EXHIBIT 30
Declaration of

[Redacted]

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

1. My daughter, [Redacted], was born on [Redacted], she is one year old. We are from Honduras.

2. We were apprehended together, around June 8, 2019 after crossing the river at around 10 P.M. and walking for about two hours. They took us to Ursula Processing Station. The trip took about an hour and a half.

3. When we arrived here at the Ursula Processing Station, they took our extra clothes and belongings. We were wet, but we were not allowed to change before we were put into very cold cells. My baby has only been wearing a T-shirt, and diaper since we arrived. They have not given her pants or socks and she is extremely cold.

4. We were put in a small cell with many others and there was no room to sit. We were not able to sleep.

5. There was a jug of water in the cell but not enough cups so we had to share. There was no food for my baby.

6. They did not give me diapers for the baby until the next day. There is no sink or running water to wash the baby and we haven’t been able to take a shower.

7. The day we arrived, my baby became sick. She she could not open her eyes and had a fever which got much worse during the day. I asked the guard for help and he told me to “just deal with it.” I asked for help again, and was ignored. The third time I asked, I was crying because she was so much worse I was very worried for her. After two days, they took her to the doctor. They gave my baby acetaminophen and called in a prescription for an antibiotic. We didn’t receive the amoxicillin until the next day.

8. Before we came here, my baby would eat several times a day, breast milk and solid food. Here she barely eats and only breast feeds in small amounts and is losing weight.

9. I am not able to eat or drink much of the food and water here and I can not sleep so I am not producing very much breast milk. I am very scared and anxious about my baby’s health and safety and what will happen to us.

10. They have not let me call my husband who is in the U.S.

11. I have not been told about my rights or about what might happen to us.
I, M____ R____ C____, swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was read back to me in Spanish, a language in which I am fluent.

M____ R____ C____

11/06/2019
Date
Certificate of Translation

I, Kathie O’Gorman, certify that I am fluent in English and Spanish and that I read the above declaration to the [redacted] in Spanish. Executed this [redacted] of June in McAllen, TX.

Kathie O’Gorman
Center for Human Rights and Constitutional Law
Declaration of

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

1. I, [REDACTED], was born on [REDACTED]. I am seventeen. I am also eight months pregnant. My due date is in July. I have been detained for 20 days now.

2. I am with my son, [REDACTED], who was born on [REDACTED]. He is two years old.

3. My son and I are from Honduras. We left our country because my son's father, and the father of the baby boy I am carrying, abandoned me. My mother is in the United States, and I will need her help with my newborn baby and my toddler.

4. We came to the United States, on May 24, 2019. My baby and I crossed the river on a raft during the night. After crossing the river, we walked for a long time until we encountered an immigration post. We then turned ourselves into the immigration police.

5. The police did not offer us any food or drink; and, after an hour, they took us to another location with more detained people. There, we were offered food, water, and diapers for my baby. Then, after another hour, the immigration police took us to Ursula.

6. At Ursula, I was given water and diapers for my baby. At first, I was given a blanket and a mattress, but then, at 3:00 am, the guards took the blanket and mattress. My baby was left sleeping on the floor. In fact, almost every night, the guards wake us at 3:00 am and take away our sleeping mattresses and blankets. They leave babies, even little babies of two or three months, sleeping on the cold floor. For me, because I am so pregnant, sleeping on the floor is very painful for my back and hips. I think the guards act this way to punish us.

7. The temperature where we are kept is very, very cold. They raise the air conditioning at night. Without the blankets at night, the babies get sick.

8. The lights where we live and sleep are kept on all day and all night. We cannot sleep with the bright lights always shining.

9. In addition, there are many people crowded into the cell where we are kept. We are all packed together.
10. The bathrooms near us are very dirty. Sometimes, to punish us, the guards close the bathrooms and do not permit us to use the toilet. I am very pregnant, so I must urinate often. But when the bathrooms are closed, I just have to bear it.

11. In the twenty days my baby and I have been here, we have been permitted to shower only four times. We ask to shower more often, but we are told that we may not.

12. The food here is not appropriate for children, and it is making them sick. The food is of poor quality, of small quantity, and tastes very bad. I try to eat it so that my son will eat, but we both feel so sick from the food.

13. My baby has been sick here. One of the nicer guards let me take him to the doctor. The doctor gave my baby a flu test, and he tested positive. So the guards transferred us to another location one hour away, where there were only sick people. But that new detention site was even worse than Ursula because the food truly was bad there. I only spent one night there, thank God. I do not know why, but the guards then transferred us back to Ursula.

14. Although I am eight months pregnant, I have not seen a doctor here. I am worried because I do not want to get sick.

15. I also do not want to give birth here, because this place is not appropriate for a newborn. We would be crowded together with many other people, and it would not be clean. I am desperate to leave here. My baby is coming very soon.

16. I want to go to live with my mother, who is in New York. I called her several weeks ago, so she knows that I am here in the US and would like to live with her. But, when I have asked the guards here, they say that they do not know how I could leave to go to my mother. The guards just tell me that I must wait until my name appears on the list of people that may leave.

17. I have not been told about the Flores agreement or our rights. I have asked how I could leave from here, but the guards say that they do not know.

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

[REDACTED]

6/12/19

Date
Certificate of Translation

I, Genevieve Grabman, certify that I am fluent in English and Spanish and that I read the above declaration to [REDACTED] in Spanish. Executed this 12 of June in McAllen, TX.

[Signature]
Genevieve Grabman
Center for Human Rights and Constitutional Law
EXHIBIT 32
Declaration of

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

1. My date of birth is [REDACTED DATE]. I am 16 years old. I am from Ecuador. At the moment, I am detained at Ursula Station together with my daughter, [REDACTED NAME]. She is 8 months old. Her birthday is [REDACTED DATE].

2. We came to the United States from Ecuador about June 4, 2019. When we got to Mexico, we took a car to Monterrey, and then a group of us crossed in a raft. We were stopped shortly after that by border patrol, and they took us to McAllen, where we were held for about 2 hours in a tent. We were brought to Ursula Station that same day, June 4, 2019.

3. When we got to McAllen I was hungry, and they gave me a salami sandwich, but no water. I was still hungry. I breastfeed my daughter. At McAllen, they gave me a diaper so that I could change her, but no diaper wipes.

4. When I arrived in Ursula, they took my fingerprints. I got a ham sandwich, and apple, and water. I was brought into a large fenced room, which is where we have been since then. We have not been allowed outside. In the room I am in there are about 12 other teenage mothers and their children. We were given one mat to sleep on the concrete floor, and 2 mylar blankets. My daughter sleeps on me. It’s cold at night, noisy, and the lights are on all the time. It is very hard for us to sleep.

5. At Ursula, we are fed three times a day. For breakfast it’s a tortilla with rice and beans, water, apple milk and chips. We don’t get any snacks between meals. I get a bottle of water with meals but there is no other way to get water. I am often hungry.

6. At Ursula, I was able to shower the first day, and two days later. I have not showered in 4 days. My daughter and I showered together, so I have also not been able to wash my daughter in 4 days. I have been able to brush my teeth only once since I arrived, 7 days ago. I have not been given a hairbrush to brush my long hair. There is a sink but no soap or towels to dry my hands.

7. I have not been given any information about our legal rights as detainees. I have not been told how long we are here.

8. My older sister is in New Jersey. I would like to live with her.
I, M[REDACTED] S[REDACTED] T[REDACTED] P[REDACTED], swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

11/06/2019
Date
Certificate of Translation

I, ANAH JACOB certify that I am fluent in English and Spanish and that I read the above declaration to M[redacted] S[redacted] T[redacted] P[redacted] in Spanish. Executed this __ of June in McAllen, Texas.

ANAH JACOB

6/11/19
Declaration of

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

1. I, [REDACTED], was born on [REDACTED]. I am seventeen.

2. My son, [REDACTED], was born on [REDACTED]. He is six months old. We are from Guatemala.

3. In Guatemala, I had lots of problems with my baby’s father. He is an alcoholic, was very angry, and always would fight with me. When we would fight, I would cry, and my baby would get sick. I am all alone; my father is dead, and my mother married another person, so she cannot care for me. I couldn’t stand that no one understands me and that my baby’s father mistreats me. I worry for my baby, because I heard that the children of alcoholics die very young. So, I decided to leave.

4. We came to the United States on June 2, 2019. My baby and I crossed the river on a raft during the day. Fifteen minutes after we crossed, the police arrived in a truck. The police asked me where I was from, and I said, “Guatemala.” They then took the clothes I was carrying and told me to climb into the truck.

5. The police took me to a location where there were other people who had crossed the border. The Border Patrol recorded my personal information. At this location, the Border Patrol offered us water. However, there were not diapers for my baby at this location.

6. Thirty minutes later, the Border Patrol bought my baby and me to Ursula in their patrol car. By now, it was night. We were not offered anything to eat or drink until the next morning. We were put in a cage with many other people, and we spent four nights there.

7. For our first four nights at Ursula, we were given only two aluminum blankets but no mattress. I had to sleep on the floor with my baby. It was very cold, and my baby got sick from the cold. He started to have green diarrhea.

8. After four nights, the guards at Ursula put me and my son in a cell for minor children. There, we were given a mattress.

9. The bathrooms here are very dirty because there are so many people using them. The toilets clog and cannot be used. And the smell goes everywhere, even to where we are sleeping.
10. Since the time my baby and I arrived, I have been permitted to shower only once, five days after I have arrived. I haven’t had a shower since then, and it has been six days. The soap in the showers is for hands and not for hair, so my hair is itchy and dirty.

11. At night, our cell is very cold, and the lights are always left on. At least my baby sleeps, but I cannot. I noticed three days ago that my eyes have been affected by the lack of sleep. I can't see anything at a distance; everything looks fuzzy.

12. I am having trouble with the food. We often receive tacos of tortilla, beans, and rice. But the rice is partially raw and not fully cooked. This has made the rice hard to digest and has made me sick to my stomach.

13. We are given two bottles of water per meal. This water is clean because it is bottled.

14. My baby is sick. He is coughing, he is congested, and he has diarrhea.

15. I have asked for a doctor to see my baby. The doctor gave my baby medicine for his fever. The doctor said the baby has an ear infection and gave my baby antibiotics. But these antibiotics have also caused the baby to have diarrhea.

16. I want to go to live with my aunt, my mother’s sister, who is New York City. I called her when I arrived at Ursula. She told me that I could come to her.

17. I have not been told about the Flores agreement or our rights. I have asked how I could leave from here, but the guards say that they do not know.

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

[REDACTED]

6/12/19

Date
Certificate of Translation

I, Genevieve Grabman, certify that I am fluent in English and Spanish and that I read the above declaration to [REDACTED] in Spanish. Executed this 12 of June in McAllen, TX.

Genevieve Grabman
Center for Human Rights and Constitutional Law
EXHIBIT 34
Declaration of S Y M C, [REDACTED]

I, S Y M C, declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED]. I am from Honduras.

2. I came to the United States with my son, C A V M (WSS), on June 8, 2019. We have been in this facility (Ursula CPC) for 2 days. Before this we were in the “perrera” at the McAllen Border Station. I have been able to shower only two times. My baby got wet and I had to take his pants off two days ago and I have not been able to get any pants for him.

3. I have seen other teen mothers that have been here for more than 20 days.

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

[REDACTED]

Date

Certificate of Translation

I, Jodi Goodwin, certify that I am fluent in English and Spanish and that I read the above declaration to S Y M C in Spanish. Executed this 15th of June in McAllen, Texas.

Jodi Goodwin
Attorney
1221 East Harrison Avenue
Harlingen, Texas 78550
EXHIBIT 35
Declaration of

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

1. My date of birth is [REDACTED]. I am from Honduras.

2. I came to the United States with D[REDACTED] and M[REDACTED] on May 26, 2019. We have been in this facility (Ursula CPC) for 21 days. I have seen other people that have been here for longer than me, but in the same cage where I am held the longest I have seen is 31 days here.

3. The temperature where I am at is ok during the day, but in the evening they put the temperature way down. I have to take my nephew and cuddle with his little body to keep him warm. There is another cage that is closest to the air conditioners and I feel bad for those children. They put the fathers with daughters in that cage and they are so freezing. I think it is as a way of punishing them and it makes me so sad.

4. There is no drinkable water available for me and the baby. The water that is in the jugs tastes awful like it is from a dirty well. The water available to wash or clean the baby smells like urine and I am not about to use that water to wash my baby. I have to wait until the give me water with a meal and I use a bit of that to clean him. I have also had to resort to stealing some wet wipes because they will not give them to me.

5. The food that we are getting here is not even suitable for dogs. The burritos they give us have rice and beans but the rice is not cooked. My baby cannot eat that. They give us a sandwich with lunchmeat that is not cooked and is just out of the freezer. It is not edible. I cannot give that to my baby. They give us two cookies each day, one for me and one for my baby, but I have to give both of them to the baby because he can’t eat anything else they give us. Juice is not available and when I have asked for juice for the baby the officers have said NO. I have notice that the guards give the juice and snacks that are for the children to those that are “working” in the cages. So in order to get the food and drinks, the people detained with me have to “work” for food. It makes me sad because my baby has always been a very good eater. But since we have been here it has been very hard because he is hungry. The best I can do is give him another bottle to calm his hunger.

6. We only are given mats to sleep on about 9pm and they take them away from us at about 5am. We have been given two mylar blankets. The lights are on ALL the time and we can not sleep because every 15 to 20 minutes the guards are yelling something out. GET UP! COUNT TIME! GET UP.

7. The conditions are very crowded in the cage where I am at. There are about 75 people each night that I have been here. We sleep literally stacked on top of each other shoulder to shoulder. So many are sick.
On any given day there are at least 20 that are sick. They try to separate the ones that are sick, so that means that people come and go. But not everyone goes if they are sick.

8. I am very worried about my baby. He has not been seen by any medical professionals since I have been here. When I have asked about getting the baby seen, the officers come and touch him and say, he is just fine. Today was the first time that a doctor or any medical professional has seen him.

9. I have no place to wash the bottle that my baby uses. Every two or three days I try to beg the officers to give me a new one because I am worried about the cleanliness of the bottle.

10. I have been here without bathing for 21 days. I have seen that when we try to complain to the consulate about the conditions, then the offices want to know what we said. Then they start yelling at us saying things like “You don’t belong here.” “Go back to where you came from.” “You are pigs.” “You came here to ruin my country.” They try to intimidate us. I have seen officers hit other detainees in the stomach and when they try to complain about it, the officers just comes and says...he didn’t even feel a thing. They also intimidate us into not reporting these types of things. There is a person detained with me that speaks English so he is translating what the guards say about us. For reporting the officer hitting the detainee, the officers warned us that we would get 25 years in jail if we couldn’t prove that he was hit by the officer. There are cameras and they could easily see what had happened. After the complaint, the officer came and told the person, “look, I am gonna let you go, just don’t say anything about what happened here, ok?”

11. There is another child that is in the same cage with my other nephew, M[redacted], that was also hit by an officer. I was asked to report that to whoever I could. I have also seen a case of a special needs child that was here for more than 16 days and they finally let them out yesterday.

12. I would ask that I be given a phone call from the place. In 21 days I have not been given a phone call. We are completely incognito. I understand from my nephew, M[redacted], that he has been given two phone calls for only one minute to his aunt that lives in Houston and that when he asked if anyone has called about him to arrange his reunification, she said no one has called.

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

[Signature]

Date: 9/15/19

Certificate of Translation

Page 2 of 3

Exhibit 35
I, Jodi Goodwin, certify that I am fluent in English and Spanish and that I read the above declaration to [REDACTED] in Spanish. Executed this 15th of June in McAllen, Texas.

Jodi Goodwin
Attorney
1221 East Harrison Avenue
Harlingen, Texas 78550
EXHIBIT 36
Declaration of

I, Y[[Redacted]], declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [[Redacted]]. I am from Guatemala.

2. I came to the United States with my son, E[[Redacted]] G[[Redacted]] on June 12, 2019. We have been in this facility (Ursula CPC) for 4 days. 3 days ago, my baby soiled his clothes. I had no place to wash the clothes so I could not put them back on my baby because when he went to the bathroom his poop came out of his diaper and all over the clothing. Since then, my baby of only 3 months has only been wearing a small little jacket made of t-shirt material. I have nothing else for my son to wear. I have been covering him up by opening up diapers and placing them against his body and then wrapping him up in bad pad. I can only use the bad pad until the cotton starts to fall out. I have been told that they do not have any clothes here at this place. I just want my baby to be warm enough. I am having to make sure that I carry my baby super close to me to keep his little body warm. I also have borrowed a jacket from another person detained with me just to keep him covered.

3. I have seen other teen mothers that have been here for more than 17 days.

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

Date

Certificate of Translation

I, Jodi Goodwin, certify that I am fluent in English and Spanish and that I read the above declaration to Y[[Redacted]] in Spanish. Executed this 15th of June in McAllen, Texas.

Jodi Goodwin
Attorney
1221 East Harrison Avenue
Harlingen, Texas 78550
EXHIBIT 37
<table>
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<th>Minor’s Name</th>
<th>All</th>
<th>Infant’s Name</th>
<th>All</th>
<th>Infant/Toddler DOB and Age</th>
<th>Visit Notes</th>
<th>Follow-Up Visit</th>
<th>Acute Emergency?</th>
<th>Child needs emergency medical services immediately?</th>
<th>Emergency Needs emergency medical services within 24 hours?</th>
<th>Child needs future/consistent monitoring?</th>
<th>No medical concern</th>
</tr>
</thead>
<tbody>
<tr>
<td>Major’s Name</td>
<td>A#</td>
<td>Infant’s Name</td>
<td>A#</td>
<td>Infant/Toddler DOB and Age</td>
<td>Visit Notes</td>
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<td>Emergency Needs emergency medical services within 24 hours?</td>
<td>Child needs future/consistent monitoring?</td>
<td>No medical concern</td>
</tr>
</tbody>
</table>

From prior visit: Both seem to have the flu: fevers, congestion, coughs.
Attorney concerned baby also has pneumonia - rapid, shallow breathing, listless, eyes rolling back into head, could not eat or drink, did not open mouth, was not hot to the touch.
Officer indicated in writing that was taken to the NICU.

From prior visit: Baby coughing, fever, vomiting, diarrhea.
Infant’s parent was initially interviewed at Rio Grande City. Officer indicated in writing that was transferred to Weslaco.

From prior visit: We have been told they are no longer at Ursula, but please double check.
Baby has had a fever and had been so sick she could not open her eyes; prescribed antibiotics.
Officer indicated in writing that was transferred to the NICU.

From prior visit: Baby is anemic, gets high fevers, gets sick easily and is allergic to milk, often has diarrhea.
Baby sleeps too much, lies asleep with eyes half open and doesn’t move, then makes a little noise and drivers (according to mom).
Mom feels weak and has headaches because not eating well.
Baby prescribed antibiotics and exhibited exacerbated diarrhea.
Officer indicated in writing that was transferred to the NICU.

From prior visit: Mother reports that baby is cold to the touch. Baby exhibited fever and cough after two days in detention. Noted to be pale on Monday, 06/10/19.

From prior visit: Baby has a cough and cold and no access to the doctor.

From prior visit: Baby is not eating the food. Has not eaten a full meal in 15 days. He has diarrhea and is coughing. Got in line to see doctor and was not able to.

From prior visit: Mom has been sick, baby has had a cough, fever, and diarrhea.

From prior visit: is 8 months pregnant, is about to turn 18, and has a 2 year old son.
No prenatal care, denied access to toilet facilities; has been at Ursula 20 days.
Son has the flu.

From prior visit: Mom has had a fever and a sore throat.

Prior interview with 14 year old brother, 14-yr-old says that (under 2) is vomiting and sick

Infant/Toddler DOB and Age Visit Notes Follow-Up Visit

Acute Emergency? (Child needs emergency medical services immediately?)

Emergency Needs emergency medical services within 24 hours? (Child needs future/consistent monitoring?)

No medical concern

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Exhibit 37 Page 179
Declaration of [REDACTED]

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

1. My date of birth is [REDACTED]. I am from Honduras.

2. I fled Honduras for various reasons. My father has never taken care of me and has never been a father to me. My father is an alcoholic and I have only seen him a limited number of times throughout my life. Also, my mother began a relationship with another man who has been in jail and will be released soon, but I am afraid of him. I fled with my niece because I have always taken care of her since she was a baby.

3. I presented myself at the port of entry to immigration officials on or about Saturday, June 08, 2019. I didn’t say anything and officers asked us to wait next to the bridge with other minors. During this time, officers asked for my birth certificate, as well as my niece’s – they wrote down our information. After about 20 minutes of waiting, an immigration officer began to call each minor by name and they called me and my niece. They took my cell, my niece’s earrings, a ring – which they put in a bag. They made me take off my shoelaces and they threw them away. I also had some over the counter medicine, which they made me throw away.

4. After this, the officers put me in a vehicle with minors, but they were all male. My niece and I were the only girls. There were nine of us in the vehicle, but no officer in the back with us, only the officer that drove. We drove for about 15 minutes and we arrived to the “perrera” or dog cage.

5. We got off the vehicle and entered the perrera building. They called our names individually and then we lined up to have a medical person look at us. The medical person only checked each of us for a few seconds, mostly looking at our arms. We got no medicine, nor did they ask us any questions. After this quick revision, we each grabbed a juice, cookies, and an aluminum blanket – and sat on a bench. The medical person came back out and told us to stand up, and did second medical look for about 2-3 minutes. She asked us to stretch our arms and looked at us, my stomach, my head, and temperature.

6. After this, we sat down and waited on the bench. Officers allowed the male minors to go to the male perrera with other boys. My niece and I stayed there and waited about another half hour – my niece and I each received a sandwich (two slices of bread, 1 slice of ham, and lettuce). My niece and I were called back to the medical room, where they checked my niece and confirmed that she had some virus and gave my niece medicine. The medical person however did not explain what virus my niece had, nor what medicine she was giving her. The medical person also gave me a pill because I had contact with my niece, but they didn’t explain what the pill was. This is the only time we received medical attention in this perrera.

7. After this medical visit, officers put me in the hallway with a small mattress and two aluminum blankets for my niece and me. My niece and I got masks to cover our faces. There were other people in the hallway, all were sick. An officer called me and told me to leave my niece in the hallway – my niece was crying.
and I felt bad leaving my niece. I was scared because I thought they were going to separate me from my niece. The officer took my fingerprints and returned me to the hallway. My niece was very upset when I returned, it took a while for her to calm down. I was in this hallway for about 1.5 hours – my niece began to sweat and her fever had finished.

8. After this, an officer called my niece and me and told us to sit on a bench. They then put us in a vehicle with other adults, there were about 12-15 people in the vehicle. There was not an officer in the back of the vehicle with us, only the officer that was driving. We drove for about 30 minutes or so and arrived at the current center (Weslaco CBP Processing Center).

9. I arrived at the Weslaco center around midnight on Saturday night June 8 (Sunday morning, June 9). Officers told us to get out of the vehicle and we waited outside for about 10 minutes. Officers began to call us by names, then a medical person came out and told us to stand up. This person checked us for about 2 minutes, she didn’t say anything to us.

10. From here, we entered the building and stood in line. The officers told us to get a juice for my niece and from there I entered my cell with my niece. The officer told us would be crammed in there, but I’d figure it out. There were many people in the cell, all were crammed into a cell – we didn’t fit. The cell was dirty – there were paper strewn everywhere and I had to sit next to the toilet because that was the only place that was left. The toilet smelled and it was dirty – it was full of paper, the trash was overflowing.

11. I was full of anguish. I felt horror to see where we were and I was worried about my niece. I tried to cover her with the aluminum blanket to keep the strong stench from her at least. I was also scared because my niece was sick and I didn’t know how she was supposed to get better in that place that was dirty and with so many other people. I wasn’t able to sleep.

12. My niece and I have been detained in this center with other adults this whole time.

13. The next morning, officers yelled at us to wake up. They also banged on the windows with a hard object. They would startle me and my niece would wake up scared. The officers would stand outside the cell and we would all line up inside the cell, however we could fit, to get our breakfast from the guard at the door. They gave my niece a burrito, cookie, and a juice; they gave me a sandwich (two slices of bread and a still frozen piece of ham). We tried to eat in the cell, but my niece didn’t want to eat the burrito or the cookie because she didn’t like them – she didn’t know that type of food. I also couldn’t eat much because the food was bad and we had to eat next to the dirty toilet. Lunch and dinner on this Sunday went the same way; and it has been the same the entire time we’ve been here. Each of the three – four meals we receive are the same, as stated above.

14. The officers also yell and bang the doors and windows for dinner or for an evening snack (around 9 or 10 pm). Officers wake up the children or force us to wake up the children, otherwise the officers do not give us food for the younger children, like my niece. I especially did not want to wake up my niece because she was still sick or recovering from a high fever.
15. Every day has been the same the four days that my niece and I have been detained here. We are locked up in the cell every day – the door is locked. We are not able to go outside or allowed outside of the cell. The toilet is in the cell and is only separated from the rest of the cell with a short wall, but everyone can still see. I feel very uncomfortable using the restroom in that cell. I try to use my aluminum blanket to give some privacy when I use the restroom.

16. My niece gets medication twice a day and I receive the same pill once a day. The medical person explained that the medicine was so that I didn’t get the virus and that my niece got the virus so her medicine helps fight off the virus, but they didn’t explain what my niece has. However, they also have not explained what the medicine is, or any side effects, or anything I need to look out for with this medicine.

17. This whole time I have been detained, I have not been allowed a shower, nor has my niece been allowed to shower. I have also not had an opportunity to brush my teeth. I haven’t asked to shower or for a toothbrush because I have heard other people ask for a bathroom or toothbrush but officers get angry. They have said many things, including “you’re not in your country,” and “you’re being punished here, not to be asking for things.”

18. On Monday morning, my niece had a very high fever of about 39 degrees Celsius (about 102 degrees Fahrenheit). I was worried that being detained in the cell, being crammed with so many people, and the lack of good food is what has also made it worse for my niece. However, again on Tuesday night my niece had fever again and I asked the medical person for help. They told me to go to my cell and that they would be there later and they gave my niece more medicine while we were in the cell. It is difficult for us to fully get better because new people are coming in that are very sick, while others are trying to recover but they get sick again because of the new illnesses that come into the cell.

19. There was a nine-year-old little girl that was detained in the same cell as me, but she was by herself. She cried for her dad, but none of the officers paid any attention to her. The little girl was already here in this center when I arrived and she was taken from the cell on Tuesday, June 11, 2019. I do not know what has happened to this little girl.

20. I hope that my niece and I are allowed to go with my sister, [REDACTED] who lives in Ft. Walton, FL. She is my niece’s mother.

21. Officers did not explain my right to speak with my consulate. I have not spoken with my consulate.

22. Officers have not told me anything about why I am detained, about the immigration process, where they are going to send me, or what’s next.

23. I do not have a lawyer and have not spoken to a lawyer. I have not spoken with my consulate nor have I been told that I have the right to see my consulate.

24. Officers have not allowed me to speak to anyone – no family members in my home country or in the United States.
I, [REDACTED], swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

Date

06-12-2019
Certificate of Translation

I, Karla M. Vargas, certify that I am fluent in English and Spanish and that I read the above declaration to [REDACTED] in Spanish.

Executed this 12th of June 2019 in Weslaco, TX.

Karla M. Vargas
Texas Civil Rights Project
1017 W. Hackberry Ave.
EXHIBIT 39
Declaration of

I, N____ C____ O____ V____, declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

“My date of birth is _______. I am from San Marcos, Guatemala.

1. I began travelling to the United States on May 26, 2019 with my common-law husband, G____ C____ V____ A____, whose date of birth is _______, and his father, M____ E____ V____ L____, and my son, A____ G____ O____ V____, whose date of birth is _______. I left Guatemala for several reasons, one of which was to have a better life for my son. It is very difficult to care for a child in Guatemala. We travelled through Mexico until we arrived at the border between the United States and Mexico on May 31, 2019.

2. I was apprehended on or about May 31, 2019 when I met some border patrol agents. We arrived at a center after a short ride, and the border patrol agents separated me from my partner and his father, and put them in separate cells.

3. The agents took all of my extra clothes and all of the things I had to take care of my baby, including food. Shortly after we arrived, they gave us sandwiches and juices. We were to sleep on the floor. I tried to sleep, but it was difficult because an agent called me out to interview me. There was only one bathroom, and we had to use the bathroom in front of everyone else in the cell, which was very full. My baby did not want to eat, and I was struggling to feed him. I would have to give him water with a cap from a water bottle.

4. After almost one day in the center, they collected a large group of people, including the people that I had travelled with and others. I was able to travel with my partner and his father. When we arrived at another center, agents separated me and my baby from my partner and his father once again. The agents placed me in a cell with other minor children. The group that we travelled with had a lot of children, and I counted around 5 to 7 cells full of children. The cell that I was in was full of children around my age, some of them had their own children.

5. I was held in the second center for about eight days. We were given blankets to sleep on the floor. There were very few bathrooms for the number of people who
were there, and there was always a line. Sometimes, little kids could not wait and would urinate or defecate on themselves while waiting in line. I could see my partner, who was located in a cell across from mine, but we could not talk to each other. When we tried to talk, they would yell at us.

6. A few days after we arrived, I heard from another detainee that they were releasing a group of kids with their parents. I saw that my partner was in the group that was going to be released, and I asked a guard who told me that the group he was in was going to be released. I was hurt and sad when I saw that I wouldn’t be released with him. After he left, I began to cry. I couldn’t understand how I could be left behind like this.

6. After my partner was released, I began to feel really bad, physically. I developed a bad cough and my throat started to hurt. I started to have a runny nose. I noticed, however, that when others in my cell would ask to see a doctor, they were told that they would only be seen by a doctor if they had a fever, so I did not ask for medical attention.

7. For food, we were given the same food each day, which consisted of bottled water, some milk, an apple, cookies, and a microwaved burrito. The food was not appetizing, but I knew that I had to eat. My baby was still having a hard time eating, and I would try to breastfeed him or give him a bottle. Sometimes he would refuse to eat at all. I noticed that he was starting to have diarrhea.

8. When I saw that my son had a fever, I went to ask for medical attention to an agent and explained that he was sick. The agent asked me to wait for a few minutes outside of the cell for someone to come and check on him. After a few minutes, a nurse came and checked my son. She gave him some medicine. The next day, a nurse returned to give him more medicine and she gave me some medicine too.

9. I was tired and dirty and I wanted to be able to take a shower. The agents would advise us that they would give us an opportunity to take showers. There were about twenty-eight showers in the center, and they would count us off in groups. There were more people in the center than spots in the groups to shower, and so I did not have an opportunity to take a shower.

10. After over a week in the second detention center, the agents told me that I was going to be moved again, because I was sick. My baby also had a cough. We were moved in a small group with some other children and some adults to a third center.
11. At the third center, in Weslaco, Texas, where I am currently detained, we are given the same food. I have finally been able to take a shower, but I was not able to wash myself well because I had to carry my son, who is too young to walk. Although he got very clean I was still not able to fully shower myself. I have not seen a nurse or a doctor. I asked when I will have an opportunity to see a nurse or a doctor and they told me maybe tomorrow or the next day. My son is still suffering from diarrhea. I still have not had an opportunity to speak with my partner, or anyone from my family.

12. I constantly feel sad when I think about being detained here. I often start crying when I think about having to stay. I have been told by agents that they will move me to a foster home, and I hope that is soon, because it is better than being detained here.

13. I have several cousins and aunts in Tulsa, Oklahoma. My step father is in Tulsa, Oklahoma, and I would like to be released to him. His name is W[redacted] and his phone number is [redacted].
Certificate of Translation

I, Erin D. Thorn Vela, certify that I am fluent in English and Spanish and that I read the above declaration to [REDACTED] in Spanish. Executed this 12th of June in Weslaco, Texas.

[Signature]

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

[REDACTED]

06-12-2019

Date

Exhibit 39
EXHIBIT 40
Declaration of

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

1. I am 17-years-old and my date of birth is [REDACTED]. My daughter, [REDACTED], was born on [REDACTED].

2. We are from a very small town in San Marcos, Guatemala, and I speak Mam and Spanish.

3. We left Guatemala in the end of May to come to the US. We crossed the border near El Paso on or around June 3, 2019. Since that time, we have been held by Border Patrol for over 14 days.

4. I crossed the border in the afternoon around 5 or 6 pm in the afternoon. The border agent took me and my daughter to an outside pen with a lot of people in it. I can’t even say how many people were in it. There were too many to count.

5. After about an hour, they transferred us to a cell inside a building. They held us there for about 6 hours. At about 3 am in the morning they transferred us here to the Clint Border Patrol station.

6. We are being held in a room about 30 feet by 20 feet. There are so many people in the room and no windows. There are bunkbeds but not enough of them. My daughter and I have been sleeping on the floor with just a blanket, no mattress for two weeks.

7. I am the only one with a baby sleeping on the floor. The other mothers with babies have a bed. I am in a “girls only” cell, with a toilet separated by a partial wall. The girls help each other by holding up blankets for some privacy when we go to the bathroom.

8. I wish I could get clean. I’ve only been able to take a quick shower, maximum 3 minutes, two times since I’ve been here. And they let me brush my teeth twice but they took the brush and told me they were throwing it away. I have not changed my clothes in the entire time I have been in this facility. I cannot really wash clothes because there is nothing to put on while we wash them. We are also not given any soap with which to wash the clothing.

9. Every day they give us the same food: one packet of oatmeal and a juice in the morning, ramen soup for lunch and a burrito for dinner.

10. My daughter is still nursing but she needs food as well. I think the food here gave her diarrhea. About a week after we got here my daughter started to get really sick. When we went to the nurse, the nurse gave me new clothes to change her. She had not had a change of clothes before that.
11. After we saw the nurse, the agents took me and my daughter to the hospital for a few hours where she got fluids through an IV.

12. During the two weeks we've been here they have let us outside about 5 times for about 20 minutes each time. Otherwise, there is nothing to do all day but sit in the cell and sleep.

13. I was allowed to call my parents a couple of days ago after over 10 days in custody. I miss my mother so much. I don’t know when they will let me out of here. I just want to go live with my sister in Tennessee.

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

[Redacted]

June 17, 2019

Date
EXHIBIT 41

I, A[Redacted] M[Redacted] O[Redacted] R[Redacted], declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. I came from El Salvador with my brothers who are 11 and 19 years-old. I am 15 years old. My birthdate is [Redacted]. We came to be with our mother who lives in the United States because the gangs were threatening us. They came to our house and beat up our aunt and so we had to leave before they came back.

2. They took our older brother to another facility and then brought my younger brother and me here to the Clint Border Patrol Station two days ago. At first my brother and I were together, but then they said that he could not be in the same room.

3. A Border Patrol Agent came in our room with a two-year-old boy and asked us, “Who wants to take care of this little boy?” Another girl said she would take care of him, but she lost interest after a few hours and so I started taking care of him yesterday. His bracelet says he is two years old.

4. I feed the 2-year-old boy, change his diaper, and play with him. He is sick. He has a cough and a runny nose and scabs on his lips. He was coughing last night so I asked to take him to see the doctor and they told me that the doctor would come to our room, but the doctor never came.

5. The little boy that I am taking care of never speaks. He likes for me to hold him as much as possible.

6. We live in Room 203 with 25 children. I estimate that it is about 10’ by 15’. The first night I slept on the concrete ground and used the blanket to cover me because it was so cold. I could not sleep because I was so cold and my head hurt. Yesterday, some of the girls left and so I was able to get one of the beds. Last night, the little boy and I were able to sleep in the bed together. Today a nurse got mad at us because a comb is missing. Two girls asked to use a comb, but only one was returned. We are not allowed to keep combs, so they came in and took out all of the beds and all of the blankets in order to punish us. Now we will have to sleep on the floor.

7. In our room, there are two toilets and a sink. One toilet is out in the open and the other is in a stall with no door so there is no privacy when we go to the bathroom. There is no soap.

8. We eat in the same room. Some of the children have to eat on the floor. I have to change the little boy’s diaper on the bed.

9. Since arriving here, I have never been outside and never taken a shower.

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

______________________________

June 19, 2019

EXHIBIT 42
DECLARATION OF A____ T____

I, A____ T____, declare that the following is true and correct to the best of my knowledge and recollection:

1. My name is A____ T____. I am 16 years old. I was born on [Redacted], in San Andrés Xecul, Department of Totonicapán, Guatemala, and I lived there with my grandparents until I left for the United States last month.

2. My grandparents speak only K’iché. I speak Spanish and K’iché. I attended school through the third year of basic primary school, taught in K’iché and Spanish, although I did not finish the year.

3. I left Guatemala on my own in May, to join my parents in the United States. I do not remember exactly how long the journey from Guatemala took me. I remember that I climbed the wall into the United States and walked for about 15 or 20 minutes before Border Patrol agents found me and apprehended me along with another Guatemalan boy who was about 17 years old. I did not know him in Guatemala; we met near the border and crossed together.

4. I crossed the border nine days ago with the other boy in the morning on the day we were apprehended. The Border Patrol agents had us remove our shoelaces and belts and took our backpacks, saying we would get those back later. Then they took us in their vehicle to a place with a lot of agents where they registered us. I think we drove for almost 40 minutes before we reached that place.

5. After they registered us, the same agents drove the two of us another 30 minutes to the place where I am now. I don’t know the name of it, but the lawyer taking this declaration tells me that I am at the Border Patrol station in Clive, Texas.

6. Here they registered us again and gave us food. There was a health check, only questions, they did not take blood or do other tests and did not examine me.
7. The days here are all the same. In the morning we get oatmeal and juice. Then we rest and wait for cleaning. When they clean, we leave the room where we are and go into the courtyard. Afterward we go back into the cell and wait for lunch. Lunch is soup, juice, and a pudding. Then we wait in our cells some more. In the afternoon we can go into the courtyard to play football for 30 minutes. The courtyard is outside, so we can get some sun. Then we go inside again and wait for the snack in the afternoon, which is a cookie. Then we get dinner. Dinner is a burrito, juice, and a cookie. There are other cleanings, a total of four times a day, so we leave our cells each time for that.

8. There are no other activities. We don’t have any crafts or indoor games, except for a card game. We don’t have any books to read. We don’t get anything to draw with or make with our hands. There is no television to watch. There are no classes. We don’t get religious services. I pray, but I do it on my own.

9. The bathroom is outside the cells, by the courtyard where we play football, so we have to ask to use the bathroom. We can ask any time, but three times I’ve asked and haven’t been able to use it. Two times it was because they were cleaning the bathroom, so I had to wait about 15 minutes until they finish. The third time they didn’t give me a reason; they just didn’t let me go. This third time was at night. I had to wait until morning. I felt bad because I really had to go. I’ve used the bathroom at night other times, so I don’t know why it wasn’t possible this time.

10. The agents tell us when we’re allowed to brush our teeth. We get toothbrushes that we keep in our pockets. I have mine with me now. We also get little tubes of toothpaste that we share, five of us to a tube. I don’t have any toothpaste with me now. Sometimes we brush our teeth twice a day.

Sometimes it’s once a day. Sometimes it’s every other day. It really depends on the day.

11. I’m staying in a large room, maybe twice the size of the conference room in the Border Patrol station where I am making this declaration. Now there are 31 of us in the room, but at the beginning
there were a lot more. We only had a little space between us when we slept, and some people slept sitting up when we were most crowded.

12. We get cloth blankets. There are big mats, something like big exercise mats, that we sleep on. They're very big; three of us sleep on one.

13. Everybody in the room with me is under age 18, all boys. Some are 15. Some are as young as 13. Some are 17.

14. I have never been sick in the time I have been here, but others have. Others have gotten flu, coughs, stomach aches. When they get sick, they are able to get medicine.

15. I have had two showers in the nine days I have been here. We get a small soap and a small bottle of shampoo when we shower. I am wearing the same clothes I arrived in. I wash my socks when I take a shower. I have never washed any of my other clothes, including my shirt or my underwear, and the center here has not washed them for me, so my clothes are dirty. I don't feel good about this. I would like to be able to wear clean clothes.

16. The staff here haven't told me anything about what will happen in my case and whether I'll be able to live with my parents.

17. I've been able to talk to my parents twice in the time I have been here. The first time was for seven minutes. The second time was for five minutes. The first call was the day I arrived. I was able to make the second call because an official came around asking us how long we had been here. I had been here seven days, so I was able to make a call.

18. Seven minutes isn't long enough to talk to my parents. I would like more time. It would be good to get at least 20 minutes, and to be able to call my parents every other day.

19. The officials here should tell us how long we are going to be staying here and what will happen next. They should also give us a little more food. The amount of food we get really isn't enough, so I'm hungry later in the day.
I make this declaration under penalty of perjury under the laws of the United States. This declaration was read to me in Spanish, a language in which I am fluent.

[Redacted]

Date: 19-June-2019

Certificate of Translation

I, MICHAEL BOCHENEK, certify that I am fluent in English and Spanish and that I read the above declaration to [Redacted] in Spanish. Executed this 19th day of June, 2019, in Clint, Texas.

Michael Bochenek
Human Rights Watch
350 Fifth Avenue
34th Floor
New York, NY 10118