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

Jenny Flores, *et al.*,

Plaintiffs,

v.

Todd Blanche, Acting Attorney General
of the United States, *et al.*,

Defendants.

Case No. CV 85-4544-DMG-AGR_x

**PLAINTIFFS' RESPONSE TO MAY 4,
2026 ICE JUVENILE COORDINATOR
STATUS REPORT AND DATA**

Judge: Hon. Dolly M. Gee

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TABLE OF EXHIBITS

Exhibit Index to Plaintiffs’ Response to

May 4, 2026 ICE Juvenile Coordinator Status Report and Data

| Exhibit No. | Exhibit Description |
|-------------|--|
| 1 | Declaration of Leecia Welch, May 17, 2026 (“Welch Decl.”) |
| 2 | Declaration of Elora Mukherjee, May 18, 2026 (“Mukherjee Decl.”) |
| 3 | C.G.C. Declaration (Dilley), April 22, 2026 (“C.G.C Decl.”) |
| 4 | A.O. Declaration (Dilley), May 08, 2026 (“A.O. Decl.”) |
| 5 | M.T.H. Declaration (Dilley), April 22, 2026 (“M.T.H. Apr. Decl.”) ¹ |
| 6 | R.G.H. Declaration (Dilley), April 22, 2026 (“R.G.H. Decl.”) |
| 7 | S.D.C. Declaration (Dilley), March 11, 2026 (“S.D.C. Decl.”) |
| 8 | G.S. Declaration (Dilley), April 22, 2026 (“G.S. Decl.”) |
| 9 | R.R.M. Declaration (Dilley), April 23, 2026 (“R.R.M Decl.”) |
| 10 | O.S. Declaration (Dilley), May 16, 2026 (“O.S. May Decl.”) ² |
| 11 | A.L.G. Declaration (Dilley), March 11, 2026 (“A.L.G. Decl.”) |
| 12 | Declaration of Rodolfo Altillo, May 14, 2026 (“Altillo Decl.”) |
| 13 | E.C.M. Declaration (Dilley), April 23, 2026 (“E.C.M. Decl.”) |
| 14 | W.L. Declaration (Dilley), March 12, 2026 (“W.L. Decl.”) |
| 15 | J.A.I. Declaration (Dilley), April 23, 2026 (“J.A.I. Decl.”) |
| 16 | Y.G.P. Declaration (Dilley), April 23, 2026 (“Y.G.P. Decl.”) |
| 17 | O.B. Declaration (Dilley), April 23, 2026 (“O.B. Decl.”) |

¹ M.T.H. has both a previously filed March declaration and a current April declaration.

² O.S. has both a previously filed August declaration and a current May declaration.

Previously Filed Declarations

| Docket No. | Description |
|-------------------|--|
| 1764-3 | Declaration of Rebecca Wolozin, May 1, 2026 (“Wolozin Decl.”) |
| 1748-5 | Declaration of M.S.P., March 12, 2026 (“M.S.P. Decl.”) |
| 1764-5 | Declaration of Michael Musa-Obregon, April 30, 2026 (“Musa-Obregon Decl.”) |
| 1764-4 | Declaration of Lyndsey Marcelino-Schalkwyk, April 28, 2026 (“Marcelino-Schalkwyk Decl.”) |
| 1748-3 | Declaration of Leecia Welch, March 20, 2026 (“Welch Mar. Decl.”) |
| 1748-25 | Declaration of A.K., January 14, 2026 (“A.K. Decl.”) |

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6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

TABLE OF CONTENTS

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

I. INTRODUCTION 1

II. ICE Continues to Violate the *Flores* Settlement Agreement. 2

 A. Children Are Subjected to Prolonged and Unexplained ICE Detention. 3

 1. Prolonged Detention at Dilley..... 3

 2. Increased Prolonged Detention of Children in Hotel Rooms 6

 B. Conditions of Detention at Dilley Continue to Violate the FSA. 9

 1. Children’s Mental Health Is Deteriorating as They Continue to Experience Long Stays and Harsh Treatment at Dilley..... 9

 2. Dilley Still Provides Inadequate Medical Care to Children. 12

 3. Children Are Still Not Being Provided Notice of Their *Flores* Rights. . 14

 4. Children Still Lack Access to Child-Friendly Foods, Healthy Snacks, and Safe Drinking Water..... 17

 5. ICE Fails to Provide Adequate Sleeping Conditions for Children. 20

 6. Children Still Lack Access to Adequate Hygiene Products. 21

 7. Children Lack Access to Appropriate and Clean Clothing..... 22

 8. Children Still Lack Access to Free Phone Calls to Their Family Members..... 23

 9. Children’s Education at Dilley Has Improved but Remains Inadequate and Recreation Remains Insufficient. 24

III. CONCLUSION..... 25

1 I. INTRODUCTION

2 ICE resumed incarcerating children and families at the South Texas Family
3 Residential Center in Dilley, Texas (“Dilley”) over a year ago. Since that time, thousands
4 of children have been subjected to prolonged detention in unsafe and unsanitary
5 conditions, with limited access to information about their *Flores* rights. This is Plaintiffs’
6 fourth response in nine months to Defendants’ fanciful reports of compliance with the
7 *Flores* Settlement Agreement (“FSA”). In reality, little has improved at the facility, and
8 children continue to suffer.

9 During the March 30, 2026 status conference, the ICE Juvenile Coordinator
10 confirmed that ICE decided in January that “to facilitate cooperation with the Court and
11 class counsel,” it would “begin to exercise discretion in considering family units for
12 conditional release . . . around the 20-day mark.” Tr. of Mar. 30, 2026 Status Conf.
13 20:10-12 [Dkt. 1757]. However, the latest ICE JC Report calculates the average time in
14 custody as nearly 60 days. May 4, 2026 ICE Juv. Coord. Suppl. Rep. at 4 [Dkt. 1768-1]
15 (“ICE JC Report”). The ICE JC Report states that 567 children spent more than 20 days
16 in ICE custody in February and March alone, with 63 children languishing at Dilley for
17 more than 90 days in February, and 17 children at Dilley for more than 90 days in March.
18 ICE JC Report at 3, 5; Ex. A, Feb. and Mar. 2026 ICE Fam. Residential Ctr 20-day Rep.
19 [Dkt. 1768-2] (“20-day Census Charts”).³ While time in custody finally started to
20 decrease in March for some children, the ICE JC Report’s absurd explanation that
21 “extended lengths of stay were primarily attributable to required immigration case-
22 processing events” offers little assurance that ICE’s exercise of discretion will ever result
23 in substantial compliance with this Court’s orders. ICE JC Report at 6. Under the FSA,
24 ICE must release children expeditiously and provide *individualized* evidence about
25 permissible reasons that ICE holds any child for over 20 days. *See*, Order re Pls.’ Mot. to
26

27 ³ Plaintiffs’ counsel’s review of this data indicates there may be duplicates or other
28 possible errors; counsel are unable to independently verify these numbers but rely on
what Defendants have reported to the Court and Plaintiffs’ counsel.

1 Enforce at 15-16, Apr. 24, 2020, [Dkt. 784] (“April 2020 Order”). ICE is clearly not
2 doing so.

3 As with previous status reports, the latest ICE JC Report again disputes that there
4 are any *Flores* violations at Dilley, with the possible exception of education, which the
5 report calls “the most persistent compliance concern.” ICE JC Report at 2. Presumably as
6 evidence of purported *Flores* compliance, the ICE JC Report asserts that (a) there was a
7 decrease in resident grievances and only two of 55 grievances had any merit; (b) Dilley
8 received an “overall compliant rating in April” from River Tech; (c) “no food complaints
9 were brought to the attention of the Food Service Department during the current reporting
10 period”; (d) “[n]o grievances relating to overnight lighting have been filed since
11 January”; and (e) “[t]he medical review and inspection materials did not identify *systemic*
12 *behavioral health deficiencies* during the periods reviewed.” *Id.* at 12-13, 23, 26
13 (emphasis added). The implication is that ICE need not address Plaintiffs’ voluminous
14 evidence of ongoing *Flores* violations because its own alternate, internal metrics do not
15 identify any problems whatsoever.

16 Defendants’ insistence that Dilley is fully compliant with the FSA is refuted once
17 again by numerous new class member declarations from March and April 2026 alone.
18 Families continue to report that their children are hungry, exhausted, anxious, and
19 depressed. Welch Decl. ¶ 6. Ongoing FSA violations include inadequate medical care,
20 lack of information about *Flores* rights and access to counsel, lack of access to healthy
21 child-friendly food and safe drinking water, lack of clothing, inability of class members
22 to sleep due to lights on in their living areas all night, lack of free calls to family
23 members, and inadequate education and developmentally appropriate activities. *Id.*

24 **II. ICE Continues to Violate the *Flores* Settlement Agreement.**

25 Since Dilley re-opened a little over a year ago, Plaintiffs’ counsel have conducted
26 ten site visits. After each site visit, Plaintiffs’ counsel provided Defendants with a
27 detailed, comprehensive list of *Flores* violations. Welch Decl. ¶ 3. Unfortunately, the
28 concerns raised in the first letter sent on May 7, 2025, remain virtually the same as the
concerns raised in the last letter sent on April 28, 2026. *Id.* ¶ 5. Plaintiffs’ counsel have

1 also raised emergency time-sensitive concerns about particular children via email after
2 each site visit and on several other occasions. *Id.* ¶¶ 3-4. Defendants generally send an
3 indifferent response. *Id.* ¶ 3.

4 Pursuant to this Court’s orders, the parties began conducting mediation sessions in
5 January 2026. The parties met on January 23, February 4, March 2, and April 27, 2026.
6 Plaintiffs’ counsel have sent four additional meet and confer letters, and four emergency
7 emails since mediation began. *Id.* ¶ 4. Despite some progress in children’s length of stay
8 and an agreement to have Dr. Paul Wise conduct medical site visits at Dilley, the parties
9 still fundamentally disagree as to FSA compliance at Dilley. *Id.* ¶¶ 4-5.

10 **A. Children Are Subjected to Prolonged and Unexplained ICE Detention.**

11 **1. Prolonged Detention at Dilley**

12 During February and March, ICE reports that they detained 567 children for more
13 than 20 days. ICE JC Report at 3. Defendants’ data show that ICE detained 132 of those
14 children between 51 and 90 days in February and 39 children between 51 and 90 days in
15 March. 20-day Census Charts. ICE held 63 children at Dilley for more than 90 days in
16 February and 17 children at Dilley for more than 90 days in March. *Id.* Defendants’
17 explanations for prolonged detention demonstrate that they are failing to release children
18 without unnecessary delay and failing to make and record prompt and continuous efforts
19 toward family reunification and release in violation of the FSA. FSA ¶¶ 14, 18.

20 For over a decade, this Court has repeatedly made clear that Defendants can detain
21 children for *up to* 20 days “if 20 days is as fast as Defendants [can] in good faith and in
22 the exercise of due diligence” screen families and conduct individualized flight risk
23 determinations. *See* Order re Resp. to Order to Show Cause at 10, 14, Aug. 21, 2015
24 [Dkt. 189] (“August 2015 Order”); Order re Pls.’ Mot. to Enforce and Appoint a Special
25 Monitor at 30, June 27, 2017 [Dkt. 363] (“June 2017 Order”).

26 Detaining children past 20 days because of standard pending immigration cases
27 and appeals violates this Court’s orders. *See* April 2020 Order at 13-16. When detaining a
28 child for more than 20 days, ICE must provide individualized explanations of why that
specific child is deemed a flight risk and evidence supporting that finding. *See* Order re

1 Updated Juv. Coord. Reps. at 5, June 26, 2020 [Dkt. 833] (“June 2020 JC Order”) (“For
2 each minor detained at an FRC for more than 20 days . . . the ICE Juvenile Coordinator
3 shall give a detailed individualized explanation of why that minor is a flight risk (cursory
4 explanations such as ‘In custody—pending IJ hearing/decision,’ ‘pending USCIS
5 response,’ ‘plaintiff in a pending lawsuit’ . . . shall not be acceptable explanations) . . .
6 [rather] a prior unexplained failure to appear at a scheduled hearing would be a
7 satisfactory explanation for continued detention if that explanation is verified in a
8 declaration by an ICE representative under penalty of perjury.”)

9 This Court has also held that ICE cannot detain children with removal orders for
10 over 20 days if removal is not imminent. *See* June 2017 Order at 24 n. 16 (Class members
11 awaiting removal should not “be treated any differently . . . with regard to the release
12 provisions under the Agreement . . .”). Continued detention when removal is not
13 imminent or “ready to take place” is a violation of ¶¶ 14 and 18 of the FSA *unless* ICE
14 has provided an individualized assessment and determined that continued detention is
15 necessary for safety reasons or because of a flight risk, and provides evidence, such as a
16 sworn statement, about the reasoning. April 2020 Order at 13-14, 17-18; June 2020 JC
17 Order at 5; *see* June 2017 Order at 25-27.

18 No individualized evidence showing flight risk or safety reasons has been provided
19 for any of the thousands of children held over 20 days during the past year. ICE detained
20 hundreds of children for more than 20 days in February and March for the same
21 immigration proceeding and removal reasons that this Court has previously found
22 insufficient to justify prolonged detention: 203 children because they had ongoing court
23 cases; 137 children while they awaited voluntary departure or travel documents; 135
24 children during credible fear screenings; 79 children pursuing potential appeals; and 13
25 due to “processing considerations.” ICE JC Report at 4; *see also* Mukherjee Decl. ¶¶ 8,
26 10, 15. This Court has explicitly and repeatedly rejected these “explanations.” June 2020
27 JC Order at 5; August 2015 Order at 10; June 2017 Order at 24 n. 16; April 2020 Order at
28 13-14; 16.

1 Despite the Court’s April 3, 2026 Order, the reasons given in the 20-day Census
2 Charts remain just as vague as in previous data and rely on unsupported statements the
3 Court has held do not excuse prolonged detention. Order re Mar. 30, 2026 Status Conf.,
4 Apr. 3, 2026 [Dkt. 1755]; 20-day Census Charts; June 2020 ICE JC Order at 5. For
5 children who remain in custody or whom ICE deported after stays over 20 days, the
6 Charts describe almost all of them as detained because they had pending cases, appeals,
7 or voluntary departure and “Immigration and Nationality Act (8 U.S.C. 1101 et seq.)
8 Significant likelihood of removal/Flight risk.” 20-day Census Charts. Nothing in the
9 lengths-of-stay descriptions supports designating any specific child as a “Flight risk.” *Id.*
10 Nor does “significant likelihood of removal” indicate ICE applied the *imminent* removal
11 standard required for continued detention beyond permissible processing times. *Id.*; April
12 2020 Order at 13-14, 18. Additionally, for many children it is unclear whether their
13 prolonged detention is allegedly justified by “Significant likelihood of removal” or
14 because of “Flight risk.” *Id.* For example, ICE’s full explanation for one 64-day
15 detention prior to removal is:

16 Detention was continued pending a scheduled administrative hearing. The
17 Immigration Judge ordered removal. FAMU removed day 64. Immigration and
18 Nationality Act (8 U.S.C. 1101 et seq.)/Significant likelihood of removal/Flight
19 risk.

20 20-day Census Charts at 2, row 4. ICE’s insistence that immigration proceedings justify
21 prolonged detention and that the agency can label children flight risks without supporting
22 evidence indicates that ICE is failing to undertake individualized fact assessments.
23 Nothing in the report or charts provides evidence that ICE engages or ever plans to
24 engage in “case-by-case” determinations based on evidence of flight risk behavior for any
25 class member.

26 Additionally, ICE has not provided individualized explanations for class members
27 ultimately released after months of detention. ICE has labeled almost all children released
28 after 20 days as “Immigration and Nationality Act (8 U.S.C. 1101 et seq.) Hold” with no
supporting facts that could justify prolonged detention. 20-day Census Charts. For
example, ICE’s full explanation for a 66-day detention prior to release is:

1 Detention was continued pending USCIS fear adjudication and subsequent IJ
2 review. Due to Habeas filing FAMU was released on day 66. Immigration and
3 Nationality Act (8 U.S.C. 1101 et seq.) Hold.

4 20-day Census Charts at 9, row 19.

5 This entry exemplifies the arbitrary nature of ICE’s decision to subject children to
6 prolonged detention prior to release. The 20-day Census Charts document that ICE held
7 246 children in custody for over 20 days before releasing them with no explanation in
8 February and March. 20-Day Census Charts. These charts also show ICE held 98
9 children in custody for over 50 days and 50 children for over 90 days before releasing
10 them without any explanation regarding why ICE detained them for so long. *Id.* This
11 suggests that each of these children was held for more than 20 days, some for months,
12 even though ICE was aware their removal was not imminent.

13 Plaintiffs have raised concerns about prolonged detention of class members at
14 Dilley for nearly a year, yet the February and March census data demonstrate hundreds of
15 children still experience illegal lengths of stay.

16 **2. Increased Prolonged Detention of Children in Hotel Rooms**

17 The ICE JC report demonstrates that DHS continues to hold more and more
18 children for long periods of time in hotel rooms in violation of this Court’s orders.⁴ Ex.
19 B, ICE Hotel Stays Rep. Feb. and Mar. 2026 [Dkt. 1768-3] (“Hotel Stays Report”); Order
20 re Ps.’ Mot. to Enforce Settlement as to “Title 42” Class Members at 17, Sept. 4, 2020
21 [Dkt. 976] (“Sept. 4, 2020 Order”) (allowing only for “one to two-night stays while in
22 transit or prior to flights, if minors are traveling longer distances, or due to unexpected
23 flight delays.”); Order re Defs.’ Ex Parte App. to Stay at 2, Sept. 21, 2020 [Dkt. 990];
24 *Flores v. Garland*, 3 F.4th 1145, 1156-57 (9th Cir. 2021). Defendants have reported a
25 sharp increase in class members experiencing extended hotel stays in recent months.
26 Hotel Stays Report; ICE Hotel Stays Rep. Dec. 2025 [Dkt. 1736-6] (“Dec. Hotel Stays

26 ⁴ Plaintiffs direct the Court to their recently filed Opposition to Defendants’ “Motion to
27 Reconsider” outlining in greater detail Defendants’ unlawful practice of holding class
28 members in hotel rooms. Pls.’ Opp. to Defs.’ Mot. for Reconsideration, May 1, 2026
[Dkt. 1764] (“Pls. Opp.”).

1 Report”); ICE Hotel Stays Rep. Jan. 2026 [Dkt. 1736-7] (“Jan. Hotel Stays Report”).
2 Defendants attributed the increase in December and January in part to “holiday and
3 winter weather disruptions.” *See* Mot. For Reconsideration at 12, Apr. 17, 2026 [Dkt.
4 1760]. But the Hotel Stays Report shows that the number of children DHS held isolated
5 in hotel rooms for over 72 hours *doubled* to 86 children in February and March 2026
6 from 43 children in December 2025 and January 2026. Hotel Stays Report; Dec. Hotel
7 Stays Report; Jan. Hotel Stays Report; *see also* Pls.’ Resp. to March 13, 2026 ICE Juv.
8 Coord. Status Rep. and Data at 10 [Dkt.1748] (“Pls.’ March 2026 Resp.”). Defendants do
9 not explain or even acknowledge this disturbing increase in their status report. ICE JC
10 Report at 6.

11 Defendants attempt to justify prolonged hotel detention by describing
12 circumstances that would predictably take long periods of time to resolve. For example,
13 DHS held some children in hotel rooms while procuring travel documents and
14 coordinating scheduling. Hotel Stays Report; *see also* Pls. Opp. at 15-16. DHS held one
15 family with three children in two hotels for over two weeks (17.7 days) in order to obtain
16 a U.S. passport for their child prior to removal. Hotel Stays Report at 4. As with most
17 other children in Defendants’ Hotel Stays Report, Defendants do not provide any
18 explanation for why the family had to remain in active ICE custody isolated in a hotel as
19 opposed to an alternative to detention while their child’s travel documents were obtained.
20 *Id.*

21 Nor do Defendants provide any explanation to justify the frequent movement of
22 children between hotels at all hours of the day and night *within the same city* when
23 unforeseen delays occur. Hotel Stays Report. For example, DHS held one child in three
24 different hotels over a period of six days in Phoenix while waiting for a canceled flight to
25 be rescheduled; DHS held another child in three different hotels in San Antonio over the
26 period of four days due to “flight scheduling.” *Id.* at 2-3.

27 Finally, Defendants’ refusal to timely provide Plaintiffs with notice of holding
28 class members in hotels and detailed reasons for their detention in irregular unlicensed
placements likewise violates the FSA and this Court’s prior orders. *See* Sept. 4, 2020

1 Order at 17; Declaration of Rebecca Wolozin, May 1, 2026 [1764-3] (“Wolozin Decl.”)
2 (detailing monthslong email correspondence requesting information specific to hotel
3 detentions with no substantive reply).⁵ Defendants’ withholding information about class
4 members placed in hotels, together with persistent inaccuracies and substantial omissions
5 in the data produced to Plaintiffs and filed with the Court, raises serious concerns.
6 Defendants omitted nine children who appear in the monthly data reports produced to
7 Plaintiffs from the Hotel Report data filed with the Court. This includes multiple children
8 whom Plaintiffs specifically flagged for Defendants in mid-April. *See* Wolozin Decl. ¶¶
9 12-13, Ex. C; Hotel Stays Report. For example, 12-year-old M.M.S. and 14-year-old
10 C.M.S., whose nine-day hotel stay is discussed in Plaintiffs’ opposition to Defendants’
11 Motion to Reconsider, do not appear in the latest Hotel Stays Report. Wolozin Decl. ¶ 12;
12 Hotel Stays Report; *see* Pls. Opp. at 16 (citing Declaration of M.S.P., March 12, 2026
13 [Dkt. 1748-05] (“M.S.P. Decl.”) and Declaration of Michael Musa-Obregon, April 30,
14 2026 [Dkt. 1764-5] (“Musa-Obregon Decl.”). Additionally, four children who appeared
15 in the Hotel Stays Report data filed with the Court did not appear in the March data
16 Defendants provided to Plaintiffs, despite being within the parameters of both data sets.
17 Plaintiffs alerted Defendants to these errors on May 8, 2026. Plaintiffs’ evidence suggests
18 that these children were likely being held in a hotel room without access to the outdoors
19 or to counsel with ICE officers or transportation contractors remaining in the room for the
20 duration. *See* M.S.P. Decl. ¶¶ 10-16; Declaration of Lyndsey Marcelino Schalkwyk ¶ 16,
21 April 28, 2026 [Dkt. 1764-4] (“Marcelino-Schalkwyk Decl.”).

22 Defendants’ February and March 2026 data and explanations regarding holding
23 children in hotels shows increased noncompliance with the FSA. Defendants are placing
24 a growing number of children in unsafe conditions that are inconsistent with their

25 ⁵ Plaintiffs sent another email on May 8, 2026, questioning much of this data. Defendants
26 responded on Friday, May 15 stating only that they had added one identified missing
27 class member to the monthly data and plan to file corrected data to replace the filed ICE
28 Family Residential Center 20-day Report data at Dkt. 1768-2. Defendants also stated they
were continuing to look into data issues Plaintiffs identified in the filed Hotel Stays
Report at Dkt. 1768-3.

1 particular vulnerabilities as minors. FSA ¶¶ 11, 12.A. *See also*, Pls. Opp. at 7-9
2 (describing Defendants’ past statements on the record that they were complying with the
3 FSA by ceasing “hoteling programs” and relying on hotel placement for only “brief, ad
4 hoc hotel stays” subject to this Court’s prior orders); Marcelino-Schalkwyk Decl. ¶¶ 11-
5 13 (describing children with preexisting medical conditions held for prolonged period in
6 a hotel room); *see also*, Tr. of Mar. 30, 2026, Status Conf. 29:16-23 [Dkt. 1757] (ICE
7 Juvenile Coordinator acknowledged that medical exams and services are typically not
8 available during hotel stays.)

9 **B. Conditions of Detention at Dilley Continue to Violate the FSA.**

10 Plaintiffs’ counsel visited Dilley again in April. Welch Decl. ¶ 2. Class members
11 and their families continue to report serious concerns regarding the impact of prolonged
12 detention on children’s mental health, inadequate medical care, lack of information about
13 *Flores* rights and access to counsel, lack of access to healthy and safe child-friendly
14 foods and snacks, illness from drinking the water, lack of clothing, lack of sleep due to
15 lights on in their living areas all night, lack of free calls to family members, and lack of
16 adequate education and developmentally appropriate activities.⁶ *Id.* ¶ 6.

17 **1. Children’s Mental Health Is Deteriorating as They Continue to**
18 **Experience Long Stays and Harsh Treatment at Dilley.**

19 Dilley’s harsh, prison-like environment remains unsuitable for children. *See, e.g.*,
20 C.G.C. Decl. ¶ 15, (“If I had to describe Dilley with one word, it would be ‘horrible.’”);
21 A.O. Decl. ¶ 7 (“I’m detained like someone who committed a crime.”); M.T.H. Apr.

22 ⁶ Exhibit 6 of the ICE JC Report reviews 35 declarations filed by Plaintiffs in an
23 unsuccessful attempt to discredit the sworn statements of class members and their
24 families. Ex. 6, ICE Juv. Coord. Suppl. Report Flores Declarations 35 Cases [Dkt. 1768-
25 10] (“ICE Resp. 35 Cases”). ICE’s chart does not disprove Plaintiffs’ concerns but rather
26 lists when grievances were not filed, demonstrates the inadequacy of medical
27 interventions, disputes a declarant’s statement with no contrary evidence, and misquotes
28 declarations in failed efforts to undermine the declarants. *Id.*; Welch Decl. ¶¶ 24-28.
Notably, ICE admits that it took drawings and artwork “because they were considered
protest-related materials . . .” and repeats the false assertion that there were no lockdowns
from January to February 2026, in direct contradiction to many sworn statements. ICE
Resp. 35 Cases at 3; *see* Pls.’ March 2026 Resp. at 12.

1 Decl. ¶ 9 (“Recently [my son] asked me: when are we going to get out of jail? . . . [W]e
2 cannot leave or go to a park, [] he cannot have his toys . . . it feels like a jail.”); R.G.H.
3 Decl. ¶ 7 (“[My son] misses school, his friends, playing, our apartment . . . , his freedom .
4 . . .”); S.D.C. Decl. ¶ 5 (“I have started to feel like . . . I’m stuck between four walls.”);
5 G.S. Decl. ¶ 59 (“If I could change one thing here it would be to shut down the whole
6 facility.”).

7 Children’s mental health continues to deteriorate at Dilley with devastating results.
8 *See* Mukherjee Decl. ¶ 24 (“Every child who I have represented in federal immigration
9 custody from March 1, 2026 to date has experienced mental health distress in
10 detention.”); C.G.C. Decl. ¶ 8 (child feels depressed, cries, and wants to be alone);
11 M.T.H. Apr. Decl. ¶ 9 (“Sometimes my son will just burst from all of his emotions and
12 start crying.”); R.G.H. Decl. ¶ 24 (son is depressed); R.R.M. Decl. ¶ 10 (“My daughter
13 cries all the time and is sad and doesn’t want to be here. She misses her friends from
14 school and was doing very well there. Now that she’s here, she doesn’t like to leave the
15 room or go outside.”); O.S. May Decl. ¶ 9 (Dilley is “mentally devastating for
16 children.”); S.D.C. Decl. ¶ 5, 9 (child is depressed and has no energy even for things he
17 used to love to do); A.L.G. Decl. ¶ 11 (“[My child’s] anxiety has led her to start biting
18 her nails non-stop . . .”); A.O. Decl. ¶ 13 (“I worry for my son’s mental state . . . he’s
19 waking up at night very frightened and scared and crying a lot. He’s become more
20 aggressive.”); Altillo Decl. ¶ 24.

21 Long lengths of stay and the arbitrariness of release decisions exacerbate the
22 impact of detention on children’s mental health. *See* O.S. May Decl. ¶ 84-85 (“I lost a
23 year of my life at Dilley. I lost a year of memories, of progress, of everything. . . . Dilley
24 distances kids from the real world and takes away all the normalcy from everything.”);
25 G.S. Decl. ¶ 45 (“It makes me feel hopeless to be here for so long, because now it’ll take
26 me and my whole family a long time to get back to normal because of how much money
27 and education we have lost.”); A.O. Decl. ¶ 22 (“[My son’s] friend left and yesterday he
28 was crying a lot and asking for this friend. It’s hard for him to be here for so long . . . The
kids leave and he’s the only one who stays.”); M.T.H. Apr. Decl. ¶ 9 (“My son sees other

1 friends leave here and asks: when we will be able to leave? Why are we still here?");
2 R.G.H. Decl. ¶ 24; S.D.C. Decl. ¶¶ 5-11 ("I have started to feel like all the days are the
3 same . . . I keep a calendar in my notebook where I mark an 'X' next to each passing day
4 to track how long I've been here . . . it makes me cry with anxiety that I might not get out
5 of here. Everything feels so bad . . . [i]f we had only spent a couple of days, maybe things
6 would feel different."); Mukherjee Decl. ¶ 13 ("[My 9-year-old client] could not
7 understand why he was detained at Dilley for weeks on end. He grew increasingly
8 disoriented and distressed at Dilley, hitting himself, crying through the night, and
9 begging to return to his home . . ."). In March and April, *Flores* Counsel met with
10 families who had been detained for 323 days (O.S. May Decl. ¶ 4), 143 days (S.D.C.
11 Decl. ¶ 4), 135 days (A.O. Decl. ¶ 4), 91 days (E.C.M. Decl. ¶ 4), 90 days (C.G.C. Decl.
12 ¶ 4), 77 days (A.L.G. Decl. ¶ 3), 76 days with 10 of those days spent in CBP (M.T.H.
13 Apr. Decl. ¶ 4), two months (W.L. Decl. ¶ 4), and 50 days (J.A.I. Decl. ¶ 4).

14 To make matters worse, families still consistently report harsh treatment by guards
15 at Dilley. One parent shared this shocking treatment:

16 About 5 officers with ICE badges and about 10 staff from CoreCivic came into the
17 hallway between the rooms where we sleep . . . and they started covering our
18 windows by standing in front of them . . . We saw they brought chains and
19 shackles into the room across from us. They grabbed this woman from that room
20 and she and her daughter started crying. She . . . started saying her case was not
21 over and that they could not deport her at this point. But then, they chained her
22 right there. Her 10-year-old cried harder as she watched her mom be shackled. The
23 officers just took them away and put them in a car. It made us all so scared.

24 S.D.C. Decl. ¶ 12; *see also* M.T.H. Apr. Decl. ¶ 6 (officers threatened to chain parents up
25 in front of their son); G.S. Decl. ¶ 49 ("One time ICE told my dad to get lost. My dad was
26 just trying to ask if there was an appeal in our file."); R.G.H. Decl. ¶¶ 18, 35 ("No one
27 here is qualified to work with children – they treat the children like adults."); R.R.M.
28 Decl. ¶¶ 17, 20 ("CoreCivic staff yell at my daughter whenever she doesn't stay near me.
29 . . . [S]taff are not nice to us and refuse to give us what we need."); Y.G.P. Decl. ¶ 10
(staff prohibited storing stroller into the room at night even though cats were sleeping in
it, causing severe allergic reactions for the baby); O.S. May Decl. ¶ 23 ("[S]taff ate pizza,

1 donuts, and outside food that the kids cried when they saw, but they didn't care and ate in
2 front of them cruelly. They would eat candy and lollipops in the middle of the recreation
3 area, knowing that all the kids would do anything to get what they have but can't.");
4 Altillo Decl. ¶¶ 12, 14 (one parent reported guards frequently wake children and another
5 reported ICE threw away a child's belongings).

6 Families report they fear ICE retaliation for raising concerns about conditions at
7 Dilley or trying to advocate for themselves in their immigration cases.⁷ See O.S. May
8 Decl. ¶ 31 ("We believe [my older sister] was separated from us to live in a different part
9 of Dilley because she spoke to the media. . . . It felt like retaliation . . ."); R.G.H Decl. ¶
10 33 ("I know of a friend here who files grievances and has been told if he doesn't stop,
11 he'll be sent somewhere else."); A.O. Decl. ¶ 9 ("They have threatened to separate me
12 from my son . . ."); G.S. Decl. ¶ 19 ("Once when we talked to ICE, they said that if we
13 didn't sign our travel documents we could be separated. My dad was scared of this so he
14 signed for us."); Altillo Decl. ¶ 13 (Clients fear reporting bad behavior "because the
15 guards say they will file reports on [family members'] behavior with ICE and the
16 immigration court.").

17 In response to Plaintiffs' concerns regarding children's serious mental health
18 deterioration at Dilley, the ICE JC Report merely states: "The medical review and
19 inspection materials did not identify systemic behavioral health deficiencies during the
20 periods reviewed." ICE JC Report at 26. Either these materials omit overwhelming facts
21 on the ground, or the ICE JC Report simply ignores them.

22 **2. Dilley Still Provides Inadequate Medical Care to Children.**

23 Dilley continues to provide inadequate medical care to children and their parents.
24 See Mukherjee Decl. ¶ 19 ("Nearly all of my clients who have been detained at Dilley

25 ⁷ Across the past two reports, defendants assert there were 324 grievances, yet only 22
26 were deemed "founded." Given persistent concerns raised by class members over the past
27 year, family's fear of submitting grievances, and the apparent unlikelihood a grievance
28 will be deemed "founded," Plaintiffs question the purpose and legitimacy of the
grievance process. ICE JC Report at 12; March 13, 2026, ICE Juv. Coord. Suppl. Report,
at 33-34 [Dkt. 1748-1] ("Mar. ICE JC Report"); see also O.S. May Decl. ¶¶ 39-42.

1 from March 1, 2026 to date have expressed concern about the medical care provided to
2 them at Dilley.”). Since Dilley re-opened, families have raised medical care concerns to
3 RAICES attorneys *on at least 948 occasions*. Altillo Decl. ¶ 17; Pls.’ March 2026 Resp.
4 at 14.

5 Class members and their families continue to report that Dilley neither provides
6 adequate medical care nor appropriately accommodates children’s special needs.
7 Mukherjee Decl. ¶¶ 11, 18, 22 (discussing child still detained at Dilley after 147 days
8 who developed breathing difficulties and regressed behaviorally and a nonverbal five-
9 year-old with developmental delays who struggled to eat and did not have a bowel
10 movement for nine days); Altillo Decl. ¶¶ 17-23 (discussing medical care delays of a
11 client with bleeding rashes, lack of access to medications, denial of dental intervention to
12 children in pain, and medical staff dismissing child weight loss and health concerns).

13 Families continue to report that Dilley staff minimize or ignore their medical
14 concerns. *See* S.D.C. Decl. ¶ 20 (“The nurses here only ever give Tylenol regardless of
15 the type of sickness.”); W.L. Decl. ¶ 11 (“We went to the medical building the first two
16 times my daughter was sick, but it was useless. They only give out Tylenol or ibuprofen
17 so it’s not useful to go.”); G.S. Decl. ¶ 57 (“My sister has a lot of stomach pain. We think
18 it’s from the food, but we aren’t sure what it is. They are just giving her Ibuprofen and
19 Tylenol.”). In many declarations, families at Dilley report that medical staff give out only
20 over-the-counter painkillers regardless of the medical issue:

21 My whole head is inflamed. It feels like there is water in my ears, and they feel bad.
22 I have pain that goes up my neck and into my teeth. I do not know what is causing
23 it. But no matter what type of pain or sickness we have, whenever we go to medical,
24 they give us ibuprofen. I wish there was some way to get a real diagnosis.

25 A.L.G. Decl. 9.

26 The ICE JC Report asserts that medical care at Dilley remained fully compliant
27 with the FSA in February, March, and April 2026. ICE JC Report at 19. The Report
28 notes, however, that a review “identified several areas for continued attention, including
staffing levels in certain medical positions, further formalization of selected protocols,

1 development of a broader keep on person medication policy, and continued improvement
2 in documentation, coordination, and communication.” *Id.* at 22.

3 Furthermore, the ICE JC Report provides three conflicting hospitalization
4 datapoints, also demonstrating the need for improved documentation.⁸ ICE JC Report at
5 12, 19, 21-22; Ex. 8, Hospitalizations February-April 2026 [Dkt. 1768-12]
6 (“Hospitalizations Report”). First, the Report notes from February to April 17, there were
7 “eleven hospital patients, and twenty-six residents referred to the emergency room.” ICE
8 JC Report at 12. Later, the Report identifies “23 hospital or emergency room visits since
9 January 1, 2026.” *Id.* at 19. Finally, the same Report states there were “five
10 hospitalization events . . . in February, with none reported in March or April.” *Id.* at 21;
11 Hospitalizations Report.

12 **3. Children Are Still Not Being Provided Notice of Their *Flores* Rights.**

13 Once again, the ICE JC Report fails to address Plaintiffs’ concern that children at
14 Dilley are not being apprised of their *Flores* rights. As repeatedly noted, Dilley has no
15 legal orientation program for children and families at Dilley beyond a 13-minute
16 animated immigration law video that never once mentions *Flores*. Welch Decl. ¶ 8;
17 Altillo Decl. ¶¶ 29-31.⁹

18 To date, Plaintiffs’ counsel have not spoken with a single family at Dilley who
19 recalls learning about their child’s *Flores* rights in a video, training, or documentation
20 provided by ICE or CoreCivic. *See* Welch Decl. ¶ 9; *see also, e.g.* O.S. May Decl. ¶ 10

21 ⁸ Similarly, in March, ICE reported there were no ER visits or hospitalizations despite
22 evidence to the contrary. Mar. ICE JC Report at 13; Declaration of Welch. ¶¶ 11-12, Mar.
23 20, 2026, [Dkt. 1748-2] (“Welch Mar. Decl.”)

24 ⁹ As repeatedly noted, the CoreCivic Resident Handbook explicitly authorizes “open
25 access” to “group presentations on U.S. immigration law and procedures and all other
26 relevant issues related to . . . discharge processes, including a resident’s legal rights.”
27 Welch Decl. Attach. A at 31. In addition, ICE’s Family Residential Standards (“FRS”)
28 expressly provide that “[a]n electronic presentation will not be considered a replacement
or substitute for an in-person or live [legal rights] presentation, when available.” 2020
Family Residential Standards § 6.4 at 415,
<https://www.ice.gov/doclib/frs/2020/2020family-residential-standards.pdf>.

1 (“No one ever discussed my rights with me for more than 10 months.”); R.G.H. Decl. ¶¶
2 21-22; E.C.M. Decl. ¶ 14; J.A.I. Decl. ¶ 17; O.B. Decl. ¶¶ 8-9; R.R.M. Decl. ¶ 11 (“No
3 one told me about my or my daughter’s legal rights until RAICES attorneys met with me
4 after I had been here more than two weeks. I only heard about *Flores* from other people
5 here after they saw me crying and told me about it and the 20 days and gave me the
6 RAICES phone number.”); S.D.C. Decl. ¶ 17; W.L. Decl. ¶ 9; A.O. Decl. ¶ 10; G.S.
7 Decl. ¶ 14. Not only does it violate the FSA to withhold information on *Flores* rights, but
8 also it causes extreme distress and confusion among families at Dilley. Welch Decl. ¶ 10.

9 The ICE JC Report again asserts that the 13-minute video, I-770 form, FSA
10 Exhibit 6, and CoreCivic Resident Handbook satisfy ICE’s obligation to inform class
11 members of their *Flores* rights. ICE JC Report at 16. This Court has repeatedly held
12 otherwise. *See, e.g.*, Order Approving Final Notice of Rights, Jan. 5, 2021 [Dkt. 1056].
13 No matter how many times a JC Report from ICE suggests that the FSA requires nothing
14 more than the provision of the unrelated video, two forms that do not explain *Flores*
15 rights, and a CoreCivic handbook, that does not make it so.¹⁰

16 Compounding this lack of information about *Flores* rights, class members continue
17 to face barriers to making free legal phone calls to counsel, including *Flores* attorneys or
18 other private lawyers. Welch Decl. ¶ 11; S.D.C. Decl. ¶ 21 (“I haven’t been able to make
19 any free pro bono calls here by using the system where you are supposed to mark 6. I saw
20 a woman try it recently, and it did not work.”); *see also* Altillo Decl. ¶¶ 32-39 (describing
21 recent changes to attorney visitation at Dilley that limit class members’ access to
22 counsel). Sometimes, class members are unaware they even have the right to call
23 attorneys for free. *See* O.B. Decl. ¶ 12 (“I have not contacted lawyers because I thought I
24 have to pay. This is the first time I am hearing I don’t have to pay for calling lawyers.”);

25 ¹⁰ Neither the video nor the CoreCivic Resident Handbook mentions *Flores* or otherwise
26 explains *Flores* rights. Welch Decl. ¶ 8. The I-770 form only addresses the “right to use
27 the telephone,” “the right to be represented by a lawyer,” and the “right to a hearing
28 before a judge.” Ex. 4, DHS Form I-770 (4/15) [Dkt. 1768-8]. Exhibit 6 of the FSA only
addresses the right to call a lawyer and seek judicial review “if you believe you have not
been properly placed or that you have been treated improperly.” *See* FSA Ex. 6.

1 O.S. May Decl. ¶ 28 (For 10 months, we “were always paying for the phone. No one ever
2 told us anything about free calls to our family or even to our attorney.”). Although the
3 ICE report asserts “indigent residents may request free domestic calls from unit managers
4 at any time, including for legal calls,” not one family Plaintiffs’ counsel have spoken to
5 has ever been aware of this option. ICE JC Report at 17; Welch Decl. ¶ 12.

6 The JC Report asserts, “Gmail access was restored on March 6, 2026 through
7 library computers. Internet access is permitted except for social media and adult content.”
8 ICE JC Report at 17. Despite this assertion, families have consistently reported since
9 March 6 that there is still little to no Gmail access. *See* R.G.H. Decl. ¶ 29; A.L.G. Decl. ¶
10 20; O.S. May Decl. ¶ 43; S.D.C. Decl. ¶ 16 (“There is still no way to communicate with
11 people via our Gmail emails . . .”). Families at Dilley further report that the internet
12 restrictions and lack of simple internet research options have impeded their ability to
13 work on their immigration cases or otherwise advocate for themselves. *See* A.L.G. Decl.
14 ¶ 22 (“The facility also took away our access [to] ChatGPT after they noticed people
15 printing information about how to ask for information and make grievances. The staff are
16 just trying to stop us from having access to tools to advocate for ourselves.”); S.D.C.
17 Decl. ¶¶ 16-17.

18 Limited interpretation access for non-English and non-Spanish speakers further
19 exacerbates families’ confusion about their legal cases, potential release dates, and their
20 *Flores* rights. *See* R.G.H. Decl. ¶ 21 (“They tried to get me to sign a piece of paper that
21 might have been about this. But it was in English and I didn’t understand.”); O.B. Decl.
22 ¶¶ 13-14 (“I can’t understand anything here – no one has explained anything to me in
23 French. There does not seem to be anyone here besides me who speaks French. . . . I have
24 not had a translator or interpreter since we arrived here.”); S.D.C. Decl. ¶ 23 (“[T]he
25 people who do not know Spanish or English really struggle here. My mom tries to help
26 the Turkish families and other families who do not know English or Spanish with the
27 tablets, but they do not really have a way to understand things.”); W.L. Decl. ¶ 16 (“It’s
28 been difficult for us to communicate with the staff because we don’t speak English. If
something really important is happening, they’ll find an interpreter but it’s not something

1 that is usually available.”); A.O. Decl. ¶ 19 (“No one has offered me interpretation for
2 [rare identifying language], even if I’m speaking to the officers here.”); G.S. Decl. ¶ 48.

3 **4. Children Still Lack Access to Child-Friendly Foods, Healthy Snacks,
4 and Safe Drinking Water.**

5 Families continue to report concerns about their children’s nutrition at Dilley.
6 Countless children and parents have reported that the food makes them sick. *See* A.O.
7 Decl. ¶ 15 (“My son has not been eating well. Lots of people are getting sick . . .”); W.L.
8 Decl. ¶¶ 12-13 (“The green beans here are especially gross and they have caused my
9 daughter to throw up and have diarrhea. The cauliflower once had bugs in it and now
10 everyone here is afraid to eat that and won’t accept it. The food is unhygienic here. . . .
11 Our daughter . . . hasn’t been growing or gaining weight.”); O.S. May Decl. ¶ 21 (“Many
12 times, people would stop eating for several days after finding mold or even worms in
13 their food. I saw a real worm in the food before. My older sister once found a human
14 fingernail in her food.”); C.G.C. Decl. ¶ 11 (“The food has made my mom sick. When
15 she ate the meatballs, she felt sick and had to go to the bathroom right away.”); R.R.M.
16 Decl. ¶ 8 (“My daughter does not eat the food because she doesn’t like it; she only eats
17 the salad. I only eat the salad because the other food makes me sick.”); *see also* Altילו
18 Decl. ¶ 28 (family denied bottled water for formula).

19 Children and their parents also express concerns about food taste, variety, and
20 quality. *See, e.g.,* Mukherjee Decl. ¶ 26 (“Every verbal child and parent who I have
21 worked with at Dilley from March 1, 2026 to date has reported that the food is not
22 appropriate or palatable for children and families.”); O.S. May Decl. ¶¶ 21-22 (“The food
23 at Dilley is one of the biggest issues for all the residents. . . . The food was very greasy
24 and very repetitive. I was eating the same things for the last 10 months.”); C.G.C. Decl. ¶
25 11 (“Mostly they give the same food – so when you’ve been here twelve weeks, it repeats
26 a lot.”); M.T.H. Apr. Decl. ¶ 10 (“My son still does not eat well here. The food is too
27 spicy and has too many condiments and sauces for him.”); R.G.H. Decl. ¶ 19 (“It’s all
28 processed, frozen food.”); E.C.M. Decl. ¶ 17 (“The only fruit they give us is from cans.
When my son sees some people with special diets getting fresh grapes, he really craves

1 them. I told him that once we get out of here, he can have all the grapes he wants.”);
2 J.A.I. Decl. ¶ 9-10 (“We are tired of not having fresh fruit here.”); G.S. Decl. ¶ 40 (food
3 is very bad and not fresh); Altillo Decl. ¶¶ 23, 26.

4 Families continue to report that due to the lack of varied, child-friendly food,
5 inappropriate mealtimes, and the prohibition of food in rooms, their children are
6 constantly hungry. *See* G.S. Decl. ¶ 41 (“Right now, there are certain times to eat, and if
7 you don’t go then you’ll starve.”); Mukherjee Decl. ¶¶ 21-22 (one child’s stomach
8 “appeared visibly distended and uncomfortable” during zoom video calls and another
9 child “refused to eat solid food for twelve days” at Dilley); A.O. Decl. ¶ 15 (“The last
10 few weeks my son has been eating milk, juice, and apples. He doesn’t eat much else. No
11 one has offered me any toddler food or pouches for my son.”); J.A.I. Decl. ¶¶ 9-10, 15 (“I
12 don’t go to breakfast because it is too early and it’s just the same thing every day. It’s
13 also hard because they serve dinner very early. We have to buy food at the commissary
14 because we’re hungry by 8 p.m.”); C.G.C. Decl. ¶ 12 (“They tell you that you can have as
15 many servings of the food as you want, but when it’s good – like the pizza – you can only
16 get one serving. . . . My mom will buy me ramen and chips from the commissary for the
17 days that I’m not eating the food.”); M.T.H. Apr. Decl. ¶ 10 (“[D]inner is served at 5
18 p.m., so by 8 p.m. [my son] is hungry. We have to buy food for him to eat at the
19 commissary.”); E.C.M. Decl. ¶ 17 (“[B]reakfast and dinner are served so early. I need to
20 buy snacks at the commissary because [my son] is hungry in the evenings.”). It is unclear
21 why food from the commissary is permitted in the rooms at all times, but families cannot
22 take food from the cafeteria to their rooms and save it for later when children are hungry.
23 Welch Decl. ¶ 16.

24 The ICE JC Status Report ignores families’ constant and repeated concerns,
25 instead echoing previous assertions that Dilley receives no food complaints and has
26 multiple diets available. ICE JC Report at 22-24. The ICE JC Report does not address the
27 voluminous evidence Plaintiffs have gathered that children’s physical and mental health
28 are suffering due to the food served at Dilley. The Report also omits that families at
Dilley have raised concerns about the lack of fresh fruit during town hall meetings with

1 CoreCivic staff. *See* E.C.M. Decl. ¶ 19 (“At the community meeting about a week ago, a
2 [] mother raised how hard it was for children not to get fresh fruit when they are seeing
3 other people eat it who have special diets.”).

4 Despite installation of water filters in the living quarters following months of
5 complaints from class members, families still repeatedly report that the water tastes bad
6 and makes them sick. *See, e.g.*, E.C.M. Decl. ¶¶ 18 (“The tap water always tasted weird
7 and made me feel a weird sensation when I would drink it . . . one day, I saw a bunch of
8 white particles in the bottom of the cup of water from the melted ice . . .”); C.G.C. Decl. ¶
9 13 (“The water from the tap here tastes weird . . .”); J.A.I Decl. ¶ 11 (“When I first came
10 to Dilley, I drank the water and it made my stomach hurt right away. I didn’t want to
11 drink it after that.”); R.R.M. Decl. ¶ 9 (water makes family sick); A.L.G. Decl. ¶ 14
12 (“[T]he tap water gives our daughter diarrhea. The guards say the water is fine, but they
13 will not drink it. It tastes so bad.”); A.O. Decl. ¶ 15 (“My son has had diarrhea here, and I
14 think it’s because of the water.”); G.S. Decl. ¶ 43 (“They put filters on the water, but it
15 still smells like chloride. . . . One time it caused us to throw up.”); Mukherjee Decl. ¶ 25
16 (“I have reviewed medical records from Dilley for my clients in which children report
17 that they are suffering from stomach pain, vomiting, diarrhea, and other stomach issues as
18 a result of drinking the water that is available for free at Dilley.”); Altillo Decl. ¶ 27.

19 Recently, CoreCivic lowered the price of bottled water at Dilley, which has made it
20 possible for some families to buy bottled water. *See* G.S. Decl. ¶ 43 (“A lot of people
21 complained when Congress came, so they had to lower the price.”); M.T.H. Apr. Decl. ¶
22 11 (“They recently brought down the cost of a pack of water from \$30 to \$9. About a
23 month or so ago, a lot of the children became sick and were vomiting a lot. They told the
24 parents the children needed to be drinking more water. The families complained and
25 complained because they could not afford the water. The guards told us they were
26 dropping the price of the water because of this . . .”); E.C.M. Decl. ¶¶ 18-19 (“[I]t used to
27 cost \$30 for a 24-pack . . . They recently reduced the price of water to \$9 and now I have
28 the ‘luxury’ of drinking clean water, too.”). Despite this welcome gesture, some families
still cannot consistently afford to buy bottled water. *See* R.R.M. Decl. ¶ 9 (“My daughter

1 and I can't drink the water here because it makes us sick; our friends give us bottled
2 water and we split a bottle between us."); A.O. Decl. ¶ 15 ("I could buy water, but I don't
3 have money to do that very often."); Mukherjee Decl. ¶ 25 ("Families use their limited
4 commissary funds to purchase bottled drinking water."); Altillo Decl. ¶ 27.

5 Despite endless complaints from families about the tap water, the ICE JC Report
6 categorically denies them. ICE JC Report at 24-25. The Report asserts that the water is
7 tested monthly and that "bottled water is not itself treated as a medical intervention for
8 diarrhea." *Id.* at 25. Yet families continue to report being told to drink bottled water at
9 medical visits and that the tap water makes their children sick. *See, e.g.*, M.T.H. Apr.
10 Decl. ¶ 11; Declaration of C.H.H. ¶ 26, Jan. 15, 2026, [Dkt. 1748-13] ("C.H.H. Decl.");
11 Declaration of M.L.S. ¶ 14, Feb. 12, 2026, [Dkt. 1748-36] ("M.L.S. Decl."). It is unclear
12 what it will take for ICE to provide children with safe water to drink.

13 **5. ICE Fails to Provide Adequate Sleeping Conditions for Children.**

14 Families also continue to raise concerns that their children cannot sleep because
15 lights are kept on in living areas all night, and the eye masks offered do not provide an
16 adequate solution. *See* C.G.C. Decl. ¶ 9 ("It's hard to sleep here because the lights are on
17 all night . . ."); R.G.H. Decl. ¶ 26 ("We have bad sleep here; the lights hit our eyes all
18 night. We feel like caged chickens in an incubator."); E.C.M. Decl. ¶ 16 ("It is very hard
19 to sleep with the lights on all night. It's harder for my son because he has to sleep on the
20 top bunk. The officers will not let parents sleep on the top bunk . . . They offer eye masks
21 but they are so tight and uncomfortable."); R.R.M. Decl. ¶ 14 (lights cause headaches);
22 J.A.I. Decl. ¶ 13 (the eye masks are too tight); O.S. May Decl. ¶¶ 26-27 (lights are barely
23 dimmed at night and eye masks are made of an irritating material); A.L.G. Decl. ¶ 6
24 (child cannot sleep because lights stay on all night); G.S. Decl. ¶ 44 ("Back at home, I
25 like to sleep in darkness. It's not dark here. You can't put something up like a towel to
26 block the light. . . . We don't feel comfortable using the eye masks."); Mukherjee Decl.
27 ¶¶ 10, 13-14 (clients cannot sleep because lights are always on).

28 More recently, children and parents report that back pain due to poor quality
mattresses is also impeding children's sleep. *See, e.g.*, C.G.C. Decl. ¶ 9 ("My back hurts a

1 lot from the bed because the mattress is so thin.”); R.G.H. Decl. ¶ 26 (“My son is not
2 comfortable because the bed is hard; the metal sticks in his back.”); E.C.M. Decl. ¶ 16
3 (“My son . . . [has] back pain from the bunk beds.”); R.R.M. Decl. ¶ 14 (“The beds are
4 too hard and hurt our backs and necks. We wake up sore all over our bodies.”); A.L.G.
5 Decl. ¶ 7 (“We also wake up with back pain here, because the mattresses are so thin. My
6 daughter sleeps on top of me trying to be more comfortable.”).

7 Families report their children are exhausted from lack of sleep, which is impacting
8 their physical and mental health. *See* S.D.C. Decl. ¶ 11 (“Having to sleep with the lights
9 on all the time for months has made me so tired. I do not know what it means to have a
10 pleasant night of sleep anymore.”); W.L. Decl. ¶ 14 (“She can’t sleep for long periods of
11 time because the lights are on and people are coming in and out of the room to inspect.
12 It’s as though she’s always only half asleep.”); J.A.I. Decl. ¶ 13 (“Even after two months,
13 I’m not used to it and it is still really hard to sleep.”); A.O. Decl. ¶ 14 (“I try to get [my
14 son] to sleep around 8 p.m. but he often can’t fall asleep until midnight or 1 a.m.”).

15 In response, the ICE JC Report states that “no grievances related to overnight
16 lighting have been filed since January” but that “if a minor is experiencing sleep
17 disruption . . . [the child’s parent] may bring the child to the medical department for
18 assessment.” ICE JC Report at 26. Given that the medical department does not have the
19 authority to turn the lights off at night so that children can sleep, it is unclear what will
20 come from such an assessment. Welch Decl. ¶ 18.

21 Lack of sleep harms children’s brain development and undermines long-term
22 physical and mental health. Welch Mar. Decl. Attachs. C & D. For some children, lack of
23 sleep is the most pressing issue they face at Dilley. *See* C.G.C. Decl. ¶ 19 (“If I could
24 change one thing here, it would be to turn off the lights at night.”).

25 **6. Children Still Lack Access to Adequate Hygiene Products.**

26 Although the ICE JC Report states that “the standard hygiene kit includes soap,
27 shampoo, toothbrush and toothpaste, deodorant, feminine hygiene products, toilet paper,
28 towels and a laundry bag,” families continue to report that they do not receive soap and
shampoo in hygiene kits. ICE JC Report at 27; Welch Decl. ¶¶ 19-20. Instead, the only

1 free option is harsh all-purpose hand soap in the showers, which causes children’s skin to
2 get dry and break out in rashes. *See, e.g.*, G.S. Decl. ¶ 23 (“We haven’t gotten any
3 shampoo. They said those are only for babies. If we want shampoo, we have to buy it at
4 the store.”); E.C.M. Decl. ¶ 20; R.G.H. Decl. ¶¶ 14-15; J.A.I. Decl. ¶ 14 (“When we first
5 got here, they gave us lotion, toothpaste, deodorant, and a tooth brush. . . . The hygiene
6 kit doesn’t include soap or shampoo. They said we should use the hand wash in the
7 shower, but my mom used it and it caused little spots on her arms. Now we buy soap
8 [and] shampoo . . . from the commissary”); R.R.M. Decl. ¶ 21; A.L.G. Decl. ¶ 13; A.O.
9 Decl. ¶ 16 (“The only soap that is available is the same soap that is used to wash hands or
10 do dishes. They have never offered me any different soap for my son either.”).

11 **7. Children Lack Access to Appropriate and Clean Clothing.**

12 Plaintiffs’ counsel have heard repeated complaints regarding the lack of clothing at
13 Dilley. R.G.H. Decl. ¶¶ 16-17 (child’s foot fungal infection keeps returning because he
14 has to wear shoes when they are wet); J.A.I. Decl. ¶ 12 (“They do not give kids enough
15 clothes.”); R.R.M. Decl. ¶ 20 (“Neither my daughter nor I have enough clothes and they
16 are too big for us.”); W.L. Decl. ¶ 19 (“Our daughter wasn’t given the right size of
17 clothing at first and we had to fill out a form and then wait a week to get clothes that fit
18 her. Shoes are the hardest part. The shoes break every couple of weeks and when it
19 rains.”); O.S. May Decl. ¶ 26 (younger siblings had to wash their clothes every day, and
20 class member waited a whole week for new shoes when his broke); *see also* S.D.C. Decl.
21 ¶ 18 (“I have very sensitive skin, and the borders of the laundry machines, which are
22 always dirty, give me rashes and hives. My skin feels so itchy, and sometimes it is red.
23 The feeling does not go away.”).

24 One mother explained the lengthy, frustrating procedure:

25 The process to get more clothes is complicated. You have to make a written
26 request and explain why you need more clothes. Then they go to your room and
27 check your clothes to see if the reason you gave was true. It can take days for them
28 to check the clothes in your room. It’s also hard because children are only allowed
to have one pair of shoes – even when it is raining a lot and their shoes are really
soggy.

For two weeks, I had been asking for new shoes for my son because the soles were

1 broken. I had been waiting and waiting, but then the day a senator came to Dilley –
2 I was suddenly able to get the new shoes. I notice that things families have been
3 asking for often happen around the time the politicians visit.

4 M.T.H. Apr. Decl. ¶¶ 17-18.

5 **8. Children Still Lack Access to Free Phone Calls to Their Family**
6 **Members.**

7 ICE continues to deny children free phone calls to non-detained family members
8 beyond their initial call upon entering Dilley. But class members have the explicit right to
9 speak to family members for free. FSA Ex. 1 ¶ A.11; *see also* Attach. 1, Order Approving
10 Final Notice of Rights, at 2 [Dkt. 1056-1] (“Notice of Rights”).¹¹ It is unacceptable to
11 deny children communication with family for months at a time. FSA ¶¶ 11, 12.A, 18.

12 The ICE JC Report states, “indigent residents may request free domestic calls from
13 unit managers at any time,” yet class counsel have never met with anyone at Dilley who
14 made a free phone call to family beyond the initial five-minute call. ICE JC Report at 17;
15 Welch Decl. ¶ 12. Families at Dilley cannot make free phone calls to family members,
16 have never been able to do so, and rack up high phone bills as a result. *See* O.S. May
17 Decl. ¶ 28 (“Many people that didn’t have money would go for weeks or even months
18 without communicating with their families. It was one of the most taxing things for
19 people there. Some people paid more than \$500 just for phone calls to be able to stay in
20 touch with their loved ones.”); C.G.C. Decl. ¶ 17 (“I talk to my stepdad and siblings on
21 the phone every day. I don’t know how much it costs, but I know we have to pay for the
22 calls and it adds up.”); E.C.M. Decl. ¶ 21 (“When we got here, we were given \$5 each for
23 a call, but after that children have to pay for calls to family members. We end up
24 spending \$26-30 every two days on phone calls to my children in Miami.”).

25 Some class members cannot speak to their non-detained family at all, because they
26 cannot afford to do so. *See* R.G.H. Decl. ¶ 27 (“I can’t call my family because they are

27 ¹¹ The Notice of Rights was created pursuant to Order re Pls. Mot. to Enforce and Aug.
28 2020 ICE Juv. Coord. Interim Report, at 2, September 18, 2020, [Dkt. 987]. The “Court
approved the final language of the Notice of Rights.” Order re Jan. 29, 2021 Status Conf.,
at 2 [Dkt. 1077].

1 not in this country and it costs too much. I have to pay to call anyone I know here.”);
2 W.L. Decl. ¶ 15 (“We have access to phones here but it’s too expensive for us to make
3 phone calls. It costs too much money for us to be able to actually use the phones.”).

4 **9. Children’s Education at Dilley Has Improved but Remains**
5 **Inadequate and Recreation Remains Insufficient.**

6 The ICE JC Report notes that the education program at Dilley still has outstanding
7 “implementation, staffing, and expansion needs.” ICE JC Report at 12. During Plaintiffs’
8 March and April site visit tours of the new classrooms, Plaintiffs noted improvements
9 from previous tours. However, the classrooms are currently divided among only three age
10 groups: Pre-K to 2nd grade, 3rd grade to 6th grade, and 7th grade to 12th grade. *Id.* at 29;
11 *see also* A.L.G. Decl. ¶ 12 (“The class she goes to is for children who are ages 4 to 7, and
12 it makes our 4-year-old feel frustrated because she does not understand the things that the
13 older kids do.”).

14 The current program remains inadequate, especially for middle and high school
15 youth, many of whom were attending school in the U.S. for years before being
16 apprehended. *See* R.R.M. Decl. ¶ 19 (“[My daughter] is not learning anything.”); J.A.I.
17 Decl. ¶ 16 (“When I first got here, I went to the classroom but no one was teaching us. . .
18 . Now they have Khan Academy on some of the computers . . . that is better but it is not
19 like high school in the U.S. . . . It’s not the same at all.”); C.G.C. Decl. ¶ 14 (“It’s not the
20 same as actual school. They do kind of teach us, but not the level I was being taught at
21 my school. I miss my robotics and science classes the most.”); O.S. May Decl. ¶ 44 (“I
22 went to both the old and new version of school at Dilley. The new way wasn’t really
23 improved. . . . It wasn’t a school.”); *see also* M.T.H. Apr. Decl. ¶ 14 (“My son had started
24 going to school at Dilley and was excited about the new program, but soon he didn’t want
25 to go again. He said the teachers were just teaching the same things and he wasn’t
26 learning anything new.”).

27 Language access at school for non-English and Spanish speakers also remains an
28 issue. *See* W.L. Decl. ¶ 10 (“My biggest concern for my daughter here is that there is no
school. . . . Our daughter went for one day and the teacher told her that if she can’t speak

1 English, she shouldn't speak at all. . . . I asked her to go back and try again but she cried
2 and said she is scared.”).

3 The ICE JC Report also notes improvements to the recreation offered at Dilley, but
4 class members still report there is little to do. ICE JC Report at 31; *see* R.R.M. Decl. ¶ 19
5 (“There is nothing more than coloring here for my daughter.”); W.L. Decl. ¶ 20 (“There
6 is not a lot for our daughter to do here. She watches TV. She has used the recreation
7 space but she’s pretty bored here.”); G.S. Decl. ¶ 55 (“I feel very bored here a lot. . . . The
8 timing to go anywhere is all limited too.”); A.O. Decl. ¶ 21 (“[My son] feels very bored.
9 Some days we can’t go outside because the sun is so strong here.”). Finally, parents
10 continue to report that their toddlers and young children have little to do and desperately
11 need more toys. *See, e.g.,* M.T.H. Apr. Decl. ¶¶ 15-16 (“Not having toys here is one of
12 the things that makes my son feel like he is in jail. He doesn’t understand why he can’t
13 have his own toys.”); O.S. May Decl. ¶ 38 (“There are no teddy bears or toys for kids at
14 Dilley. . . . Because there were no toys, [my younger siblings] were really sad. They
15 knew they were supposed to have toys, and they would miss theirs at home so it’s
16 mentally damaging for them.”).

17 III. CONCLUSION

18 The ICE JC Report’s depiction of conditions at Dilley remains in stark contrast to
19 the voluminous evidence from class members and their families incarcerated there. As
20 this Court has previously noted, “None of [Defendants’] generalized evidence, however,
21 undermines the veracity of Plaintiffs’ first-hand experiences.” June 2017 Order at *9.
22 Defendants point to policies of compliance, but “[t]he mere existence of those policies
23 tells the Court nothing about whether those policies are actually implemented, and the
24 current record shows quite clearly that they were not.” Order re Pls.’ Mot. to Enforce
25 Settlement of Class Action and Defs.’ Mot. to Amend Settlement Agreement at 18, July
26 24, 2015 [Dkt. 177].

27 The parties have been following this Court’s order to mediate about conditions at
28 Dilley, but thus far, mediation has not led Defendants to substantially comply with the
FSA. Children continue to experience the same harmful conditions.

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Dated: May 18, 2026

CENTER FOR HUMAN RIGHTS AND
CONSTITUTIONAL LAW
Carlos Holguín
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Diane de Gramont
Rebecca Wolozin

CHILDREN’S RIGHTS
Leecia Welch
Eleanor Roberts

/s/ Leecia Welch

Leecia Welch
Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on May 18, 2026, I caused a copy of Plaintiffs' Response to the May 4, 2026 ICE Juvenile Coordinator Status Report and Data to be served to all counsel through the Court's CM/ECF system.

Dated: May 18, 2026

/s/ Leecia Welch
Leecia Welch
Attorney for Plaintiffs

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TABLE OF EXHIBITS

Exhibit Index to Plaintiffs’ Response to May 4, 2026 ICE Juvenile Coordinator Status Report and Data

| Exhibit No. | Exhibit Description |
|--------------------|---|
| 1 | Declaration of Leecia Welch, May 17, 2026 (“Welch Decl.”) |
| 2 | Declaration of Elora Mukherjee, May 18, 2026 (“Mukherjee Decl.”) |
| 3 | C.G.C. Declaration (Dilley), April 22, 2026 (“C.G.C Decl.”) |
| 4 | A.O. Declaration (Dilley), May 08, 2026 (“A.O. Decl.”) |
| 5 | M.T.H. Declaration (Dilley), April 22, 2026 (“M.T.H. Apr. Decl.”) |
| 6 | R.G.H. Declaration (Dilley), April 22, 2026 (“R.G.H. Decl.”) |
| 7 | S.D.C. Declaration (Dilley), March 11, 2026 (“S.D.C. Decl.”) |
| 8 | G.S. Declaration (Dilley), April 22, 2026 (“G.S. Decl.”) |
| 9 | R.R.M. Declaration (Dilley), April 23, 2026 (“R.R.M Decl.”) |
| 10 | O.S. Declaration (Dilley), May 16, 2026 (“O.S. May Decl.”) |
| 11 | A.L.G. Declaration (Dilley), March 11, 2026 (“A.L.G. Decl.”) |
| 12 | Declaration of Rodolfo Altillo, May 14, 2026 (“Altillo Decl.”) |
| 13 | E.C.M. Declaration (Dilley), April 23, 2026 (“E.C.M. Apr. Decl.”) |
| 14 | W.L. Declaration (Dilley), March 12, 2026 (“W.L. Decl.”) |
| 15 | J.A.I. Declaration (Dilley), April 23, 2026 (“J.A.I. Decl.”) |
| 16 | Y.G.P. Declaration (Dilley), April 23, 2026 (“Y.G.P. Decl.”) |
| 17 | O.B. Declaration (Dilley), April 23, 2026 (“O.B. Decl.”) |

Previously Filed Declarations

| Docket No. | Description |
|-------------------|--|
| 1764-3 | Declaration of Rebecca Wolozin, May 1, 2026 (“Wolozin Decl.”) |
| 1748-5 | Declaration of M.S.P., March 12, 2026 (“M.S.P. Decl.”) |
| 1764-5 | Declaration of Michael Musa-Obregon, April 30, 2026 (“Musa-Obregon Decl.”) |
| 1764-4 | Declaration of Lyndsey Marcelino-Schalkwyk, April 28, 2026 (“Marcelino-Schalkwyk Decl.”) |
| 1748-3 | Declaration of Leecia Welch, March 20, 2026 (“Welch Mar. Decl.”) |
| 1748-25 | Declaration of A.K., January 14, 2026 (“A.K. Decl.”) |

EXHIBIT 1

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14 UNITED STATES DISTRICT COURT
15 CENTRAL DISTRICT OF CALIFORNIA
16 WESTERN DIVISION

17 Jenny Flores, *et al.*,
18 Plaintiffs,
19 v.
20 Todd Blanche, Acting Attorney General
21 of the United States, *et al.*,
22 Defendants.
23
24
25

No. CV 85-4544-DMG-AGR_x
**DECLARATION OF LEECIA WELCH IN
SUPPORT OF PLAINTIFFS' RESPONSE
TO MAY 4, 2026 ICE JUVENILE
STATUS REPORT AND DATA**

Honorable Dolly M. Gee
Chief United States District Judge

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1 **DECLARATION OF LEECIA WELCH**

2 I, Leecia Welch, declare as follows:

3 1. I am Chief Legal Counsel at Children’s Rights. I represent Plaintiffs in the
4 above-titled action. If called to testify in this case, I would testify competently about
5 these facts. This declaration is an update to my previous declarations filed on September
6 15, 2025, December 8, 2025, and March 20, 2026.

7 2. Since I filed my last declaration on March 20, 2026, Plaintiffs’ counsel have
8 visited the South Texas Family Detention Center (“Dilley”) a tenth time. I have attended
9 all of these site visits. In 2025, we interviewed class members at Dilley six times: May 1-
10 2, June 4-5, July 28-29, September 9-11, October 9-10, and November 18-19. In 2026,
11 we have interviewed class members four times so far: January 14-15, February 11-12,
12 March 11-12, and April 22-23. We have spoken to approximately 165 families regarding
13 the ongoing *Flores* violations and harms they have endured at Dilley.

14 3. We have been sounding the alarm about the inhumane conditions at Dilley
15 for over a year. We notified Defendants of the ongoing *Flores* violations reported to us
16 by children and parents at Dilley after each site visit. We sent Defendants meet and
17 confer letters on May 7, May 16, May 28, June 4, June 20, August 14, September 16,
18 September 18, October 9, October 23, and November 25, 2025, and on January 22,
19 February 19, April 9, and April 28, 2026. We also raised emergency time-sensitive
20 concerns about particular children via email on June 6, June 17, July 30, August 5,
21 October 15, and November 21, 2025, and on January 16, February 13, March 13, and
22 April 23, 2026. Defendants generally send an indifferent response. For example, after
23 the April site visit, Plaintiffs asked ICE to refer a mother who was suddenly unable to
24 move her leg to a specialist after ICE medically isolated her and her child for nine days,
25 so her daughter could leave isolation. Plaintiffs also asked ICE to seek follow up care for
26 a child with a heart murmur and provide the child’s father with treatment for a foot
27 fracture as his inability to move was impacting his ability to care for his son. ICE’s only
28 response was that the FSA was not violated. Plaintiffs and Defendants met and conferred

1 five times in 2025 about the *Flores* violations at Dilley identified in our correspondence:
2 May 14, May 30, July 24, September 17, and October 6, 2025.

3 4. We have also raised concerns repeatedly in confidential court-ordered
4 mediation sessions over the past four months. In accordance with the Court’s December
5 15, 2025 Order, Dkt. 1713, the parties began conducting mediation in January 2026. The
6 parties held mediation sessions on January 23, February 4, and March 2, 2026 and met
7 briefly on March 10 and April 27, 2026. ICE allowed Dr. Paul Wise to conduct medical
8 site visits at Dilley in March and April. On April 15, Plaintiffs provided a proposal to
9 Defendants regarding our concerns about the lack of notice of *Flores* rights at Dilley.
10 Defendants are currently assessing Plaintiffs’ proposal. However, the latest ICE JC
11 Report suggests that Defendants’ position continues to be that they are fully compliant
12 with the *Flores* Settlement Agreement (“FSA”) in all respects, with the possible
13 exception of education. May 4, 2026, ICE Juv. Coord. Suppl. Report [Dkt. 1768-1]
14 (“ICE JC Report”).¹

15 5. Plaintiffs have seen minimal improvements in the conditions at Dilley over
16 the last 12 months. The concerns raised in our May 7, 2025 meet and confer letter are
17 virtually identical to the concerns raised in our April 28, 2026 letter. Despite some
18 reduction in children’s length of stay, a slightly improved education system, and an
19 agreement to have Dr. Wise conduct medical site visits at Dilley, the parties still
20 fundamentally disagree as to FSA compliance at Dilley.

21 6. Defendants’ assertions of compliance with the FSA in the ICE JC Report are
22 again refuted by extensive evidence provided by class members and their parents.
23 Families continue to report their children are hungry, exhausted, anxious, and depressed.
24 Ongoing FSA violations include inadequate medical care, lack of information about
25 *Flores* rights and access to counsel, lack of access to healthy, child-friendly food and safe

26
27 ¹ Since Dilley re-opened, Defendants have filed five JC Reports. If there is no
28 identifying month or date before a citation of an ICE JC Report in this declaration, I am
referring to the report filed on May 4, 2026.

1 drinking water, lack of clothing, the inability of class members to sleep due to lights on in
2 their living areas all night, lack of free calls to family members, and inadequate education
3 and developmentally appropriate activities.

4 7. While the census and time in custody in March and April were both lower
5 than in the previous months, far too many children remain in custody past 20 days. *See*
6 ICE JC Report at 6. On our most recent site in April, four class members had been
7 detained for 320 days or more, one had been detained for 100 to 319 days, two had been
8 detained for 75 to 99 days, six had been detained for 50 to 74 days, and 15 had been
9 detained for 20 to 49 days. These individuals' lengths of stay are entirely unacceptable,
10 and children's mental health continues to deteriorate due to prolonged detention.

11 **Flores Violations at Dilley**

12 **Lack of Notice of Flores Rights**

13 8. Since the last status conference, no progress has been made regarding the
14 need for children at Dilley to be apprised of their *Flores* rights. There is still no legal
15 orientation program for children and families at Dilley. Defendants insist that an
16 orientation about *Flores* rights is not needed or required. Their position is that class
17 members are informed of their *Flores* rights because children and families are shown a
18 13-minute animated immigration law video at intake, are given a copy of the CoreCivic
19 Resident Handbook, and are shown an I-770 form and Exhibit 6 of the FSA. Many
20 families I have met have never heard of the video and have no recollection of the
21 handbook or the forms. Even if they remembered them, taken collectively, the videos
22 and documents do not address the vast majority of children's *Flores* rights. I have
23 watched the video a few times, and it still makes no mention of *Flores* or *Flores* rights. I
24 have also reviewed the CoreCivic Resident Handbook, which similarly does not mention
25 *Flores*. A true and correct copy of the July 2025 CoreCivic Resident Handbook is
26 attached to my declaration as Attachment A. The I-770 form only addresses the "right to
27 use the telephone," "the right to be represented by a lawyer," and the "right to a hearing
28

1 before a judge.” Ex. 4, DHS Form I-770 (4/25) [Dkt.1768-8]. Exhibit 6 of the FSA only
2 addresses the right to call a lawyer and seek judicial review “if you believe you have not
3 been properly placed or that you have been treated improperly.” See FSA Ex. 6.

4 9. To date, Plaintiffs’ counsel have not spoken with a single family at Dilley
5 who recalls learning about their child’s *Flores* rights in a video, handbook, training, or
6 document provided by ICE or CoreCivic.

7 10. Not only does it violate the FSA to withhold information on *Flores* rights,
8 but also it causes extreme distress and confusion among families we have met at Dilley. I
9 have seen firsthand how disoriented families are at Dilley due to the lack information
10 provided. Families we meet with constantly ask us basic questions like: Why are we at
11 Dilley? When will we leave Dilley? How can we access legal help for our family?
12 Families often seem utterly shocked when I tell them that children at Dilley have certain
13 rights under *Flores*.

14 11. Compounding this lack of information about *Flores* rights, class members
15 also continue to face barriers to making free legal phone calls to counsel, including
16 *Flores* attorneys or other private lawyers. One family who was at Dilley for 323 days did
17 not receive one single free phone call to their lawyers while detained. This is especially
18 concerning given that many families at Dilley have told us they cannot access email right
19 now. Their ability to contact lawyers for free is extremely limited, if not altogether
20 impossible.

21 12. Although the ICE JC report asserts “indigent residents may request free
22 domestic calls from unit managers at any time, including for legal calls,” ICE JC Report
23 at 17, not one family Plaintiffs’ counsel have spoken to has ever been aware of this
24 option.

25 **Ongoing Concerns about Food and Water**

26 13. Families have continually raised concerns about the food at Dilley since our
27 first visit a year ago. Complaints we hear every visit include: there is little fresh fruit; the
28

1 menu is repetitive; the food is over-sauced and spicy; and some children are simply not
2 eating. These issues, like many others, are exacerbated by increased lengths of stay.

3 14. In March and April, many families shared once again that the food and water
4 are making children sick. They also expressed concerns about the food taste, variety, and
5 quality. Food that is soft and easy for teething toddlers to swallow is not available.
6 Families long for simple child-friendly foods like soups, plain noodles, yogurt, and
7 bananas. The food for children and toddlers at Dilley remains the same prison food
8 served to adults. Families also repeatedly shared that the water makes their stomachs
9 hurt and gives their children diarrhea.

10 15. The ICE JC Report again ignores the repeated concerns raised by families
11 and recycles the same responses about not receiving food complaints and offering many
12 different special meals. ICE JC Report at 22-24. There continues to be a vast
13 discrepancy between the ICE JC Report's assertions about the food and water and the
14 information shared with us during every site visit. Further, we talked to families in April
15 who said they have never heard about a food survey being conducted.

16 16. Families also repeatedly tell us that they are not allowed to bring any food
17 outside of the cafeteria. This rule is purportedly to guard against insects or pests in the
18 living quarters. It is unclear why food purchased from the commissary is permitted in the
19 rooms at all times, but families cannot take food from the cafeteria to their rooms and
20 save it for later when their children are hungry. Many families report that, due to early
21 mealtimes, their children are hungry after dinner around 8 or 9 p.m., and they can only
22 give them food purchased at the commissary at this time. Families who cannot afford the
23 commissary food have nothing to offer their hungry children.

24 **Poor Sleeping Conditions for Children**

25 17. In April, numerous families again reported that children cannot sleep
26 because lights are kept on in living areas throughout the night. This has been true since
27 Dilley opened and is a serious health issue. Families also have begun reporting that the
28

1 bunk beds are extremely uncomfortable and causing their children to have back pain.
2 Countless families report their children are exhausted from lack of sleep, and children at
3 Dilley continue to look exhausted.

4 18. The ICE JC Report states that no grievances about “overnight lighting”
5 have been filed since January. *Id.* at 26. Yet, everyone we interview reports that the
6 lower intensity light bulbs and turning off some of the overhead lights are not adequate
7 interventions. The ICE JC Report further offers that “if a minor is experiencing sleep
8 disruption . . . [the child’s parent] may bring the child to the medical department for
9 assessment.” *Id.* at 26. But until the medical department has the authority to prescribe
10 turning off the lights off at night so that children can sleep, it is unclear what will come
11 from such an “assessment.” The status quo continues to harm children and must be
12 addressed immediately.

13 **Lack of Adequate Hygiene Products**

14 19. The December 2025 ICE JC Report shows photos with soap dispensers that
15 are labeled “Citrus Fresh Foaming Handwash,” as proof that families have access to soap
16 and shampoo for showering. December 1, 2025 ICE Juv. Coord. Suppl. Report, at 29
17 [Dkt. 1692-4] (“Dec. ICE JC Report”). The March ICE JC Report instead states that
18 “[r]esidents are provided with basic hygiene items such as soap and shampoo at no cost
19 *upon intake and through routine distribution.*” March 13, 2026 ICE Juv. Coord. Report,
20 at 16 [Dkt. 1736-1] (emphasis added); *cf. id.* at 54 (soap and shampoo not included in list
21 of hygiene products). The latest ICE JC Report again claims that the “standard hygiene
22 kit includes soap [and] shampoo.” ICE JC Report at 27.

23 20. ICE continues to assert that soap and shampoo are provided in the hygiene
24 kits – when over the course of twenty days of interviews, families consistently reported to
25 me that hygiene kits do not contain soap or shampoo. Families have repeatedly told me
26 that the only option for washing their children’s body and hair is the harsh all-purpose
27 hand soap in the showers. This makes their skin red and irritated, and families tell me
28 that they spend a lot of money at the commissary on necessary hygiene products like

1 soap, shampoo, and conditioner. There is no way so many families across ten site visits
2 would tell me the same thing if it were untrue.

3 **Lack of Adequate Education and Developmentally Appropriate Activities**

4 21. The ICE JC Report lists the many deficiencies of the education program at
5 Dilley, including limited time for core subjects, lack of textbooks, no certified teachers,
6 and no special ed services. ICE JC Report at 30. The report itself notes the need to
7 enhance “assessment practices, instructional differentiation, staffing qualifications, and
8 the use of available educational resources.” *Id.* at 31. The current program remains
9 inadequate for middle and high school aged youth at Dilley, many of whom were
10 attending school in the U.S. for years before being apprehended. During our April tour,
11 there were four youth in the 7th-12th grade classroom using Khan Academy on
12 computers with little to no teacher interaction. While an improvement, this is no
13 substitute for a comprehensive educational program.

14 22. The ICE JC Report again notes improvements to the recreation offered at
15 Dilley, but we do not hear positive reports from families. *Id.* at 31. During our recent
16 site visit, we again did not observe any of these activities occurring. Reports from
17 families over many months of visits contradict the purported offerings.

18 23. Parents continue to express concerns that their toddlers and young children
19 have little to do and desperately need more toys. Families have never mentioned any
20 preschool or organized activities for children under four years old. Depriving children of
21 any personal toys in their rooms makes Dilley feel even more like a prison. Children
22 need toys to develop properly. Families we interviewed also made no mention of the list
23 of “creative and recreational activities” supposedly provided. *Id.* at 31. Again, these rosy
24 descriptions stand in stark contrast to the reality on the ground.

25
26 **Defendants’ Review of 35 Declarations**

27 24. The ICE JC Report states that Dilley’s medical department and ICE’s
28 independent medical subject matter expert conducted a review of Plaintiffs’ March 20

1 declarations. ICE JC Report at 20. The resulting chart does not address *Flores* violations
2 raised in nearly one hundred declarations to date. Ex. 6, ICE Juv. Coord. Suppl. Report
3 Flores Declarations 35 Cases [Dkt. 1768-10] (“ICE Resp. 35 Cases”). The chart simply
4 marches through 35 recent declarations in an unsuccessful attempt to discredit the sworn
5 statements of class members and their families. See Exs. 3-14 and 16-36 to Pls.’ Resp. to
6 March 13, 2026 ICE Juv. Coord. Status Report and Data [Dkts. 1748-4 to 1748-15 &
7 1768-17 to 1748-37] (“Pls. Resp. to Mar. JC Report”).

8 25. ICE’s responses under the column “Action Taken/Follow-Up” do not
9 disprove Plaintiffs’ legitimate medical concerns. ICE Resp. 35 Cases. For example,
10 more than 25 entries state that “no grievances or resident requests received for any of the
11 noted concerns.” *Id.* But the FSA does not require class members to file grievances, and
12 countless families have reported that they are worried about retaliation for filing
13 grievances or that they find the grievance process a waste of time. As just one example
14 of the futility of the system, the response to a grievance regarding a life-threatening
15 medical condition that had previously resulted in a child’s hospitalization was: “Good
16 morning, Please submit a sick call request so Pediatric Provider R. can evaluate resident.
17 Thank you.” *Id.* at 40.

18 26. In some instances, ICE simply denies statements made by class members
19 and their families. For example, the father of an autistic child says his son did not get the
20 special diet he required, but the response says that he did. *Id.* at 34-35. A mother
21 reported that her two-year-old child had a chronic illness, but the ICE response says there
22 were no complaints about it. *Id.* at 37. In one entry, ICE tries to discredit completely a
23 mother’s declaration regarding a mismanaged UTI, her daughter’s special diet issues, and
24 her daughter’s fainting and arm injury. *Id.* at 5. ICE responds that none of these issues
25 were reported, but the chart indicates they are relying on the records of another person
26 altogether. *Id.* at 5.

27 27. ICE also misquotes two declarations with the transparent goal of
28 undermining class members’ sworn statements. The ICE chart reports that “the

1 declaration only states that when the child is constipated, he gets a special diet and fruit;
2 thus, indicating medical needs addressed.” *Id.* at 45. The declaration actually states that
3 “[b]ecause of his constipation, he gets a special diet, which just means he gets some
4 fruit.” Ex. 32, Pls. Resp. to Mar. JC Report at ¶ 9 [Dkt. 1748-33]. In another instance,
5 ICE states that “the declaration generally alleges that the mental health appointments are
6 not helpful and the resident is worried.” ICE Resp. 35 Cases at 46. The declaration
7 states:

8 I have been to two [mental health appointments here] and they aren’t helpful.
9 They last not even ten minutes. They just ask how you’re doing and if you’ve had
10 suicidal thoughts or have tried to harm yourself. I say things like ‘I could be
11 better.’ They just say I should not worry about things I can’t control and that my
12 mom is the adult and she can handle things. But all of this is happening to me, too,
and I can’t help but worry about it.

13 Ex. 33, Pls. Resp. to Mar. JC Report at ¶ 16 [Dkt. 1748-34].

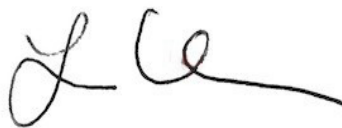
14 28. The chart also claims that “A CoreCivic facility employee dressed as Santa
15 to provide holiday cheer to the residents. Photos were taken and Santa handed out
16 snacks.” ICE Resp. 35 Cases at 28. One parent described the event as “cruel and
17 cynical”: it actually left the children in “complete shock and tears” – they were “simply
18 used as decorations for pretty photos, and then their hope for a holiday was taken away”:

19 A man dressed as Santa Claus entered the playroom, followed by a cart full of
20 chips and sweets. The children, already in a difficult situation at the center, were
21 overjoyed. They dropped everything, ran up to him, begged for candy, and wanted
22 to take pictures. Some children even cried and begged him to give them freedom.

23 Santa himself acted very indifferent: he lifted his beard, drank water, and simply
24 sat there. When the photo shoot was over, management simply said, “These chips
25 aren’t for you.” The cart and the food were simply turned around and carted out of
26 the room right in front of the children. They gave them absolutely nothing—not a
single piece of candy.

27 Ex. 24, Pls. Resp. to Mar. JC Report at ¶¶ 48-49 [Dkt. No. 1748-25]. This is what
28 happens when a prison company is put in charge of Christmas.

1 I declare under penalty of perjury that the foregoing is true and correct. Executed on this
2 17th day of May, 2026 at San Francisco, California.

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7 Leecia Welch
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ATTACHMENT A

Resident Handbook

**Dilley Immigration
Processing Center**

July 2025

TABLE OF CONTENTS

| | |
|--|------------------|
| PHILOSOPHY OF CENTER OPERATIONS AND FAMILY UNITY | 5 |
| RESIDENT HANDBOOK | 5 |
| THE ADMISSION PROCESS | 5 |
| LIVING ARRANGEMENTS a. Housekeeping b. Quiet Time/Bedtime c. Overnight Checks d. Resident Chores | 5, 6 |
| CLOTHING a. Center Clothing b. Resident Dress Code | 6, 7 |
| LAUNDRY | 7 |
| FINANCES / RESIDENT FUNDS/MONEY ORDERS | 7, 8 |
| CONTRABAND | 8 |
| PERSONAL PROPERTY a. Allowable Property b. Other Property c. Rules for Storing or Mailing Property d. Staff Processing of Personal Property Other than Funds and Valuables e. Property and Release f. Claims g. Stolen Property h. Lost/Damaged Property i. Processing a Claim j. Investigation k. Replacement of Property l. Reimbursement for Property m. Property Lost by Another Center or Agency | 8, 9, 10, 11, 12 |
| RESIDENT CENSUS | 12 |
| SEXUAL ABUSE AND ASSAULT - PREVENTION AND INTERVENTION a. Reporting b. Staying Safe | 13, 14 |
| STAFF/RESIDENT COMMUNICATION a. Staff Roles | 15 |
| CONTACTING IMMIGRATION/REPORTING PROCEDURES | 15, 16 |
| RESIDENT INFORMATION BOARD/ACTIVITY ROOM | 16 |
| RESIDENT INFORMATION REQUESTS | 16 |
| RESIDENT RULES/ BEHAVIOR MANAGEMENT | 16, 17 |

| | |
|---|------------|
| BEHAVIOR MANAGEMENT a. Corrective Actions for Children b. Corrective Actions for Adults | 17, 18 |
| RESIDENT RIGHTS AND RESPONSIBILITIES | 18, 19 |
| FOOD SERVICE a. Snacks b. Special Diets | 19, 20 |
| MEDICAL SERVICES a. Emergency Medical Situations b. Sick Call c. Urgent Care d. Dental Services e. Mental Health Services f. Medications g. Conduct while in Medical h. Complaint or Grievance about Medical Care i. Advanced Directives | 20, 21, 22 |
| PERSONAL HYGIENE a. Issued Personal Hygiene Items | 22 |
| LINENS | 23 |
| MAIL/ CORRESPONDENCE a. Addressing Envelopes b. Indigent Resident Mail c. Special Correspondence d. Postage and Envelopes e. Posting Outgoing Mail f. Electronic Mail | 23, 24 |
| FREE MOVEMENT | 24, 25 |
| RECREATIONAL PROGRAM | 25 |
| ART SUPPLIES/WRITING INSTRUMENTS | 25 |
| RELIGIOUS SERVICES | 25, 26 |
| TELEPHONE ACCESS a. ICE Free Access Telephone Calls b. Indigent Resident Telephone Access c. Legal Assistance-Telephone Access d. Telephone Use Rules | 26, 27 |
| RESIDENT-USE TABLETS | 27 |

| | |
|---|------------|
| VISITATION a. Legal Aid Visitation b. Consular Visitation c. Visitor Dress Code | 27, 28 |
| GRIEVANCE SYSTEM a. Emergency Grievance Procedures b. Non-Grievable Matters c. Staff Misconduct | 28, 29, 30 |
| LIBRARY a. General Library b. Legal Information/ Law Library / Access to Legal Materials c. Materials Provided by Legal Representatives d. Free Legal Assistance e. Legal Rights Group Presentations | 30, 31 |
| GENERAL SAFETY/EVACUATION DRILLS | 31 |
| MONITORED CARE SERVICES | 32 |
| ROUTINE SANITATION AND SAFETY INSPECTIONS | 32 |
| NON-ROUTINE SEARCHES | 32 |
| NOTARY PUBLIC | 32 |
| PHOTOCOPIES | 32 |
| HAIR CARE SERVICES | 32 |
| CONVENIENCE STORE | 33 |
| SMOKE-FREE ENVIRONMENT | 33 |
| LANGUAGE ACCESS AND DISABILITY REQUIREMENTS | 33 |

PHILOSOPHY OF CENTER OPERATIONS AND FAMILY UNITY

The Dilley Immigration Processing Center is operated by CoreCivic. The Center's mission is to allow families to remain together while in Immigration and Customs Enforcement (ICE) custody in the least restrictive setting available while enforcing rules necessary to ensure the safety and well-being of residents and staff alike. The Juvenile and Family Management Division (JFMD) monitors activity at this Center. JFMD is a unit within U.S. Immigration and Customs Enforcement and is responsible for all operations where ICE families are housed. JFMD and the ICE Enforcement and Removal Operations (ERO) are responsible for monitoring the health, safety and security of residents placed here. These officers ensure the Center complies with federal standards relating to a variety of topics including food service, sanitation, medical care, visitation, and legal rights.

RESIDENT HANDBOOK

The purpose of this handbook is to provide residents with specific rules, regulations, policies and procedures that must be followed while residing at the Center. The handbook will also provide a general overview of the programs and services offered.

Upon admission, but before being placed into general population, each resident 14 years of age and older will be provided with a resident handbook. It is the residents' responsibility to become familiar with the contents of this handbook, explain the contents of the handbook to children under 14 years of age and to ask staff questions if there is anything they do not understand. Questions may be directed to any of the staff. In addition to the handbook received at intake, a copy of the current resident handbook is also available in each neighborhood complex's activity room. Occasionally, changes need to be made to the Resident Handbook. When this occurs, residents will be given updates, and the updates will also be communicated and posted in each neighborhood complex's activity room.

THE ADMISSIONS PROCESS

All residents entering the Center will complete the following process:

Note: Children will never be separated from their parents/guardians during the admissions process unless necessary to protect the child(ren).

- Personal information documented;
- Fingerprints obtained;
- Primary and secondary (if applicable) language identified;
- Medical and mental health screenings;
- Identification of disabilities;
- Opportunity to shower;
- Eat (sack meal provided);
- Time allotted for a free phone call;
- Property inventoried and receipted;
- Clothing, bedding, and hygiene items issued;
- Housing assignment; and
- Handbook issued to all residents 14 years old and up.

LIVING ARRANGEMENTS

Residents are expected to share common equipment such as telephones, televisions, tables, laundry facilities and machines, recreational games and other equipment. Each living area has a television with both Spanish and English programs available. There will be a listing posted in the living area of channels available. Generally, all activity will cease after children's bedtime; however, parents may use this time for reading or quiet time activities if they do not disturb the sleep of others.

Housekeeping

Each family unit is assigned to a specific neighborhood suite and bed. Residents are only allowed to enter the suite to which they are assigned. Residents should make their beds and straighten up their immediate area each morning. When not in use, beds should remain made.

Resident children between the ages of 0 to 17 months will be assigned a crib. Residents with children between the ages of 18 months up to 35 months may request a crib by filling out a crib use form during the intake process. Do not use cribs for storage. Cribs must have clean fitted sheets. Residents may use receiving blankets to cover children. No pillows shall be in cribs.

Children under age ten (10) shall not be permitted in any upper bunk beds. All bunk beds and ladders can be equipped with a safety rail.

Residents may decorate their rooms with personal items if the decorations do not present a health or safety hazard, do not peel paint off the walls or otherwise deface Center property.

No items shall cover light fixtures, doors, or windows. Items shall not to be hung from vents, sprinkler heads, or beds. Due to the communal nature of the Center, residents must only disrobe in the shower rooms, bathroom, or when utilizing the privacy curtains provided in the complex suites.

Approved property will be stored inside provided storage units. See the section on allowed personal property for more information. All hygiene items must be stored in provided storage units. Center toys are allowed in suites during free movement hours but must be returned to the activity room no later than 8:00 p.m. Center toys will be sanitized (if appropriate) for the following day. See the section on free movement for more information.

Quiet Time/Bedtime

Children's bedtimes are set to promote a routine for the children at the Center. The general bedtime for children four (4) years old and younger is 8:30 p.m. The general bedtime for children five (5) years old up to 17 years of age is 9:00 p.m. Suite lights over the bunk beds will be turned off at 10:00 p.m. Parents are encouraged to continue (or develop) their children's bedtime routines while at the Center.

Overnight Checks

Staff will conduct safety checks during the night to ensure resident safety. During these checks, staff is required to visually observe each resident to verify their well-being; however, the checks will be done with as little disruption as possible. Staff will use a flashlight pointed down at the ground or at the ceiling to conduct safety checks.

Resident Chores

Residents are responsible for maintaining their suite in a neat and sanitary condition. Residents are expected to make their beds each morning and pick up after themselves and their children.

CLOTHING

Residents must be properly dressed when outside of their suites. See the section on resident dress code for more information. These sets may be clothing brought into the Center, clothing provided by the Center or a combination of these. Underwear, bras and socks will be issued as needed. Residents in need of new underwear or clothes should submit a resident clothing request form. Residents will not be allowed to have more items than those listed above, except when authorized by the Center Administrator. Residents are not allowed to share clothes with other residents or wear their children's clothing.

Center Clothing

Residents arriving at the Center will be issued three sets of seasonally appropriate clothing. A set will include shirt, pants, bra, socks, panties, or boxer/briefs. Each resident will receive an additional three (3) of each applicable undergarment for a total of six (6). Residents ages 12 and under may receive up to three sets of pajamas at their parent's request.

Should additional or seasonally appropriate clothing be needed, residents should speak with a member of the unit team and submit a Resident Clothing Exchange form. Upon departure, residents may take clothing with them, however, they shall not leave clothing with other residents.

Resident Dress Code

The dress code outlined below applies to residents five (5) years and older.

- Must wear clothing which covers shoulders, chest, stomach and all areas of the anatomy between the naval (belly button) and mid-thigh when seated.
- The top or neckline of clothing shall be no lower than the underarm in the front and in the back.
- Sheer (see-through) clothing is prohibited.
- Shoes shall be always worn while outside the neighborhood complex.
- Shirts shall be worn at all times.
- "Gang colors" or other signs are prohibited.
- No "sagging" below the waist or tight pants will be allowed

LAUNDRY

It is the responsibility of the residents to maintain clothing in a clean and sanitary condition. For that purpose, a laundry Center is provided in each neighborhood complex. Written procedures are posted in both English and Spanish in the laundry area. The laundry room is available from 8:00 a.m. to 8:00 p.m., however, residents shall not begin laundry later than 7:30 p.m. Residents are not allowed to wash shoes, linens, blankets or pillows in the laundry rooms. Residents' linens (towels, sheets and pillowcases) will be collected and laundered once a week using Center wide services. Blankets will be collected and laundered monthly. Each neighborhood is scheduled to turn in their bedding on an assigned day. The schedules are posted in each neighborhood activity room. In the event bedding/crib sheet becomes soiled between scheduled laundry times, residents should ask any unit team staff for additional linens. When a resident leaves the Center, they have the option of keeping all issued clothing.

FINANCES/RESIDENT FUNDS/MONEY ORDERS

Residents are not allowed to have money (paper or coin) or funds in their possession while at the Center. If any money is found in a resident's possession, it will be placed in his/her account. Upon admission, all U.S. currency will be deposited into a personal account for which residents have access during their stay. Any non-U.S. currency will be placed into resident's valuable stored property. Residents will receive a receipt for any funds processed during their stay at the Center.

Occasionally a resident may wish to have money deposited to his/her account. Funds can be added to a resident's account by way of Western Union or ViaPath. **See Attached Instructions.**

Money received through the mail will be returned to the sender by the mailroom officer. **No money will be accepted at this facility.**

Residents coming from another Center will have their funds credited to their account on the next business day. Upon discharge, residents will receive the balance of any funds they have in their Center account, in cash. In the event of an emergency or abandonment of funds or property, the Center shall report and turn over to ICE/ERO all resident's abandoned property for management and disposition.

Residents who need funds/monies (such as mail fees, legal fees, to persons, etc.) must complete a Personal Funds Withdrawal Slip. Residents should list only one item per withdrawal slip and be sure to specify the purpose of the funds. The slip must be filled out completely, signed by the resident, verified by the Unit Manager or Resident Counselor, and forwarded to the accounting clerk. If the check requires mailing, a stamped, self-addressed envelope must accompany the withdrawal slip.

CONTRABAND

Contraband is anything residents are not authorized to have in their possession.

A resident found in possession of hard contraband could face corrective action or criminal prosecution.

Hard contraband includes, but is not limited to, any item that:

- Is inherently dangerous; or
- May otherwise interfere with safe and secure Center operations.

Soft contraband includes, but is not limited to, “nuisance” items that do not pose a direct and immediate threat to safety or security, but that have the potential to create dangerous or unsanitary conditions in the Center (e.g., excess papers that create a fire hazard, inappropriate written materials, food items that are spoiled or retained beyond the point of safe consumption). Staff will discard all food (including uneaten fast food, drinks, and opened baby food or formula) at the time of admission.

During admission to the Center, residents' property will be searched. Anything deemed dangerous or illegal will be seized by staff. Any item considered contraband will be confiscated and disposed of properly. All other property will be inventoried, receipted, and stored.

Random suite inspections will be conducted to control and dispose of contraband items such as: food from the dining hall, packets of jelly, other condiments and uneaten snacks (not commissary).

During admission, money will be counted and placed in the resident's account. Any money not turned over during admission will be returned to intake, counted, and placed in the resident's account.

Religious property will not be treated as contraband or seized without consultation with the Center Religious Services Chaplain (RSC) and the Center Administrator. However, if a religious item is deemed contraband, it will be seized and disposed of in accordance with contraband disposal procedures. When the ownership of a contraband item is in question, an investigation will be conducted to determine ownership. Staff shall inventory and store the item(s) pending verification of ownership. The resident shall have seven (7) calendar days to verify ownership of the listed item(s). If a resident cannot establish ownership and/or ownership cannot be reasonably established, the property may be destroyed.

PERSONAL PROPERTY

Allowable Property

Upon admission to the Center, residents will receive a copy of form 14-100A Allowable Personal Property, which residents are permitted to retain. Allowable items are:

- Three (3) sets of clothing per resident (shirts, pants, underwear, bra, socks).
- Three additional applicable undergarments per resident for a total of six (6).
- Shorts (children only).
- Coat (seasonal).
- Shoes (2 pair), \$60/athletic pair maximum value.
- Pajamas (3 sets, ages 12 and under).
- Newborn to five-year-old clothing (6 sets).
- Pillow (1 per person; must be flame retardant).
- Authorized personal hygiene items.

- Legal documents, legal papers, and legal information.
- Photos (no nudity), loose, 5x7 or smaller.
- Photo album.
- Medical prostheses (i.e., eyeglasses, dentures, etc.), maximum value determined by ownership and medical direction.
- Personal reference materials (i.e., address/phone book and/or list of relatives and/or friends).
- Religious items (approval by the RSC required; see the RSC section for more information).
- Newspapers, magazines, books (\$25 maximum value) and other literature (limited to any combination of 10 at a time to ensure accumulations do not produce and/or effect fire safety standards).
- Convenience store purchases.
- Postage stamps (book or loose).
- Personal correspondence.
- Writing paper, pads (2), loose paper, and drawings (within reason to ensure accumulations do not produce and/or effect fire safety standards).
- Artwork, crafts, etc., created at the Center during stay (limited to 10 items).
- Wedding band (plain, no stones), \$50 maximum value; religious medallion/chain, \$50 maximum value; rosary (plastic).

Any items not included on the above list will be considered contraband.

Other Property

Additional personal property must be approved by the Center Administrator prior to purchase / possession. Identity documents such as passports and birth certificates are to be held in each resident's A-file for safekeeping by ICE until the resident is removed or until the removal proceedings are resolved. However, upon written request, ICE staff shall provide the resident a copy of the requested document (certified to be a true and correct copy).

Residents are allowed to access their property to retrieve electronic information stored in their cell phones such as contact information.

Rules for Storing or Mailing Property

To prevent overcrowding and related storage problems, staff shall encourage residents to send extra suitcases, televisions, electronic devices, and other "soft" (not illegal or dangerous) contraband to a third party of their choosing.

The resident will be provided the opportunity to designate the disposition on the Disposition of Non-Allowable Personal Property in one of the following manners:

- The Center may make shipping arrangements for a resident requiring such help and shall assume the cost if the resident cannot afford postage.
- If a resident does not provide an appropriate mailing address within 30 calendar days, the Center may make reasonable accommodations to store the property; however, ordinarily, the amount stored may not exceed 40 lbs.
- If a resident does not provide an appropriate mailing address or is financially able but unwilling to pay the postage, the Center Administrator may dispose of the property after providing the resident with 30 calendar days written notice.
- When personal property is shipped, staff shall prepare an inventory record of the property that was shipped, the shipment addressee, and maintain a copy of the property inventory and shipping information in the resident's file.

Staff Processing of Baggage and Personal Property Other Than Funds and Valuables

The procedures listed below do not apply to identity documents, such as passports and birth certificates, which are held in each resident's A-file.

If a resident has no baggage, a Center container shall be provided to store his or her personal property. After being properly inventoried and inspected for contraband, all baggage and Center containers shall be tagged as follows:

- A pre-numbered, three-part inventory form shall be issued for each separate container or item of baggage.
- Each form shall bear the resident's full name, A-number or Center resident number, and the date.
- The resident's signature must appear on the form.
- The top portion of the form shall be attached to the resident's property, and the Center portion to the resident's booking card or residential file. A brief description of the property container shall be made on this portion of the inventory form; for example, "black suitcase" or "paper bag".

The resident shall be given the bottom portion of the inventory form. The back portion of the form shall also contain a brief description of the property container.

All resident luggage and Center containers used for storing resident property shall be secured in a tamper-resistant manner (such as a tamper-proof, numbered tie strap) and shall only be opened in the presence of the resident. A logbook shall be maintained listing the resident's name, A-number or Center resident number, inventory form number, security tie-strap number, property disposition, date issued, and date returned. Tagged baggage and other property tagged on an inventory form shall then be stored in the property storage area.

Property and Release

Prior to a resident's release, transfer or removal from custody, a complete inventory of the resident's personal property will be conducted by a designated employee. The inventory should be completed in the presence of the resident.

The resident will sign the Allowable Personal Property Inventory/Receipt and be given a copy. The original will be maintained by the Center in the permanent property file. The resident will be given all property in storage at the time of release. The resident will be required to sign for all property received.

Claims

Only items outlined on the Allowable Property List will be eligible for claim investigation. Residents being transferred or released from the Center may also submit property claims.

Stolen Property

Residents should complete a Lost/Damaged/Stolen Personal Property Claim for items they believe to have been stolen. Proof of ownership and value must be available upon investigation.

The Center will attempt to recover property stolen by other residents; however, the Center will not be responsible for the reimbursement of those property items unless it is proven through investigation to be the result of Center negligence.

Lost/Damaged Property

Property that has been lost or damaged due to a CoreCivic employee's negligence will be eligible for claim investigation.

- If a resident wishes to request an investigation on property that has been lost or damaged due to CoreCivic employee negligence, the resident must complete the Lost / Damaged / Stolen Property Claim and forward it to the Property Officer.
- Proof of ownership and value must be available upon investigation.

The designated ICE representative shall be immediately notified when properly receipted resident property is reported missing or damaged. Supervisory staff shall investigate and, if necessary, take prompt action to prevent further loss. If the property is not recovered or is recovered in a damaged condition, staff shall prepare a report to the Center Administrator and ICE/ERO, providing the following information:

- Name and A-number or Center resident number of the resident claiming ownership.
- Description of the property and, if applicable, the noted damage.
- Date and time the loss or damage was discovered.
- Name(s) of person(s) discovering the loss or damage.
- The circumstances under which the person(s) discovered the loss or damage and the cause of the loss or damage to the property, if determined.
- Names and statements of the resident and all witnesses.
- Place, date, and time the property was last seen (before reported missing or damaged); and
- The circumstances under which the property was last seen (before reported missing or damaged).

A resident being transferred, released, or removed who has a claim for lost or damaged property shall be allowed to initiate the claim before leaving the Center. A standard claim form (SF95) shall be provided to the resident for making their claim. The Center Administrator shall send the result of the investigation of the resident's claim and their claim form to the Office of the Principal Legal Advisor, CALD, at 425 I Street, N.W. Room 6100, Washington, DC 20536 for further resolution of the claim.

In addition, to the procedures listed above, ICE/ERO staff must complete a Report of Resident Missing Property for lost (but not damaged) property (Form I-137). The original copy of this form shall be placed in the resident's A-file, with a copy retained by the Center. The Center Administrator shall send the result of the investigation of the resident's claim, a copy of the Form to the Office of the Principal Legal Advisor, CALD, at 425 I Street, N.W. Room 6100, Washington, DC 20536 for further resolution of the claim.

A copy of the completed forms shall be forwarded to the JFMD for a determination of any additional required reporting.

Processing a Claim

The Property Officer will assign the claim a number and maintain a Lost / Damaged / Stolen Personal Property Log that includes the following information:

- Claim number.
- Date the claim was received.
- Resident's name.
- Resident's A-number.
- Area where alleged loss / damage / theft occurred.
- Staff member assigned to investigate and date of assignment.
- Date investigation was completed.
- Disposition of the claim; and
- Date of replacement or reimbursement, if applicable.

The Property Officer shall forward the claim to the Center Investigator within three (3) calendar days of receipt. When appropriate, the Center Investigator may designate a staff member to complete the investigation.

Investigation

The designated staff member shall complete the investigation within seven (7) calendar days.

The designated employee shall take the appropriate steps in reaching a determination of the validity of the claim.

Once the investigation has been completed, any corresponding paperwork will be returned to the Property Officer for logging.

If the claim proves valid, the Investigator will forward the claim to the Center Administrator, who will be the final authority in the award of any compensation.

The Center Administrator shall review and approve / disapprove the claim within five calendar days of receipt.

Replacement of Property

Residents will be provided the opportunity to send personal property items to locations outside the facility.

Attempts will be made to replace property with like items, however the maximum amount to replace an item will be \$100. If the replacement of the property is not possible, a reimbursement will be made.

Prior to receipt of replacement property, the resident will sign the Lost / Damaged / Stolen Personal Property form.

Replacement items shall be issued to the resident within 30 calendar days of the Center Administrator's approval.

Reimbursement for Property

Reimbursement of property will be limited to a maximum amount of \$100.

If residents choose to acquire or maintain personal property valued above the maximum reimbursable amount designated by the Center Administrator, they do so at their own risk. A claim, if found valid, will only result in the maximum reimbursable amount stated above.

In addition to the maximum reimbursable amount, the following depreciation schedule will be used to calculate the normal wear and tear of residents' personal property:

| Age of Property (in months) | Percentage of Original/Maximum Reimbursable Value |
|--------------------------------|---|
| Less than 12 months | 100% |
| 12-23 months | 75% |
| 24-35 months | 50% |
| 36 or more | 25% |

Prior to receipt of reimbursement funds, the resident will sign the Lost / Damaged / Stolen Personal Property form.

Reimbursement shall be issued to the resident within thirty (30) calendar days of the Center Administrator's approval.

Property Lost by Another Center/Agency

If property is found to be missing when a resident is received at the Center, the Center will assist the resident in determining what procedures to follow. CoreCivic is not responsible for property that another Center / Center / agency may have lost or destroyed. The Center will notify ICE personnel in the event of property claims against another Center / Center / agency.

RESIDENT CENSUS

Resident accountability is established through residents reporting for censuses three times during each 24-hour period.

Mandatory check-in times are:

- 7:00 a.m. daily (neighborhood complex)
- 11:00 a.m. (neighborhood complex)
- 8:00 p.m. daily (neighborhood complex)

Residents will report to the Resident Supervisor as a family unit in their assigned neighborhood complex during the times listed above. If residents are at an appointment near the close of the census time, the staff supervising the appointment will report the resident's location. Residents who do not check in properly during census will be counseled regarding the requirement.

SEXUAL ABUSE AND ASSAULT PREVENTION AND INTERVENTION

This Center has a Sexual Abuse and Assault Prevention and Intervention Program in place to protect residents against all forms of sexual abuse and assault. There is zero-tolerance for all forms of sexual abuse and assault. Prohibited conduct includes resident-on-resident sexual abuse and assault, staff-on-resident sexual abuse and assault, and any contractor or civilian-on-resident sexual abuse or assault.

Resident on resident sexual assault includes any of the following acts by one or more residents who, by force, coercion, or intimidation, or if the victim did not consent or was unable to consent or refuse, engages in or attempts to engage in:

- Contact between the penis and the vulva or anus and, for purposes of this subparagraph, contact involving the penis upon penetration, however slight.
- Contact between the mouth and the penis, vulva, or anus.
- Penetration, however slight, of the anal or genital opening of another person by a hand, finger, or any object.
- Touching of the genitalia, anus, groin, breast, inner thighs, or buttocks, either directly or through the clothing, with an intent to abuse, humiliate, harass, degrade, arouse, or gratify the sexual desire of any person; or
- Threats, intimidation, or other actions or communications by one or more residents aimed at coercing or pressuring another resident to engage in a sexual act.
- Repeated verbal statements or comments of a sexual nature to a resident.

Staff on resident sexual misconduct is any behavior or act of a sexual nature toward a resident by an employee, volunteer, official visitor, or agency representative. Romantic relationships between employees and residents are considered sexual assault. Sexual acts include intentional touching of the genitalia, anus, groin, breast, inner thigh, or buttocks with the intent to arouse or gratify sexual desire; or attempted, threatened, or requested sexual acts; or occurrences of indecent exposure, invasion of privacy or employee voyeurism for sexual gratification without a sound security reason.

Reporting

If residents feel unsafe at any time during their stay at the Center because of threats of sexual abuse or assault, or if they are sexually abused or assaulted, it should be immediately reported. There will be no retaliation against residents who report sexual assault or abuse. This shall not negatively impact the resident's immigration proceedings. Sexual abuse and/or assault may be reported by any of the following methods:

- Requesting to speak with Health Services to report a concern.
- Calling the Center's 24-hour toll-free notification telephone numbers as posted in suites. The phone numbers are 1-800-323-8603 or 518*.

- Forwarding a letter, sealed and marked "confidential", to the Center Administrator or any other employee.
- Calling or writing someone outside the Center who can notify Center staff
- Contacting the respective consular office.
- Forwarding a letter to the FSC PREA Coordinator at the following address:

CoreCivic
PREA Coordinator
5501 Virginia Way
Brentwood, TN 37027

- Filing an emergency grievance stating the nature of the problems and emergent needs. See section on grievances for more information.
- Contacting ICE by completing a Resident Request Form or calling **1-888-351-4024 or 9116#**.
- Contacting the Department of Homeland Security Contact or the Office of the Inspector General (OIG) through the free phone call system.
- Writing:

DHS OIG
245 Murray Drive, S.E., Building 410
Washington, D.C. 20538

- Emailing: DHSOIGHOTLINE@DHS.GOV
- Telephoning: 1-800-323-8603 or 518#
- Calling the Safer Path crisis Center located in Pleasanton, Texas by dialing 258# or
- Writing:

Safer Path
506 W. Adams St.
Pleasanton, Texas 78064
Phone: 830-569-2001

Staying Safe

Residents should practice the following behaviors to reduce the risk of sexual misconduct:

- Avoid situations that encourage sexual misconduct such as conversations about sexual activity.
- Leave a situation where you are uncomfortable and fear that there is sexual risk.
- Look around and be aware of your surroundings.
- Avoid areas that are secluded or where you can't be seen by staff and other residents.
- Say NO to advances from others seeking sexual contact.
- Don't accept gifts such as commissary purchases or personal property.
- Don't get into debt to other residents.

If you are the victim of sexual abuse or assault, the most important thing you can do is tell someone who can help you. Your report will be handled with confidentiality. And you will be protected.

Information about sexual abuse and assault is available in the activity room on the Information Bulletin Board. Counseling and other support services are available to residents who have been subjected to sexual abuse and assault.

STAFF/RESIDENT COMMUNICATION

Staff Roles

Residents may contact any staff including Center management and supervisors by speaking to them in person or by completing a Resident Request Form, available in each neighborhood complex activity room.

Residents may contact the CoreCivic Center Support Center by calling directly to 1-877-834-1550 or in writing to:

Managing Director, Division II CoreCivic
5501 Virginia Way
Brentwood, TN 37027

Brief descriptions of the roles of certain staff members and their primary functions are listed below.

Center Administrator – Chief Administrative Officer of the Center. Directs, administers, oversees, and coordinates the activities of the Center.

Assistant Center Administrator(s) – coordinate(s) the professional Center management in the areas of security, unit operations, case management and program operations.

Chief of Security – responsible for the overall security plan, including staff and post assignments.

Chief of Unit Management – supervises the overall operation of the housing unit management teams.

Health Services Administrator – manages the Center’s medical program activities and provides overall direction and leadership in compliance with all applicable policies, procedures, laws, regulations, and standards.

Shift Supervisor – responsible for the supervision of the administrative and operational security activities on a specific shift.

Unit Manager – responsible for all matters relating to the housing units, including case management, security, programs, safety and sanitation.

Chaplain/Religious Services Chaplain – coordinates religious services, activities and volunteers. Performs pastoral work, including pastoral counseling.

Resident Counselor – the primary staff contact for the residents in a neighborhood complex. Counselors act as a liaison between the resident and other staff.

Resident Supervisor – the first line supervisor for residents, a member of the unit team and supports the Center's mission and programs. Resident Supervisors are assigned to specific posts/neighborhood complexes and will assist residents with questions regarding housing, supplies and other issues that may arise during the Resident’s stay at the Center.

Recreation Supervisor – is responsible for planning and supervising the total recreational program for the Center.

Grievance Coordinator – acts as a liaison between the resident and other staff regarding the grievance process.

Assistant Shift Supervisor – assists in the supervision of the administrative and operational security activities for the Center. Directly supervises Senior Resident Supervisors assigned to the shift.

CONTACTING IMMIGRATION / REPORTING PROCEDURES

Specific Immigration Customs Enforcement (ICE) staff are assigned to immigration cases, and they conduct scheduled visits at least once a week to answer immigration concerns. These scheduled visits are held in the neighborhood complex areas. Residents may visit with these officers during their scheduled visits and submit written questions, requests or concerns to them by completing a Resident Request Form. These forms are available in each neighborhood complex activity room. Completed forms are to be placed in the mailbox labeled “ICE Requests.” These forms are collected each business day and routed to an ICE officer for

resolution. Residents may obtain assistance from another resident or staff member in preparing request forms. The ICE visit schedule, Town Hall and free-call 100# to ICE are all posted on each neighborhood complex's information board in the activity room.

Residents may contact the Department of Homeland Security, Office of Inspector General by calling directly to 1-800-323-8603 TTY: 1-844-889-4357, by using the free call system programmed into the telephones or by writing to:

Department of Homeland Security Office of the Inspector General
245 Murray Drive, S.E., Building 410
Washington, D.C. 20538

THE RESIDENT INFORMATION BOARD/ACTIVITY ROOM

The Resident Information Board is in each neighborhood complex activity room. Forms are available in that location relating to legal assistance, ICE communication requests, grievances, sick call, mail, program services information, recreational activities, a copy of the current resident handbook and required postings, among other things.

RESIDENT INFORMATION REQUESTS

Generally, residents can have questions answered and obtain services merely by speaking to staff. For those who would rather request information formally, the official method is by completing a Resident Information Request form. All the information requested on the forms must be completed. Residents may obtain assistance from another resident or staff member in preparing request forms. Completed forms are to be placed in the drop off box labeled "Requests" located in each neighborhood complex at the end of the hallway. These forms are collected each business day and routed to a unit team member for resolution. This procedure is not to be used for submitting formal grievances. See the section on grievance procedures for more information.

RESIDENT RULES / BEHAVIOR MANAGEMENT

Residents must:

- Follow the instructions that are given by Center staff.
- Wear identification, at all times, and report to staff any damage or loss so a replacement may be made.
- Treat all residents and staff with respect and courtesy, regardless of race, religion, ethnicity, gender or age.
- Attend to the physical and emotional needs of your children while modeling appropriate behavior.
- Monitor your child's behavior and use only approved behavior modification techniques when necessary; corporal/physical punishment is prohibited.
- Not file knowingly false complaints, grievances or other reports.
- Not speak disrespectfully or be verbally or physically aggressive towards other residents or staff; should a resident encounter other displaying this behavior, they should report it immediately to staff.
- Not have physical or intimate contact with other residents or staff while at the Center; this includes overfamiliarity with staff for example, giving personal notes or asking personal questions; see the section on sexual abuse and assault prevention for more information.
- Not possess contraband while at the Center.
- Respect the rights of other residents and staff.
- Not take or borrow other residents' property.

- Comply with census procedures.
- Perform assigned chores.
- Maintain proper hygiene.
- Clean living area every morning.
- Behave in an orderly manner during meals, clean immediate area after each meal and ensure their children's area is also cleaned.
- Not bring any food or condiments from the dining hall to the suites.
- (For students) Follow classroom rules that are established by the teachers and the Center staff.
- Promptly report broken items or damaged property to staff.
- Clean any damage done to furniture with ink, crayons or other writing implements.
- Alert staff immediately of any problems or concerns.
- Abide by the room visitation policy; see the section concerning suites for more information.
- Not borrow or trade clothing, hygiene products, jewelry or make-up.
- Not deface or otherwise damage Center property.
- Comply with the dress code found in this handbook.
- Not use or possess tobacco products in any form, drink alcohol or chew gum.
- Not waste food.
- Not use profanity.
- Not leave your children in the care of other residents or accept other's children to care for.

Residents are encouraged to ask a staff member if they do not clearly understand the rules or if they are unable to remember specifics.

Failure to follow the above rules may result in the initiation of disciplinary proceedings. Serious and/or continuous infractions may lead to a review of continued suitability for placement in this residential setting. See the following section on Behavior Management for more information. Residents who act in an aggressive manner and/or attempt to cause harm to themselves or others may be passively restrained under the Center's restrictive procedure policy to protect themselves and others.

BEHAVIOR MANAGEMENT

This Center promotes a safe and secure living environment for residents by establishing fair rules and regulations and expecting residents to comply with them. Residents will be accountable for their behavior through a system designed to encourage positive behavior and interaction with others.

Staff will attempt to correct minor rule violations informally through conversation and counseling. This informal procedure may include consequences which are mutually acceptable by the resident and staff.

The Center will investigate all incident reports. Any serious incident report that may constitute a criminal act will be referred to law enforcement.

Staff will never impose the following corrective actions: corporal punishment; deviations from normal food services; denial of legal assistance; deprivation of legal/special correspondence, telephone, or visitation privileges; deprivation of physical exercise or access to recreation, or confinement in any locked room or space. In the event a staff member believes that a resident is committing an offense that cannot be handled through

the informal procedure, the staff member will complete an incident statement form 5-1C and forward it to the appropriate supervisor before the end of the assigned shift. The assigned supervisor will begin an investigation of incident reports immediately.

Decisions related to behavior management will be made by a behavior management panel comprised of ICE, JFMD, Center staff and the Office of the Principal Legal Advisor (OPLA).

The above-referenced panel will make determinations and decisions based on the incident report and investigation.

Corrective Actions for Children Include but are not Limited to:

- Referral to counseling.
- Suspension of "free movement" privilege

Only the ERP can restrict children to their living and activity area and only for a period not to exceed 24 hours with one (1) hour of outdoor activity time.

Corrective Actions for Adults Include but are not Limited to:

- Referral to counseling.
- Required attendance in appropriate classes (parenting, anger management, etc.).
- Restriction to the living and activity area, for a duration not to exceed 72 hours:

When a resident's movement is restricted, they must be afforded a minimum of one (1) hour of outdoor activity time daily.

A resident may be restricted to the living and activity area but will not be forced to remain in their room.

Prior to imposing this sanction, the behavior management panel must consider the ages of the affected resident's children and the negative impact this sanction would have on the children who were not involved in the charged offense.

When the behavior management panel believes a resident presents an immediate or continuing threat to Center safety or welfare, it may recommend to the respective ICE that the resident be removed from the Center.

RESIDENT RIGHTS AND RESPONSIBILITIES

It is the Center's philosophy to treat residents with dignity and respect while maintaining a safe, secure, and sanitary environment. It is expected that staff will receive each resident's full cooperation while in residence here. Although staff may not know newly admitted residents by name, they are always expected to address residents in an appropriate and respectful manner. Residents are expected to address other residents and staff in the same manner.

- The right to protection from personal abuse, corporal punishment, unnecessary or excessive use of force, personal injury, disease, property damage and harassment.
- The right to protection from personal abuse, corporal punishment, unnecessary or excessive use of force, personal injury, disease, property damage and harassment.
- The right to freedom from discrimination based on race, religion, national origin, gender, sexual orientation, physical or mental ability, or political beliefs.
- The right to pursue a grievance in accordance with procedures provided in the resident handbook, without fear of retaliation.
- The right to pursue a grievance in accordance with the Family Residential Standard on Grievance System and procedures provided in the resident handbook.

- The right to correspond with persons or organizations, in accordance with policy and contractual requirements, and consistent with safe and secure Center operations; and
- The right to due process, including the prompt resolution of a disciplinary matter.
- Residents have the right to be informed of the rules, procedures and schedules concerning the operation of the Center; residents have the responsibility to know and abide by them.
- Residents have the right to freedom of religious affiliation and voluntary religious worship; residents have the responsibility to recognize and respect the rights of others in this regard.
- Residents have the right to contact their consulate or embassy and have those officials call and visit during a resident's stay at the Center; see the sections on telephone usage and visitation for more information.
- Residents have the right to receive regular health care, nutritious meals, proper bedding and clothing, regular shower opportunities, hygiene products, proper indoor climate control, and regular exercise opportunities, among other things; it is the resident's responsibility to seek medical care as needed, to not waste food, to follow the laundry schedule, to maintain proper hygiene and keep living quarters clean;
- Residents have the right to unrestricted and confidential access to the courts.
- Residents have the right to pursue legal assistance at no cost to the United States Government.
- Residents have the right to use the law library; it is the resident's responsibility to use those resources responsibly and to respect the rights of other residents in the use of the space and materials.
- Residents have the right to take advantage of activities and programming, which may aid in an enjoyable stay at the Center; residents have the responsibility to abide by the rules governing the use of such activities and programs.
- Children have the right to participate in all age-appropriate activities and programs. Residents have the responsibility to encourage their children to participate in leisure activities, ensure they abide by all of the Center's rules, including respecting the personal space of others and refraining from bullying behavior.
- Residents with a communication disability or a mobility disability have the right to request accommodations.

FOOD SERVICE

All menus are designed to be nutritionally balanced and are approved by a certified dietician. Residents are provided three meals each day in the dining room.

Monday through Friday Schedule

- Breakfast 6:00 a.m. to 8:00 a.m.
- Lunch 11:00 a.m. to 1:00 p.m.
- Dinner 4:00 p.m. to 6:00 p.m.

Saturday and Sunday Schedule

- Continental Breakfast 6:00 a.m. to 8:00 a.m.
- Brunch 10:00 a.m. to 2:00 p.m.
- Dinner 4:00 p.m. to 6:00 p.m.

NOTE: Residents will not be routinely awakened before 6:30 a.m. Monday through Friday; however, breakfast service will begin daily at 6:00 a.m. Residents may voluntarily awaken early to eat should they choose to do so, but this is not required.

Seating in the dining room is not assigned, and residents may sit wherever they desire for each meal. Highchairs are available in the dining room. Small children are expected to be seated during meals to encourage sound eating habits, and parents are expected to monitor and control their children's behavior. At the end of each meal, residents are required to clear their family's immediate area and return all trays to be cleaned. Residents are allowed unlimited trips to the self-service bars in the dining room but must use a clean tray on every trip. It is the resident's responsibility to eat what is taken to reduce food waste. All food or drink must be consumed during the meal. No food or drink may be taken from the dining room, to include condiments, cups, utensils, etc.

Snacks and Drinks

Fruit, snacks and healthy drinks are available 24 hours a day. Baby formula is available for children under 12 months old, or if otherwise approved by medical staff. Residents are not allowed to take more food or drinks than they will consume at one sitting. This food is replenished in each neighborhood pantry two (2) times a day. These items are not allowed to be stored in the sleeping area.

Special Diets

Therapeutic/medical diets shall be prepared and provided according to the orders of the Center's medical department physician. Religious diets shall be prepared and provided for residents whose religious beliefs require the adherence to religious dietary laws. Residents are required to meet with the RSC for religious diet approval. See the section on the Religious Services Chaplain (RSC) for more information.

MEDICAL SERVICES

CoreCivic wants resident families to be healthy during their stay, so appropriate and necessary health care is provided free of charge.

Medical Screenings

All residents will receive an initial medical, dental, vulnerability, and mental health screening within 12 hours of arrival. Any resident with a known acute or emergent medical condition will be evaluated by a qualified, licensed health care professional, as clinically indicated, but no later than two working days after the initial screening.

Your medical appointments are very important. Appointment lists are in each neighborhood complex's activity room. Residents should arrive on time. Residents who have an immunization record, should bring their record to every medical appointment.

Emergency Medical Situations

If a resident or a family member is experiencing a medical emergency and/or need immediate medical attention while at the Center, they should notify any staff member and stay calm – medical staff will respond. If a resident cannot go to staff due to the medical situation, residents should request any other resident in the area to alert staff to help. Medical staff respond to all areas within the Center. If during the evening a resident has an emergency, they should seek assistance from the resident supervisor posted in their complex. The resident supervisor will alert medical staff of all medical emergencies. Do not wait for sick call to open.

Sick Call

If residents or their children are feeling sick or have a medical, dental or mental health problem, they can access the medical department through the sick call process. Sick call is conducted seven days a week. Sick call is held at specific times each day and the times are posted in each neighborhood complex's activity room. Staff is also available to provide information on how to access routine and emergency medical care.

Urgent Care

Urgent care is defined as care that cannot wait for routine sick call is not a medical emergency. If a resident is having an urgent medical, mental health or dental condition, they should notify staff so the medical department can be contacted. If the condition reported is determined not to be urgent, residents may be requested to report to sick during sick call hours. Urgent care is available 24 hours a day. Residents should not use the urgent care process for routine medical care because it slows down the medical process for everyone.

Dental Services

This Center is equipped to assess dental concerns. Upon admission to the Center, residents will receive a dental screening. Following initial screening, all residents will be scheduled for a comprehensive dental examination. Comprehensive exams for children are scheduled for completion within 60 calendar days. Comprehensive exams for adults are scheduled for completion within one year.

Routine and emergency dental care is also available. Emergency dental care includes, but is not limited to, dental infections, painful teeth, facial swelling, or trauma to teeth. To receive dental treatment, residents should access the medical department through the sick call process. An appointment will be made to address dental concerns in a timely manner. The appointment time will depend on the seriousness of the problem.

Mental Health Services

Counselors are available for all residents at this Center. Routine mental health services are available upon request. Residents should use the sick call process if the concern is routine in nature. All families are assigned a counselor and will be seen on a routine basis.

Non-emergency mental health services are available. Individuals seek mental health services for many reasons. Some individuals are being treated for illnesses such as depression, bipolar disorder or attention deficit disorder. Others seek mental health services to better cope with significant life stressors such as parenting a child with conduct problems, coping with the loss of a loved one or processing recent trauma. Residents are encouraged to request mental health services for themselves or their children if they notice a significant change in behavior or experience challenges in adapting to the routines of the Center.

The medical department is available to help residents and their children.

If you, a family member, or someone at the Center is feeling suicidal, expressing thoughts of self-harm or experiencing a severe emotional crisis, it is considered a medical emergency, and services are available 24 hours a day. For ALL mental health emergencies, IMMEDIATELY notify a staff member so the appropriate health care services can be provided.

Medications

If a resident or family member is prescribed medication, they will be educated to the name, frequency, and purpose of the medication. These medications will be prepared and dispensed in child-proof prescription bottles at scheduled intervals in a "pill-line." Residents should report to the "pill-line" as scheduled to assist in ensuring that they receive timely and appropriate medical care.

A few medications such as inhalers, creams and eye drops will be given to resident to keep on person. Residents shall keep these medications in its original package or container, locked in a draw or cabinet and not share with other residents. Unsecured medication will be returned to the medical unit. Left-over medication should not be given to another resident. Left-over medication should be returned to the medical unit.

Conduct While in the Medical Department

The general rules of conduct at the Center will be followed while in the medical department. Parents are required to supervise their children at all times. The clinic is a busy place. Parents are to keep their children in sight at all times and ensure that they are not engaging in any activity that may lead to an injury, such as running around or jumping off chairs. There may be medical equipment in the area such as scales. Parents are to ensure that their children are not playing on these items.

Complaint or Grievance about Medical Care

Residents are encouraged to discuss the medical care that they or family members are receiving with the medical staff. If a resident needs to discuss the care that they or a family member receives, they should report to sick call and staff can answer their questions. If it is an urgent matter, residents should ask any unit staff in each neighborhood complex to contact the medical department. If residents are not satisfied with the outcome of the discussion with medical staff or continue to have concerns about medical services provided, they may choose to complete a medical grievance, which will be submitted to the Medical Grievance Officer (MGO) for further review. See the section on GRIEVANCE for more information.

Advanced Directives - Process for obtaining medical advanced directives A resident may request forms or other related materials on Advance Directives or Living Wills. These may be prepared by the resident's attorney at the resident's expense.

Copy of Records

Residents who would like to receive a copy of their medical records should complete and sign an "Authorization for Release of Confidential Health Information" form. The forms can be obtained at the medical records department.

PERSONAL HYGIENE

At the Center, residents will be living in close proximity with other families. Personal hygiene is essential. Each resident is expected to bathe daily and keep their hair clean. Upon arrival to the Center, each resident is issued hygiene products. Residents may request these items anytime from staff. Also, these items are available in all bathrooms and shower rooms and replenished as needed. Feminine hygiene items are available in the female bathroom in each neighborhood complex. Female residents are allowed to keep a supply in their suite. Additional hygiene items may be requested from any unit staff.

Issued Personal Hygiene Items

Each resident will receive, at a minimum, the following items:

- One bar of bath soap, or equivalent;
- Deodorant;
- One comb/hairbrush;
- One tube of toothpaste;
- One toothbrush;
- One bottle of shampoo, or equivalent (i.e. shower dispensers);
- One bottle of hair conditioner or equivalent (i.e. shower dispensers);
- One container of skin lotion;
- Hygiene items for children and infants (baby wipes, diapers, diaper rash ointment, etc.);
- One bottle of sunscreen; and
- Lip balm (in tube/stick rather than tub form); and any other items designated necessary by the Field Office Director.

Residents have free access to showers seven (7) days a week, 24 hours a day. The shower rooms are accessible and labeled according to gender. Children nine (9) years and older will shower in their gender-specific shower areas. Children eight (8) years and younger will shower only under the direct supervision of their parent.

Razors are available 7:00 a.m. - 11:00 a.m. daily by speaking with a Resident Supervisor. Razors are issued to adult residents in exchange for the resident's identification (ID). Razors must be returned within an hour for proper disposal.

LINENS

The following linens are provided to each resident upon admission to the Center:

- Two (2) towels;
- Two (2) washcloths;
- Two (2) sheets;
- Fitted crib sheet (if applicable);
- Pillowcase;
- One (1) blanket; and
- One (1) laundry bag.

These linens, other than blankets, will be exchanged for clean linens no less than once a week, or more frequently as needed. Should an occasion arise when clean linens are needed outside the normal exchange day, residents should speak with staff. All linens must be returned when a resident departs from the Center.

MAIL / CORRESPONDENCE

Residents may send correspondence and receive legal and special correspondence through the mail. This includes prepaid envelopes.

An unlimited amount of special correspondence including correspondence with a legal representative, potential legal representative, courts and other governmental agencies and news organizations. See the section on special correspondence for more information.

Packages to/from legal/special correspondents, containing personal property may neither be sent nor received without advance arrangements approved by the Center Administrator. To get instructions and approval to send or receive packages, residents should complete a Resident Information Request Form addressed to their Resident Counselor or Unit Manager. Residents will be instructed on the procedure for sending and receiving packages.

Addressing Envelopes

When sending mail, the resident should write their name, "A" number, and the Center address legibly in the return address area of the envelope or package. They should also write the name and address of who the mail is being sent, legibly. The Center mailing address is:

Resident Name
Dilley Immigration Processing Center
300 El Rancho Way/P.O. Box 608
Dilley, TX 78017

Indigent Resident Mail

Residents who do not have adequate funds to purchase postage will be permitted to send at no cost:

- A reasonable amount of "special correspondence" mail. Should the Center consider the related amount "unreasonable," the ICE Office of Chief Counsel will be consulted prior to suspending mail postings.
- At least five (5) general correspondence letters per week.
- Any packages that are deemed necessary by ICE Enforcement and Removal Operations (ERO), such as clothing, personal items, and items needed for return to country of origin.
- Packages containing personal property when it is determined that space is limited for the proper storage of the items.
- Residents who are indigent and wish to use this service provided should contact their Resident Counselor or Unit Manager for proper approval and processing.

Special Correspondence

Special correspondence is written correspondence to or from attorneys and other legal representatives, judges, courts, embassies/consulates, the President and Vice President of the United States, members of Congress, the Department of Justice, the Department of Homeland Security, the U.S. Public Health Service, and representatives of the news media.

Correspondence will only be treated as Special Correspondence if the title and office of the sender (for incoming mail) or addressee (for outgoing mail) are unambiguously identified on the envelope and the envelope is labeled "Special Correspondence." Incoming special correspondence must also be marked as "Special Correspondence" on the envelope or package. Residents must instruct anyone sending Special Correspondence to the Center of the related rules and address requirements.

- Special Correspondence may only be opened in the presence of the resident, and may only be checked for contraband, not read.
- Special Correspondence sent by the resident must be clearly marked with "Special
- Correspondence" on the envelope. The Center shall provide postage for all outgoing resident Special Correspondence.
- Special Correspondence packages may only be sent or received with advance arrangements. To send or receive such a package, residents should speak with their Resident Supervisor or complete a Resident Request form.

Postage and Envelopes

Envelopes are readily available in the phone room and can also be requested at no cost by speaking with a Resident Supervisor in your neighborhood complex. Postage is available for purchase at the Convenience Store or accepted through legal/special mail.

Distribution of Incoming Mail

Incoming legal and special correspondence is distributed within 24 hours when arriving during normal business hours. Mail received on weekends and holidays is distributed the next administrative business day.

Posting of Outgoing Mail

Outgoing mail will not be opened, inspected, or censored unless it is addressed to another resident in a detention center, or there is reason to believe the item may pose a threat to the Center security or orderly operation, endanger the recipient or the public, or facilitate criminal activity. Outgoing mail will be posted within 24 hours of the time the mail was turned over to the Center by the resident, excluding weekends and holidays: then it will be posted the next administrative business day.

Outgoing mail (containing appropriate postage) may be placed into the drop off box labeled "Mail" located near the bathrooms at the end of each neighborhood complex. If mail is placed into the drop off box without proper postage, it will be returned to the resident unless they are indigent. See the section on indigent mail for more information. Mail that does not fit into the slot may be handed to staff for processing.

Electronic Mail (email) and other Electronic Correspondence

The Center provides access to an Internet connection so residents may send and receive email, use instant messaging, and send and receive PDFs and/or other scanned documents that are sent electronically.

In some instances, electronic correspondence will be monitored, and inappropriate websites are blocked.

FREE MOVEMENT

Barring temporary restrictions due to medical or security reasons, free movement hours are from 8:00

a.m. to 8:00 p.m. each day. Some residents may have 8:00 a.m. appointments that require the resident to leave prior to 8:00 a.m. and shall notify staff of their departure. During free movement, families are allowed to move freely throughout their assigned neighborhood and all programming areas of the Center, however, residents are not allowed to visit other neighborhoods. Children aged 12 and older may participate in free movement between 8am-8pm. Free Movement passes are issued by a case manager at the direction of the parent. This pass may be given, suspended or reinstated by the parent at any time of their choosing. Resident children receiving a pass may go to the library, education, recreation and the activity room in their complex. Children aged 12 and older who do not have a pass and all children under 12 years old are expected to be under the direct supervision of their parent at all times when not in school or participating in an organized activity.

RECREATIONAL PROGRAM

The Center provides for structured, age-appropriate indoor and outdoor activities, to include educational packets, toys, games, puzzles, books, television, large muscle activities/exercise, leisure activities for adults, and Bibles and streamed religions services.

Staff will schedule specific activities for pleasure and fitness and ask that residents cooperate and participate in these activities along with their children. Some on-site activities are scheduled on particular days and times, while others are available for use independently.

Recreation postings, information and schedules are posted in each activity room. For the safety of residents, children should never be left unattended in a suite. Outside of free movement hours, residents are expected to remain in their neighborhood complex.

Residents are authorized to use the recreation facilities within their neighborhood during open movement.

Residents are expected to take care of supplies and equipment issued to them and to return the items after use. Check the bulletin board in the activity room for a list of events and times.

Outdoor Campus Access

Barring temporary restrictions due to medical, environmental or security reasons, the outdoor activities are available from 8:00 a.m. to dusk or 8:00 p.m., whichever comes first. Outdoor recreation equipment may be utilized only on assigned neighborhood recreation yards and must be returned prior to going back to the neighborhood. Residents must report any loss or breakage to staff, so the equipment stays in good working order and is replaced as needed. Drinking water is available at each recreation park pavilion and bathrooms are available in the neighborhood complexes, adjacent to the recreation parks. It is recommended residents stay within the boundaries of their assigned neighborhood unless participating in Center wide programs or services.

ART SUPPLIES/WRITING INSTRUMENTS

Art supplies (colored pencils, crayons) are available from recreation staff. Parents must supervise young children using art supplies so as to not deface Center property. If a resident's child is not properly supervised and marks or draws on the Center Property, the parent and child will be responsible for cleaning and removing those markings.

RELIGIOUS SERVICES

These services include individual counseling, group prayer, Bible study and various church / worship services. These onsite religious services are provided through outside religious organizations and community volunteers. The Center RSC addresses all questions or concerns regarding religious opportunities or practices, will assist in obtaining materials on various faiths and may, upon request, be able to facilitate visits by ministers of particular religious faiths.

Outside religious persons may also freely visit with residents, either by appointment made by the RSC or during visitation hours. See the section on visitation for more information. A list of scheduled services is posted in each neighborhood complex's activity room. These services are open to all who wish to attend and are only

limited by the occupancy of the chapel space. If this occurs, additional arrangements will be made. Should residents wish an accommodation such as for special religious observances, they should speak to the RSC who will coordinate the request if possible or submit a Resident Information Request form.

Religious Services Chaplain (RSC)

Residents may request appointments with the Chaplain by speaking with him/her or by completing a Resident Request form.

TELEPHONE ACCESS

Attorneys, friends and family may call the Center to leave messages for residents by calling 830-378-6500 option 0. The call-in number is posted in each neighborhood complex activity room. Emergency messages will be delivered to the resident as soon as possible and non-urgent messages will be delivered within 24 hours.

Resident telephones are located in each suite and are available 24 hours a day. CoreCivic does not monitor conversations on any of the telephones; however, all calls are subject to monitoring by Federal agencies. Sanitizing wipes are available upon request from the complex resident supervisor to clean the phones before or after use. Accommodations shall be made for residents with communication impairments (ex: hearing / speech impaired), or residents who wish to communicate with such persons by speaking with unit team staff or completing a Resident Request form.

Calls outside of the United States to legal assistance organizations, immediate family, or others may be made in cases of emergency or compelling need by speaking to a unit team staff or by completing a Resident Information Request form.

ICE Free Access Telephone Calls

Residents may contact a variety of organizations at no cost. Information is posted on each activity room information board and near the phone bank(s) on calling consulates, immigration courts, the American Bar Association, the ICE Public Advocate Hotline, the Office of Inspector General, and a variety of other government and non-governmental offices.

Indigent Resident Telephone Access

In addition to the free ICE telephone calls mentioned above, indigent residents may also make free calls to legal assistance organizations, family and others within the United States by speaking to the case manager assigned to their complex or by completing a Resident Information Request Form. Additionally, calls outside of the United States to legal assistance organizations, immediate family, or others may be made in cases of emergency or compelling need by speaking to any unit team staff or by completing a Resident Information Request form.

Legal Assistance Telephone Access

Telephone calls to legal providers and courts are not monitored at any time. To access a more private area from which to make legal assistance calls, residents should speak to the case manager assigned to their complex or by completing a Resident Request form.

All Other Calls

Other phone calls not referred to above will be charged at the rates posted in the phone rooms. Phone time must be purchased through the convenience store in \$1.00 increments. Once purchased, the time will ordinarily be uploaded to the phone account within 24 hours. All phone time purchased on the weekends will be posted on Monday morning. Refunds of any remaining phone-time account balance must be received directly from the facility's Telephone System provider, Talton. You will receive a card upon your discharge from this facility which will include instructions on how to request a full refund of the unspent balance.

Telephone Use Rules

Residents are allowed reasonable and equitable access to the telephone room during established Center waking hours (which exclude the hours between lights-out and morning resumption of scheduled activities).

Ordinarily, a Center may restrict the number and duration of general telephone calls only for the following reasons:

- When required by resident telephone use demands, rules and procedures. The time limit will be 20 minutes.
- Emergencies.

Residents are not allowed to use another resident's phone card or pin number.

Residents must be courteous to other residents when using the telephones.

Residents must keep their voice down, so it won't disturb another resident trying to also use the telephone.

Parents using the telephone must supervise their child's behavior and must be within sight and sound of them.

Residents are not allowed to write in or tear the telephone books provided.

RESIDENT-USE TABLET

Each neighborhood will have multiple tablets for Resident use. These tablets have three different pricing structures depending on what you want to do on the tablet. These include:

- Free Profile - Education, Convenience store, Religious Library
- Promotional \$0.03/minute - VP Games, Premium Movies, Music Channels
- Standard \$0.05/minute - WoWSE Games, Pluto TV, Messaging, VP Sports

Tablet Time is available for purchase from the convenience store in \$1 increments. A list of the applications available on the tablet and the cost associated of each can be located in your neighborhood's Activity Room.

VISITATION

Residents are allowed legal and special visits as outlined in those related sections in this handbook and on policy 16-101 Visitation. All visitors must present identification.

Disruptive conduct by visitors or residents may cause termination of the visit. Any property brought to a visit intended to be given to a resident must be turned over to staff for inventorying and receipting, prior to entering the visitation area. No items may be given directly to a resident during a visit. Residents are not allowed to receive contraband or perishable food items. See the sections on allowable personal property and contraband for more information.

Legal Aid Visitation

The Center permits legal visitation seven (7) days a week, including holidays. Legal visitation hours are from 8:00 a.m. to 4:00 p.m., Monday-Friday and 12:00 p.m. to 4:00 p.m. on Saturday, Sunday and holidays. Legal visits are by appointment only. Legal aid visitors may contact the Center to schedule legal visitation appointments. Should a legal aid provider need to arrange an appointment at other than the times listed above, they may contact a supervisor for assistance. Legal visits may proceed through a scheduled meal period. In such cases, the resident shall receive a tray or sack meal after the visit or may choose to eat during the visit. Attorneys must present a US state issued bar membership card. Persons allowed during a legal visit:

- Attorneys and other legal representatives.
- Legal assistants.

- Upon presentation of a letter of authorization from the legal representative under whose supervision they are working, an unaccompanied legal assistant may meet with a resident during legal visitation hours. The letter shall state that the named legal assistant is working on behalf of the supervising legal representative for purposes of meeting with the ICE resident(s); approved Interpreters to aid the legal representatives or assistants.

Consular Visitation

The Center permits visits by consular officers at any time. Consular officers should contact the Center to schedule appointments. Should a consular officer need to arrange an appointment at other than the times listed above, they may contact a supervisor for assistance.

Visitor Dress Code

- Shorts shall cover customarily covered areas of the anatomy, including the buttocks and crotch area, both when standing and sitting. Shorts no higher than mid-thigh complies. "Short shorts," jogging shorts, cut-offs, and other obviously inappropriate short garments are prohibited.
- Skirts and dresses shall extend no higher than mid-thigh when the wearer is seated.
- Slits in skirts and dresses shall rise no higher than mid-thigh when the wearer is seated.
- Sheer (see-through) clothing is prohibited.
- The top of shirts and dresses (excluding straps) shall be no lower than the underarm in the front and back. Bare midriffs and strapless tops, tube tops, and swimsuits are prohibited.
- Shirts shall be worn at all times. Muscle shirts, bare midriff shirts and sleeveless shirts are prohibited.
- Shoes shall be worn at all times.
- Gang "colors"* and other gang displays are prohibited.

GRIEVANCE SYSTEM

Staff will not harass, discipline, punish or otherwise retaliate against a resident who files a grievance or complaint. Any allegations of this nature are thoroughly investigated by the Center Administrator. Residents have access to the formal grievance system at all times but are encouraged to try to resolve small complaints informally whenever possible.

Informal Process – The informal route involves discussing the issue with staff in an attempt to resolve the matter. Residents may choose to speak with staff, case manager, or resident supervisor. They may also submit a complaint on a Resident Request form, which a unit manager or designee will review and attempt to resolve. The informal route is less time consuming than the formal route and may offer resolution more quickly. Residents dissatisfied with the response may file a formal grievance as outlined below.

Formal Process – If a resident does not receive a desired resolution through the informal process, or wishes to bypass the informal process, that resident may file a grievance on a Resident Grievance form. These forms are available in the neighborhood complex's activity room. If an attempt was made to resolve the matter first informally, residents should indicate on the grievance form who they spoke with informally. Using the correct grievance form is important.

Grievance forms should be completed and placed in the mailbox located in each neighborhood, marked "Grievance." Only the grievance coordinator has access to this mailbox and will keep the grievance as confidential as possible. This mailbox will be checked and emptied each business day.

The ICE Grievance Coordinator is responsible for picking up the grievances daily from the "ICE/Medical Grievance" mailboxes located throughout the Center. After the grievance form is time-stamped and entered into an electronic log, it will be routed to the Medical Grievance Officer (MGO) or designee. If a resident is

unsatisfied with the resolution suggested by the MGO, he/she may elect to appeal the decision to the Health Services Administrator (HSA). If the medical grievance is not resolved at the first appeals level, the HSA will refer the grievance to the ICE administrator to coordinate a Grievance Appeals Board (GAB)

If a resident feels the grievance is of a sensitive nature or that their safety or well-being would be jeopardized if others read the grievance, it may be sealed in an envelope marked as "Sensitive" and delivered directly to the Center Administrator. A resident has the right to seal the grievance in an envelope, clearly marked, "Medically Sensitive" Each grievance form submitted in a sealed envelope must be delivered to the MGO. Residents should see their Resident Supervisor for an envelope if needed and information on how to deliver it directly to the Center Administrator. Grievances should be filed as soon as possible after the alleged incident. Delays in filing may make it more difficult to investigate the issue. Residents may ask other residents, family members, legal representatives or staff for assistance in completing the grievance form. Residents are not allowed to submit a grievance on behalf of another resident unless they are the parent of the resident child who has a problem.

Residents may write about one single complaint or several closely related complaints concerning a single subject on each grievance form. When completing the forms, residents should try to clearly identify the issue, complaint or area of concern. If the form is not clear, it will be returned for further information. The responsible department head will meet with the resident, conduct an investigation, and return a written decision to the resident within five (5) business days of receipt of the grievance. If the resident disagrees with the decision, the resident may submit an appeal to the grievance coordinator or Resident Grievance Committee (RGC). The grievance coordinator or RGC will respond to the appeal within five (5) business days and serve the resident with the written decision and basis of that decision.

If the resident disagrees with the grievance coordinator's second-step formal decision, the resident may appeal to the Center Administrator. Prior to submission, the resident must complete the section on the grievance form described as "State Reason(s) for Appeal" and return it to the grievance coordinator, or place it in a sealed envelope, which may be placed in the grievance mailbox or handed directly to any supervisor or manager of the Center. The Center Administrator will render a written decision on the appeal within five (5) business days of receipt.

If the resident does not accept the Center Administrator's decision, the resident may appeal to ICE/ERO or communicate directly with ICE officials. The resident shall complete the appeal section of the grievance and place it in a sealed envelope, which is placed in the ICE mailbox or handed directly to any ICE/ERO staff. A written decision is provided to the resident within five (5) business days of receiving the appeal.

Emergency Grievance Procedures

An emergency grievance is initiated when a resident verbally notifies staff that they have a complaint that immediately affects their safety or welfare. The staff receiving the resident's report will bring the matter to the immediate attention of the Center Administrator, Administrative Duty Officer or shift supervisor.

Non-Grievable Matters

The following matters are not grievable through the Center grievance procedure:

- State and Federal Court decisions.
- State and Federal laws and regulations.
- Final decisions on grievances.
- ICE policies, procedures, or decisions (i.e., institutional transfers, releases, removals etc.).
- Disciplinary hearing decisions. Disciplinary appeals may be submitted on the disciplinary form after the hearing.
- Residents who demonstrate a pattern of filing nuisance complaints or otherwise abuse the grievance system may have those complaints returned unprocessed.

Staff Misconduct

If a resident suspects, sees, or is the recipient of staff misconduct, they may report the activity by speaking to any staff member or by writing a letter or statement, following the instructions in the Staff Organization and Contact section at the beginning of this manual. Or they may choose to follow the grievance reporting procedures listed in the Complaint and Grievance Procedure section above.

A resident may file a complaint about staff misconduct directly to the DHS/OIG by calling the DHS/OIG Hotline at 800-323-8603, TTY: 1-844-889-4357 or by writing to:

U.S. Department of Homeland Security
245 Murray Drive, S.W., Building 410
Washington, DC 20528
Attn: Office of Inspector General
Online Complaints can be submitted: <https://hotline.oig.dhs.gov>

LIBRARY

General Library

Rules for general library use will be posted in the library. Library hours are posted in each neighborhood complex's activity room.

Library hours are:

- 8:00 a.m. – 8:00 p.m.
- Seven (7) days a week

Legal Information / Law Library / Access to Legal Materials

The law library is located in the general library and is open as per the building schedule. If residents cannot access the law library due to the resident limit (based on available workstations), they should speak with a supervisor who will make arrangements to use the law library. Staff will accommodate resident requests for additional law library time to the extent possible, and requests for the accommodation of work schedules to the extent practicable, consistent with safe and secure Center operations, and with special priority given to such requests from residents facing a court deadline. Any residents not using the law library for its intended purpose will be asked to leave. Typewriters and computers are available in the law library for preparation of legal documents and for legal research. The computers contain LexisNexis – an application which has a variety of publications on immigration law and other related publications. There may be other legal, immigration or non-governmental organization related research on the bookshelves in the law library. Residents may request off site law related materials by completing a Resident Request form.

For instruction on accessing the LexisNexis application, residents should speak with the library aide or complete a Resident Request form. Residents should speak to the library aide for paper, storage thumb drive to store documents and/or to report malfunctioning of law library equipment.

If a resident discovers that material is missing or damaged, the resident should notify library personnel.

Materials Provided by Legal Representatives

Documents or other written material provided to a resident during a legal aid visit shall be inspected but not read. Residents may keep legal materials in their suites. Quantities of blank forms or self-help legal material in excess of that required for personal use may be held for the resident in their property. The resident will be permitted access to these documents by speaking with staff or by completing a Resident Request form.

Free Legal Assistance

Pro bono (free) legal assistance may be requested by contacting the pro bono legal assistance organizations posted in each neighborhood complex's activity room. The Executive Office for Immigration Review supplies this list to ICE ERO for posting.

Legal Rights Group Presentations and Legal Orientation Programs

The Center ensures that authorized persons and organizations may present information on U.S. immigration law and procedures freely to residents and that residents will have open access to these presentations.

Residents will have access to group presentations on U.S. immigration law and procedures and all other relevant issues related to the immigration court, appeals, and discharge processes, including a resident's legal rights. Residents will be notified of these presentations at a minimum of 48 hours prior to the presentation. Notification in the form of a poster will be placed in all relevant activity rooms. Presentations will be open to all residents, regardless of the presenter's intended audience, except when a particular resident's attendance may pose a safety risk.

GENERAL SAFETY/EVACUATION DRILLS

- The Center staff makes every effort to ensure the safety of all residents and staff. Residents also have a responsibility for aiding in their family's safety in the following ways:
- Cleaning up spills or request staff assistance to do so.
- Paying attention to posted warnings, such as wet floor signs and use reasonable care when in these areas.
- Notifying staff immediately if a fire, emergency or other possible hazard is observed.

During an emergency, loud alarms may sound, and bright lights may flash. At these times residents must refrain from conversation unless it is directed to staff and concerns the immediate issue at hand. Resident's family safety depends on the ability to hear, understand, and follow staff direction during an emergency. During an emergency, staff is required to evacuate all residents and staff to a predetermined outdoor evacuation location. Staff will confirm everyone has left the building by counting the residents and staff when they arrive at that location. If family members become separated during a total evacuation, the procedures listed below will be followed:

- Once in a secure location, a census will be conducted to verify all residents are present and accounted for.
- All separated residents will be staged in a central location, as identified by the supervisor in charge, until reunited with their family unit.
- All residents are to immediately inform the nearest resident supervisor if they become separated from their family unit, or if a member of their family is missing.
- Staff will immediately notify the supervisor in charge of any missing/separated residents.
- The supervisor in charge will then check with the 'separated resident' staging area for the resident. Once positive identification has been made, the family unit will be reunited as soon as it is safe to do so.

Residents should familiarize themselves with the evacuation route plan and rally point posted in their suite, which shows the location of the outdoor evacuation location. There are exit diagrams posted around the Center that show the location of all emergency exits. Should an emergency occur while a resident is near a fire exit, they should not wait for staff but should exit to the outdoor evacuation location and wait for staff to arrive. Per local, state and federal laws, the Center is required to perform evacuation drills. The Center performs several drills each month, at varied times of the day and night. These drills are not designed to inconvenience residents, but rather to comply with regulations and ensure resident and staff safety in the case of an actual emergency. Parents should advise and discuss these drills with their children.

MONITORED CARE SERVICES

Monitored care is a service available for short term childcare seven (7) days a week during free movement 8:00 a.m. to 8:00 p.m. for those instances in which a parent is attending court, meeting with a legal representative, participating in an administrative interview, or for other short-term absences (i.e., medical appointments, volunteer work program, when approved by an ICE representative).

Children cannot remain in Short-Term Childcare/Monitored Care overnight or for multiple days. If a parent or guardian is going to be away from the Center overnight or for a period of more than one day and their children are not allowed to go, Center staff will work with the family and ICE ERO to make appropriate arrangements for the care of children during that time.

ROUTINE SANITATION AND SAFETY INSPECTIONS

Sanitation and fire safety inspections are conducted weekly in all living and program areas of the Center. During these inspections, staff inspects for proper sanitary conditions and compliance with other regulations. When inspecting suites during these inspections, the residents living in the room will be requested to be present. Parents are requested to be present when staff are checking their child's living area.

NON-ROUTINE SEARCHES

A non-routine search of housing or programing areas is completed when there is a reasonable suspicion to believe contraband or a threat to resident or staff safety is present. A non-routine search of a resident's suite or personal items will only be done after the resident is notified and is present unless urgent circumstances exist (such as in a self-harm situation). In these cases, the resident is notified after the search is conducted.

Searches of Persons

Visual Inspection – A visual search for contraband without physical contact.

NOTARY PUBLIC

If you need to have a legal document notarized, please fill out a Resident Information Request form to the attention of your case manager, who will make arrangements within 72 hours. To avoid unnecessary delays, **DO NOT SIGN YOUR DOCUMENT UNTIL THE NOTARY TELLS YOU TO DO SO.** By law, pre-signed or altered forms cannot be notarized. If you bring a document with corrections or that has already been signed, you will be instructed to obtain a new form.

PHOTOCOPIES

Photocopies may be obtained by speaking to a Library Staff or filling out a Resident Request Form.

Photocopying services for legal material is available free of charge.

Requests for photocopies of legal material may be denied only if:

- The documents might pose a risk to safe and secure Center operations.
- Copying would constitute a violation of any law or regulation.
- The request is clearly abusive or excessive; or
- There are other legitimate security reasons.

HAIR CARE SERVICES

Residents have the opportunity to receive a haircut free of charge. Hair care services information and schedules are located in each neighborhood complex's activity room.

CONVENIENCE STORE

Convenience items are available for purchase at the Center's Convenience store. These may include snack foods, hygiene items, single-use medications, phone time, tablet time and postage.

Other pertinent information includes:

- Hours of operation are Monday through Friday from 8:00 a.m. to 4:00 p.m.
- Convenience store tools located in the neighborhood's Activity Room include:
 - The ordering and pickup schedule.
 - The day of the week you will be allowed to shop and pick up your convenience store order will align with the housing unit to which you are assigned.
 - An item listing with the associated price.
 - Resident-use tablets will be used to order convenience store only on weekend days (Saturday and/or Sunday).
 - If you need to place an order the same week in which you arrive at the facility (before the weekend), you can do so via the use of the bubble sheet which was provided to you in your orientation meeting.

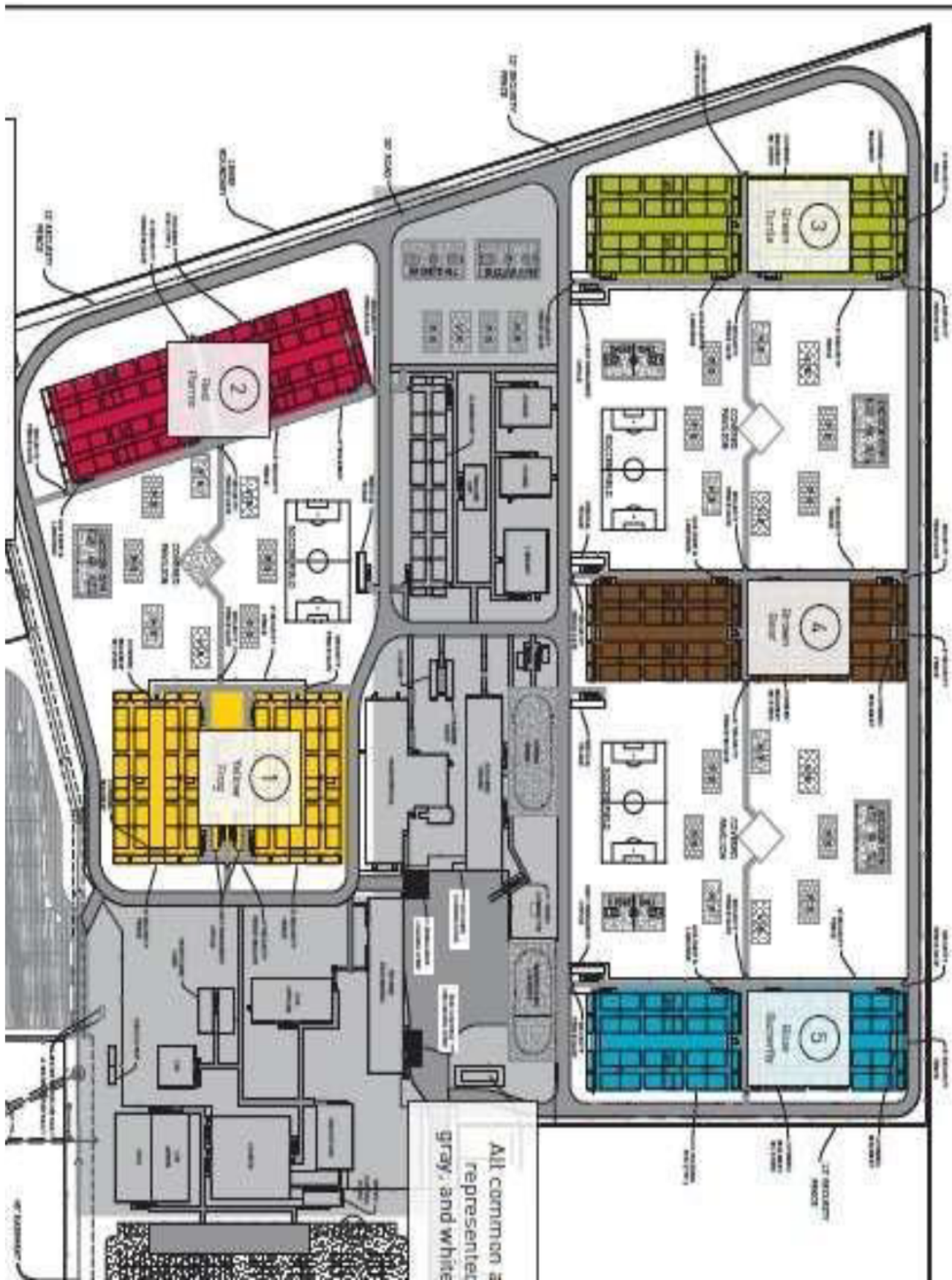
There are no ordering fees for utilizing the Resident-use tablets to buy convenience store goods. This application is free to use.

SMOKE-FREE ENVIRONMENT

Dilley Immigration Processing Center is tobacco-free in its entirety, to include the use and possession of smoking and smokeless tobacco and paraphernalia (lighters, matches, papers, pipes, etc.).

LANGUAGE ACCESS AND DISABILITY REQUIREMENTS

This Center adheres to the language access and disability laws, regulations, responsibilities, requirements, and laws. Reasonable accommodation will be provided to all residents with disabilities to ensure equal opportunity to access, participate in, or benefit from this Center's programs, services and activities. Residents who are limited in their English proficiency will be provided meaningful access to the programs, services, and activities in a language they understand.



This handbook has been reviewed and approved by:

JFMD _____

Date: 07/23/2025

FOD _____

Date: _____

FA _____

Date: _____

EXHIBIT 2

DECLARATION OF ELORA MUKHERJEE

I, Elora Mukherjee, swear under penalty of perjury, that the following information is true and correct to the best of my knowledge and abilities:

1. My name is Elora Mukherjee. I am the Jerome L. Greene Clinical Professor of Law at Columbia Law School. I have served as the founding Director of the Immigrants' Rights Clinic at Columbia Law School since 2014. I have been licensed in the State of New York since 2006 and the State of New Jersey since 2005.
2. Since January 2007, I have provided pro bono representation to hundreds of children and families in immigration detention facilities, including those detained at the secure federal facilities in Dilley, Karnes City, and Taylor, Texas and in Berks, Pennsylvania.
3. Since 2025, I have provided pro bono representation to more than 80 children and their parents who have been detained at or are currently detained at the family detention facility in Dilley, Texas.
4. From March 1, 2026, to date, I have provided pro bono representation to more than 30 children and their parents who have been detained or are currently detained at the family detention center in Dilley, Texas.
5. Through my recent work at Dilley, and through my years of experiences working with children and families in detention, I have become familiar with the *Flores* Settlement Agreement and related judicial orders. I am also familiar with U.S. Immigration and Customs Enforcement's ("ICE") Family Residential Standards ("FRS").
6. I have read the ICE Juvenile Coordinator's supplemental report and attachments filed May 4, 2026. ECF Nos. 1767 # 63381 & 1768 #: 63400.

7. The facts set forth are personally known to me and, if called as a witness, I could and would testify competently thereto under oath.

Exceedingly long periods of detention

8. From March 1, 2026 to date, I have been representing children and families who have experienced extremely long periods of detention at Dilley.
9. Below are summaries of the experiences of several families who I have been representing from March 1, 2026 to date.
10. My clients eleven-year-old M. and twelve-year-old G. have been detained at Dilley since about February 17, 2026. They remain detained at Dilley to this day, May 18, 2026, for a total of about 90 days and counting. Prior to their detention, M., G., and their parents had been building lives in Los Angeles for about four years as bona fide asylum seekers. M., a math-whiz, won a “perfect attendance” award at her school in Los Angeles. G. loved playing soccer, but now feels, in his words, like “a bird in a cage” at Dilley. Both children’s mental and physical health are deteriorating in detention. G. has experienced blood in his stools. Both children have had stomach pain and vomiting after drinking the water at Dilley. Both children are not getting sufficient vegetarian food. At times, including throughout this month, M. and G. maintain vegetarian diets for religious reasons, and they do not have access to sufficient vegetarian food at Dilley. Both children are unable to sleep properly at night because the lights are on 24/7 and guards make loud noises throughout the night. They are concerned that they are not receiving appropriate medical care. M. and G.’s mother’s health is also suffering at Dilley, and M. and G. consistently stay near her to help her with daily tasks and serve as her caretaker. The

family has a motion pending before the Board of Immigration Appeals. M., G., and their parents have spoken publicly about their experiences in detention.¹

11. I represent a three-year-old who has been detained in federal immigration custody since December 22, 2025. This child remains detained at Dilley to this day, May 18, 2026, for a total of about 147 days and counting. This child has developed breathing difficulties in detention and has regressed behaviorally by, for example, wetting the bed. Our clinic has filed requests for discretionary Notices to Appear for this family, which have been denied.
12. I represent a teenager who has been detained in federal immigration custody since January 15, 2026. This teenager remains detained at Dilley to this day, May 18, 2026, for a total of about 123 days and counting. Our clinic has filed a parole request for this family, which was denied.
13. My nine-year-old client K. was detained at Dilley for about 85 days. He and his mother entered the United States lawfully and were arrested when they were on their way to refill prescription medication for K. K. has severe autism. He could not understand why he was detained at Dilley for weeks on end. He grew increasingly disoriented and distressed at Dilley, hitting himself, crying through the night, and begging to return to his home and school in Louisiana. He could not stand the lights being on 24/7 or the noise of patrolling guards at night. K. was finally released on March 6, 2026, after our clinic filed a parole

¹ Sarah Stillman, *The Return of Family Detention*, *The New Yorker* (Apr. 13, 2026), <https://www.newyorker.com/magazine/2026/04/20/the-return-of-family-detention>; Maanvi Singh, *She celebrated her 11th birthday in ICE detention. Her wish: that her family could go home*, *The Guardian* (Apr. 27, 2026), <https://www.theguardian.com/us-news/2026/apr/27/texas-ice-family-detention>.

request for him. K.'s mother has spoken publicly about her family's experiences in detention.²

14. My clients fourteen-year-old E.A. and her sixteen-year-old brother J.A. were detained at Dilley for about 126 days. Prior to their detention, E.A. and J.A. had been building lives in Portland, Maine for more than three years as bona fide asylum seekers. E.A. was a stellar student, and J.A. was both a great student and a star soccer player. During their time in detention, E.A. and J.A. suffered from deteriorating mental health and physical health, they were unable to sleep properly because the lights were on 24/7, and they were unable to obtain appropriate medical care. E.A. and J.A. were devastated on or about November 12, 2026, when federal immigration authorities separated them from their nineteen-year-old sister Olivia. E.A. and J.A. did not know where their beloved sister was for weeks. Later, Olivia was also detained at Dilley. E.A. and J.A. were released from Dilley on March 18, 2026, after our clinic filed a parole request for them. Olivia was released from Dilley on May 8, 2026, after the U.S. District Court for the Western District of Texas granted her federal habeas petition. Oliva, J.A., E.A., and their mother have spoken publicly about their experiences in detention.³

² Mike Hixenbaugh, *'This place broke something in us': Kids languish in ICE detention long past 20-day court limit*, NBC News (Mar. 13, 2026), <https://www.nbcnews.com/news/us-news/children-languish-ice-detention-long-20-day-court-limit-rcna262525>; *Un niño con autismo severo estuvo detenido por ICE cuatro veces más del tiempo permitido (A boy with severe autism was detained by ICE for four times longer than permitted)*, Noticias Telemundo (Mar. 13, 2026), <https://www.telemundo.com/noticias/edicion-noticias-telemundo/inmigracion/video/un-nino-con-autismo-severo-estuvo-detenido-por-ice-cuatro-veces-mas-del-tiempo-permitido-tmvo13145416>.

³ Daniella Silva, *A teen and her family fled torture in Congo to resettle in Maine, but then ICE showed up*, NBC News (Apr. 25, 2026), <https://www.nbcnews.com/news/us-news/olivia-andre-ice-detention-fled-congo-to-maine-dilley-immigration-rcna341003>; Daniella Silva, *Teen says judge's order for her release from immigration detention had her family screaming with joy*, NBC News (May 7, 2026; updated May 8, 2026), <https://www.nbcnews.com/news/us->

15. I represent a fifteen-year old who was in federal immigration custody at Dilley for about 151 days. This family was released into the United States on March 20, 2026, after our clinic filed three parole requests for them.
16. I represented siblings—a seven-year old and a twelve-year old—who were in federal immigration custody for about 100 days, including about 99 days at Dilley. Our clinic filed two parole requests for this family, but neither was granted. The family was deported on March 14, 2026.
17. I represented a two-year old who was in federal immigration custody for about 136 days, including about 134 days at Dilley. The two-year old often refused to eat in detention. The water available at Dilley caused the child to suffer from diarrhea. Medical records from Dilley recorded the child as consistently being in the bottom 1 percentile in weight based on age and height (“weight-for-length ratio”). The child’s weight-for-length ratio even dropped to the zero percentile, which qualifies as “severe malnutrition.” Our clinic filed a parole request and a request for discretionary notices to appear for this family, but neither was granted. The family was deported on March 25, 2025.

Ongoing medical concerns and failure to accommodate special needs

18. Children and their families consistently report that they are not receiving appropriate medical care and that children’s special needs are not appropriately accommodated.

[news/olivia-andre-release-dilley-immigration-ice-detention-maine-rcna344006](https://www.nbcnews.com/news/us-news/olivia-andre-release-dilley-immigration-ice-detention-maine-rcna344006); *Exclusive: Teen asylum seeker detained by ICE for nearly 6 months speaks out*, MS Now (May 10, 2026), <https://www.nbcnews.com/news/us-news/olivia-andre-release-dilley-immigration-ice-detention-maine-rcna344006>; *Olivia comes home: Teen reunites with family after ICE detainment in Dilley, Texas*, ABC News (May 11, 2026), <https://abcnews.com/video/132857770/>.

19. Nearly all of my clients who have been detained at Dilley from March 1, 2026 to date have expressed concern about the medical care provided to them at Dilley.
20. My clients—a parent and two-year-old child—were kept in medical isolation for months at Dilley. The parent had been diagnosed with tuberculosis.
21. My two-year-old client, K., refused to eat solid food for twelve days while in federal immigration custody. According to his mother, he survived on only water and apple juice. K. and his mother are bona fide asylum seekers who built lives in California and complied with all their ICE check-in requirements and all requirements of the Intensive Supervision Appearance Program (ISAP). They were released on April 1, 2026, after our clinic filed two parole requests for them. His mother has talked publicly about their experiences in detention.⁴
22. My five-year-old nonverbal client, G., who has significant developmental delays, faced serious health problems in federal immigration custody. G. struggled to eat in detention and did not poop for nine days. The laxatives and enemas provided at Dilley did not significantly improve his conditions. During attorney-client meetings via Zoom video calls with the family, I saw that G.'s stomach appeared visibly distended and uncomfortable. Prior to their detention, G. and his parents complied with all ICE check-in requirements, all ISAP check-in requirements, and were bona fide asylum seekers living

⁴ Dara Kerr, *Two-year-old held by ICE sick and not getting adequate care, Democrat warns*, The Guardian (Mar. 30, 2026), <https://www.theguardian.com/us-news/2026/mar/30/texas-ice-detention-facility>; Pablo Manríquez, *The Toddler in the ICE Prison Who Wouldn't Eat*, Migrant Insider (Apr. 2, 2026); *Kaleth is back home safe*, Lidia Terrazas News (Apr. 3, 2026), <https://www.instagram.com/reel/DWtWqG2id8A/>.

in Texas for more than two years. G.'s parents have talked publicly about their experiences in detention.⁵

23. As described above and in the associated news coverage, my nine-year-old client K., who has severe autism, struggled throughout his 85 days in detention.

Ongoing mental health concerns

24. Babies, toddlers, children and teenagers should not be detained at Dilley. Every child who I have represented in federal immigration custody from March 1, 2026 to date has experienced mental health distress in detention.

Inadequate access to clean drinking water and lack of appropriate palatable food

25. Every verbal child and parent who I have worked with at Dilley from March 1, 2026 to date has reported that they do not have access to sufficient clean drinking water. Families use their limited commissary funds to purchase bottled drinking water. I have reviewed medical records from Dilley for my clients in which children report that they are

⁵ Mike Hixenbaugh, *Children's entertainer Ms. Rachel has a new cause: Freeing kids from ICE detention*, NBC News (Mar. 21, 2026), <https://www.nbcnews.com/news/us-news/ms-rachel-ice-detention-children-immigration-dilley-texas-center-rcna263786>; Mike Hixenbaugh, *Nonverbal 5-year-old who met Ms. Rachel over Zoom is released from ICE detention*, NBC News (Mar. 24, 2026), <https://www.nbcnews.com/news/us-news/ice-release-5-year-old-ms-rachel-zoom-dilley-texas-immigration-rcna264926>; *Tras su liberación, los padres del niño Gael relatan el calvario que vivieron detenidos por ICE (Following their release, the parent of young Gael recount the ordeal they endured while detained by ICE)*, Noticias Telemundo (Mar. 26, 2026), <https://www.telemundo.com/noticias/noticias-telemundo-en-la-noche/inmigracion/video/tras-su-liberacion-los-padres-del-nino-gael-relatan-el-calvario-que-vivieron-detenidos-por-tmvo13154399>; *"Nadie quiere ver eso para un hijo": Hablan los padres de Gael, niño con autismo que estuvo detenido en Dilley, Texas ("No one wants to see that happen to their child": The parents of Gael, a boy with autism who was detained in Dilley, Texas, speak out)*, Univision (Mar. 25, 2026), <https://www.univision.com/shows/noticiero-univision/nadie-quiere-ver-eso-para-un-hijo-hablan-los-padres-de-gael-nino-con-autismo-que-estuvo-detenido-en-dilley-texas-video>.

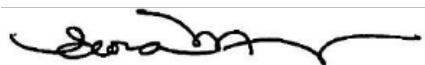
suffering from stomach pain, vomiting, diarrhea, and other stomach issues as a result of drinking the water that is available for free at Dilley.

26. Every verbal child and parent who I have worked with at Dilley from March 1, 2026 to date has reported that the food is not appropriate or palatable for children and families.

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

May 18, 2026

New York, New York



Elora Mukherjee

EXHIBIT 3

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

1 I, C [REDACTED] G [REDACTED] C [REDACTED], declare as follows:

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

4 2. I am 13 years old. I was born in [REDACTED], but I have been living in Florida since I
5 was a baby. I have never been back to [REDACTED] since I was born.

6 3. I speak English and Spanish.

7 4. I have been detained at Dilley for 90 days. I keep track of the days on the
8 calendar.

9 5. I have lived in Miami for as long as I can remember. I have a nine-year-old
10 brother and a five-year-old sister who were both born in the U.S. I am in 7th grade. My
11 favorite things about my school are robotics, science, and reading. In my robotics class,
12 we were making robot cars. After school, I like to play soccer and FIFA on my
13 PlayStation. I also like to stay up late and sleep in on the weekends. Things were going
14 well before we came to Dilley.

15 6. One day, I went to an ICE check-in meeting with my mom. They told her to bring
16 me. We showed up at the meeting, and they told us we were being taken to a detention
17 center. I felt very scared. My mom said she could ask whether I could possibly stay with
18 my stepdad and my siblings, but I was worried about being apart from my mom. I was
19 also worried that if I didn't go with her, she would go to a jail.

20 7. After the meeting, they took us directly to the airport. We flew to Houston and
21 then to San Antonio. We stayed at a hotel for one night in San Antonio, and then they
22 drove us to Dilley.

23 8. When I first got here, I felt really depressed. I would cry sometimes. I would shut
24 down and want to be alone.

25 9. It's hard to sleep here because the lights are on all night and the bed is
26 uncomfortable. My back hurts a lot from the bed because the mattress is so thin. My
27 back never used to hurt at home. I wake up a lot at night here.

28

1 10. We live in the yellow area. I think there are about 62 people there right now.
2 There are three other families living in our room. Each of the families has a mom and a
3 son. We get along okay.

4 11. The food gets boring. Mostly they give the same food – so when you’ve been here
5 twelve weeks, it repeats a lot. The food has made my mom sick. When she ate the
6 meatballs, she felt sick and had to go to the bathroom right away.

7 12. They tell you that you can have as many servings of the food as you want, but
8 when it’s good – like the pizza – you can only get one serving. I feel hungry sometimes
9 because I often don’t want to eat the food. My mom will buy me ramen and chips from
10 the commissary for the days that I’m not eating the food.

11 13. The water from the tap here tastes weird, so my mom buys bottled water from the
12 commissary.

13 14. When I first got here, they didn’t have school at all. In March, they set up a
14 classroom for the older kids and I started going for a couple hours a day. It’s not the
15 same as actual school. They do kind of teach us, but not the level I was being taught at
16 my school. I miss my robotics and science classes the most.

17 15. The kids here are sad. They get stressed out being locked in here. They do weird
18 things that they wouldn’t do at home. If I had to describe Dilley with one word, it would
19 be “horrible.” It is awful to be inside here all the time and feel like you’re locked up.

20 16. The bathrooms here are dirty, and I wish they would clean them more often.

21 17. I talk to my stepdad and siblings on the phone every day. I don’t know how much
22 it costs, but I know we have to pay for the calls and it adds up.

23 18. The past few days, there has been a lot of rain. Having to stay inside makes you
24 feel even more like you’re locked up.

25 19. If I could change one thing here, it would be to turn off the lights at night.

26 20. I am hopeful that we can get out of here. I want to be able to see the messages on
27 my phone and go to my house and play with my little brother.

28

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 22nd day
4 of April 2026, at Dilley, Texas



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EXHIBIT 4

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

1 I, A [REDACTED] O [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 39 years old. I am from [REDACTED].

5 3. I speak [REDACTED].

6 4. I have been detained at Dilley for 135 days. I am detained here with my son who is
7 three years old. He was born in [REDACTED].

8 5. I spoke to *Flores* Counsel in March and April.

9 6. My son and I arrived in the United States and we were sent to a very cold place
10 that was some kind of detention facility. We stayed there for a few hours and then we
11 were taken to another detention facility that was also very cold. We were in that second
12 place for two days and then we were sent to Dilley. They gave us food, water, and a foil
13 blanket.

14 **Dilley ICE Detention Center**

15 7. I'm detained like someone who committed a crime. It is very stressful to be here.
16 There is so much uncertainty, and I feel a lot of emotional stress. I am very worried for
17 my son here.

18 8. No one has told me why my son and I have been here for so long. I think I need to
19 wait for a review of some sort, and they just keep telling me I need to wait. They don't
20 tell me anything else.

21 9. All this time I have been here, I write on the tablet to ICE and they just say they are
22 analyzing my case. They came and talked to me a bit ago about giving up my son's
23 nationality. They have threatened to separate me from my son as well. I asked to be sent
24 to a third country, if nothing else, for our safety, and ICE said that would only mean we
25 have to stay here longer.

26 10. No one has told me about any rights my son has here or any rights that are specific
27 to him as a child. I don't remember being shown any video about my rights or my son's
28 rights here.

1 11. A few weeks ago, my son had a cold and he had a fever. It's the second time he's
2 had a cold and been sick since we've been here. Every time he is sick, I go to the
3 medical care facility. This time, they were helpful.

4 12. Now, I'm having medical problems too. A doctor here told me I have a UTI. I was
5 prescribed antibiotics. I was taking them for two days when the doctor called and said,
6 actually don't take them anymore. The doctor said it's actually bacteria with the kidneys
7 or liver. I have never had these types of problems before. I have a lot of stomach pain as
8 well here.

9 13. I worry for my son's mental state. He has been going to the psychology team here
10 because he's waking up at night very frightened and scared and crying a lot. He's
11 become more aggressive. I think because of the stress. They've been switching us to
12 different rooms with different people.

13 14. My son has a very hard time sleeping here. I try to get him to sleep around 8 p.m.
14 but he often can't fall asleep until midnight or 1 a.m. I am not sure why he is having
15 trouble sleeping; maybe because there is a lot of stress here. We've also switched rooms
16 and now we are in a new space with new people. That probably is making it harder for
17 him to sleep too.

18 15. My son has not been eating well. Lots of people are getting sick, and I am always
19 very worried my son will also get very sick. I went to the doctor many times because I
20 was worried about my son not eating. The doctors weren't able to do anything. The last
21 few weeks my son has been eating milk, juice, and apples. He doesn't eat much else. No
22 one has offered me any toddler food or pouches for my son. I don't think the water is
23 good here either. My son has had diarrhea here, and I think it's because of the water. I
24 could buy water, but I don't have money to do that very often.

25 16. They have given us diapers and wipes for my son, but they haven't offered us any
26 food that is more appropriate for a little kid. The only soap that is available is the same
27 soap that is used to wash hands or do dishes. They have never offered me any different
28 soap for my son either.

1 17. A lot of kids here have been here for more than 21 days.

2 18. I was given a list of lawyers who I could call to try and get help. I have tried to
3 call but I always get voicemail, and I think because I leave a message in [REDACTED] and
4 not Spanish, no one has called me back. Someone from RAICES only contacted me after
5 *Flores* Counsel flagged my case for them.

6 19. I have been able to communicate with the staff with the Spanish I do know, but I
7 am not fluent in Spanish. No one has offered me interpretation for [REDACTED], even if
8 I'm speaking to the officers here.

9 20. I am not aware of any process to let the staff know about complaints or concerns I
10 have. Everything is in English or Spanish, not my language.

11 21. My son sometimes plays in the gymnasium and on the play structure. There is not
12 much else for him to do here. He feels very bored. Some days we can't go outside
13 because the sun is so strong here. At the gym, sometimes there are teenagers playing,
14 and one teenager accidentally hit my kid in the face. It was an accident, but it still scared
15 me to go back.

16 22. My son is very young, and he doesn't fully understand what is happening here.
17 But I know he is very bored and he is often sad. He made a friend here, but that friend
18 left and yesterday he was crying a lot and asking for this friend. It's hard for him to be
19 here for so long. Until today, he would ask for his friends [REDACTED] or [REDACTED]. The kids
20 leave and he's the only one who stays.

21 23. Recently, there have been small snakes at the park where children play and in the
22 bedroom area as well.

23 24. No one has been bitten so far but everyone is scared. Moms are afraid to take their
24 kids to use the toilet in the bathroom so some kids have been pooping on the floor.

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 8 day
4 of May 2026, at Dilley, Texas.



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I, Katherine Johnson, hereby declare under penalty of perjury, the following:

I am an attorney at Children’s Rights. On April 23, 2026, I met with A.O. with the assistance of a telephonic interpreter provided by Jeenie, identified by Interpreter ID 083614 and named Bruna, who is certified to interpret in the English and [REDACTED] languages. During our meeting, I read the “Declaration of A.O.” in English, and Bruna interpreted the entirety of the declaration into [REDACTED] for A.O. A.O. confirmed that all the information contained in the declaration is correct and complete to the best of her knowledge. On May 8, 2026, I met with A.O. again with the assistance of a telephonic interpreter provided by Jeenie, identified by Interpreter ID 277060 and named Erica, who is certified to interpret in the English and [REDACTED] languages. A.O. added two sentences to her declaration at this time and Erica interpreted the entirety of those two sentences. A.O. confirmed that all the information in them was correct and complete to the best of her knowledge.



Signature

05/12/2026

Date

EXHIBIT 5

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

1 I, M [REDACTED] T [REDACTED] H [REDACTED], declare as follows:

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

4 2. I am 27 years old and my son, [REDACTED], is six years old. We are from [REDACTED].

5 3. I speak Spanish.

6 4. We have now been detained at Dilley for 66 days, and before that we were in CBP
7 detention for about 10 days. This is an update from my earlier statement.

8 5. I am very upset and stressed because they are not telling us what will happen with
9 our case.

10 6. At the end of March, ICE said we were being taken to Ecuador. Around 5:30 p.m.
11 one evening, the guards came to our room and told us to pack up our things because we
12 were leaving. Then the guards brought us to intake. We waited for about an hour and
13 then some transport people came to pick us up. They said they would take us to
14 Louisiana and then to Ecuador. We were adamant that we didn't want to leave. The
15 transport people said they could not take us against our will and that if we didn't leave
16 voluntarily, ICE would have to chain us up and take us out. We insisted that we were not
17 leaving voluntarily, and they called ICE. An ICE officer showed up and was really mean
18 to us in front of our son. I just tried to stay calm and not back down. I told them we had
19 not agreed to go to Ecuador and that we had a court date that we wanted to keep. ICE
20 then said that if we wouldn't go the right way, they would take us chained another day,
21 and the guards brought us back to our room.

22 7. We then had a court date on March 31, 2026. At the hearing, the judge said he
23 would only give me a bond, but not my husband or son. I did not understand that, and
24 we said that it needed to be for our family. The judge then gave us another court date for
25 April 9, but at that hearing the judge said he would not give any of us a bond, but we
26 could appeal the decision.

27

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1 8. An attorney later told us that there was a document with my signature on it
2 agreeing to go to Ecuador, but I never signed a paper agreeing to that. I do not know
3 how my signature is on that document.

4 9. As time has gone by, it has been harder and harder for my son. My son sees other
5 friends leave here and asks: when we will be able to leave? Why are we still here?
6 Recently he asked me: when are we going to get out of jail? I tried to explain to him that
7 Dilley isn't actually a jail. But he knows what it feels like here, that we cannot leave or
8 go to a park, that he cannot have his toys, and that the bed is so uncomfortable. I
9 understand it feels like a jail. There are so many restrictions, and the guards are so rude –
10 a child is yelled at even if he spills some milk. Sometimes my son will just burst from all
11 of his emotions and start crying.

12 10. My son still does not eat well here. The food is too spicy and has too many
13 condiments and sauces for him. Also, dinner is served at 5 p.m., so by 8 p.m. he is
14 hungry. We have to buy food for him to eat at the commissary. We will buy soup, tuna,
15 crackers, and bread. We also have to buy water.

16 11. They recently brought down the cost of a pack of water from \$30 to \$9. About a
17 month or so ago, a lot of the children became sick and were vomiting a lot. They told the
18 parents the children needed to be drinking more water. The families complained and
19 complained because they could not afford the water. The guards told us they were
20 dropping the price of the water because of this but I don't know if that is true.

21 12. My son is very anxious and has started biting his nails. He feels trapped inside the
22 living area. He's always asking to go outside. He can never stop moving and settle
23 down. Every night he cries at 8 p.m. when he has to say goodnight to his Dad. He wants
24 to be able to be in the same place as him at night or even just hang out a little longer.
25 Being separated from his father each night is probably the hardest thing for him.

26 13. My son was not sleeping well at all because the lights are on all night. The night
27 shift guards for our area will now allow me to put a towel over the bunk bed so that the
28

1 light doesn't go through the area where my son is sleeping. This has helped him a lot but
2 they really should just turn off the lights at night so all the children can sleep.

3 14. My son had started going to school at Dilley and was excited about the new
4 program, but soon he didn't want to go again. He said the teachers were just teaching the
5 same things and he wasn't learning anything new.

6 15. Not having toys here is one of the things that makes my son feel like he is in jail.
7 He doesn't understand why he can't have his own toys. There are toys in the day care
8 room, but kids can only go there when parents have court hearings or meetings. Children
9 cannot have toys in their own rooms - where they have to spend a lot of time. It is really
10 hard for my son not to have toys.

11 16. If you want crayons for your child to draw, you have to buy them at the
12 commissary. If your child draws a picture of anything negative about this place, the
13 guards will take it from your room.

14 17. The process to get more clothes is complicated. You have to make a written
15 request and explain why you need more clothes. Then they go to your room and check
16 your clothes to see if the reason you gave was true. It can take days for them to check the
17 clothes in your room. It's also hard because children are only allowed to have one pair of
18 shoes - even when it is raining a lot and their shoes are really soggy.

19 18. For two weeks, I had been asking for new shoes for my son because the soles were
20 broken. I had been waiting and waiting, but then the day a senator came to Dilley - I was
21 suddenly able to get the new shoes. I notice that things families have been asking for
22 often happen around the time the politicians visit.

23 19. About two weeks ago, my son had diarrhea and vomiting but it went away pretty
24 quickly. I think it was the food since he was sick for just one day. If it was a virus, it
25 would have probably lasted longer. A few days ago, my son fell on his wrist and it was
26 swollen and painful. Medical was very dismissive and just gave him ice.

27 20. It is hard to be here for so long. I try to stay busy by washing clothes or cleaning
28 the living area - I just try to find something to do to keep my mind off of things. I try to

1 talk to other moms for support, but that can be hard, too. I am happy for families when
2 they leave, but it is frustrating to be the ones still here. I just want 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 22nd day
4 of April 2026, at Dilley, Texas



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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: 4/22/2026 Jean Cano

EXHIBIT 6

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

1 I, R [REDACTED] G [REDACTED] H [REDACTED], declare as follows:

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

4 2. I am 36 years old. I am from [REDACTED].

5 3. I speak Spanish.

6 4. I have been detained at Dilley since March 7, 2026, almost 50 days. I have been
7 here with my son [REDACTED] since then. He is 10 years old.

8 5. No one has told me why we have been here so long. All they have told me is that
9 they won't let us go. A friend not at Dilley called RAICES to get us a lawyer, who then
10 called me. Our lawyer at RAICES has contacted ICE several times to find out why we
11 are here past the 20 days under *Flores* (on April 1, 2, 10, 14, and 20), but ICE has not
12 responded to her emails or questions. ICE told me today that they won't let us go
13 because they don't have authorization for my son's case.

14 6. Before I arrived at this facility I was living in San Antonio, Texas for about two
15 years. Before that, I lived in El Paso, Texas, for a year and half. I lived with my son,
16 [REDACTED]. [REDACTED] was in fourth grade when we were arrested. He wanted to be an engineer
17 and build houses. His favorite subject was math. He was also very athletic and loved
18 sports, especially soccer.

19 7. Since being detained here, [REDACTED] misses school, his friends, playing, our
20 apartment that we don't have anymore, his freedom, and everything he had in the
21 apartment. He wrote all this in a letter. He doesn't like to play anymore. He misses the
22 friends that he makes here who leave. It's not easy for me to have my son in this
23 situation.

24 8. I was arrested in my car at 5 a.m. on the way to work in a restaurant. My girlfriend
25 was with me and she was arrested, too. She is at Dilley, but I can't see her because we
26 are not married. [REDACTED] was sleeping and was going to go to school with the babysitter. I
27 said, "I have my son in the apartment; please don't take me." They didn't believe me and
28 were going to take me. They were armed with big and small guns. They dragged me out

1 of the car, put me on the ground and handcuffed me. They did not identify themselves,
2 but I saw “ICE” on their jackets. I begged them not to take me because of my son, and
3 they didn’t believe me. Then they took the keys out of my pockets and all my
4 identification, including my social security card.

5 9. They went into the apartment with guns out as though they were looking for a
6 criminal. They found my son asleep, grabbed him by the arms, and told him to get
7 dressed, that we were going to leave. They grabbed [REDACTED]’s book bag, emptied it of his
8 notebooks, and grabbed shoes and clothes, stuffed them in the bag, and said, “Let’s go.”
9 I was still handcuffed, but they did not handcuff [REDACTED].

10 10. While we were being arrested, no ICE agent told me that my son could stay with
11 someone else while I was arrested. I tried to show the ICE agents my documents,
12 including my work authorization, my [REDACTED] passport, and my immigration
13 document, but they just took them away and said “Let’s go.”

14 11. We were first taken to an ICE processing facility in San Antonio near my
15 apartment until 10 p.m. and then got on a bus to come to Dilley at 3 a.m. My son was
16 hungry the whole day and got only some water and a small sandwich.

17 12. When we arrived at Dilley, no one told us how long we will be here. No one told
18 us what will happen next. On April 6, we had a video conference at Dilley with a judge.
19 We did not have a lawyer. The judge wanted to separate my son and me, and told us this
20 in court. My son told the judge he didn’t want to be separated from me and leave me
21 alone. I don’t want to be separated from my son.

22 13. We have another video conference with a judge on April 28 supposedly about my
23 son, but I am not sure. I don’t know if I will have a lawyer at that video conference. No
24 one has told me about any other hearing.

25 14. Dilley does not have the kind of conditions that any family should be in. Hygiene
26 is a big problem – it’s not adequate.

27 15. My son doesn’t have any soap or shampoo; I have to buy all of it. He can only use
28 the liquid hand soap.

1 16. About a month and a half ago, [REDACTED] got a fungal infection on his face and his
2 feet. He uses a cream every morning and night – sometimes it works and sometimes it
3 doesn't work, but because of the water it comes back again.

4 17. He only has one pair of shoes and has to wear them when they are wet after it
5 rains.

6 18. Treatment of kids is a big concern. No one here is qualified to work with children
7 –they treat the children like adults. CoreCivic does not speak nicely to the kids; they yell
8 directly at the kids instead of going to the parents first.

9 19. The third biggest concern is the food. It's all processed, frozen food. The only
10 things they make here are the French fries.

11 20. I had a DNA test but nothing happened afterwards; they did not give me a paper to
12 say if [REDACTED] is my son. I have heard that if the test shows the child is not the son or
13 daughter, then the family is separated. I have heard that the parent is deported or sent
14 somewhere else.

15 21. When we arrived at Dilley, someone told us that the *Flores* law applied to us, but
16 they didn't tell us what that meant. They tried to get me to sign a piece of paper that
17 might have been about this. But it was in English and I didn't understand. No one has
18 told me about my rights except my RAICES lawyer; she is the only one who has told me
19 about [REDACTED]'s *Flores* rights, that [REDACTED] can't stay here longer than 20 days and that his
20 *Flores* rights are being violated.

21 22. I have never seen a video about our rights.

22 23. People who are getting released have told me they are getting released because of
23 *Flores*.

24 24. My son has been feeling depressed. He feels sad because he sees kids leave and
25 feels alone. I don't know if seeing the therapist helps. He tells me, "Every time I go
26 outside I feel bored; I don't want to play. When I go to the play area, there aren't any
27 toys for kids my age except PlayStation." Sometimes he goes on the treadmill.

28

1 25. Sometimes the food doesn't sit well with my son; I have to buy him ramen.

2 Sometimes I have to buy water at the store because the water here is not good.

3 26. My son is not comfortable because the bed is hard; the metal sticks in his back.

4 The lights are on all night. We have bad sleep here; the lights hit our eyes all night. We
5 feel like caged chickens in an incubator.

6 27. I can't call my family because they are not in this country and it costs too much. I
7 have to pay to call anyone I know here. The only time it's free to call is when you first
8 get here, and that's only for five minutes.

9 28. I got a list to call, but no one answered. To get through, you would need to be on
10 the phone all day calling.

11 29. Use of email here is very limited; I can't use Gmail. I can only receive emails from
12 my lawyer and I have to call her back on the phone.

13 30. On April 6, the judge told us we did not qualify for a bond hearing. I had a credible
14 fear interview at Dilley, but was denied, just like everyone here. There is no way out.

15 31. The only person who has talked to me about my case is the lawyer from RAICES.
16 We do not have a case manager here.

17 32. Whenever someone comes from Congress, we aren't allowed to leave our rooms.
18 We are put on lockdown whenever there are visitors, and whenever there are protests
19 outside. Protests happen a lot.

20 33. I know of a friend here who files grievances and has been told if he doesn't stop,
21 he'll be sent somewhere else. I have other friends who have complained, and they have
22 been deported.

23 34. Education here doesn't work for [REDACTED]. He says it's very bad. Some teachers are
24 nice, but some teachers make him sit alone if he tries to help another kid. One teacher is
25 particularly strict.

26 35. [REDACTED] feels bad when he can't go out when he wants to and can't bring snacks
27 outside the play area; he tells me they yell at you when you do try to leave with food.

28

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 22 day
4 of April 2026, at Dilleys.



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CERTIFICATE OF TRANSLATION

My name is KAITLYN VELAZQUEZ 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: 04/22/26 Kaitlyn Velazquez

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EXHIBIT 7

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

1 I, S [REDACTED] D [REDACTED] C [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 Spanish.

6
7 **Dilley ICE Detention Center**

8 4. I have been detained at Dilley for 143 days this most recent time, and this is my
9 second time being detained at Dilley. I've waited for so many weeks to get out of here.
10 My mom and I receive no information about what is happening or how long we will be
11 here. After months of detention, the officials only told us that there was a mistake in one
12 of our forms that we had to refile, and that was contributing to us remaining detained. My
13 mom tries to be strong, but we have been waiting for freedom for so long that sometimes
14 she cries in the corner.

15 5. The first time they detained me here for a few days, but that was so different than
16 my current detention. After being back here for so many months, I have started to feel
17 like all the days are the same and I'm stuck between four walls. The only thing that
18 changes from day to day is the topics we speak about. All the kids who I have gotten to
19 know have started to lose their ability to try to stay upbeat, too.

20 6. It feels depressing to just go to the same place every day and say goodbye to so
21 many people while I remain stuck here. When my last friend left, I went back to the room
22 and just cried. I asked my mom, "Why are we still here?" I just want a normal life. I want
23 to be free.

24 7. ICE has kept me separated from my baby sister for eight months. I lived with her
25 when she was a newborn. I still think about holding her when she was three months old
26 and the bond we developed. We felt so connected. I just want to be with her. I try to make
27 calls, but I always feel sad because even though I knew her as a baby, I'm missing
28 milestones like her first steps. These are such special moments that I wanted to be there

1 for and it hurts to miss those experiences. My mom feels so sad because she cannot be
2 there to comfort her or help her with her necessities. It just feels so ugly to have to hear
3 about her without being with her.

4 8. Even though we have been detained here for over four months, the ICE officers do
5 not give us any information about how long we will be here. They just say the orders are
6 from above them.

7 9. I feel so sad and impotent because I do not have information about what will
8 happen and I see my mom losing hope. I was trying to keep my emotions up to give
9 others strength, but whenever we get bad news, I feel so sad. A lot of the time, I try to do
10 breathing exercises to stay calm. But when I keep so much bottled up inside, it feels even
11 worse. I feel so locked up now that I do not even want to go anywhere inside the facility
12 anymore. Even though I have a pass, I just do not want to get up and go outside. I used to
13 love school, but I do not want to go anymore. Sometimes the officers who see me say,
14 “Oh, I thought you had left.” I feel depressed.

15 10. I keep a calendar in my notebook where I mark an “X” next to each passing day to
16 track how long I’ve been here. I try to keep track of the important days, too, like when we
17 have immigration court, because that is the only thing I can look forward to. I go to
18 library every day looking for more information about our case in the system, but I do not
19 find information. I feel disillusioned and it makes me cry with anxiety that I might not get
20 out of here.

21 11. Everything feels so bad here because we have spent so much time here. If we had
22 only spent a couple of days, maybe things would feel different. Having to sleep with the
23 lights on all the time for months has made me so tired. I do not know what it means to
24 have a pleasant night of sleep anymore. Even when we finally fall asleep with the lights
25 on late at night, they knock loudly on the door at 6 a.m. every morning and call our
26 names, which wakes us back up.

27 12. Two days ago, the staff did something scary. About 5 officers with ICE badges and
28 about 10 staff from CoreCivic came into the hallway between the rooms where we sleep

1 around 9 p.m. It was dark outside, and they started covering our windows by standing in
2 front of them. We were not allowed to leave our room, so we tried to look out the
3 window to see what was happening. We saw they brought chains and shackles into the
4 room across from us. They grabbed this woman from that room and she and her daughter
5 started crying. She had a pending appeal in her immigration case and was waiting for her
6 response from the court and started saying her case was not over and that they could not
7 deport her at this point. But then, they chained her right there. Her 10-year-old cried
8 harder as she watched her mom be shackled. The officers just took them away and put
9 them in a car. It made us all so scared. This was so different than when other people
10 leave.

11 13. The children in that room came over to ours afterwards and we were in shock. The
12 girl who was in the bunk next to that family said she felt so awful that she had to watch
13 and could not do anything to help. Now we are all feeling so scared that this will happen
14 to us. We now feel like the people who work here are capable of doing anything to us.

15 14. The lack of dignity and respect that the staff showed that night really shocked me. I
16 do not know why they had to remove her like that. That woman did not do anything bad
17 that made her deserve that treatment or to be made a spectacle in front of so many
18 families. It seemed like they were trying to embarrass her and make us all scared. Why
19 could they not just call a meeting with her and talk to her? It also makes us all fearful,
20 because we have our own cases pending, and what happens if officers decide to chain us,
21 too? I won't have any way to defend myself.

22 15. Another time, ICE took a woman who was very pregnant with toddlers to be
23 deported, but the pilot would not let her board the flight. When she came back, she was
24 crying because she had to stay detained.

25 16. There is still no way to communicate with people via our Gmail emails, and we
26 cannot use Google to look up information about how to do immigration appeals.

27 17. I have never seen a video about my rights. I only ever found out about my rights
28 when I looked them up in ChatGPT. But then the library took away access to ChatGPT,

1 too, which I used to look up legal information and medical questions about how to treat
2 my allergies.

3 18. I have very sensitive skin, and the borders of the laundry machines, which are
4 always dirty, give me rashes and hives. My skin feels so itchy, and sometimes it is red.
5 The feeling does not go away. Sometimes when I do the laundry, the clothes all come out
6 stained, and it makes me think there are bacteria all over everything.

7 19. I have seen a lot of people who were sick with coughs and vomiting who the
8 medical people turned away. They told did not need treatment.

9 20. The nurses here only ever give Tylenol regardless of the type of sickness.

10 21. I haven't been able to make any free pro bono calls here by using the system where
11 you are supposed to mark 6. I saw a woman try it recently, and it did not work.

12 22. The education provided used to be only one hour of classes, where they only let 12
13 kids in. Kids would go early, and be turned away because there were more than 12. The
14 teacher would just tell them to come earlier the next. But even when I got into the
15 hourlong class, the teacher would just give us a packet and say to do it. It was the same
16 every time. I tried to tell the teacher that I already did this, but they just said to do it
17 again. That experience did not feel like school, so I stopped going. I hear they have
18 expanded the hours, but I cannot imagine it's any better.

19 23. While we can speak with a lot of people because we speak Spanish, the people
20 who do not know Spanish or English really struggle here. My mom tries to help the
21 Turkish families and other families who do not know English or Spanish with the tablets,
22 but they do not really have a way to understand things.

23 24. How long will we have to be here? We are reasonable people and we do not pose
24 any risk. We want to follow rules. We do not understand the reason they would keep us
25 so long. This does not help anyone. It seems like we are still here because the people
26 higher up in the government want to feel good about themselves and their egos. I just
27 want a normal life with my family and sister.

28

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 10 day
4 of March 2026, at Dilley.



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CERTIFICATE OF TRANSLATION

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My name is Eleanor Roberts 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: 3/10/2026 

EXHIBIT 8

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

1 I, G [REDACTED] S [REDACTED], declare as follows:

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

4 2. I am 12 years old. I am from [REDACTED] and so is my sister, but my parents are from
5 [REDACTED].

6 3. I speak English, [REDACTED], and [REDACTED].

7 4. My family and I were living in Los Angeles, California for about four years before
8 coming here.

9 5. I have been detained at Dilley for 64 days. I'm here with my dad, mom, and
10 younger sister.

11 6. I was in sixth grade in LA, and my sister was in fifth grade. I liked my school a lot
12 there. My favorite subject was Physical Education.

13 7. The four of us were living in an apartment in LA. We used to live with my cousins,
14 but then my cousins moved to live in the floor above us.

15 8. Since getting here, something I miss the most is how my cousins and I used to
16 hang around. I miss them a lot.

17 9. We always studied a lot before coming here. It was study, study, study. Here, it's
18 not like that.

19 10. We were detained because we voluntarily showed up to an ICE check-in in LA.
20 We've always showed up to our ICE check-ins. We've never missed one.

21 11. We stayed in a hotel for one night before coming here. It was right in front of the
22 LAX airport, but I don't remember the name. We had no privacy, because three ICE
23 officers also stayed in the room with the four of us. There were two beds. We got the
24 beds, and they slept on the couch. It was very uncomfortable.

25 12. Then, we took a plane the next day to San Antonio and came straight here, to
26 Dilley.

27

28

1 **Dilley ICE Detention Center**

2 13. After about 15-20 days of arriving here, we had a DNA test. We asked why they
3 had to do that, and they responded for security reasons. They made up an excuse, they
4 said to ensure no one is taking other people's kids, that we had to prove my dad was
5 actually my dad. They did the DNA testing for everyone in my family, including me.
6 We've heard of other families having to do that too.

7 14. We never received a know your rights training. I have never heard of or seen an I-
8 770 form.

9 15. We remember the video playing when we first came in. There was someone
10 talking on it, but we don't remember anything about it.

11 16. Before meeting with you, we had heard the word *Flores* before. Our lawyer said
12 we are going to do the parole request under *Flores*.

13 17. We never heard it from anyone here though. We never knew we were only
14 supposed to be here for 20 days. Some people have been here for 10 months, so that
15 doesn't seem true.

16 18. I have never received an individual release hearing.

17 19. Once when we talked to ICE, they said that if we didn't sign our travel documents
18 we could be separated. My dad was scared of this so he signed for us. My mom has not
19 signed yet, though, which is why we are still here.

20 20. I have never seen a judge here, just ICE officers.

21 21. The only thing we got when we arrived was the list of free legal services.

22 22. About two weeks ago, we received the handbook. It was in [REDACTED]. They asked us
23 to sign and we signed.

24 23. We haven't gotten any shampoo. They said those are only for babies. If we want
25 shampoo, we have to buy it at the store.

26 24. We are not getting floss. We are getting very cheap toothbrushes and toothpaste.
27 You can buy better stuff at the store. The toothbrushes are really small.

28 25. My mom has diabetes and rheumatoid arthritis.

1 26. Once, they kept her in the medical annex for five days so they could test out new
2 medicines on her. They would check her blood in the morning and at night. And one
3 morning, it was 279. This is very bad. It's dangerous. You could go into a coma.

4 27. My dad argued with them to stop the medication, because she was getting so bad.

5 28. Since 2018, he has been giving her medication and food and knows how her
6 disease works.

7 29. They aren't giving her all the medicines she used to be on before here. At first, the
8 food they were giving her was also all wrong.

9 30. Now, they are giving her a special diet.

10 31. She only got a special diet for the first time last week. My dad has been asking all
11 the time for her to get this.

12 32. My mom, sister, and I also need a vegetarian diet on Tuesdays and Thursdays for
13 religious purposes, and the staff just say to eat off the salad bar. We are [REDACTED], except my
14 dad is Christian.

15 33. My mom also has a back hernia that was never operated on.

16 34. For nine days now, she can barely move her right leg. She's been trying to walk
17 but it's getting worse. She has slept at medical for the last nine nights. So has my sister.

18 35. We are able to visit them during the day.

19 36. Today, the doctor came and finally saw her after she has been in medical for the
20 past nine days. He saw her the first day she was in medical for this foot issue, and did not
21 see her at all the other days until today. We asked them, "Why aren't you referring her to
22 a specialist?" Then the doctor got mad at my dad and said, "You're going to tell me when
23 to send her to a specialist? If you're going to talk to me like this, I'll tell security to not
24 let you in anymore."

25 37. This all affects me because if we go back to [REDACTED], my dad will get in trouble. He is
26 not safe there. Then, who will take care of my mom? Me.

27 38. I am nervous my mom could get worse.
28

1 39. It's difficult to watch the staff here not help her. I get very mad, but I can't say
2 much about it. A nurse is supposed to help you. They don't even clean the room she's in.

3 40. The food is really bad here. They reuse the food. For example, today if there are
4 hotdogs, in two days there will be mini corndogs. It's gross.

5 41. If I could change the food here, I would want fresh food every day, and you could
6 go eat any time you want. Right now, there are certain times to eat, and if you don't go
7 then you'll starve.

8 42. I miss [REDACTED] foods, they don't have any [REDACTED] food here. My mom and aunt used
9 to cook it for us.

10 43. They put filters on the water, but it still smells like chloride. It's very heavy. One
11 time it caused us to throw up, but now we just drink bottled water. First it was 30 dollars
12 per case, but now it's 10 dollars. A lot of people complained when Congress came, so
13 they had to lower the price.

14 44. I can't sleep well here. Back at home, I like to sleep in darkness. It's not dark here.
15 You can't put something up like a towel to block the light. Sometimes there are noises at
16 night too from staff. We don't feel comfortable using the eye masks.

17 45. It makes me feel hopeless to be here for so long, because now it'll take me and my
18 whole family a long time to get back to normal because of how much money and
19 education we have lost. We lost the apartment in LA. They are throwing out all of our
20 stuff. Our cousins tried to save the most that they could before the landlord threw it all
21 out.

22 46. I can't talk to my friends because I don't know any of their phone numbers. It's
23 pretty expensive to talk on the phone. If you don't have money here and you're about to
24 be deported, you're screwed. You're probably starving from the food here and you can't
25 tell anyone where you are going.

26 47. We have received one visit from my uncle.
27
28

1 48. Sometimes my parents have a tough time communicating with staff, because they
2 don't speak a lot of English. They talk to me or my sister because we know English
3 better than them.

4 49. One time ICE told my dad to get lost. My dad was just trying to ask if there was an
5 appeal in our file. The ICE officer lost his mind a bit at us.

6 50. I have never heard of a case manager. We just go to the chapel to talk to ICE if we
7 have to.

8 51. We have been here when there have been lockdowns. Any time there is an outsider
9 coming, everyone must be in their rooms. And, you have to be escorted to the dining hall
10 or medical. It has happened maybe four times since I've been here.

11 52. My dad used the grievance system one time for the doctor who threatened him.

12 53. The religious guy in the chapel told us about the grievance system. Otherwise, we
13 wouldn't have known. No one had previously told us how to do this. They just told us
14 certain rules like you can't wash your blankets and you can't wear slippers outside.

15 54. I used to go to the education room during the day. I went because my friends were
16 going, but now I don't go. My mom's condition is getting worse, so I am just staying
17 with her.

18 55. I feel very bored here a lot. You can go to the library or the gym, but it's different
19 when you don't have your freedom. The timing to go anywhere is all limited too.

20 56. We can only use the tablets to access prayers from 8 a.m. to 8 p.m., but there is a
21 prayer we are supposed to do at 4 a.m. We can't access the tablets at that time to pray.
22 There isn't really a silent place to pray here. There is a time for Quran and the Bible in
23 the Chapel, but that's it. There isn't a time for our religion.

24 57. My sister has a lot of stomach pain. We think it's from the food, but we aren't sure
25 what it is. They are just giving her Ibuprofen and Tylenol.

26 58. My dad also needs a knee brace. He has asked for an MRI, but the staff said no.

27 59. If I could change one thing here it would be to shut down the whole facility.
28

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 22 day
4 of April 2026, at Dilley, TX.



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EXHIBIT 9

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

1 I, R [REDACTED] R [REDACTED] M [REDACTED], declare as follows:

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

4 2. I am 40 years old. I am from [REDACTED].

5 3. I speak Spanish.

6 4. I have been detained at Dilley since March 24, 2026, about 30 days. I am here with
7 my daughter [REDACTED], who is 11.

8 5. Before I arrived at this facility, I was living in Texas with my daughter for about
9 three years. I lived in Houston, then Dallas for eight months, then back to Houston. I was
10 visiting in San Antonio when I was arrested.

11 6. I was arrested in my car; the police noticed that my car was missing lights. All five
12 people in the car were arrested, including my daughter and me; three have already been
13 deported. Everyone in the car was handcuffed except my daughter, who was screaming
14 and crying. My daughter and I spent the night in jail; after a day, my daughter and I were
15 brought to Dilley.

16 7. No one told me my daughter could stay with someone else.

17 8. My daughter does not eat the food because she doesn't like it; she only eats the
18 salad. I only eat the salad because the other food makes me sick.

19 9. My daughter and I can't drink the water here because it makes us sick; our friends
20 give us bottled water and we split a bottle between us.

21 10. My daughter cries all the time and is sad and doesn't want to be here. She misses
22 her friends from school and was doing very well there. Now that she's here, she doesn't
23 like to leave the room or go outside.

24 11. No one told me about my or my daughter's legal rights until RAICES attorneys
25 met with me after I had been here more than two weeks. I only heard about *Flores* from
26 other people here after they saw me crying and told me about it and the 20 days and gave
27 me the RAICES phone number. I never saw a video or got a form about my rights.
28

1 12. The RAICES lawyers told me that my daughter could be released without me, but
2 we don't want to be separated.

3 13. But I am afraid to go back to [REDACTED] because I am afraid I will be killed. I have
4 not had a credible fear interview.

5 14. The beds are too hard and hurt our backs and necks. We wake up sore all over our
6 bodies. I get a headache from the lights. My daughter sleeps on the top bunk and moves
7 around a lot because she has trouble falling asleep because of the lights.

8 15. The RAICES attorneys said they would come back, but I am not sure when I will
9 see them.

10 16. ICE told me I could get \$2,600 if I sign a voluntary departure form.

11 17. CoreCivic staff yell at my daughter whenever she doesn't stay near me.

12 18. Whenever there are visitors here, they do not let my daughter and me leave our
13 room.

14 19. There is nothing more than coloring here for my daughter; she is not learning
15 anything.

16 20. Neither my daughter nor I have enough clothes and they are too big for us. When
17 we ask for different clothes, staff are not nice to us and refuse to give us what we need.

18 21. We can only get shampoo if we buy it. We only got soap when my friend left it for
19 us; otherwise, we only get soap if I go around asking for it.

20 22. When my daughter grows up, she would like to be a doctor.
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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 23 day
4 of April 2026, at Dilley.



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CERTIFICATE OF TRANSLATION

My name is KAITLYN VELAZQUEZ 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: 04/23/26 Kaitlyn Velazquez

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EXHIBIT 10

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

1 I, O [REDACTED] S [REDACTED], declare as follows:

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

4 2. I am 16 years old. I am from [REDACTED].

5 3. I speak English and [REDACTED].

6 4. I was detained at Dilley for 323 days consecutively from June 3, 2025 to April 23,
7 2026.

8 5. On April 23, my family and I were released from Dilley, but we were re-detained
9 two days after that at our ICE check-in. We were almost deported, but luckily our lawyer
10 was able to help us.

11 6. I have now been out of Dilley for about three weeks.

12 7. I was at Dilley for almost a year with my mom; my older sister [REDACTED], who is 18
13 years old; my younger sister [REDACTED], who is nine years old; and my twin siblings [REDACTED] and
14 [REDACTED], who are five.

15 8. I spoke to *Flores* Counsel in August of 2025, March of 2026, April of 2026, and
16 May of 2026.

17 **Dilley ICE Detention Center**

18 9. That place was mentally devastating for children.

19 10. No one ever discussed my rights with me for more than 10 months. We weren't
20 told any instructions or told anything about our case or rights. We had to find out
21 everything on our own. Just one week before being released, we were given our
22 CoreCivic handbook for the first time, more than 10 months after our arrival. And when
23 we read it, we saw that it had clear lies. It was very different than the reality we were
24 facing. When we brought up these differences to the officers and supervisors there, they
25 said they weren't even aware of these things in their own handbook.

26 11. The handbook said there was a hygiene kit, but we never got any of that. We asked
27 them about conditioners and sunscreen, but we had to buy all these things from the
28 commissary.

1 12. There was all-purpose hand soap in the bathroom. It caused rashes for a lot of
2 people. My mom couldn't use it, because it would cause redness. We were supposed to
3 wash our hair and body with that.

4 13. We were never shown any videos. No one spoke to us or helped us through
5 anything. We were never even told there was a video.

6 14. We never heard the word "*Flores*" except from our lawyer. ICE never mentioned
7 the *Flores* agreement to us. However, when we found out about it and asked them about
8 it, they said our case was different. Almost eight months into our detention, we asked
9 them for humanitarian release based on the *Flores* agreement. They never responded to
10 us.

11 15. My mom and my younger sister were suffering from medical neglect for many
12 months there. Almost four to five months ago, my mom started to have slight
13 discoloration on her face. At that time, it was only a few spots. She brought up the issue
14 to the CoreCivic medical staff several times. However, the doctor couldn't diagnose her
15 and said he would refer her to a dermatologist. Since then, my mom asked both the ICE
16 and CoreCivic supervisors to approve her medical appointment. She explained to them
17 that the discoloration was spreading rapidly and that her sickness was getting worse.
18 Until our release, she hadn't seen anyone, and no one ever followed up or cared about her
19 issue.

20 16. Further, she discovered a weird bump in her chest about three to four months ago.
21 She was really worried about it and brought it up to the nurses and the doctor repeatedly.
22 The nurses just gave her ibuprofen for her pain and ignored the issue. She went to them
23 repeatedly, but every time they just gave her painkillers and didn't try to find out what
24 was actually wrong with her. She explained to them multiple times that her family has a
25 history of cancer, that her aunt has breast cancer, and that her grandma died from
26 leukemia. She expressed how much stress it was causing her and how worried she was
27 for her children. The doctor, after almost four or five visits, finally referred her to do a
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1 CT scan to find out what was wrong with her. He said it wasn't guaranteed that ICE
2 would approve it, but that he wrote it down.

3 17. She waited for almost a month for that referral to be approved and told ICE about
4 it several times, yet nothing happened. She waited for so long until one day her pain got
5 so severe she went to medical just asking them for painkillers. Her pain was so severe
6 that she needed to be transported to the ER. It was only then that she finally got her CT
7 scan and the other tests she needed. The ER doctor determined that she needs to be seen
8 by more specialists, do an ultrasound, and complete other tests.

9 18. When she came back to Dilley, though, no one followed up with her until she went
10 to them again telling them about her pain and asking about her referrals from the ER.
11 Until our release, nothing had been done for her yet, and she had been in pain that whole
12 time.

13 19. In addition, my five-year-old sister had 13 cavities in her teeth. At first, they didn't
14 cause her pain, and the facility didn't have dental services. In November, the facility's
15 dentist saw her and determined that she had 13 cavities. But since that time, he did
16 nothing to stop these cavities from worsening or to treat them.

17 20. Her pain got significantly worse over time, and by February, she would cry and
18 scream for several hours if she wasn't on painkillers. So, she was kept on painkillers for
19 two months straight. A five-year-old couldn't live without painkillers for two months, and
20 instead of actually treating her and stopping the cavities, they just gave her more
21 painkillers.

22 21. The food at Dilley is one of the biggest issues for all the residents. Many times,
23 people would stop eating for several days after finding mold or even worms in their food.
24 I saw a real worm in the food before. My older sister once found a human fingernail in
25 her food.

26 22. The food was very greasy and very repetitive. I was eating the same things for the
27 last 10 months. My younger sibling would sometimes skip all the meals in the day and
28 eat nothing but the noodles that we would buy from the commissary. Even the

1 commissary didn't provide any healthy or good options. Everyone just ate noodles almost
2 every day.

3 23. Children had to watch as the officers and staff ate pizza, donuts, and outside food
4 that the kids cried when they saw, but they didn't care and ate in front of them cruelly.
5 They would eat candy and lollipops in the middle of the recreation area, knowing that all
6 the kids would do anything to get what they have but can't.

7 24. We were there for almost a year and were never asked about any food. Why
8 wouldn't you ask the family that's been there the longest?

9 25. The back of the cafeteria had a board that said they asked the residents what was
10 our favorite food, and the answer would be something we had never been served before.
11 Apparently, someone wrote "Thank you everything is great" to a question asking "How
12 can we better serve you?" I have no clue who they were interviewing.

13 26. The lights were so bright throughout the whole day. They were barely dimmed
14 during the night, and at 8 a.m. an officer would come and turn on the lights right over
15 your head even if you were sleeping.

16 27. The officers had no consideration whatsoever and would report you or yell at you
17 if you just tried to dim the lights throughout the day for a nap or if you were tired. It was
18 very hard to sleep throughout the night when at any moment people could walk into your
19 room and wake you up at any time. The eye masks were made of a bad and irritating
20 material. They were kid-sized and didn't fit me or any adults.

21 28. We were always paying for the phone. No one ever told us anything about free
22 calls to our family or even to our attorney. Many people that didn't have money would go
23 for weeks or even months without communicating with their families. It was one of the
24 most taxing things for people there. Some people paid more than \$500 just for phone
25 calls to be able to stay in touch with their loved ones.

26 29. We saw some numbers for lawyers posted at Dilley when we arrived, but no one
27 explained what they were for or how we could reach them. Many of the numbers weren't
28 up to date and didn't work. They never gave us any advice concerning the lawyers.

1 30. I want to say a few things about the staff at Dilley. First, when my older sister
2 turned 18 and was separated from us, my mom begged ICE to bring her back or to at least
3 allow us daily visitation at the beginning. One of the ICE agents then threatened her and
4 said, "If you keep arguing, we will ship your daughter to another facility that is 200 miles
5 away and you will only get to have a call with her once every two weeks."

6 31. We believe [REDACTED] was separated from us to live in a different part of Dilley
7 because she spoke to the media. Staff said it was because she turned 18, but she had been
8 18 for almost seven months at that point. It felt like retaliation for speaking to media.

9 32. The separation of our family from [REDACTED] was so heartbreaking and especially
10 damaging for her.

11 33. Second, there was one time an officer was yelling at my younger siblings for
12 fighting over the PlayStation. My mom said, "You shouldn't yell at them like that." The
13 officer said, "It's a privilege, not a right, and we'll take it away if we want to." The officer
14 then said, "You have no rights here except a place to sleep, medical attention, and food."

15 34. Third, many of the staff in the cafeteria were very racist towards me and my family
16 They would serve less food to the people who were not Latino, or they would refuse to
17 give us more servings even though the rules said you could get more. Sometimes, they'd
18 tell my younger brother you can't have more food but then they would give more food to
19 another kid.

20 35. Pregnant women received no different treatment at Dilley. There was a woman who
21 was eight months pregnant who also had a child, and they wouldn't let her husband take
22 the kid so she could rest. They received no different food or anything special.

23 36. Babies, age three and under, don't get any special or different food. I've heard it's
24 hard to get formula for them. Babies have a lot of needs, and if moms had more than one
25 kid it was very difficult for them at Dilley.

26 37. Even my mom with five kids, she'd have to take all three little kids to the bathroom
27 at one time – otherwise she'd get in trouble.

28

1 38. There are no teddy bears or toys for kids at Dilley. With my five-year-old siblings,
2 I saw this firsthand. Because there were no toys, they were really sad. They knew they
3 were supposed to have toys, and they would miss theirs at home so it's mentally
4 damaging for them. They would try to make toys out of random things. They had this
5 feeling of wanting something and never being able to have it through no fault of their
6 own. It was bad for their development, and it would be healthier for them to have toys
7 there – even if just as a distraction from Dilley. They didn't do anything wrong, and it felt
8 like they were unfairly being punished at Dilley.

9 39. The grievance system at Dilley did not work at all. We would just do it to get a
10 record of something. We knew nothing would change. No one ever even told us about the
11 grievance system. No one knows about it at Dilley; our family would tell other people.

12 40. The psychiatrist we met with at Dilley was really nice, and my mom was crying
13 about the lack of Halal food one time, and she said she should write a grievance. She said,
14 “Make sure you don't tell anyone I told you this.” This was after we had been there for
15 two to three months already.

16 41. They do absolutely nothing for grievances. There is a grievance coordinator there,
17 her name is [REDACTED]. She always would lie and say anything we said about the
18 officers didn't have evidence. She just covers for the staff and facility. The grievance
19 response would always say this is “unfounded.” I think my mom submitted over 60
20 grievances, and only one was founded. The one that was founded was just because
21 someone forgot to write a response to her grievance, but when they eventually wrote the
22 response – it was still unfounded.

23 42. No matter what we wrote, they'd say it was unfounded. My mom probably
24 submitted 20 grievances about her health. The response was always unfounded, and staff
25 would say they couldn't let her know about a referral for “security reasons.” Even when
26 my mom would say her sickness was getting worse, that's all the response would say.

27 43. Everyone struggled to send anything via email, even to their lawyers. Gmail was
28 blocked for several months up until our release, and you were unable to make Proton

1 emails without verifying through Gmail. The proton email storage is very limited, and for
2 people who have been there for a long time, it's hard to send and receive things with such
3 a small storage space. I asked why they blocked Gmail, and they said that's just policy. I
4 think this was because everyone was trying to talk to reporters. Until the day I left, there
5 was still no Gmail access.

6 44. I went to both the old and new version of school at Dilley. The new way wasn't
7 really improved. If you wanted to learn on your own, you could, but you just sat there on
8 the computer doing Khan Academy. It wasn't a school. There was no teacher assigned to
9 talk to you or anything.

10 45. I lost a year of school, so I am a year behind my friends now. I am trying to catch
11 up through multiple sessions of summer school. I'm going to have to do summer school
12 plus eight classes in one semester next year instead of the usual four or five to catch up.
13 Even if I do all that, it still may not be possible to catch up.

14 46. Access to clothes and shoes was determined by staff. Whoever we were with at
15 first did not give us access to new clothes, but then our second officer was better. The
16 first officer said we were only allowed one shirt, one pair of pants, one pair of pajamas,
17 and a sweater. Because of this, we were washing our clothes every day. If my five-year-
18 old siblings spilled something, that was it for the day because you couldn't wear your
19 pajamas outside the bedrooms. If you asked for more clothes, you had to show staff it
20 was ripped. That treatment lasted our first six months there.

21 47. You could only have one pair of shoes. For me, I'm a size 12, so if my shoes broke
22 or something it would take almost a week to get a new pair. There was a whole week I
23 had to walk around in slides. When we changed units and officers, it was a bit better.

24 48. I was mostly really bored the whole time I was there. Weirdly, it was more fun
25 when there were more people my age there, but of course I don't want people to be
26 detained there. There was mostly just Uno cards, and everyone had to share those.

27 49. It was extremely hot there so we wouldn't go outside until 6 p.m. or so. The TVs
28 were mostly in Spanish, and we don't speak Spanish. It was definitely just really boring.

1 50. My little siblings were not able to develop properly at Dilley. It's so important to
2 grow and go to school and socialize. When we got home, my five-year-old sister didn't
3 remember herself before Dilley. She kept asking us, "What did I like to do before? What
4 did I like to eat?" That was really concerning to me.

5 51. I felt inferior at Dilley and without freedom. I am damaged mentally and
6 physically from my time at Dilley.

7 52. The day we got released, they didn't let my lawyer into the facility to see my
8 family. They said he was outside, but they didn't let him in. He had a legal meeting
9 scheduled with us in-person at 1 p.m. At the same time, we got called to intake and were
10 told ICE needs us there.

11 53. We were told only to go to intake. They didn't tell us anything else. We waited for
12 ICE for almost 45 minutes at intake. We kept asking to see our lawyer, but they never
13 said anything and just said they had to bring us to intake.

14 54. We were at intake for so long until my mom got very frustrated and said she
15 needed to go to the bathroom and grab some stuff from her bedroom. They let her and
16 then she called our lawyer from the bedroom. That's how we found out we were getting
17 released. I don't understand why no one could just tell us.

18 55. It's crazy they couldn't just tell us the truth. We were confused for almost three
19 hours. ICE never came to intake even though we were waiting for them, and eventually
20 we were released.

21 56. We stayed the night at a hotel in San Antonio. We woke up early the next day and
22 drove all the way home to Colorado. ICE wanted us to have a check-in that day, but we
23 couldn't because we had to drive home. Eventually they said to just come to the check-in
24 the following day, Saturday. We got home at 3:30 a.m., and the appointment was at 9
25 a.m. The appointment is 1.5 hours from our home, so we had to get up around 6 or 7 a.m.
26 in order to get ready and drive to the appointment. They wouldn't change the time.

27 57. My three younger siblings slept a little, but not me, my mom, or [REDACTED].
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1 58. We met one of our lawyers outside the check-in area, and she told us we were
2 going to be okay. An ICE officer told her they were going to keep the check-in very
3 short, and that we'd be in and out. That was a lie.

4 59. They took my mom and [REDACTED]'s ankle monitors off, and we thought that was a
5 good sign.

6 60. After that, an officer said, "You have a final order of removal, and we are going to
7 put you guys on a plane back to your country."

8 61. I asked to call our lawyer who was right outside and was told I don't have that
9 right since I had a final order of removal.

10 62. An officer threatened [REDACTED], saying to her our family would be separated and that
11 handcuffs would be used on her and my mom if we didn't comply.

12 63. After that, we stopped fighting.

13 64. We never got to call our lawyer. We got pushed into a van and it had bars on it. It
14 was like a police car with tinted windows to separate criminals from agents. There was
15 only one baby chair originally. They brought another one, but it was not tied to the back
16 of the car to keep it in place, so one of my younger siblings was not safely buckled in.

17 65. It was really unsafe, and they were driving really fast.

18 66. My mom kept asking for a phone call to our lawyer, and we were still denied it.
19 The officer then proceeded to ignore my mom.

20 67. My three little siblings were crying and very confused. The car ride was very
21 difficult for them, because it felt like a real jail setting.

22 68. I had a bad stomachache and was feeling really nauseous. I said we had to stop
23 somewhere because I had to throw up. The agent told me to throw up on the floor. I
24 started crying at that point. It was really stressful. My stomach really hurt, and I didn't
25 want to throw up on my family.

26 69. We didn't go to a commercial airport; we arrived to a private tarmac. There were
27 maybe 20 agents waiting for us, and they all had guns.

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1 70. Finally, we got a phone call right before we got on the plane. We saw eight other
2 people who were private security contractors. These people were the ones on the plane
3 with us. I don't know who they work for, but they weren't ICE officers.

4 71. A nurse came to talk with us. My mom said her heart hurt, her blood pressure was
5 very high, and she didn't feel safe to fly. The nurse checked her and said she was good to
6 go.

7 72. We flew from Colorado to Michigan. We got some crackers and water on the
8 flight, but that was it until nighttime.

9 73. My mom's chest hurt very badly. She repeatedly told the nurse on the flight she had
10 a heart issue and was having really bad pain. The nurse said she couldn't give her anything
11 besides ibuprofen. The nurse finally told my mom she'd taken as much ibuprofen as a
12 person can take in a single day.

13 74. The plane ride was very hard for [REDACTED], my nine-year-old sister. She was so scared
14 and confused. She had plans to return to school and then all of a sudden her plans and
15 dreams went away and she was devastated.

16 75. That whole time, we didn't know where we were going or what was happening.

17 76. At some point, we landed in Michigan. We were told we'd go from there to New
18 Jersey. In the air to New Jersey, the plane turned around. No one told us why, though. We
19 were forced to keep our seatbelts on during the whole flight. Security told us that even
20 though they were not wearing their seatbelts. My mom was in a lot of pain. She was
21 having issues breathing, and it helped her to undo her seatbelt. A security guard who was
22 very rude pushed my mom into her chair when she tried to undo her seatbelt to breathe
23 better, belted her in, and put her hands on the clasp so my mom couldn't take it off.

24 77. We landed back in Michigan and waited there for three hours. Around 8 p.m. EST
25 we got cold pizza. This was the first piece of real food we had eaten all day. As we were
26 eating, we took off. We still weren't told where we were going. One of the security
27 guards took pity on us and finally told us we were going back to Denver, but he wasn't
28 supposed to.

1 78. The flight was about four hours long.

2 79. We got off the plane in Denver and were greeted by two ICE agents who took us in
3 the same van we came in just to retraumatize us. They took us back to the same office. At
4 this point, it was very late at night.

5 80. After signing a bunch of papers, we still had to drive 1.5 hours home.

6 81. The best way I can describe that day is that somehow it was worse than all the
7 months we spent at Dilley combined. For those 10 months we always had some sense of
8 hope and knew our lawyer was trying to help us. This was an immediate threat, and it
9 was so scary. It was our biggest fear coming true.

10 82. Our high spirits right after getting released from Dilley just made the re-detention
11 that much worse.

12 83. My mom was in pain for days after that.

13 84. I lost a year of my life at Dilley. I lost a year of memories, of progress, of
14 everything. I was finally able to see some of my friends recently after being released.
15 They're all talking about prom and driving cars, and I'm thinking about whether or not I
16 can stay in the U.S.

17 85. Being at Dilley distances kids from the real world and takes away all the normalcy
18 from everything. After you get released, the effects are still there. Nothing is normal
19 anymore because you live in fear of going back to that place.

20 86. Getting back into a normal routine has been a bit rough, especially after the re-
21 detention of my family. It's kind of hard to know what normalcy really is. We were there
22 for so long that nothing really feels normal. I can't describe it.

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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

4 5/16/2026

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8 Signature

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EXHIBIT 11

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

1 I, A [REDACTED] L [REDACTED] G [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 from [REDACTED].

5 3. I have been detained at Dilley for 77 days with my husband and my four-year-old
6 daughter, [REDACTED].

7
8 **Dilley ICE Detention Center**

9 4. My daughter suffers at night because she has to sleep in a separate area from her
10 dad. She cries every night when she has to leave him. I have to pick her up to get her to
11 come to our bedroom. She does not understand why her dad cannot stay with her and
12 asks me over and over why dad is not with us. Then she cries herself to sleep and wakes
13 up crying and scared throughout the night. She is so depressed.

14 5. We have never gotten the opportunity for my daughter spend a night with my
15 husband. Since we got here, the staff have told us that children have to spend the night
16 with their mom unless there is an emergency where the mom goes to the hospital. Even if
17 a child says they want to spend one night with their dad, the officers would not allow any
18 child to do so.

19 6. It is also hard for [REDACTED] to sleep because the lights stay on all night. We are not
20 allowed to cover our heads with towels to block it out, and when we try to the guards
21 bang the doors open with their radios on loud and wake everyone up. They come in and
22 out of the room a lot and it always wakes her up.

23 7. We also wake up with back pain here, because the mattresses are so thin. My
24 daughter sleeps on top of me trying to be more comfortable.

25 8. Sometimes [REDACTED] doesn't want to play or do anything but lie down on top of me
26 because she is so sad. The few times that I left her with my husband so that I could have a
27 bit of time alone, the officials asked where I was immediately. So, I generally cannot
28 have a moment to myself, even if my head hurts.

1 9. My whole head is inflamed. It feels like there is water in my ears, and they feel
2 bad. I have pain that goes up my neck and into my teeth. I do not know what is causing it.
3 But no matter what type of pain or sickness we have, whenever we go to medical, they
4 give us ibuprofen. I wish there was some way to get a real diagnosis. My mom is a health
5 director, and I know that it's not good to just take high doses of ibuprofen all the time.

6 10. My daughter has lost her appetite over the months we have spent here. We are
7 always trying to motivate her to eat, but each meal is harder than the last. It has gotten
8 worse over time. At first, she would eat some food, but as the days go on, there are more
9 and more things she will not eat. Mealtime has become a struggle because she cries a lot
10 and does not want to eat.

11 11. Her anxiety has led her to start biting her nails non-stop, too.

12 12. We try to take her to school to try to get her to have some interaction with other
13 children. Starting last week, they started having some more school hours. The class she
14 goes to is for children who are ages 4 to 7, and it makes our 4-year-old feel frustrated
15 because she does not understand the things that the older kids do.

16 13. She has had many stomachaches, too, while here and is constantly getting spots all
17 over her face. We do not know what it is. They gave her a small baby shampoo when we
18 first got here, but it is so small that it ran out, so we have had to buy shampoo since then.
19 Even still, we all have dry and peeling skin from the water in the showers and the soap.

20 14. There are some days when my husband's stomach hurts, and he finds the pain feels
21 worse when he drinks the tap water. We try to save up to buy water bottles, because the
22 tap water gives our daughter diarrhea. The guards say the water is fine, but they will not
23 drink it. It tastes so bad. So, while everyone uses the sink water for washing our hands,
24 anyone who can buy water does so that they will not feel sick. One trick I use is taking
25 ice and letting it melt. That melted ice water does not make me feel as sick, but it means I
26 must wait for it to melt.

27 15. This week, a congressperson came, and we all felt hopeful that he would be able to
28 help with what is happening here.

1 16. Still, no one has explained to us why we are still here. All of the families who have
2 been here for a long time talk with each other, and we do not know what about our cases
3 is keeping us detained. When I talk to ICE officers, they say we have to wait for our next
4 court date, but mine isn't scheduled yet, so we have no idea how long we have to wait.

5 17. After the last court date, an ICE officer told me I would have to be here 21 more
6 days, even though I had been here for a long time. When I asked why, she said "I do not
7 know why, it says it in the system." I tried to ask more questions, but she said there were
8 other people waiting and that I had to go.

9 18. I feel so frustrated that I cannot do anything to get my daughter out of here. At
10 times, I have gone to ask ICE officials for more information, but they just say I need to
11 wait. They do not take what is happening to our daughter's mental health seriously. The
12 staff say that there are some people who have been here longer and we just need to wait.

13 19. There are some people who have spoken to reporters, but doing that makes me
14 scared because I think ICE might retaliate against us and keep us longer.

15 20. We still do not have access to Gmail here to contact our lawyers. Yesterday,
16 someone new to Dilley asked the library how to email his lawyers, and the people in the
17 library said he could not use Gmail and would have to use Proton. But people have to pay
18 for Proton, so we cannot really use it.

19 21. For the past month, some of us have been praying at night and singing hymns.
20 There was one person who led us in prayer and the mariachi brothers helped make the
21 music. The person who led us left so now we are in charge of leading the songs. But we
22 need to learn the songs, so we tried to look up some hymns in the library on the
23 computer, but they were all blocked. When we asked the staff in the library for access to
24 lyrics for hymns, they said that looking up that information was not allowed.

25 22. The facility also took away our access ChatGPT after they noticed people printing
26 information about how to ask for information and make grievances. The staff are just
27 trying to stop us from having access to tools to advocate for ourselves.
28

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 10 day
4 of March 2026, at Dilliey.



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CERTIFICATE OF TRANSLATION

My name is Eleanor Roberts 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: 3/11/2026

Eleanor Roberts

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EXHIBIT 12

DECLARATION OF RODOLFO C. ALTILLO

I, Rodolfo C. Altillo, swearing under penalty of perjury, make the following declaration:

1. My name is Rodolfo C. Altillo, and I serve in the role of Managing Attorney for the Asylum Access Services (“AAS”) team at the Refugee and Immigrant Center for Education and Legal Services (“RAICES”). I have been in the role of Managing Attorney since July 2025. I have been licensed in the State of Texas since December 2020 and in the State of Maryland since December 2017; I am an attorney in good standing in each state.
2. In my current role as the Managing Attorney for AAS (formerly known as the Family Detention Services Program), I oversee free legal services for detained people and families facing expedited removal from the U.S., as well as people seeking asylum and related protections, at the Dilley Immigration Processing Center (“Dilley”).
3. RAICES is a 501(c)(3) nonprofit, non-partisan organization founded in 1986 and headquartered in San Antonio, Texas. Additional offices are located statewide in Austin, Corpus Christi, Dallas, and Houston. As a humanitarian aid organization in service to immigrant, refugee, and asylum-seeking people and families, RAICES provides free and low-cost immigration legal services, including, but not limited to, assistance with asylum applications, removal defense, DACA renewals, and status adjustments. RAICES provides this full range of immigration-related services to individuals who are in detention, or who are continuing to fight their cases following release.

4. AAS provides *pro bono* legal services for minors who are *Flores* class members and their families detained at Dilley. Since Defendants resumed detaining families at Dilley in April 2025, RAICES has served more than 350 families in ICE custody.
5. Through my current role as Managing Attorney in charge of AAS, I am sufficiently familiar with the terms and requirements of the *Flores* Settlement Agreement (“FSA”), as well as subsequent agreements and/or judicial orders related to it.
6. I am also familiar with U.S. Immigration and Customs Enforcement’s (“ICE”) Family Residential Standards (“FRS”). Between 2017 and 2025, I worked at Kids In Need of Defense (“KIND”), providing *pro bono* legal services to “Unaccompanied Alien Children” (“UCs”) and families separated by the Trump Administration’s “Zero Tolerance Policy.”
7. I have reviewed RAICES’ prior declarations detailing ICE’s non-compliance with protections for minors, and I am familiar with prior judicial orders instructing ICE with regard to its compliance.
8. The facts set forth below are known personally to me and, if called as a witness, I could and would testify competently thereto under oath.
9. RAICES has noted a deterioration in specific areas regarding the Defendants’ treatment of class members over the last few months, and several elements of their non-compliance with the FSA remain as previously reported in declarations to this Court.

Harsher treatment of families.

11. Between March and May 2026, families detained in Dilley consistently reported harsh treatment by ICE and CoreCivic staff.

12. Clients continue to report mistreatment by guards. For example, one parent detailed sustained sleep disruption impacting the well-being of both adults and children. Lights are kept on all day, and the guards conduct loud dorm inspections while detainees are asleep.
13. Clients also report fear of retaliation if they speak up or complain because the guards threaten to file reports on their behavior with ICE and the immigration court. For example, a client states that a detainee was fasting during Ramadan and explained to the guards when he can eat. At 4am, the guards threw his meal at him, rendering him reluctant to self-advocate further for his religious protections.
14. Some parents are especially concerned about how staff treat their children, especially during the limited schooling sessions available. For example, one parent reports school staff referred their child to medical care due to suspected lice. Despite the medical staff claiming the child did not have lice, the child's belongings were all confiscated and destroyed; replacement clothing was only provided upon request by the parent.

Exceedingly long periods of detention.

15. Although RAICES acknowledges that ICE has started to release more families within 20 days of their arrival at Dilley, numerous families remain in federal custody far beyond that timeframe. The severity of these prolonged detentions is highlighted by one client family that, as of May 11, 2026, has reached 140 days.
16. In another case, a child was in prolonged ORR detention for over 200 days. The child had counsel who filed a habeas petition for her release. The child was released to her mother before the petition could be adjudicated. When complying with a prescheduled wellness check three days later, mother and child were both detained and taken to Dilley, where

they remained for nearly a month. In all, the child, a *Flores* class member both in ORR custody and at Dilley, spent over 230 days in federal custody, including the re-detention.

Ongoing medical concerns.

17. Detained families continue to report lack of adequate medical care for class members. Indeed, between March 2026 and May 2026, RAICES' records indicate at least 213 additional concerns over inadequate medical care.
18. RAICES has received complaints from clients that it can take several weeks to be seen following an initial request for medical care; any request requires persistence. For example, one client with a prediagnosed blood disorder developed rashes on her body. She sought care but was not seen. Approximately two weeks later, her rashes began to blister and bleed. She once again requested medical care, yet was forced to wait indefinitely.
19. Clients also report difficulty with accessing medications and care they received prior to being detained at Dilley. For example, a child with asthma manages his condition with a medication that helps prevent asthma attacks; his parent alerted medical staff that his medication was running low and requested that it be refilled, but CoreCivic would not give his mother confirmation that his access to medication would be uninterrupted throughout the duration of their detention or the status of any refill, if any. Similarly, the child received therapy prior to detention but did not receive timely continuation of therapy, causing the child to regress with his behavior and speech.
20. Clients also report inadequate dental care. For example, one client was told that her son needed to wait until they were released from detention to address extraordinary oral pain. Even for dental services that can be performed at Dilley, services are not optimal,

especially for children. Another parent reported that her child had to have a molar extracted. Despite being administered anesthetic, the child was in extreme pain throughout the entire extraction, calling into question the adequacy of care.

21. Some children also experience weight loss while in detention, even during relatively brief detention periods. For example, a 12-year-old child lost almost five pounds after one week. When the parent addressed the concern with medical staff, they were advised by CoreCivic staff that such weight loss is normal.
22. Some clients also complain about having their concerns summarily dismissed by medical staff as simply psychological. Their ailments are then left unaddressed, or they are told to get some fresh air and drink some water to help alleviate their symptoms.
23. The general quality of food and water remains a concern, and clients report problems with severe constipation, which they attribute to the food. Clients have reported going one-to-two weeks without any bowel movements and without adequate medical intervention.

Ongoing mental health concerns.

24. Many children become quiet and withdrawn while in detention. For example, parents mention that their child will cry a lot and state how much they miss other family members, friends, teachers, and school.
25. Seventeen-year-old female children, who then turn eighteen years old while in detention, are generally transferred to the separate adult wing of Dilley, which only houses female adults. This separation causes additional stress and strain on the collective family's mental health. Despite being in close proximity, family members cannot readily see each

other. Additionally, in several instances, the adult child has remained in custody even though the family unit is released, or vice versa, exacerbating anguish.

Inadequate Food and Water.

26. Families continue to report concerns about the quality and appropriateness of the food and water provided to the minor class members. There does not appear to be any improvement from reporting in prior declarations.
27. Many families worry that the poor quality of water makes their children sick, and indicate that they feel forced to use their limited commissary funds to buy bottled water.
28. One family reported that a guard refused to provide them with bottled water to prepare formula for their child. Upon escalating their complaint, they were provided with a highly rationed bottled water supply restricted solely for formula use.

Lack of Legal Orientation Program and Legal Rights Group Presentations.

29. As of May 14, 2026, Class members and their family members detained in Dilley continue to be deprived of information about their legal process and rights. Families do not have access to a Legal Orientation Program, and do not receive a Legal Rights Group Presentation provided for in section 6.4 of the FRS.
30. As set forth in previous declarations, RAICES requested the requisite permission to provide detained class members and their families with Legal Rights Group Presentations. After Defendants denied the request without explanation, RAICES submitted a FOIA request to seek clarification on DHS' reason for the denial and what they would approve. The FOIA request remains pending without a response as of May 14, 2026.

31. Accordingly, Class members and their families are neither provided with information about their rights under the FSA, nor appraised of their basic rights. Instead, families commonly report receiving inaccurate or misleading legal advice from non-attorney ICE and CoreCivic staff at Dilley. The advice appears intended to deter families from further pursuing their case for protection from harm in their home country. For example, a family was told by ICE that they would be deported to a third country so they can seek asylum there. When the parent objected and stated they would prefer voluntary departure or removal to their own country, the officer told them it was too late and they should just sign documents to accept removal to a third country because they do not qualify for any relief or voluntary departure and that they would be removed to the third country regardless of whether they signed. By the time RAICES met with the family, they had already signed those documents, without access to legal counsel to properly advise them on their options.

Hindered Access to Counsel.

32. Since Defendants resumed family detention at Dilley in early 2025, RAICES has scheduled legal visits through e-mail with designated ICE and CoreCivic staff at least 24 hours in advance. Based upon longstanding precedent, this process was devised to allow RAICES, a high volume legal services provider, to schedule daily legal visitations with both current and prospective clients for multiple staff members and volunteers. Visitations are arranged and prioritized according to client needs, anticipated duration, interpretation needs, urgency of the legal matter, and any imminent hearings, interviews, and filing deadlines.

33. On Thursday, April 30, 2026, RAICES sent designated ICE and CoreCivic staff a visitation request list for Friday, May 01, 2026, as per standard protocol over the past 12 months. RAICES was not informed of any upcoming changes to Dilley scheduling policies.
34. On Sunday, May 03, 2026, RAICES sent designated ICE and CoreCivic staff a visitation request list for Monday, May 04, 2026. CoreCivic informed RAICES staff that effective May 01, 2026, legal visitation appointments must be made through the ERO eFile system.
35. The ERO eFile system is burdensome and inadequate for high-volume legal services providers such as RAICES, thereby severely limiting the scale and scope of legal services access available to detainees.
36. On Monday, May 04, 2026, RAICES reached out to the Dilley Assistant Field Office Director (AFOD) to raise concerns with this policy change and request an exception. No response was received.
37. On Tuesday, May 05, 2026, RAICES sent additional correspondence, specifying the active and anticipated challenges with the ERO eFile system, all hindering timely and effective access to counsel. Upon receipt of an out of office notice, additional correspondence was sent to designated officials in her absence, as well as the San Antonio Field Office Director (FOD), who also oversees Dilley. No response was received that week.
38. On Monday, May 11, 2026, AFOD De Leon responded, stating the agency's position that the use of the ERO eFile system is lawful. The response did not address specific access to counsel concerns, and no exception was granted to RAICES.

39. Based on RAICES' current use of the ERO eFile system to schedule legal visitations at Dilley, the following concerns were detailed:

- a. *Restricts Prioritization of Urgent Cases.* The ERO eFile system significantly restricts RAICES' ability to prioritize urgent legal matters, which are common given the fast-tracked nature of detained proceedings and expedited removal. New clients often require multiple meetings per week; however, the lack of available slots in the system makes arranging these critical sessions nearly impossible. To ensure any access at all, we are forced to reserve times one to two weeks in advance, sacrificing the flexibility necessary to respond to immediate client needs.
- b. *Inefficient Fixed Two-Hour Blocks.* The system's rigid two-hour block structure for family unit visits creates significant operational inefficiencies. Regardless of whether a meeting requires 10 minutes or four hours, the block remains fixed. In one extreme, this puts false limitations on the number of clients RAICES can serve while onsite at Dilley. In the other extreme, it also leads to the abrupt termination of complex meetings that exceed the two-hour limit. Extended length meetings are often necessary when language access is a matter of a concern.
- c. *Lack of Transparency on Concurrent Availability.* Scheduling is further complicated by a lack of transparency regarding concurrent availability. While the system indicates if a time block is open, it does not reveal how many simultaneous meetings can occur. Consequently, a supervisor might book one staff member for a 10:00 a.m. visit only to discover that no other slots are available for additional team members until late in the evening, preventing multiple staff from meeting the high volume of clients requiring attention that day.

- d. *Administrative Barriers to Team Management.* Administrative barriers also hinder effective team management. The AAS team at Dilley includes attorneys, DOJ Accredited Representatives, and legal assistants, yet the system prevents supervisors from effectively managing these diverse roles. Attorneys are unable to schedule visits for other attorneys they supervise, and non-attorney supervisors, such as legal assistants, are barred from scheduling visits for themselves or any other team members.
- e. *Undermines Pro Bono Support.* Finally, the ERO eFile system undermines our efforts to leverage *pro bono* support. RAICES staff members each see five to seven clients daily, a figure capped by our own capacity rather than the much higher actual need. As such, we rely on volunteer attorneys and law students to expand access to services reliably and sustainably. The system stifles this collaboration by requiring extensive coordination and mandating that even time-limited volunteers manage their own independent ERO accounts to schedule visits.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: May 14, 2026

Austin, Texas



Rodolfo C. Alttillo, Esq.

EXHIBIT 13

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

1 I, E [REDACTED] C [REDACTED] M [REDACTED], declare as follows:

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

4 2. I am 38 years old. I am from [REDACTED].

5 3. I speak Spanish.

6 4. I have been detained at Dilley for 91 days with my son, [REDACTED], who is 13 years
7 old.

8 5. I came to the U.S. with my son in 2014. We have lived in Florida for 12 years. I
9 also have a 9-year-old son and a 5-year-old daughter. They are both U.S. citizens.

10 6. I have been going to ICE check-ins every year since 2015. About a week before
11 my most recent ICE check-in, I got a text from ICE saying that I needed to bring
12 [REDACTED] to my next check-in and they would give me an excuse for his school absence. I
13 was scared because I thought that meant we might get detained.

14 7. I went to the ICE check-in on January 22, 2026. At first, I was speaking to an ICE
15 officer who I usually meet with and answering her regular questions. Then two ICE
16 officers came in and said that we were being arrested. They told us that we would not be
17 getting handcuffed because we were a good family with no problems. They said they
18 would take us to a place in Miami first and then to a family detention center where we
19 could be together. The ICE agents did not tell us that [REDACTED] had the option of staying
20 with his stepfather and siblings in Miami.

21 8. They took us to a border patrol station and we stayed in a room for a couple hours.
22 They took my fingerprints and ran DNA tests on both of us. Once I got to Dilley, I later
23 met a pregnant woman who had also been arrested at her ICE check-in in Miami. She
24 said she'd been detained at this same station for a few days in a cold cell with her small
25 children while waiting for transportation to Dilley. They slept on the floor with mats and
26 aluminum blankets. Hearing her story made me feel grateful that we were only there for
27 a short time.

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1 9. After that, two people picked us up from the office and took us to the airport to
2 come to Texas. They explained to us that my son and I would not be separated and they
3 showed us a video about who they were and what was going to happen. We then took
4 two planes to get to San Antonio. When we arrived in San Antonio, they said we would
5 be spending the night at a hotel. We got to the hotel a little after 11 p.m. About two
6 hours later, two other people came to our room and replaced the people who had traveled
7 with us. The next day, we stayed in that room until about 3 p.m. I asked if my son and I
8 could go outside for fresh air because I get anxiety inside a small room for long periods,
9 but they said unfortunately we could not. Then around 2 p.m., two different people came
10 to the hotel to transport us to Dilley.

11 10. During this time, [REDACTED] would ask questions and be very pensive. He said the
12 only way he would cry is if he saw me cry, so I was trying to be as strong as possible. I
13 was so worried that we would be sent to [REDACTED] and that I would not be able to be with
14 my other children. I was allowed to make one call to my partner when I was getting
15 fingerprinted, but at that point I didn't know what was going to happen. He was very
16 worried during this time because he did not know where we were. I was not allowed to
17 call him and my children again until we were at Dilley.

18 11. My partner shared that when he showed up at school to pick up our children that
19 day instead of me, my nine-year-old started crying and said "Where is mom? Did she get
20 arrested?" I am so worried about my children. We are so close. They would even sleep
21 with me.

22 12. When I got to Dilley I was absolutely devastated. I had a horrible headache and
23 even vomited from the stress of the apprehension and being separated from my younger
24 children.

25 13. At the intake, they gave us clothes and allowed us to shower. They also X-rayed
26 both me and my son. I'm not sure why.
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1 14. During the orientation, I remember that they spoke to us about getting money for
2 voluntary departure. I don't recall anyone mentioning anything about *Flores* or *Flores*
3 rights.

4 15. They assigned us to a room with other mothers and their sons. We have been
5 moved three times to different rooms. We started off in the red area and now we are in
6 the yellow area.

7 16. It is very hard to sleep with the lights on all night. It's harder for my son because
8 he has to sleep on the top bunk. The officers will not let parents sleep on the top bunk so
9 I am not able to switch places with him. There is a small difference in the light when
10 some are turned off, but it is still too bright and doesn't help. They offer eye masks but
11 they are so tight and uncomfortable. They would leave marks on my son's face and he
12 didn't want to wear them. My son also complains a lot about having back pain from the
13 bunk beds.

14 17. My son has gotten so bored with the food and he will only eat limited number of
15 things. The mealtimes are also challenging because breakfast and dinner are served so
16 early. I need to buy snacks at the commissary because he is hungry in the evenings. We
17 can only go to the commissary once a week so I have to plan ahead with buying food and
18 water. The only fruit they give us is from cans. When my son sees some people with
19 special diets getting fresh grapes, he really craves them. I told him that once we get out
20 of here, he can have all the grapes he wants.

21 18. Since the beginning, I have always bought bottled water for my son. I used to let
22 the ice melt that they give us and drink that water. The tap water always tasted weird and
23 made me feel a weird sensation when I would drink it, but I couldn't afford to buy it for
24 both of us because it used to cost \$30 for a 24-pack. Then one day, I saw a bunch of
25 white particles in the bottom of the cup of water from the melted ice – and I did not feel
26 comfortable drinking the tap anymore.

27 19. They recently reduced the price of water to \$9 and now I have the "luxury" of
28 drinking clean water, too. At a community meeting about a month ago, a mother stated

1 that it was very unkind not to give children water. The following week, they had lowered
2 the price of the water. I do not know if it was connected. At the community meeting
3 about a week ago, a different mother raised how hard it was for children not to get fresh
4 fruit when they are seeing other people eat it who have special diets.

5 20. They gave us some hygiene products when we first got here – a toothbrush that
6 broke after the first use, a small tube of transparent toothpaste, a tiny lotion, a deodorant
7 that was not adequate. They did not give us shampoo or soap – they just expect us to use
8 the hand soap in the showers. We buy shampoo, soap, toothpaste, toothbrushes, and
9 deodorant at the commissary. We ask to be able to buy wipes to use, but they do not sell
10 them.

11 21. My son talks to his stepfather and siblings every day. When we got here, we were
12 given \$5 each for a call, but after that children have to pay for calls to family members.
13 We end up spending \$26-30 every two days on phone calls to my children in Miami.

14 22. I feel being here at Dilley is a like a trial and God is testing me. I try to focus on
15 that there must be a purpose to what I am going through. I can see all the bad things that
16 are happening, but I am grateful that my children are alive. At this point I am so tired,
17 and I feel like I will just have to do whatever they decide. But I am worried about my
18 son. He believes that he will go back to Miami, and that is what has been keeping him
19 going. I know there's a real possibility that we won't be able to go back and I am scared
20 of having that conversation with him.

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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 23rd day
4 of April 2026, at Dilley, Texas

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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: 4/23/2026 Diana Cano

EXHIBIT 14

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

1 I, W [REDACTED] L [REDACTED], declare as follows:

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

4 2. I am 34 years old. I am from [REDACTED].

5 3. I speak [REDACTED].

6 4. I have been detained at Dilley for two months. I am here with my seven-year-old
7 daughter and my husband.

8 5. When we arrived to the United States, we were taken to CBP. We had to be in CBP
9 for eight days. It was very crowded, there were a lot of people and they were always
10 coming in and out. There were probably about 20 people in one cell with me and my
11 daughter with everyone sleeping on the ground.

12 6. In CBP the only thing we had to eat was burritos every day. My daughter was the
13 only child there and we were separated from my husband. It was very cold and they only
14 gave us t-shirts. I asked for a blanket for my daughter, but they denied me. When one of
15 the other detainees left, I was able to use the blanket they had.

16 **Dilley ICE Detention Center**

17 7. Here at Dilley my daughter and I sleep in one area but my husband has to be in
18 another part of the facility. From 8 a.m. to 8 p.m. every day we are allowed to all be
19 together but at night my husband has to go to a different part of the facility. It would be
20 ideal if we could be together all the time, as a family unit, but that's what the rules are
21 here and we can't change them.

22 8. We have not been told why we have been here so long. The officers here have told
23 us that it is the new agenda in the United States that they don't want immigrants. They
24 threatened us to try and pressure us to agree to leave and told us we would be separated
25 from our daughter and jailed. But we said we do not want to leave the United States and
26 they have not threatened us again.

27 9. No one has explained to us what our rights are here at Dilley or what rights our
28 daughter has here. We were not shown any video about our daughter's rights here.

1 10. My biggest concern for my daughter here is that there is no school. They say they
2 have school, but it's not real school. Our daughter went for one day and the teacher told
3 her that if she can't speak English, she shouldn't speak at all. They gave her one book in
4 [REDACTED], but she can't read yet and no one is able to help her. I asked her to go back and
5 try again but she cried and said she is scared.

6 11. When we were first here my daughter would get sick every two weeks or so. Now
7 that there are fewer people here, she is not getting sick as often. They don't give her any
8 vitamins here. We went to the medical building the first two times my daughter was sick,
9 but it was useless. They only give out Tylenol or ibuprofen so it's not useful to go.

10 12. Our daughter really doesn't like the food here. It doesn't taste good. The green
11 beans here are especially gross and they have caused my daughter to throw up and have
12 diarrhea. The cauliflower once had bugs in it and now everyone here is afraid to eat that
13 and won't accept it. The food is unhygienic here. Especially when we first arrived our
14 stomachs hurt all the time after eating. Our daughter really only eats toast while here and
15 she hasn't been growing or gaining weight. We buy a lot of ramen at the commissary so
16 that there is enough food our daughter will eat.

17 13. There is an area near where we sleep where we can get snacks during the day and
18 they often have apples but they are sometimes bruised and I've seen worms in them. Two
19 different times, I've seen milk in the snack area that is spoiled.

20 14. It's hard for our daughter to sleep here because the lights are always on. She can't
21 sleep for long periods of time because the lights are on and people are coming in and out
22 of the room to inspect. It's as though she's always only half asleep. They gave us an eye
23 mask, but our daughter doesn't like to wear it because it's really uncomfortable. And
24 even with the eye mask, there are still people coming in and out of the room at different
25 times.

26 15. We have access to phones here but it's too expensive for us to make phone calls. It
27 costs too much money for us to be able to actually use the phones.
28

1 16. It's been difficult for us to communicate with the staff because we don't speak
2 English. If something really important is happening, they'll find an interpreter but it's not
3 something that is usually available. The people who speak Spanish are treated much
4 better here.

5 17. Our daughter has been bullied here, and the staff don't do enough to intervene or
6 help.

7 18. The living area doesn't always feel clean. For example, I don't think they clean the
8 water filters and the laundry machines are often very dirty. Also, the toilets here are too
9 tall for kids and it's hard for our daughter to get on and off the toilet by herself.

10 19. It's very difficult to get different clothes and switch clothing sizes. Our daughter
11 wasn't given the right size of clothing at first and we had to fill out a form and then wait a
12 week to get clothes that fit her. Shoes are the hardest part. The shoes break every couple
13 of weeks and when it rains they fall apart. If you need new shoes or need to change the
14 size of shoes it takes a very long time.

15 20. There is not a lot for our daughter to do here. She watches TV. She has used the
16 recreation space but she's pretty bored here. There are only three places she goes – the
17 playground, the library, and the gym. Also, there are only ten books in [REDACTED] in the
18 entire library.

19 21. There is no privacy here, there is no space here where we can be on our own. There
20 are twelve people in the room my daughter and I sleep in so there is no privacy there.
21 Then during the day, there are always people watching you. The officers are always
22 watching us.

23 22. I don't think my daughter is growing here – emotionally or physically. It feels like
24 this place has diminished her. I'm very worried about her social development because
25 while we have been here. I really want her to go to a normal school where she can make
26 friends and develop.

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 12th day
4 of March 2026, at Dilley, Texas.

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CERTIFICATE OF INTERPRETATION

My name is Theresa Cheng and I swear that I am fluent in both the English and [REDACTED] languages and I interpreted the foregoing declaration from English to [REDACTED] on March 12, 2026, to the declarant to the best of my abilities.

Dated: March 12, 2026 Theresa Cheng

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EXHIBIT 15

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

1 I, J [REDACTED] A [REDACTED] I [REDACTED], declare as follows:

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

4 2. I am 16 years old. I am from [REDACTED].

5 3. I speak English and Spanish.

6 4. We have been detained at Dilley for about 50 days. I am here with my mom and
7 my 12-year-old brother.

8 5. I have been living in Texas for 8 years. I am a sophomore in high school and my
9 brother is in 6th grade. My favorite classes in school are Biology, AP Spanish, and
10 Business. In my Business class, we were learning about entrepreneurship, and I was
11 excited about what we were going to learn in that class in 11th grade. My brother likes
12 reading and soccer.

13 6. About two months ago, my family was sleeping at our home in Austin and
14 suddenly I heard a really loud noise at our front door. It was a Monday morning at about
15 5 a.m. and I was half awake because it was almost time to get up for school. I heard a
16 loud pounding on the door and then police were yelling. Then they made another very
17 big sound and I heard a lot of police come charging inside. I don't remember how many,
18 but it was terrifying. They came into my little brother's room and my room. They
19 pointed a gun at my little brother; threw him against a wall; grabbed him by the hair; and
20 then put handcuffs on him. They did the same thing with me. They also put handcuffs
21 and shackles on both my parents' hands and feet.

22 7. Next they separated me and my mom from my dad and my brother. They took us
23 in separate cars, and it was really scary because no one told us where we were going or
24 what would happen next. They brought my mom and I to a detention center in
25 Pflugerville. I was relieved when my dad and brother showed up there about 20 minutes
26 later.

27 8. At the detention center, they separated my brother, my mom and I from my Dad.
28 Around 1 p.m., they told my brother, mom and me that we were going to a family

1 detention center. They didn't tell us why our Dad wasn't going with us or where he was
2 going. I asked if I could give my Dad a hug goodbye, and they said no. I kept asking and
3 asking – but they wouldn't let me. That was the last time I saw him. Apparently, they
4 brought my Dad to Dilley at some point but we never saw him and we don't know how
5 long he was here. He was later brought to another facility, but I am not sure where it is.

6 9. It is hard to be here – especially the food. I don't go to breakfast because it is too
7 early and it's just the same thing every day. It's also hard because they serve dinner very
8 early. We have to buy food at the commissary because we're hungry by 8 p.m. My mom
9 especially has a rough time because she's not getting the medicine she needs for her food
10 allergies and that causes a rash.

11 10. We are tired of not having fresh fruit here. All we get is a couple kinds of canned
12 fruit. It is frustrating because I know they have fresh fruit, but you can only get it if you
13 have a special diet. There was a meeting recently with the guards, and we all asked for
14 fresh fruit, but the guards said it was just for people with special diets. I don't
15 understand that.

16 11. When I first came to Dilley, I drank the water and it made my stomach hurt right
17 away. I didn't want to drink it after that. I would either melt the ice or drink bottled
18 water. We now mainly drink the bottled water because they recently dropped the price.

19 12. They do not give kids enough clothes. They just give you three t-shirts and three
20 pants or shorts. So – if you want a pair of pants, you can only have two pairs of shorts.
21 My mom and I are washing clothes every other day because we don't have enough
22 clothes otherwise.

23 13. It is hard to sleep with the lights kept on all night. They will turn off some lights,
24 but the others are always on. Even after two months, I'm not used to it and it is still
25 really hard to sleep. I tried to wear the eye mask, but it was too tight and I couldn't sleep

26 14. When we first got here, they gave us lotion, toothpaste, deodorant, and a tooth
27 brush. The toothpaste didn't work; the toothbrush fell apart quickly; and the deodorant
28 was strange and also didn't work. The hygiene kit doesn't include soap or shampoo.

1 They said we should use the hand wash in the shower, but my mom used it and it caused
2 little spots on her arms. Now we buy soap, shampoo, toothpaste, deodorant, and
3 toothbrushes from the commissary, in addition to food to water.

4 15. They tell us we can't drink apple juice outside our room or the cafeteria. They say
5 it's because of bees, but we see the staff here eating lots of foods and drinking Starbucks
6 outside and just throwing it in the garbage.

7 16. When I first got here, I went to the classroom but no one was teaching us. They
8 would just give you a reading and staff would give the answers. For math, they would
9 just give worksheets. Now they have Khan Academy on some of the computers in the
10 classroom, and that is better but it is not like high school in the U.S. where we have
11 teachers who are teaching us while we take notes. It's not the same at all.

12 17. When we got here, they gave us an orientation about the rules and layout here.
13 They didn't tell us about our rights. We learned about *Flores* from other residents.

14 18. The first days we were here, I was getting nightmares about the police coming to
15 our house. I was crying a lot from all the trauma we experienced. I would try to go to
16 the gym or go outside to distract myself. Sometimes I would color different characters
17 and that would also help me calm down. I am not having nightmares as often, but I still
18 feel traumatized. If there's a loud sound, I get startled and scared easily.

19 19. It feels really unfair to be here when we did nothing wrong. I am hoping we can
20 go home soon and stay in the United States. I want to finish high school, go to a
21 university, and start my career.

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 23rd day
4 of April 2026, at Dilley, Texas



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EXHIBIT 16

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

1 I, Y █ G █ -P █, declare as follows:

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

4 2. I am 33 years old. My daughter is 15 months old, and my son is 12 years old. My
5 son and I are from █, and my daughter was born in █.

6 3. I speak Spanish.

7 4. We have been detained at Dilley since March 31, 2026. We were previously here
8 for 27 days in July after we first came to the United States. ICE released us in August
9 without any explanation. We were put on a bus and driven to a shelter in Laredo. We
10 then went to live with a sponsor.

11 5. My twelve-year-old son was able to start school right at the beginning of the
12 school year in August. Things were going okay and we were adapting.

13 6. My husband and I were both given ankle monitors when we were released from
14 Dilley. We went to ICE check-ins in September, December, and then every month after
15 that.

16 7. My husband was deported in February from his ICE check-in. Once my husband
17 was deported, I was worried this would happen to me and the kids, too.

18 8. Then at my March ICE check-in, I was told that I would be fingerprinted,
19 processed, and taken back to Dilley. They said that I was going back because I hadn't
20 passed my credible fear interview. I told them that that was the case when I was released
21 and the government already knew that. They said we would need to be re-processed at
22 Dilley.

23 9. Dilley is just the same as before except that this time I have generally not had
24 problems with making sure my daughter has clothes, diapers and bottled water for her
25 formula. One time, a guard refused to let me have bottled water for her formula and said
26 I would need to use the tap water. I reported her – and the next day the supervisor put a
27 piece of paper on the wall in our room saying we were entitled to six bottles of water per
28 day for the baby. Things have been okay since then.

1 10. I think that guard just doesn't like me because there always seems to be an issue
2 with her. Another time, the same guard would not let me put our stroller inside even
3 though my baby is allergic to cats and the cats were getting inside the stroller at night
4 causing my daughter to have bad allergic reactions. I went to medical to explain what
5 was going on. I don't know who they talked to but after that they ensured I had
6 permission to bring the stroller in every night.

7 11. At first I wanted to fight to stay here, but at this point I am just resigned that we
8 will be sent 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 23rd day
4 of April 2026, at Dilley, Texas.

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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: 4/23/2026 

EXHIBIT 17

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

1 I, O [REDACTED] B [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 French and [REDACTED], my mother language.

6 4. I have been detained at Dilley since April 14, 2026, for about a week. I am here
7 with my daughter [REDACTED], 4 years old.

8 5. I was arrested at the border with my daughter. The border guards spoke English to
9 me. They searched me and cut my shoelaces and my daughter's shoelaces. The next
10 place they took us was full of military officers.

11 6. Then they took us to another place with a lot of immigrants. We stayed there one
12 night. Then they took us and another family here to Dilley.

13 7. No one has told me how long we will be at Dilley.

14 8. No one has told us anything about our rights here at Dilley.

15 9. We never saw a video and no one has told us about *Flores*. This is the first time I
16 am hearing about *Flores*.

17 10. No one has discussed my daughter's right to be released, and I don't want us to be
18 separated.

19 11. ICE gave me the phone numbers of lawyers I could contact and also asked if I am
20 afraid to return to my country – a credible fear interview. There was an interpreter on the
21 telephone.

22 12. I have not contacted lawyers because I thought I have to pay. This is the first time I
23 am hearing I don't have to pay for calling lawyers.

24 13. I can't understand anything here – no one has explained anything to me in French.
25 There does not seem to be anyone here besides me who speaks French. My daughter
26 speaks only [REDACTED].

27 14. I have not had a translator or interpreter since we arrived here.
28

1 15. The food here and the food we normally eat are very different. We eat only
2 chicken, French fries, and rice here. We cannot eat anything else, although we have tried.
3 There are also apples, cookies, and milk that we can eat. Sometimes there are grapes or
4 oranges, but not every day.

5 16. My daughter and I drink only bottled water, but I don't have any money so one of
6 the women who lives here gives it to me.

7 17. We have received only one very small bottle of shampoo since arriving here. We
8 have not gotten any soap. We only have the liquid soap in the bathrooms. My daughter's
9 skin is getting dry and flaky and so is mine.

10 18. The phone in my room does not work, even though it worked when we first
11 arrived.

12 19. ICE told me I have an appointment to see a judge on May 4, but I don't understand
13 what will happen. I will need an interpreter.

14 20. We have only one pair of shoes each, and I have only one sweater.

15 21. I am depressed because there is no one to talk with. People do not speak French,
16 only English and Spanish. The stress is so bad I can't sleep. I wonder how things will go
17 in court and I worry about that a lot.

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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 23 day
4 of April 2026, at Dulley.



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CERTIFICATE OF TRANSLATION

My name is Danielle Girard and I swear that I am fluent in both the English and ^{French} ~~Spanish~~ languages and I translated the foregoing declaration from English to ^{French} ~~Spanish~~ to the best of my abilities.

Dated: 04/23/2026

