

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

JENNY LISETTE FLORES; <i>et al.</i> ,	)	Case No. CV 85-4544-DMG
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
TODD BLANCHE., Acting Attorney	)	
General of the United States; <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	
	)	
	)	

DECLARATION OF DAWNISHA M. HELLAND

I, Dawnisha Helland, hereby declare that the following statements are true and correct to the best of my knowledge, information and belief:

1. I am the Deputy Assistant Director overseeing the Juvenile and Family Management (JFMD), Non-Detained Management Division, Enforcement and Removal Operations (ERO), U.S. Immigration and Customs Enforcement (ICE), U.S. Department of Homeland Security (DHS) in Washington, D.C. I oversee all national juvenile and family custody programs, including ICE's Family Residential Centers (FRCs).
2. I have been with ICE ERO since 2013. Prior to working for ICE ERO, I served in the United States Army as a Human Intelligence Collector/French linguist, and the United States Border Patrol (USBP) as a Border Patrol Agent.
3. I am responsible for leading a dedicated, high-level operational division created to manage immigration issues related to unaccompanied alien children (UAC), young

adults, and family units (FAMU), and developing and implementing goals, policies, procedures, and operational plans that are sensitive to this population's vulnerabilities and needs.

4. On July 29, 2022, I was appointed by the Court to serve as the Juvenile Coordinator for ICE.
5. I am submitting this affidavit to explain why some families have been detained for longer than 20 days at the Dilley Immigration Processing Center (DIPC).

Delays of Venezuelan Removals Due to Earthquake

6. On June 24, 2026, the country of Venezuela was affected by an earthquake which resulted in removal flights to the country being temporarily suspended.
7. DIPC currently houses 88 families, which include 128 class members. Twenty-one families are from Venezuela and are subject to final orders of removal. This group includes 32 class members. Nine additional Venezuelan families are subject to orders of Voluntary Departure. This group includes 18 class members. Overall, individuals from Venezuela in these 30 families comprise 38% of the current population at DIPC.
8. These families have no stay or appeal pending, they have executable final orders. Generally, release on an Order of Supervision is not appropriate because repatriation is imminent once flights resume, but ICE will continue to treat each case individually and evaluate for release on a regular basis.
9. Flights to Venezuela are scheduled to resume shortly, and families and children will be prioritized for flights.

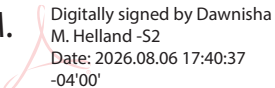
Other Cases

10. In addition to the cases noted above, extended stays can occur due to other unusual circumstances. These can include a myriad of issues such as security concerns, refusal to cooperate to obtain travel documents, failing to comply with an immigration judge's orders, or the need for a special chartered flight. There are currently 2 cases, comprised of 3 class members in total, that have extended stays due to other unusual circumstances.

I declare, under penalty of perjury under 28 U.S.C. § 1746, that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed on this 6th day of August 2026.

Dawnisha M.
Helland -S2



Digitally signed by Dawnisha
M. Helland -S2
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Dawnisha Helland
Juvenile Coordinator
Deputy Assistant Director for the Juvenile and Family Management Division
Non-Detained Management Division
Enforcement and Removal Operations
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security