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Attorneys for Plaintiffs

Additional counsel listed on following page

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.

No. CV 85-4544-DMG-AGRx

**SUPPLEMENTAL DECLARATION OF
SARAH KAHN IN SUPPORT OF
PLAINTIFFS' RESPONSE TO JULY 1,
2026 CBP JUVENILE COORDINATOR
ANNUAL REPORT**

Honorable Dolly M. Gee
Chief United States District Judge

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DECLARATION OF SARAH KAHN

I, Sarah Kahn, declare as follows:

1. I am a Senior Staff Attorney at the Center for Human Rights and Constitutional Law. I represent Plaintiffs in the above-titled action. If called to testify in this case, I would testify competently about these facts. Plaintiffs' counsel file this declaration supplementing Plaintiffs' Response to the July 1, 2026 CBP Juvenile Coordinator Annual Report [Dkt. 1814] to provide the Court with a brief update on time in custody in CBP facilities.

2. On July 13, 2026, Plaintiffs' counsel visited the Chula Vista Border Station.

3. Counsel met with three families. The first family, a mother and her twelve-year-old daughter, who is autistic and had become mostly nonverbal in detention, had been detained since July 7, 2026. Counsel checked the online ICE Locator database daily. The family was listed in this database as in CBP custody until at least July 17, 2026, after nine days of detention.

4. The second family, a mother, father, sixteen-year-old son, fourteen-year-old daughter, and four-year-old son had been detained since July 8, 2026. The online ICE Locator database listed the family as being in CBP custody until at least July 24, 2026, after sixteen days of detention.

5. The third family, a mother, father, and seven-year-old boy with a severe cough, had been detained since July 8, 2026. The online ICE Locator database listed the family as being in CBP custody until at least August 5, 2026, after twenty-eight days of detention.

6. On July 21, 2026, I contacted counsel for Defendants to alert them and to alert the Juvenile Coordinator, through counsel, to these prolonged detentions.

7. On August 3, 2026, Defendants' counsel responded by email confirming that two of the three families identified by counsel were no longer in CBP custody and that the third family remained in CBP custody. Regarding the third family's ongoing

1 detention, Defendants' counsel stated only that the family was scheduled for removal that
2 week. *See* Exhibit A.

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4 I declare under penalty of perjury that the foregoing is true and correct. Executed on this
5 6th day of August, 2026 at San Francisco, California.

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9 Sarah Kahn
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Exhibit A



Sarah Kahn <sarah@centerforhumanrights.org>

CBP Length of Stay

3 messages

Sarah Kahn <sarah@centerforhumanrights.org>

Tue, Jul 21, 2026 at 7:00 PM

To: "Celone, Michael A. (CIV)" <Michael.A.Celone@usdoj.gov>, "Silvis, William (CIV)" <William.Silvis@usdoj.gov>, "McCroskey, Joshua C. (CIV)" <Joshua.C.McCroskey@usdoj.gov>, "Lesnau, Jessica R. (CIV)" <Jessica.R.Lesnau@usdoj.gov>

Cc: Bardis Vakili <bardis@centerforhumanrights.org>, Leecia Welch <lwelch@childrensrights.org>, Mishan Wroe <mwroe@youthlaw.org>, Becky Wolozin <bwolozin@youthlaw.org>

Good evening,

On July 13, 2026, Plaintiffs' counsel interviewed children at the MCA and Chula Vista Border Station. There were eight families present and counsel spoke with three families.

The [REDACTED] family, [REDACTED], sixteen-year-old [REDACTED], fourteen-year-old [REDACTED], and four-year-old [REDACTED], were detained on or about July 7, **six days** before counsel interviewed them.

The [REDACTED] family, [REDACTED] and 12-year-old [REDACTED], were detained on or about July 6, seven days before counsel interviewed them. The [REDACTED] family, according to the ICE locator, were still in custody on July 16, 2026, **ten days** after they were detained.

The [REDACTED], [REDACTED], and seven-year-old [REDACTED], were detained on or about July 8, 5 days before counsel interviewed them. The [REDACTED] family, according to the ICE locator, were still in custody on July 16, 2026, **eight days** after they were detained.

Can you please confirm these three families are no longer in CBP custody?

Further, one of the families counsel interviewed shared that there was a father and daughter detained with them who had been detained for **twenty days**. Can you confirm whether or not a father and daughter were recently detained at Chula Vista for 20 days?

We raise these newer examples of extremely long lengths of detention of class members in CBP custody now because they were not included in our response to the CBP JC Annual Report and we intend to make the Court aware of the length of stay of these four families at the August 4 status conference.

Best,
Sarah Kahn (she/her)
Senior Staff Attorney
Center for Human Rights and Constitutional Law
sarah@centerforhumanrights.org
<http://www.centerforhumanrights.org>

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including the Electronic Communications Privacy Act of 1986, Pub. L. 99-508, 100 Stat. 1848, codified at 18 U.S.C. §§ 2510 et seq. If you are not the intended recipient, please contact the sender and destroy all copies of the original communication.

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

Thu, Jul 23, 2026 at 8:34 AM

To: Sarah Kahn <sarah@centerforhumanrights.org>, "Celone, Michael A. (CIV)" <Michael.A.Celone@usdoj.gov>, "Silvis, William (CIV)" <William.Silvis@usdoj.gov>, "Lesnau, Jessica R. (CIV)" <Jessica.R.Lesnau@usdoj.gov>

Cc: Bardis Vakili <bardis@centerforhumanrights.org>, Leecia Welch <lwelch@childrensrights.org>, Mishan Wroe <mwroe@youthlaw.org>, Becky Wolozin <bwolozin@youthlaw.org>

Hi Sarah, confirming receipt.

Thank you,

Joshua

[Quoted text hidden]

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

Mon, Aug 3, 2026 at 6:28 PM

To: Sarah Kahn <sarah@centerforhumanrights.org>, "Celone, Michael A. (CIV)" <Michael.A.Celone@usdoj.gov>, "Silvis, William (CIV)" <William.Silvis@usdoj.gov>, "Lesnau, Jessica R. (CIV)" <Jessica.R.Lesnau@usdoj.gov>

Cc: Bardis Vakili <bardis@centerforhumanrights.org>, Leecia Welch <lwelch@childrensrights.org>, Mishan Wroe <mwroe@youthlaw.org>, Becky Wolozin <bwolozin@youthlaw.org>

Hi Sarah,

Two of the three families identified in your email below are no longer in CBP custody. The third is scheduled on a removal flight this week. CBP provides TIC data to Plaintiffs on a monthly basis in accordance with the FSA and the Court's orders, and declines to provide additional on-demand TIC reports to Plaintiffs.

Best,

Joshua

From: Sarah Kahn <sarah@centerforhumanrights.org>

Sent: Tuesday, July 21, 2026 10:01 PM

To: Celone, Michael A. (CIV) <Michael.A.Celone@usdoj.gov>; Silvis, William (CIV) <William.Silvis@usdoj.gov>; McCroskey, Joshua C. (CIV) <Joshua.C.McCroskey@usdoj.gov>; Lesnau, Jessica R. (CIV) <Jessica.R.Lesnau@usdoj.gov>

Cc: Bardis Vakili <bardis@centerforhumanrights.org>; Leecia Welch <lwelch@childrensrights.org>; Mishan Wroe <mwroe@youthlaw.org>; Becky Wolozin <bwolozin@youthlaw.org>

Subject: [EXTERNAL] CBP Length of Stay

Good evening,

[Quoted text hidden]