 38. Now we have spoken to a lawyer at RAICES finally. We believe we have a
15 hearing with a judge.

16 39. My dad had a court hearing Monday. We think we have a hearing soon, but we
17 don't know.

18 40. We heard that we were supposed to be released after 20 days because I am a minor
19 but now it is 23 days and we have not been released. Another asylum seeker with a child
20 here has been here 23 days also.

21 41. My mom wrote to ICE on the library computer explaining that we need more
22 information about this process and what will happen and they did not respond.

23 42. Once we were able to access to the computers in the library, we searched for
24 information about asylum ourselves, trying to understand what was happening.

25 43. The restrooms are always dirty, many of us must use the restroom so it's difficult
26 for them to keep it clean. There are constantly clogs in the toilets and water spilling out.

27 44. The sleeping area is fine and we are able to turn off the lights in the immediate
28 area, but we cannot turn off all the lights in the common areas for safety.

1 45. There is a school we can go to for an hour. It was just opened yesterday or the day
2 before.

3 46. We are able to walk through recreation areas and around the facility during the
4 day.

5 47. We are able to use the phone when we want, but we cannot make international
6 calls. Many people have asked for help to call but no one has fixed it and no one living
7 here nor staff can figure out how to make an international call.

8 48. People here keep asking the staff how to make these calls. They said they would
9 try, but they did not fix the problem.

10 49. The thing we want most is to be informed about our situation, the process, how to
11 get in contact with a lawyer. We are terrified that they will deport us and we feel like we
12 have no voice or hope.

1 I declare under penalty of perjury that the foregoing is true and correct. I understand that
2 I have to tell the truth in this declaration. The interviewer read the declaration to me and
3 everything in it is true and accurate. Executed on this 1 day of May 2025, at
4 Dilleys ICE.

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EXHIBIT 15

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, [REDACTED], declare as follows:

2
3 1. This testimony is based on my personal knowledge and the following facts
4 are true to the best of my understanding and recollection.

5 2. I am 30 years old. I am from [REDACTED]. I came with my two sons [REDACTED],
6 who is 6, and [REDACTED] who is 4. I came also with my one-year-old daughter, [REDACTED],
7 who is with my wife [REDACTED] in the facility in another area.

8 3. I speak [REDACTED]

9 4. We crossed the border on foot. My wife is six months pregnant and we went
10 to border patrol to turn ourselves in. They brought us here. They took our documents and
11 belongings and drove us here.

12 5. We arrived at this facility April 20 or 21, 2025. We have been here about 10
13 days.

14 6. I was separated from my wife and daughter and we were taken to the male
15 hall with only my sons. We have mats to sleep on, no pillows, and only aluminum
16 blankets for warmth. The rooms have hard walls, like cement, and there is a window
17 facing the hall but you cannot go out or see the sun. We are never allowed to go out.

18 7. The children keep telling us, "This is not America." They feel imprisoned
19 and confused. They are seeing the sun for the first time in this interview room. They both
20 ran to the window and stared out, and my son asked, "Is that America?" They sometimes
21 dim the lights in the room at night but the light in the hall always stays on. The lights
22 staying on when we cannot see the sun outside is especially disorienting and upsetting for
23 the kids, sometimes we do not even know whether it is day or night.

24 8. My wife is in the women's area with our daughter. There are more families
25 where she is but there are no families in the male hall with us. I miss my daughter
26 whenever she is away. I feel so lucky to have such a beautiful daughter and I wait for the
27 times when I can see her.
28

1 9. We are able to be together only one hour each day in a common area. There
2 are other families there too and we don't have any privacy to speak. We don't have much
3 time together. Otherwise we do not see them. I wish that we were together. It is very
4 difficult for the boys because they are separated from my wife and difficult for my
5 daughter to be away from me. My son is crying every day.

6 10. We are able to shower and brush our teeth once in the morning.

7 11. The restroom does not have a door, just a curtain, it does not feel very
8 private.

9 12. There is no soap to wash our hands.

10 13. The food is unfamiliar to my children so sometimes it is difficult for them to
11 eat.

12 14. We can make a five minute call after our shower. The staff escort us to a
13 booth in the hall. They wait outside while we call. They never gave us a list of free legal
14 services or told us we can call a lawyer.

15 15. Day by day it is affecting our minds to be here. We just need to get out of
16 this place for my kids, and to start our life.

1 I declare under penalty of perjury that the foregoing is true and correct. I understand that
2 I have to tell the truth in this declaration. The interviewer read the declaration to me and
3 everything in it is true and accurate. Executed on this 30 day of April 2025, at
4 WRENDA CARR.

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7 
8 [Signature]

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CERTIFICATE OF INTERPRETATION

I, Yalda, am competent in both English and [REDACTED] and certify that I interpreted the above statement, Declaration of [REDACTED], in [REDACTED] to the declarant before he signed and that my interpretation was true and accurate to the best of my abilities.



April 30, 2025

Yalda

Date

Jeenie Interpretation Service

1816 Redwood Terrace NW

Washington, DC 20012

EXHIBIT 16

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, [REDACTED], declare as follows:

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3 1. This testimony is based on my personal knowledge and the following facts
4 are true to the best of my understanding and recollection.

5 2. I am 24 years old. I am from [REDACTED]. I came with my daughter [REDACTED]
6 [REDACTED] who is seven years old who was born in [REDACTED].

7 3. I speak Spanish.

8 4. We crossed the border with a man that we met on the journey here. We were
9 in the wilderness walking and crossed over a mountain. It was pitch dark, it was night
10 time. A Border Patrol agent found us and stopped us. He shone a light on us and my
11 daughter and I were crying because we were afraid of what would happen.

12 5. They took us to another station and then to this station in McAllen. We have
13 been here 9 days.

14 6. When we arrived here the agents asked us some questions about who we are,
15 our address and numbers and names. They didn't tell us anything about what is going to
16 happen.

17 7. When we arrived here they took us to a large room with other families.
18 There is only one family there with us, a woman with her daughter.

19 8. They give us food but some of it we cannot eat. The lunches are very bad so
20 we save our breakfast for lunch.

21 9. There are some games in the room for her and we can shower and brush our
22 teeth in the mornings. We can only shower and brush our teeth if we are escorted to the
23 area.

24 10. The restroom has a short wall to cover us but no door, there is no privacy for
25 us.

26 11. There is water but no soap to wash our hands.
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1 12. We are allowed one call a day after our shower. The phones are in a type of
2 hallway. The agent is nearby and listens while we make calls. We have not been given a
3 list of free legal services.

4 13. Yesterday one agent came into the room at 8:30am and spoke at us
5 disrespectfully, saying “what are you doing sleeping?” We lined up to shower and brush
6 our teeth. They do not give us water, we brush our teeth with only the dry paste. When
7 we were brushing our teeth, she told us to step away from the sink and wait for everyone
8 else to finish. This agent has always been disrespectful to us. We were all brushing our
9 teeth and the paste was still in our mouth. It was very disgusting. We were not allowed to
10 spit and some women were getting sick from it, gagging from the paste sitting in their
11 mouths.

1 I declare under penalty of perjury that the foregoing is true and correct. I understand that
2 I have to tell the truth in this declaration. The interviewer read the declaration to me and
3 everything in it is true and accurate. Executed on this 30 day of April 2025, at

4 Ursula CBP.

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CERTIFICATE OF INTERPRETATION

My name is Camila Menendez and I swear that I am fluent in both the English and Spanish languages and I interpreted the foregoing declaration from English to Spanish to the declarant to the best of my abilities.

Dated: April 30, 2025

Camila Menendez



EXHIBIT 17

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, [REDACTED], declare as follows:

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3 1. This testimony is based on my personal knowledge and the following facts
4 are true to the best of my understanding and recollection.

5 2. I am 38 years old. I am from [REDACTED]. I came with my son [REDACTED].

6 3. I speak [REDACTED]

7 4. We came from Mexico into the U.S. on foot. We looked for a border agent
8 and when we found some individual working, we went to them to ask them to call Border
9 Patrol. Around ten minutes later, agents came.

10 5. Two [REDACTED] men were with us, but we did not know them. They took us in a
11 car like a police car and to a border station.

12 6. There, they gave us a short phone call and an aluminum blanket because
13 [REDACTED] was very cold. After around 30 minutes they took us to this facility. We arrived here
14 yesterday.

15 7. The doctor examined us. I have an autoimmune disease and my son has
16 some medicine for his anxiety and trauma. They gave me some medicine, but I do not
17 think it is the medicine I have been taking previously. [REDACTED] takes medicine for anxiety,
18 but they didn't give him his anxiety medicine. They said they do not provide medicine for
19 anxiety here, but his anxiety is only getting worse every day here.

20 8. He is extremely upset because he is afraid he will be separated from me.

21 9. They took us to a large room and gave us mats to sleep. Today one other
22 family joined our room, a mother and her kid from Mexico.

23 10. It is extremely cold in the room. We cannot ask for more clothes, we have
24 only the aluminum blankets.

25 11. We weren't able to sleep much. Around 1am they took us to a room and
26 asked me to sign something on a computer. I asked what they wanted me to sign and they
27 told me they want to know my address so that they can confirm I am not working with
28 terrorists. They made me sign this form.

1 12. Around 2am they woke me and my son again. They took us to a room and
2 asked me to sign a paper. I was so tired I could barely see. I asked why they woke my
3 son, who is very young. I did not sign. Finally they took us back to the room where we
4 sleep.

5 13. They gave us a chance to shower and brush our teeth this morning and gave
6 us clean clothes. There are no brushes or combs, so we cannot brush our hair.

7 14. There is no door to the restroom in our room, only a very short wall, so we
8 feel very exposed.

9 15. There is no soap to wash our hands.

10 16. The food is not good but we take what we are given. My son does not
11 always eat the meals. They did not provide any coffee which I am used to every day, and
12 without it I feel withdrawals.

13 17. I got a very severe headache, but they told me it is not possible to get
14 something for this here.

15 18. I was given a five minute call this morning. We were not given a list of free
16 legal services or told we could call a lawyer.

17 19. We need a chance to explain our situation and have our case heard, but we
18 don't know what will happen or whether we will ever get that chance.

19 20. Some of the agents are fine, but some you can see the hate in their eyes.
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1 I declare under penalty of perjury that the foregoing is true and correct. I understand that
2 I have to tell the truth in this declaration. The interviewer read the declaration to me and
3 everything in it is true and accurate. Executed on this 30 day of April 2025, at
4 URSULA CBF.

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CERTIFICATE OF INTERPRETATION

My name is Zohreh Shirmohammadi and I swear that I am fluent in both the English and
[REDACTED] languages and I interpreted the foregoing declaration from English to [REDACTED] to the
declarant to the best of my abilities.

Dated: April 30, 2025



EXHIBIT 18

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, [REDACTED], declare as follows:

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3 1. This testimony is based on my personal knowledge and the following facts
4 are true to the best of my understanding and recollection.

5 2. I am 19 years old. I am from [REDACTED]. My daughter, [REDACTED]
6 [REDACTED], is 2 years old.

7 3. I speak Spanish.

8 4. I crossed the border Thursday the 24th, six days ago. After only a couple of
9 minutes I saw border patrol. We crossed just the two of us, me with my daughter.

10 5. They took my belongings and took us in a patrol car to this facility.

11 6. When we arrived, immigration asked me a few questions, about who I am
12 and my address and where I could stay in the U.S.

13 7. They didn't ask us anything about why we came. They didn't tell us about
14 what was happening, where we would go, or what would come next.

15 8. They took us to a large cell. There are some other families, yesterday three
16 families were there, only women and children.

17 9. We have mats to sleep on and no pillow. We have aluminum blankets.

18 10. They gave us clothes when we arrived.

19 11. It is very cold. They gave us one sweater, but it is thin and we didn't get
20 anything else to stay warm.

21 12. They escort us to the showers once a day. The showers are short, usually a
22 few minutes.

23 13. We have toothbrushes but only when we shower. There are restrooms we
24 can use but they keep the doors open all the time. There is a short half wall but there is no
25 privacy.

26 14. The bathroom is in the cell where the other families. We can only wash our
27 hands with water, there is no soap.

1 15. The food is difficult because my daughter cannot eat it, she is too young.
2 She can only eat the fruit. They do give her different food, but it is not good. They give
3 her meat balls or chicken.

4 16. I haven't been able to get other food for her although she is not eating.

5 17. There is milk and diapers for her.

6 18. There are some coloring books and toys in a common area outside the cell.
7 However, we cannot go outside. We cannot see the sun or breathe the air outside.

8 19. They give us one call per day. I cannot call a lawyer. They did not give us a
9 list of legal service providers. There is an agent outside listening to our phone calls. I
10 have been able to speak to a friend who is in the U.S.

11 20. I haven't had the opportunity to speak with anyone to ask for asylum.

12 21. My daughter and I are in danger in [REDACTED], our lives are in danger and
13 we came to seek asylum, but we have not had a chance to tell anyone. We saw another
14 mother was deported yesterday and she never had any chance to tell anyone she needed
15 asylum or explain anything. No one has asked us anything.

16 22. Some, but not all, of the officers are aggressive and disrespectful.

17 23. One day, we went to get a shower and we were brushing our teeth and an
18 officer was very rude to us, she felt we were taking too long and she made us step aside
19 and stand and wait while other women used the sink. We had paste in our mouths and
20 couldn't spit it out, some of the women began to vomit because of holding it in their
21 mouths. One of the other women spoke up for us. We were all afraid of what would
22 happen if we said anything. I don't know what happened to her after she spoke up or
23 whether this guard was ever told not to do something like this again.

24 24. I want to live here and work to support my mom because I am a single
25 mother. I want to settle down here in a safe place and provide the best life for my
26 daughter.

1 I declare under penalty of perjury that the foregoing is true and correct. I understand that
2 I have to tell the truth in this declaration. The interviewer read the declaration to me and
3 everything in it is true and accurate. Executed on this 30 day of April 2025, at
4 Wrsula CBP.

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CERTIFICATE OF INTERPRETATION

My name is Marcelo Limó and I swear that I am fluent in both the English and Spanish languages and I interpreted the foregoing declaration from English to Spanish to the declarant to the best of my abilities.

Dated: April 30, 2025

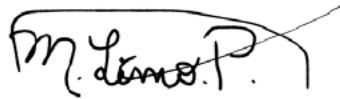
A handwritten signature in black ink, appearing to read "M. Limó P.", with a horizontal line drawn above it.

EXHIBIT 19

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, [REDACTED], declare as follows:

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3 1. This testimony is based on my personal knowledge and the following facts
4 are true to the best of my understanding and recollection.

5 2. I am 32 years old. I am from [REDACTED]

6 3. I speak [REDACTED].

7 4. I was apprehended by Border Patrol agents on or around April 2, 2025 near
8 San Ysidro, California. My three children and I walked through a sewage tunnel under
9 the border barrier and into the United States. We immediately found authorities and
10 surrendered ourselves.

11 5. When Border Patrol agents found me, I was with my three children, [REDACTED]
12 [REDACTED] (age 12), [REDACTED] (age 11), and [REDACTED] (age 5). The officers
13 took my children and I directly to the Chula Vista Station where we are currently
14 detained.

15 6. When we arrived at this facility, we were still covered in sewage, including
16 feces and urine. Officials took our fingerprints and took away our documents before we
17 were allowed to shower.

18 7. We were given clean underwear, sweatshirts, and sweatpants, but the
19 clothing was too big for some of my children. The officers cut the legs of my son's pants
20 shorter to fit, but his shoes are still too big for him. We have not been given a change of
21 clothes in the last eight days.

22 8. My children and I have been detained at the Chula Vista Station for
23 approximately eight days.

24 9. There are about three other families with children here. We have been here
25 the longest. Some people come for only a day and then are taken away.

26 10. We are kept together in a locked room with the other families. There are no
27 windows, only a small window in the door to the hallway. For the first few days we were
28

1 here, they did not let us outside at all. In the last few days, we have been allowed outside
2 for no more than fifteen minutes at a time.

3 11. I have not been told anything about where I am or why I am being held here.
4 I have asked how long we will be held here and what will happen to us, but the officers
5 do not tell me anything.

6 12. Yesterday, an officer asked if my children and I would accept deportation.
7 He told me that if I did not accept deportation, that my children would be taken away. He
8 said that we could be kept here for a very long time, and that they would send me back to
9 [REDACTED] on a dangerous plane. I told him that I was scared and that I wanted to seek
10 asylum, but he ignored me and walked away.

11 13. We do not have any hand sanitizer or soap to wash our hands. We do not
12 have any towels to dry our hands either.

13 14. There is only one toilet that we all have to share with the other families.
14 There are no doors on the toilet, so everyone can see you using the bathroom. It is
15 completely humiliating. My older children are having a hard time using the bathroom
16 because they are embarrassed. There are beds right next to the toilet, so the other people
17 get bothered when we have to use the toilet at night.

18 15. It is always cold in the room. They gave us aluminum blankets and clothing
19 but it is still always cold.

20 16. We have been allowed to shower only three times in the last eight days. I
21 shower together with my daughter and youngest son, but my older son has to shower with
22 an older boy from another family. They rush us every time we are allowed to shower and
23 tell us we have to hurry up.

24 17. We do not have any way to brush our teeth in our room. They only give us
25 toothpaste on days that we shower, and we do not get a regular toothbrush, just an
26 attachment.

27 18. We have to eat in our room. The food they give us is disgusting. They serve
28 hamburgers for breakfast and dinner every day, and they are inedible. My children cannot

1 eat the hamburgers, so they just eat crackers and salty snacks instead. I have headaches
2 from the food and my children are suffering from stomach aches because they are not
3 eating enough. We told a doctor about these problems, but he just gave my children
4 electrolytes and told me to drink water for my headaches.

5 19. We sleep on metal beds with a silicone mattress. We have aluminum
6 blankets that make a loud noise every time someone moves, so it is impossible to sleep.
7 The officers here often come into our room to talk to someone or do something, and they
8 keep the lights on all day and night, so it is never dark. My children and I are not sleeping
9 enough because it is so difficult to fall asleep.

10 20. My children are deteriorating psychologically. My son has started hitting
11 himself in the head and complaining of boredom. My daughter is always crying. I am
12 very scared that my children are going to hurt themselves.

13 21. I have a prescription for psychiatric medication but I am not taking it,
14 because I do not think it would be effective in this environment.

15 22. There is nothing to do in the room where we are locked up. The children
16 have no toys. Only in the last couple days have people started coming to talk to the kids
17 and take them outside for small periods of time. My children are always bored and are
18 upset because we do not know what will happen to us.

19 23. We have not been allowed to use the phone even once since we arrived here
20 eight days ago. I have asked multiple times to call my husband who lives in the United
21 States, but the officers always say no. I asked if at least my children could call their
22 father, even for one minute, but the officers refused.

23 24. We do not understand English, so we often have to communicate with the
24 officers here in sign language. When we were first apprehended, I told the officers that
25 my children and I needed to seek asylum. Nobody has asked me if I am scared to return
26 to [REDACTED] or any other country. Neither my children nor I have received a fear
27 interview.
28

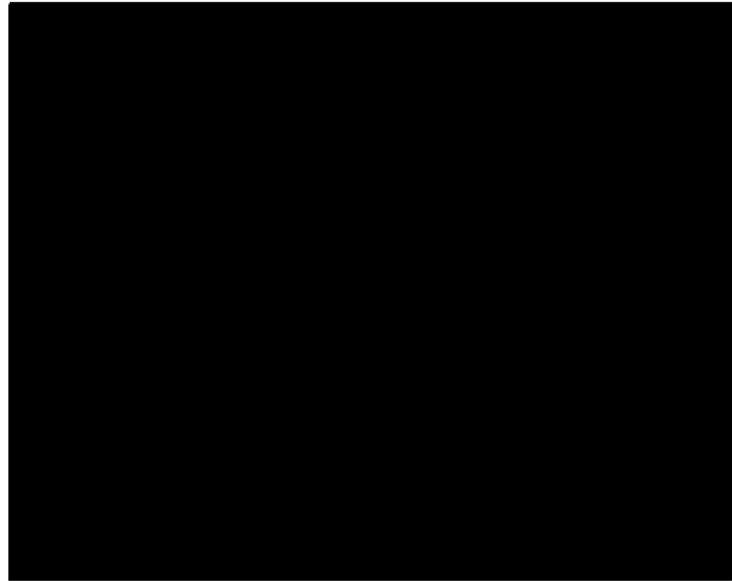
1 25. I have not been provided with a list of attorneys, or any way to contact an
2 attorney. I have not been given any documents or any explanation of my rights.

3 26. I have not been told anything about what will happen to me or my children.

4 27. I want to reunite with my husband inside the United States so that my
5 children can be with their father again.

6 28. I do not want any family with children to ever have to come to this facility.
7 All of the children here are crying all of the time. Nobody is doing well here.

1 I declare under penalty of perjury that the foregoing is true and correct. I understand that
2 I have to tell the truth in this declaration. The interviewer read the declaration to me and
3 everything in it is true and accurate. Executed on this 10 day of April 2025, at
4 Chula Vista.



CERTIFICATE OF INTERPRETATION

My name is Mahmut Kobaner and I swear that I am fluent in both the English and [REDACTED] languages and I interpreted the foregoing declaration from English to [REDACTED] to the declarant to the best of my abilities.

Dated: April 10, 2025 Mahmut Kobaner

EXHIBIT 20

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, [REDACTED], declare as follows:

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3 1. This testimony is based on my personal knowledge and the following facts
4 are true to the best of my understanding and recollection.

5 2. I am 17 years old. I am from [REDACTED].

6 3. I speak [REDACTED].

7 4. I was apprehended by immigration agents on or around April 3 after
8 crossing the Mexico border. I was taken to a van and driven to this facility, where I am
9 now. After arrival I was provided with food and water.

10 5. When immigration agents found me, I was with my mother.

11 6. I have been detained at the Chula Vista facility for 7 days.

12 7. There are about 6 other children and 3 families that I have seen here.

13 8. I am staying in the same room with my mother and we are restricted to our
14 room. We are not allowed to go outside. We can only leave to go take a shower. We have
15 nothing to do in our rooms, just walk around and sleep. I have taken one shower since
16 being here.

17 9. I was told that I was being held here because I crossed the border illegally. I
18 have not been told how long I will be here or where I will be going next. I have not been
19 told when they will release me from here.

20 10. I was never given information about what I could ask for. I was not told that
21 I could ask to call my family back in [REDACTED]. Since I have been at this facility I have not
22 used a phone.

23 11. The facility is usually cold and we are only allowed to wear one layer of
24 clothing at a time. They will only give us an additional aluminum blanket to cover
25 ourselves. At night they give us an aluminum blanket to sleep.

26 12. The lights in our room are always on. They never turn them off or dim them
27 and I have to cover my head with my blanket so that I can sleep.
28

1 13. I have not been provided with a list of free lawyers to contact. I have not
2 been told that I could call a lawyer.

3 14. We are asking for asylum. We asked when we first arrived and when they
4 gave us a form that talked about voluntary repatriation. They told us that asylum does not
5 work anymore and that you cannot ask for asylum.

6 15. I wish that we could have been told what could be done or not about our
7 immigration status before getting to this facility.

8 16. After leaving here I would like to get an education and get a job to support
9 myself. I am interested in studying the law to become an attorney one day.

1 I declare under penalty of perjury that the foregoing is true and correct. I understand that
2 I have to tell the truth in this declaration. The interviewer read the declaration to me and
3 everything in it is true and accurate. Executed on this 10 day of April 2025, at
4 enula Vista.

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CERTIFICATE OF INTERPRETATION

My name is Chern Tat Chong and I swear that I am fluent in both the English and
[REDACTED] languages and I interpreted the foregoing declaration from English to [REDACTED]
to the declarant to the best of my abilities.

Dated: April 10, 2025

A handwritten signature in blue ink, appearing to read "Chern Tat Chong", is written over a horizontal line.

EXHIBIT 21

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, [REDACTED], declare as follows:

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3 1. This testimony is based on my personal knowledge and the following facts
4 are true to the best of my understanding and recollection.

5 2. I am sixteen years old. I am from [REDACTED].

6 3. I speak [REDACTED], Russian, [REDACTED], and some German and English. I learned
7 English at school in my country. [REDACTED] is my best language, but there was not a
8 [REDACTED] interpreter available so I am doing this declaration with the assistance of a
9 Russian interpreter.

10 4. I was apprehended by Border Patrol agents about eight days ago with my
11 mother and my two younger siblings. We had just crossed through some disgusting
12 water that smelled terrible in the middle of the night. It might have been sewage, I am
13 not sure what it was. On the other side of the water, we found immigration agents and
14 my mom told them we were seeking asylum. They told us to “shut the fuck up” and that
15 asylum had been canceled by President Trump and that there would be no asylum for five
16 years. They handcuffed my mom and they ordered us into a car and took us to Chula
17 Vista detention center. We were still soaking wet and dirty and cold and stinky. We had
18 been waiting in Mexico for many months for our CBPOne appointment, but the program
19 got canceled.

20 5. After we got to the detention center we were given clothes, but they didn’t
21 fit. My little brother’s shoes are too small and my little sister’s shoes are too big. They
22 gave us some burgers and they took our fingerprints and took our passports and then took
23 us to a place to sleep. The sleeping place was actually a prison cell. It is very, very cold.
24 There is no door for the toilet, and the floor is very dirty. It’s very embarrassing to not
25 have privacy to use the toilet.

26 6. For water to drink, there is a very dirty water container with a strong
27 chemical smell. They told us this was the water we had to drink. My mom told the
28 officers she was scared for us to drink this water because my brother has stomach

1 problems. I asked for different water, because I could see bottled water and juices, but
2 they won't give it to you if you ask. A boy from another family said the water was
3 making him sick and the officer told him that that wasn't his problem. The officers are
4 very rude. They talk in English thinking we can't understand the rude things they say,
5 but I understand a lot of English so I can understand what they say. I heard one officer
6 say about us "they smell like shit," and another officer responded "they are shit." For the
7 first four or five days they didn't let us leave the cell. There is trash everywhere, and
8 they made my mom and the other adults clean up trash. They wouldn't let us have any of
9 our belongings, even five days they wouldn't let me mom have her contact lenses or
10 glasses.

11 7. When I got here I had tonsilitis and my tonsils were very swollen and
12 painful. The doctor only gave me some ibuprofen and told me to drink water. My tonsils
13 still hurt me. They just said to see a throat doctor when I get to where I'm going, once
14 I'm out of this place. My little brother has a stomach problem that requires medicine, and
15 special foods but he can't have either here. He has started to get diarrhea because of it.

16 8. I asked to call my father who is in the United States and the officers said no.
17 I said my mental health was suffering and I needed to talk to my dad but they didn't care.
18 They treat us like we are not human beings. I still haven't been able to speak with my
19 father since we've been here.

20 9. When my mom told them we're not criminals, we are just seeking asylum,
21 they screamed at her and told her she's a criminal.

22 10. I have been detained at Chula Vista for eight days. They haven't told us
23 how long we will be here or what will happen to us next. There are about three other
24 families with children here. There are no toys in the cell, even though we asked for some,
25 the officers told us it's not allowed. All we have to play with is trash, but the officers
26 shout at us when we try to play. The cell is very disgusting and I don't like it.

27 11. For the first five days we were here, they offered to let us take a shower, but
28 it was in the middle of the night at eleven, one and two AM and the showers were cold,

1 so we didn't take them because we were sleeping. Only in the last three days have we
2 been allowed to bathe at a normal time. We can't play. We just sleep, eat, cry and wait.
3 My mom tries to keep us occupied, but there is nothing for us to do. Even though we
4 asked for our own toys from our backpacks, they won't even let us have those.

5 12. There is a poster in our cell that says we have the right to call a lawyer or a
6 consul or a family member. So I asked if I could make the calls, and the officer said that
7 if I were by myself, I would have that right, but since my mother is here I don't have any
8 right. We have not been allowed to use the phone, my mother and I both asked and they
9 refused. They said the only phone call we can make is to call the consulate for voluntary
10 deportation. They haven't given us a list of lawyers and no one told us we can have a
11 lawyer. My father has a lawyer but we haven't been able to contact him to even let him
12 know we're here or that we are alive.

13 13. It's very cold in the cell. They give us an aluminum blanket but it is not
14 enough to keep us warm. We just have a thin mat to sleep on bunks. It's very hard to
15 sleep. The aluminum blanket is very noisy and rusty and it wakes us up. The officers
16 shout at us to wake up to check our bracelets in the middle of the night. They leave the
17 lights on all day and night, so it is very hard to sleep.

18 14. They gave us disposable toothbrushes the first couple days, but after that
19 they stopped and we weren't able to brush our teeth. There's no soap in the cell to wash
20 our hands after we use the bathroom or before we eat. For the first five days they didn't
21 let us change our clothes or leave the cell. In the last three days, they let us go outside a
22 couple times to a small fenced yard that feels like it's for criminals and they gave us
23 some pencils to draw with.

24 15. We have the same meals every day—a burger in the morning and in the
25 evening and a burrito for lunch. My little sister refused to even eat today because the food
26 is so bad.

27 16. My mom started having problems with her heart and having panic attacks,
28 the government finally gave her some pills after many days. It is scary for my little

1 siblings and I to see her like that. My little sister tries to make her feel better by giving
2 her a hug when she is feeling sad.

3 17. My mom tried to ask for asylum and they told her asylum is over. She had
4 some kind of interview yesterday about her fear of return to our country. They told her to
5 sign some papers but she refused. They did the interview in Russian even though her
6 best language is [REDACTED]. We do not know what will happen next.

7 18. I want to give this declaration because if there is a chance I can help other
8 kids like me, I want to do so. When I grow up I would like to be a diplomat. I like
9 international relations and I would love to travel all around the world and use the
10 different languages I know.

1 I declare under penalty of perjury that the foregoing is true and correct. I understand that
2 I have to tell the truth in this declaration. The interviewer read the declaration to me and
3 everything in it is true and accurate. Executed on this 10 day of April 2025, at
4 Chula Vista.

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8 [Signature]

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CERTIFICATE OF INTERPRETATION

My name is Igor Musiyuk and I swear that I am fluent in both the English and Russian languages and I interpreted the foregoing declaration from English to Russian to the declarant to the best of my abilities.

Dated: April 10, 2025

Igor Musiyuk

EXHIBIT 22

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, [REDACTED], declare as follows:

2 1. This testimony is based on my personal knowledge and the following facts are true
3 to the best of my understanding and recollection.

4 2. I am 28 years old. I am from [REDACTED].

5 3. I speak Kazak, Russian, and a little bit of English.

6 4. I am currently detained in the Karnes Immigration Center with my husband and my
7 two-year-old daughter, [REDACTED]. We arrived here almost two weeks ago on March 13,
8 2025.

9 5. We entered the United States around January 28th. When we were at the border,
10 they told all of us we were going home. They said there is no more political asylum.

11 6. We were detained at the border for 42 or 43 days at a facility that I think was
12 called Otay Mesa. There are two other families at Karnes who were at the border with us.
13 I believe the rest were deported.

14
15 Family Separation at the Border

16 7. During the 42 days we were detained at the border, my daughter [REDACTED] only
17 saw her father, my husband, two times. The first visit was only 15 minutes long and the
18 second visit lasted 30 minutes. We asked for more visits, but the officers said they
19 weren't authorized to give us more visits.

20 8. Where we were detained, there was another mother with children who were
21 separated from their father. One child was around 5 years old and was autistic. The child
22 was crying and screaming so loud all the time and it was hurting our ears. The agents let
23 that family have more visits with the father than we had. I think they had more visits
24 because the mother had two kids to take care of.

25 9. [REDACTED] was crying all the time because she was missing her father. She would
26 wake up at night and cry and it was hard to get her to calm down.

27 10. Since being separated from her father, [REDACTED]'s behavior has changed. She used
28 to speak a lot before, and now she's not speaking anymore. She previously used five or

1 six words, like “mom” “dad” and “yes,” but now she doesn’t talk at all. Her behavior is
2 more aggressive than before. She starts screaming over small things more than she used
3 to, although slightly less often than she did when we were at the border.
4

5 Conditions at the Border

6 11. Being in the border facility with my daughter was worse than being in a jail. There
7 were 23 women and children in one room with no windows. It was so crowded that we
8 couldn’t even step forward or backwards.

9 12. We spent all 42 days in that same place. We didn’t see the daylight. We only went
10 outside when we went to the different place where the showers are.

11 13. It was extremely cold in that room, and we didn’t have enough layers of clothes.
12 The mattresses were thin; they were more like yoga mats than mattresses. Because the
13 mats were thin and on the floor, it was very cold while sleeping at night.

14 14. It was very hard for my daughter to sleep at night because one light was always on
15 and there was noise from 23 people moving around with foil blankets. I made a double
16 layer of the foil blanket over her face to block the light to help her sleep.

17 15. At one point, a staff said that if a foil blanket rips, it’s our last one, and we won’t
18 be getting another one.

19 16. Many kids in the room got sick because of the cold, including fever, diarrhea, and
20 vomiting.

21 17. [REDACTED] got diarrhea and I asked for medication. The staff said she didn’t have
22 diarrhea, they said it was just liquidy stool and that she just needed water. I asked for
23 medication for her, but they only gave her electrolytes.

24 18. [REDACTED] had a fever of 38 degrees Celsius—which is a fever—but the doctor said
25 it was normal.

26 19. When my daughter was sick, a member of medical staff said it’s my own fault that
27 my daughter was sick, because it was my decision to bring her here. When I asked for
28 medication, staff told us to go home and we’d get it there.

20. When the diarrhea got on [REDACTED]'s clothes, all I could do was wash them with water in the sink. The staff did not give her a change of clothes. Every day while [REDACTED] was sick, I was washing her clothes in the sink and having them dry out. There was not even soap to clean them with. It was horrible.

21. During the entire time we were there she only got a change of clothes twice.

22. I was only able to bathe my daughter about once every two weeks, because those were the only times the shower water was warm. Every three or four days the staff took us to the showers but there was only cold water. As adults we could shower in cold water, but we couldn't do that to our children.

23. During 42 days, I only brushed her teeth two or three times and that was only because there was a particular officer there who was nice and gave us toothbrushes.

24. The room was very dirty. The staff didn't clean the floors, they only swept. It was dusty and dirty in the room, so my daughter was coughing.

25. There was one toilet in the room for 23 people. There was a panel on one side of the toilet, but it wasn't fully covered, so if someone was in front of you, they could see you going to the bathroom.

26. I tried to communicate with the staff in English, but it was sometimes difficult to say what I wanted to say. Only once did medical staff have an interpreter when my child was ill.

27. At that facility, they also did not give us time to eat – only 10 minutes for me to feed my daughter and for me to eat.

28. Dinner was the only time the children received real food. For breakfast, [REDACTED] got cold milk with cereal and one cookie. At lunch, she got instant noodles. She got sick of eating instant noodles so she ate very little. A few times they gave her macaroni and cheese for lunch when I asked; only certain officers would do that.

29. By dinnertime, children were so hungry because lunch was served at 12 and dinner at 7. There were no snacks available between those times.

1 30. Meal times were the only time [REDACTED] could drink water because other than that,
2 there was only a drinking fountain you had to drink directly from. There were no cups for
3 water. The officers said we just had to teach her to drink from the fountain.

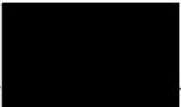
4 31. There were no toys in the facility. Kids were playing with toilet paper.

5 32. I wanted to cut my daughter's nails while we were there because her nails were
6 growing out and she was scratching up her entire face. But they wouldn't give me nail
7 clippers. We also couldn't have hair ties, so I couldn't tie up my child's hair while she
8 ate.

9 33. When we asked for anything for our children, the officers would say "go home."
10 Like if you were hungry and asked for food, they would say, "go home."

11 34. My husband and I are desperate to know when we will be released from here
12 because our daughter's mental health is getting worse. She needs a speech therapist since
13 she has stopped speaking. We are very worried about her.

1 I declare under my duty to tell the truth and penalty of perjury that to the best of my
2 knowledge, all the information I have here given is correct and complete and I understand
3 the legal consequences of testifying falsely to the authorities. Executed on this 26th day
4 of March 2025, at Karnes City, TX.

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CERTIFICATE OF INTERPRETATION

My name is __Diana Buela____ (Jeenie interpreter ID: 242425) and I swear that I
am fluent in both the English and Russian languages and I interpreted the foregoing
declaration from English to Russian on March 26, 2025 to the best of my abilities.

DBuela

Dated: __April 8, 2025____

CERTIFICATE OF INTERPRETATION

My name is Rachel Smith and I swear that I read the foregoing declaration aloud to the declarant on March 26, 2025, using a live English to Russian interpreter on www.jeenie.com (interpreter ID: 242425). The receipt for the call is below.

Call Details

X



Diana
ID: 242425

Date And Duration	Mar 26, 8:11 AM 104m
Type of Call	On-Demand
Languages	English <> Russian
Ratings	
Service	Immigration & Refugee
Call Platform	Jeenie

Dated:

April 8, 2025

EXHIBIT 23

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, [REDACTED], declare as follows:

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3 1. This testimony is based on my personal knowledge and the following facts
4 are true to the best of my understanding and recollection.

5 2. I am 40 years old. I came with my wife, my daughter [REDACTED] who is 3, my
6 son [REDACTED] who is 4, and my son [REDACTED] who is 6. I am from [REDACTED].

7 3. I speak [REDACTED].

8 4. I came to this port of entry on May 17, five days ago.

9 5. A police officer immediately shouted at us. He shouted at my son, who is
10 only a child, yelling that the president doesn't give asylum here.

11 6. I asked him please don't yell at my son, but he told us just turn around and
12 leave back to Mexico.

13 7. I was asking for asylum, I was asking him to have mercy for my family. We
14 are in danger at home.

15 8. He told me, "I don't give a damn, you have to leave, the political situation
16 has changed and there is no protection here."

17 9. They took us to a white room with a chair and table, a small room, and began
18 asking us questions, interrogating us about how we made it to the border.

19 10. They took the kids to a room with my wife. They told them don't run, don't
20 play. They pressured my wife to tell the kids not to move. They demanded that the kids
21 freeze, not to move at all, they said that the kids had no choice.

22 11. For days I slept in that small room. My wife was taken to a separate room
23 and slept away from me. It was the same type of room but a little larger. It was extremely
24 cold.

25 12. We asked for blankets to cover our children to keep them warm but they
26 would not give us more, only one extremely thin foil blanket.

27 13. It was windy inside from the AC, there was a very strong, freezing gust of
28 cold air.

1 14. For five days we were without a window, without sun. There was a light on
2 24 hours.

3 15. The kids could not go outside. They had no toy. They had nothing.

4 16. There was not even a single toy. They were not allowed even to jump, to
5 move, to play with each other. Can you imagine being three years old and told not to
6 move for five days? Officers would stop by the room and if the children were moving,
7 the officer would tell them that if they didn't stop they would be taken away. There were
8 cameras everywhere.

9 17. There was a toilet we could access. There was a sink but no soap.

10 18. We could not wash our children. Our daughter has allergic reactions, we
11 usually wash her when she uses the restroom. They wouldn't allow us to wash her or
12 even give us a wet wipe or anything.

13 19. The washroom was inside the room, there was no separation.

14 20. The switch to flush the toilet was outside the room.

15 21. Every thirty minutes they would flush it. It was extremely loud, we could not
16 sleep.

17 22. There were a few kind officers, four, but the rest of them tortured us.

18 23. My daughter has allergies. We asked for food she could eat but they gave us
19 only junk, like chips, my daughter was sick from this and they wouldn't let us see a
20 doctor or get medicine.

21 24. We submitted medical documents about her allergy but they gave us
22 nothing, only one cream over five days, and that did not help her.

23 25. We got only one call at 3am. No other calls in the five days. We tried to call
24 our sponsor. We tried to explain to the officers that he would be asleep, but it was the
25 only call we were allowed.

26 26. My youngest son hurt his eye. He has a bad black eye now, black and blue
27 and bruised with some swelling still. The room where he slept is empty, there are only
28 iron chairs. He slipped and hit his face on the corner of the chair.

1 27. His face and head were so badly injured that he became dizzy and was
2 vomiting. I was terrified that he had a concussion or could be seriously hurt. I asked them
3 to x ray him or give him a test or scan or to take him to a hospital but they refused. I was
4 afraid he had broken a bone in his face or that he had injured his brain.

5 28. A doctor came and applied a cream and said to keep ice for ten minutes but
6 nothing else. I asked if we could get more care for my son, because he was vomiting and
7 dizzy, but they did nothing. I tried to ice his eye but it wasn't helping. I was so worried
8 about him. After that there was not even a single checkup.

9 29. I never had a proper interview. I spoke to an officer. He said if I do not sign
10 a voluntary departure, I will be separated from my kids. I still don't know whether they
11 can do that, take my kids from me.

1 I declare under penalty of perjury that the foregoing is true and correct. I understand that
2 I have to tell the truth in this declaration. The interviewer read the declaration to me and
3 everything in it is true and accurate. Executed on this 22 day of May 2025, at
4 Otay Mesa.

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CERTIFICATE OF INTERPRETATION

My name is Sona Petrosyan and I swear that I am fluent in both the English and
[REDACTED] languages and I interpreted the foregoing declaration from English to [REDACTED] to
the declarant to the best of my abilities.

Dated: May 22, 2025

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

EXHIBIT 24

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, [REDACTED], declare as follows:
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3 1. This testimony is based on my personal knowledge and the following facts
4 are true to the best of my understanding and recollection.

5 2. I came here to the border with my daughter [REDACTED], who is 12 years old; my
6 son [REDACTED], who is 15; and my husband [REDACTED]. I am from [REDACTED].

7 3. I speak [REDACTED].

8 4. We came first to Mexico. We were in Mexico for some time. We came here
9 to seek asylum.

10 5. It was extremely dangerous for us. There were bombings in our city and the
11 dictatorship, it is politically extremely dangerous.

12 6. The border police here told us that the President does not allow asylum
13 anymore. We tried to use the CBP One program, but just after we arrived in Mexico this
14 was ended by Trump.

15 7. We came to this port on May 18, four days ago.

16 8. We handed over our passport. They tried to deceive us, saying that the
17 decision in our case had already been made, they pressured us to sign some deportation
18 documents but we did not.

19 9. My children are adopted, they have been with us for eight years, we are
20 afraid that we will be separated.

21 10. My children have a disability, Marfan Syndrome, which causes mental and
22 cognitive challenges. They cry and worry, it is very difficult for them to handle being
23 here. They are afraid and don't know how long we will be forced to stay here.

24 11. We have a 31-year-old son in the United States. He and his wife will be our
25 sponsors and we will live with them.

26 12. We wrote a letter explaining that we have a son and daughter in law who
27 will support us. We gave this letter to the officers when we gave our passports. They did
28 not care.

1 13. They put us into a room.

2 14. My husband and son were in a two-person cell. There was a sink and steel
3 toilet and steel bench. They had nothing to cover themselves, no real blanket or jacket. It
4 was so hard for them. It was extremely cold.

5 15. The room I was in was bigger. We were there with a mother with three
6 children. There was more space, but it was still small, about four times the size of the
7 cell. It was freezing cold.

8 16. There are cameras everywhere in the rooms.

9 17. I was with my daughter [REDACTED]. She was trying to play but there was nothing
10 there to do.

11 18. We had nothing but a thin foil blanket and we were so cold. The lights were
12 on all night and day. We could not see the sun. There were no windows.

13 19. We didn't know what time of day or night it was.

14 20. We saw each other only when we ate lunch or breakfast. My husband
15 demanded that we eat together so he could see his daughter. They refused to allow us
16 some days and we would not see each other at all. My husband and son missed us so
17 much that they didn't eat anymore. We tried to beg them to let us eat together, we said we
18 wouldn't eat without each other.

19 21. I asked for an interpreter so I could talk to the officer, but they only yelled at
20 me.

21 22. Yesterday, they decided to search me, I don't know why, maybe they
22 thought that I would steal a toothbrush. They put their hand with great force into my
23 intimate place.

24 23. The only thing I had on me was [REDACTED] hair tie. When they were searching
25 me the woman felt I was wearing a pad. Then both officers were grabbing it. They were
26 talking about what size it was. There were men around, male officers and my husband
27 and son. I offered to go somewhere private and show them that it was only a pad but they
28 continued to grab me in front of everyone, including my kids.

1 24. I will not shower again after that because I am too afraid it could happen
2 again.

3 25. It was the only time I was allowed to shower, I would never ask to shower
4 again because of this experience.

5 26. They gave us no shampoo, only a small packet of soap, we had enough only
6 to use on our body or our hair, we had to choose one. My daughter and I have very long
7 hair. It was too little soap even to wash my hair. I tried to spread it but could not get
8 clean.

9 27. They pour a little soap on our hands when we leave the cell, sometimes they
10 only spray with sanitizer or we wipe with alcohol. They gave us a napkin, only in the
11 evening.

12 28. We don't know how long we will be here or where they will take us.

13 29. I am grateful that we are still alive.

14 30. We are so thankful that we will be leaving.
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1 I declare under penalty of perjury that the foregoing is true and correct. I understand that
2 I have to tell the truth in this declaration. The interviewer read the declaration to me and
3 everything in it is true and accurate. Executed on this 22 day of May 2025, at
4 otay mesa.

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8 [Signature]

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CERTIFICATE OF INTERPRETATION

My name is Sona Petrosyan and I swear that I am fluent in both the English and
[REDACTED] languages and I interpreted the foregoing declaration from English to [REDACTED] to
the declarant to the best of my abilities.

Dated: May 22, 2025

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

EXHIBIT 25

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, [REDACTED], declare as follows:

2 1. This testimony is based on my personal knowledge and the following facts are true
3 to the best of my understanding and recollection.

4 2. I am twenty-five years old, and my son, [REDACTED], is five years old.
5 I am from [REDACTED] and my son is from [REDACTED]. I came to the United States in 2021.
6 I was in CBP for about four days, and then I was released with an ankle detector. They
7 called me four days later to take it off.

8 3. I speak Spanish.

9 Apprehension Prior to Dilley

10 4. My son and I have been detained at this facility for 14 days. Prior to this we
11 were in an immigration jail in Buffalo. We had just moved to Buffalo from Las Vegas.

12 5. A few weeks ago, I was at a Walmart in Buffalo with my friend. They called the
13 police on my friend and since my son and I were with her, they arrested all of us. They
14 took my son and I into a police station and we waited there about an hour. When we
15 arrived, immigration was already there. I told them I had immigration paperwork
16 including a work permit, but they would not let me get it out of my truck.

17 6. The ICE officials took me and my son over to an immigration jail. They put us in
18 a cell for 5 days and did not let me make any phone calls. They asked me if I wanted to
19 leave my son with someone and I said "No. I don't want to leave my son." At this jail,
20 we could not shower and we weren't free to go outside. My son would cry because he
21 didn't have enough food. They would just give him cookies and juice. I was crying
22 because my son was so hungry. He was so upset and didn't know if it was day or night.
23 When we finally were leaving there, he asked me if we were going to a different jail.

24 7. After five days with no information, they told me that my son and I were going to
25 another facility, and they let us take a shower. Two men and one lady were assigned to
26 accompany us on our trip to Dilley. They took us on two flights – first to Atlanta and
27 then to San Antonio. When we were on the plane, one of the men told me that they could
28 not tell me how long we would be in custody, but that the five days in CBP did not count

1 towards that time and it would be a fresh start in terms of my time in detention when we
2 arrived at the new center. After the flights, we drove in a van from San Antonio for over
3 an hour.

4 Dilley Family Detention

5 8. I'm upset because no one here is telling me anything. Talking to the Flores
6 attorneys is the first time I have spoken to anyone. The people here tell me that they
7 don't have any information. They have not given me a list of free lawyers for my son. I
8 signed up to talk to attorneys on a sheet of paper, but that was about six days ago and I
9 have not heard anything, yet.

10 9. One of my family members has my immigration paperwork, and they could send it
11 to me if I knew what was going on. The ICE officials never allowed me to go to my car
12 to get it.

13 10. I live in the yellow area of this facility. My son and I share a room with two other
14 families. There are three moms and three kids. They do not let us turn the lights off at
15 night. If I turn off the lights, the guards turn them back on. It really bothers my vision
16 and it makes it hard for my son to sleep. We are right in front of the light, and I try to put
17 a handkerchief over it, but the guards say I can't do that. They also are coming in and out
18 all night and they are not careful with the door. It just slams over and over.

19 11. Most of the time I have to buy food from the commissary because my son won't
20 eat the food. He hasn't eaten in the last four days. We also have to pay for bottled water.
21 It costs about \$1.50 per bottle. The tap water does not smell good, and I don't trust it to
22 drink. I don't even trust the ice.

23 12. There is not much to do here. I just take my son to the outside area, and he also
24 loves to color. In the play area, they only have about 4 pieces of broken crayons left. I
25 asked if they would get more crayons and a guard said probably not because the kids
26 keep breaking them and eating them. Otherwise, we are just in our room. They are no
27 toys. Guards complain about the kids getting on the workout machines – but what can
28 you expect when there are not other things for them to do.

1 13. In the gym, they just have balls and my son gets bored of playing with them after a
2 while. They don't do activities here. I have never seen anyone watching movies, eating
3 snow cones or doing karaoke. I am not sure why the guards told you that happens.
4 People who have been here longer than I have told me there is nothing to do and they are
5 stressed out.

6 14. One of the ladies here has said they ordered more toys but they don't have them
7 yet. She understands the kids get really bored.

8 15. I try to keep my son busy throughout the day, but he is constantly asking when we
9 are getting out of here. When he calls my partner, he tells my son we will go to the beach
10 when we get out, and that helps distract him. He's looking forward to going to the beach.

11 16. Yesterday was the first day I was able to take my son to the school classroom here.
12 I kept taking him and they would tell me that his name was not on the list. He was able
13 to go for an hour. The different age groups only get an hour in the classroom. The
14 teacher gave him some homework and he did it right away. The teacher said he was very
15 smart and quick.

16 17. My son has had a problem with his penis since he was born and needs a surgery.
17 We were going to do this before we were detained. Since he's been here, the restrooms
18 are sometimes dirty and it is hard to ensure he has a thorough bath. He has been having
19 trouble urinating and I am worried that his condition is getting worse.

20 18. The doctors here told me my son needs vaccines, but they want to give him all of
21 them. The last time we were at the doctor before coming here, they told me he only
22 needs one booster – so I didn't sign for him to get vaccines here because they don't have
23 the record of what he needs.

24 19. My son is allowed to call family, but we have to pay for all of his phone calls. I
25 don't know exactly how much it costs per call, but a \$50 card lasts about five days. He
26 has used the tablet for FaceTiming and it costs \$3 for 15 minutes.

1 20. I don't really know how my son is doing, but I am worried about it because
2 yesterday he said he doesn't believe in God anymore because he prays to him but we still
3 haven't been able to get out of here.
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1 I declare under my duty to tell the truth and penalty of perjury that to the best of my
2 knowledge, all the information I have here given is correct and complete and I understand
3 the legal consequences of testifying falsely to the authorities. Executed on this 2nd day
4 of May 2025, at Dilley, Texas.



CERTIFICATE OF TRANSLATION

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

Dated: 5/02/2025

Diana Cano