CENTER FOR HUMAN RIGHTS & CONSTITUTIONAL LAW
Carlos R. Holguín (Cal. Bar No. 90754)
crholguin@centerforhumanrights.org
Bardis Vakili (Cal. Bar No. 247783)
bvakili@centerforhumanrights.org
Sarah E. Kahn (Cal. Bar No. 341901)
skahn@centerforhumanrights.org
1505 E 17th Street, Suite 117
Santa Ana, CA 92705
Telephone: (619) 983-7910

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

Defendants.

Case No. CV 85-4544-DMG-AGRx

PLAINTIFFS' NOTICE OF MOTION AND MOTION TO ENFORCE SETTLEMENT RE: DEFENDANTS' FAILURE TO PROVIDE CLASS MEMBERS WITH NOTICE OF THEIR *FLORES* RIGHTS

Hearing: January 8, 2027

NATIONAL CENTER FOR YOUTH LAW
Mishan Wroe (Cal. Bar No. 299296)
Diane de Gramont (Cal. Bar No. 324360)
428 13th Street, Floor 5
Oakland, CA 94612
Telephone: (510) 835-8098
Email: mwroe@youthlaw.org

NATIONAL CENTER FOR YOUTH LAW
Rebecca Wolozin (admitted *pro hac vice*)
2300 18th St. NW, P.O. Box 21156
Washington, DC 20009
Telephone: (510) 835-8098
Email: bwolozin@youthlaw.org

CHILDREN'S RIGHTS
Leecia Welch (Cal. Bar No. 208741)
2021 Fillmore Street
San Francisco, CA 94115
Telephone: (415) 602-5202
Email: lwelch@childrensrights.org

CHILDREN'S RIGHTS
Eleanor Roberts (admitted *pro hac vice*)
88 Pine Street, Suite 800
New York, NY 10005
Telephone: (212) 683-2210
Email: eroberts@childrensrights.org

To all Parties and their attorneys of record:

Please take notice that on January 8, 2027, at 9:30 a.m., or as soon thereafter as counsel may be heard, Plaintiffs will and do hereby move the Court for a classwide order requiring ICE to provide class members with notice of their *Flores* rights as delineated in Plaintiffs' proposed order.

This motion is based upon the memorandum of law and exhibits filed concurrently herewith, and all other matters of record; it is brought following many meetings of the Parties pursuant to Local Rule 7-3 and Paragraph 37 of the Settlement on May 14, May 30, July 24, and September 17, 2025, and on January 23, February 4, March 2, March 10, and April 27, 2026. Declaration of Leecia Welch, November 20, 2026 ("Welch Decl.") ¶¶ 4-5.

Dated: November 20, 2026

CENTER FOR HUMAN RIGHTS AND CONSTITUTIONAL LAW
Carlos Holguín
Bardis Vakili
Sarah Kahn

NATIONAL CENTER FOR YOUTH LAW
Mishan Wroe
Diane de Gramont
Rebecca Wolozin

CHILDREN'S RIGHTS
Leecia Welch
Eleanor Roberts

/s/ Leecia Welch
Leecia Welch
Attorney for Plaintiffs

CENTER FOR HUMAN RIGHTS & CONSTITUTIONAL LAW
Carlos R. Holguín (Cal. Bar No. 90754)
crholguin@centerforhumanrights.org
Bardis Vakili (Cal. Bar No. 247783)
bvakili@centerforhumanrights.org
Sarah E. Kahn (Cal. Bar No. 341901)
skahn@centerforhumanrights.org
1505 E 17th Street, Suite 117
Santa Ana, CA 92705
Telephone: (909) 274-9057

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

Defendants.

Case No. CV 85-4544-DMG-AGRx

MEMORANDUM IN SUPPORT OF PLAINTIFFS' MOTION TO ENFORCE SETTLEMENT RE: DEFENDANTS' FAILURE TO PROVIDE CLASS MEMBERS WITH NOTICE OF THEIR *FLORES* RIGHTS

Hearing: January 8, 2027
Time: 9:30 am
Hon. Dolly M. Gee

NATIONAL CENTER FOR YOUTH LAW
Mishan Wroe (Cal. Bar No. 299296)
Diane de Gramont (Cal. Bar No. 324360)
428 13th Street, Floor 5
Oakland, CA 94612
Telephone: (510) 835-8098
Email: mwroe@youthlaw.org

NATIONAL CENTER FOR YOUTH LAW
Rebecca Wolozin (admitted *pro hac vice*)
2300 18th St. NW, P.O. Box 21156
Washington, DC 20009
Telephone: (510) 835-8098
Email: bwolozin@youthlaw.org

CHILDREN'S RIGHTS
Leecia Welch (Cal. Bar No. 208741)
2021 Fillmore Street
San Francisco, CA 94115
Telephone: (415) 602-5202
Email: lwelch@childrensrights.org

CHILDREN'S RIGHTS
Eleanor Roberts (admitted *pro hac vice*)
88 Pine Street, Suite 800
New York, NY 10005
Telephone: (212) 683-2210
Email: eroberts@childrensrights.org

TABLE OF EXHIBITS

Exhibit Index to Motion to Enforce re: Defendants' Failure to Provide Class Members with Notice of Their *Flores* Rights

Exhibit No.	Exhibit Description
1	Declaration of Leecia Welch, November 20, 2026 ("Welch Decl.")
2	W.D.B. Declaration (Dilley), October 6, 2026 ("W.D.B. Decl.")
3	T.C. Declaration (Dilley), October 7, 2026 ("T.C. Decl.")
4	Y.W. Declaration (Dilley), October 7, 2026 ("Y.W. Decl.")
5	J.P.R. Declaration (Dilley), October 7, 2026 ("J.P.R. Decl.")
6	M.M.V. Declaration (Dilley), October 6, 2026 ("M.M.V. Decl.")
7	D.Z.C. Declaration (Dilley), November 4, 2026 ("D.Z.C. Decl.")
8	K.O.C. Declaration (Dilley), November 4, 2026 ("K.O.C. Decl.")
9	P.G.P. Declaration (Dilley), November 4, 2026 ("P.G.P. Decl.")
10	Y.M.P. Declaration (Dilley), November 4, 2026 ("Y.M.P. Decl.")
11	Y.Z. Declaration (Dilley), November 4, 2026 ("Y.Z. Decl.")
12	W.P.P. Declaration (Dilley), July 15, 2026 ("W.P.P. Decl.")
13	Y.P.R. Declaration (Dilley), July 15, 2026 ("Y.P.R. Decl.")
14	D.C.S. Declaration (Dilley), October 6, 2026 ("D.C.S. Decl.")
15	S.R.A. Declaration (Dilley), October 7, 2026 ("S.R.A. Decl.")
16	G.Z.R. Declaration (Dilley), September 9, 2026 ("G.Z.R. Decl.")
17	I.O.R. Declaration (Dilley), September 9, 2026 ("I.O.R. Decl.")
18	M.A.G.Z. Declaration (Dilley), November 4, 2026 ("M.A.G.Z. Decl.")
19	E.N.P. Declaration (Dilley), July 14, 2026 ("E.N.P. Decl.")

20	L.Z. Declaration (Dilley), July 29, 2026 ("L.Z. July Decl.")
21	A.C. Declaration (Dilley), October 6, 2026 ("A.C. Decl.")
22	W.T.P. Declaration (Dilley), July 15, 2026 ("W.T.P. Decl.")
23	J.O. Declaration (Dilley), November 3, 2026 ("J.O. Decl.")
24	J.M.O. Declaration (Dilley), October 7, 2026 ("J.M.O. Decl.")
25	Y.D. Declaration (Dilley), October 7, 2026 ("Y.D. Decl.")
26	D.L.R. Declaration (Dilley), October 6, 2026 ("D.L.R. Decl.")
27	X.W. Declaration (Dilley), July 15, 2026 ("X.W. Decl.")
28	M.T. Declaration (Dilley), July 15, 2026 ("M.T. Decl.")
29	S.N.K. Declaration (Dilley), October 7, 2026 ("S.N.K. Decl.")
30	L.R.O. Declaration (Dilley), July 15, 2026 ("L.R.O. Decl.")
31	A.D.G. Declaration (Dilley), September 8, 2026 ("A.D.G. Decl.")
32	M.G.O. Declaration (Dilley), July 14, 2026 ("M.G.O. July Decl.")
33	N.A.P. Declaration (Dilley), November 4, 2026 ("N.A.P. Decl.")
34	Declaration of Miguel Chiapetta, November 18, 2026 ("Chiapetta Decl.")

Previously Filed Declarations

Docket No.	Description
1706-2	Declaration of Javier Hidalgo, December 8, 2025 ("Hidalgo Dec. Decl.")
1748-16	Declaration of Javier Hidalgo, March 20, 2026 ("Hidalgo Mar. Decl.")
1748-21	Declaration of Z.V. (Dilley), February 11, 2026 ("Z.V. Decl.")

1748-24	Declaration of S.S. (Dilley), January 15, 2026 ("S.S. Decl.")
1748-36	Declaration of M.L.S. (Dilley), February 12, 2026 ("M.L.S. Decl.")
1779-2	Declaration of Leecia Welch, May 18, 2026 ("Welch May 2026 Decl.")
1779-8	Declaration of S.D.C. (Dilley), March 11, 2026 ("S.D.C. Decl.")
1779-18	Declaration of O.B. (Dilley), April 23, 2026 ("O.B. Decl.")
1811-2	Declaration of Leecia Welch, July 15, 2026 ("Welch July 2026 Decl.")
1811-4	Declaration of Elora Mukherjee, July 15, 2026 ("Mukherjee July Decl.")
1811-5	Declaration of Rodolfo Altillo, July 15, 2026 ("Altillo Decl.")
1811-6	Declaration of M.A.B.H. (Dilley), June 1, 2026 ("M.A.B.H. Decl.")
1811-7	Declaration of J.C.B. (Dilley), June 3, 2026 ("J.C.B. Decl.")
1811-9	Declaration of L.R.V. (Dilley), June 2, 2026 ("L.R.V. Decl.")
1811-11	Declaration of L.R.P. (Dilley), June 8, 2026 ("L.R.P. Decl.")
1811-12	Declaration of M.G.O. (Dilley), June 2, 2026 ("M.G.O. June Decl.")
1811-13	Declaration of J.C.M. (Dilley), June 8, 2026 ("J.C.M. Decl.")

TABLE OF CONTENTS

I. INTRODUCTION 1
II. STATEMENT OF FACTS 2
A. Defendants Do Not Give Class Members Meaningful Notice of Their *Flores* Rights. 2
1. Families Consistently Report That No One Tells Them About Their Children's *Flores* Rights. 2
2. ICE Presents Families with Incomplete, Confusing, or Incorrect Information About *Flores*. 4
3. ICE's Materials Do Not Provide Meaningful Notice of Class Members' *Flores* Rights. 6
4. Lack of Language Access Compounds Class Members' Confusion About Their *Flores* Rights and the Ability to Exercise Them. 8
5. Families Face Barriers to Accessing Legal Service Providers to Help Them Understand Their Children's Flores Rights. 9
6. Defendants Have Refused to Allow Legal Service Providers to Present Know-Your-Rights Trainings About Class Members' *Flores* Rights. 11
B. Defendants' Failure to Advise Children of their Comprehensive *Flores* Rights Prevents Families from Effectuating their Children's Rights. 13
III. ARGUMENT 17
A. The FSA and This Court's Orders Require Meaningful Notice of *Flores* Rights. 17
B. Defendants' Materials and Practices Do Not Satisfy These Obligations. 19
C. The Court-Approved Notice Should Be Updated to Reflect Current Detention Practices. 20
D. Regular Know-Your-Rights Presentations Are Necessary to Inform Class Members of Their *Flores* Rights. 22
IV. REQUESTED REMEDIES 23
V. CONCLUSION 25

I. INTRODUCTION

The *Flores* Settlement Agreement ("FSA" or "Settlement") guarantees children in immigration custody rights governing their detention, treatment, and release. Those rights mean little if children never learn they exist. For more than a year and a half, U.S. Immigration and Customs Enforcement ("ICE") has detained children and families at the South Texas Family Residential Center in Dilley, Texas ("Dilley"), without giving them meaningful notice of their *Flores* rights or consistent access to legal service providers who can explain them. Over 15 site visits, class counsel have interviewed more than 200 families. None recall learning about their children's comprehensive *Flores* rights from ICE or CoreCivic.

Plaintiffs seek to enforce the Settlement and ensure that children and their families are given a notice of their rights while they are detained. Paragraph 12.A of the FSA plainly requires Defendants to provide class members with a notice of rights. This Court has previously held that the notice must inform class members of their custody and release rights sufficiently to allow them to act upon those rights, has already recognized legal service providers' entitlement to broad access to minors in order to explain their *Flores* rights, and has previously approved a Notice of Rights for dissemination. *See* Order re Plaintiffs' Motion to Enforce and August 2020 ICE Juvenile Coordinator Interim Report at 5-6, September 18, 2020 [Doc. # 987] ("Sept. 18, 2020 Order"); Order Approving Final Notice of Rights January 5, 2021 [Doc. # 1056] ("Jan. 5, 2021 Order");

Order re March 19, 2021 Status Conference at 2, March 19, 2021 [Doc. # 1098] ("Mar. 19, 2021 Order").

Since May 2025, Plaintiffs have repeatedly raised these violations with Defendants and reminded Defendants of this Court's prior orders in correspondence, meet and confers, mediation sessions, and court filings. Defendants have made no attempt to cure them. Instead, Defendants maintain that no violations exist. Plaintiffs respectfully ask the Court to enforce the Settlement and its prior Orders to ensure that all class members at Dilley receive meaningful notice of their *Flores* rights and access to legal service providers who can explain those rights.

II. STATEMENT OF FACTS

A. Defendants Do Not Give Class Members Meaningful Notice of Their *Flores* Rights.

Time and again since May 2025, Plaintiffs have informed Defendants that families at Dilley are not receiving required information about their children's *Flores* rights. Welch Decl. ¶¶ 3-6, 8-9. Despite Plaintiffs' repeatedly raising the same concerns in correspondence, meet and confers, mediation sessions, and status conference statements, nothing has changed. Defendants have neither addressed these concerns nor provided a substantive response to Plaintiffs' proposed notice of rights shared seven months ago. *Id.* ¶¶ 8-9.

1. Families Consistently Report That No One Tells Them About Their Children's *Flores* Rights.

Class counsel have made 15 site visits to Dilley and interviewed over 200 families.

No family has recalled learning about their child's comprehensive *Flores* rights through a video, training, or notice of rights document from ICE or CoreCivic. Welch Decl. ¶¶ 10-11. Children's and parents' declarations are consistent over this entire time:

- "I have never received an orientation or video about my rights." J.C.M. Decl. ¶ 7 [Doc. # 1811-13].
- "No one ever explained my rights to me here. I asked for them, and ICE told me they don't know what our rights are." L.R.P. Decl. ¶ 15 [Doc. # 1811-11].
- "We received no presentation about our rights." J.C.B. Decl. ¶ 24 [Doc. # 1811-7].
- "No one who works here has mentioned *Flores* to me . . . . There was no know your rights training. They do not do that." W.D.B. Decl. ¶¶ 6, 17.
- "We did not get any paper with our rights on it, and we have never received any rights-related papers over the past few months. . . . I do not remember ever seeing a video about my rights here, either. I have never heard about *Flores* before. No one who worked here ever mentioned this to us or told us about how long our child could be detained. . . . No one ever told us about any of our children's rights." T.C. Decl. ¶¶ 14, 17-19.
- "No one told us anything about our rights. . . . No one did any kind of know your rights training . . . . I have never seen a video about my rights since being here. I have never heard about *Flores* before." Y.W. Decl. ¶¶ 9, 11, 14-15.
- "We didn't see a video about *Flores* . . . ." J.P.R. Decl. ¶ 22.
- "The staff has not explained our rights to us. What we learn is from the other people detained with us." M.M.V. Decl. ¶ 35.
- "They did not tell us about our *Flores* rights at all. We never received a paper with our rights." D.Z.C. Decl. ¶ 9.
- "I was not told about my rights or my daughter's rights. . . . I learned about *Flores* from another person detained here." K.O.C. Decl. ¶¶ 23-24.
- "I was not told about my children's *Flores* rights." P.G.P. Decl. ¶ 10.
- "No one told us our rights. No one told us about my son's rights or a case called *Flores*." Y.M.P. Decl. ¶ 9.

- "When we arrived at Dilley, there was an orientation but I only remember that they told me I would be deported. . . . No one has ever mentioned *Flores* to me or told me that my child and I have any rights related to conditions or release." Y.Z. Decl. ¶¶ 17, 21.

One mother explained:

> No one has given me a handout about my children's rights. I do not remember watching a video about my children's rights either. They showed us a video when we got here, but it was about immigration law and credible fear interviews. . . . I have not heard about my children's right to be released from Dilley without me. No one has told me anything about bond hearings.

M.G.O. June Decl. ¶¶ 16-19 [Doc. # 1811-12].

2. ICE Presents Families with Incomplete, Confusing, or Incorrect Information About *Flores*.

Families report that the only information ICE provides them about *Flores* is that their children cannot be detained for longer than 20 days. *See, e.g.,* W.P.P. Decl. ¶ 14 ("Several days after we arrived, maybe five days, there was an official who gathered us in a group and told us about *Flores* and said we could only be held here for 20 days. I don't remember learning anything else about other *Flores* rights. And anyway, we have been here far longer than 20 days."); Y.P.R. Decl. ¶ 8 ("The only thing they have ever said about *Flores* is that under *Flores*, children are not supposed to be here longer than 20 days. They had us sign a paper about that. But we have now been here for 70 days."); *see also* Y.M.P. Decl. ¶ 8; D.C.S. Decl. ¶ 10; S.R.A. Decl. ¶¶ 20-21.

Families report being confused by their meetings with ICE where they are asked to sign a document purportedly referencing a 20-day limit to detention pursuant to *Flores*. The paper they are asked to sign is in English, which most cannot read, and the 20-day

limit they are told about does not match their experience, since many families are detained far longer. L.R.V. Decl. ¶¶ 6, 9 [Doc. # 1811-9] ("ICE gave us a paper to sign that said that children can't be detained more than 20 days. But the ICE agent told us that even though the paper said kids couldn't be here more than 20 days . . . it really didn't apply to anyone in this facility. . . ."); K.O.C. Decl. ¶ 14 ("I signed a paper when I got here, but I don't know what it said. I was just recently traumatized and couldn't think straight."); M.A.B.H. Decl. ¶ 17 [Doc. # 1811-6] ("[T]hey made me sign the *Flores* paper. But they just put the paper in front of me and told me to sign it. They did not give me the paper after, and I did not get a copy of it, so I do not know what it says exactly."); G.Z.R. Decl. ¶ 24 ("When I got here, I was presented with a paper in English to sign. I think it said something about our rights, but it was not translated. I refused to sign it because I did not understand what it said."); I.O.R. Decl. ¶ 8 (same); Y.W. Decl. ¶ 6 (same); D.C.S. Decl. ¶ 10; S.R.A. Decl. ¶¶ 19-20, 22 ("The page was in English. . . . It said *Flores* applies and you can't be here more than 20 days. I signed it. . . . We don't have an official translator, and we don't receive a copy.").

When Plaintiffs requested a copy of the paper that families are asked to sign, Defendants stated they "ha[ve] no such document in use." Welch Decl., Attachment U ("D.' June 5, 2026 Correspondence to Pls."). Plaintiffs' counsel have not been able to verify what is being provided to class members despite requests to Defendants. Welch Decl. ¶ 14.

Families also report receiving information from ICE that is clearly incorrect and seems designed to discourage them from protecting their children's rights under the FSA. For example, ICE told one family, without explanation, that they "don't qualify for *Flores*." L.R.P. Decl. ¶ 16 [Doc. # 1811-11]. ICE told another family that they have "lost [their] chance to [use *Flores*]." J.C.B. Decl. ¶ 26 [Doc. # 1811-7]. Another family reported that "[a]ll the staff and ICE officers here say *Flores* doesn't work. It's history now. It's a story from back in the 1900s, it's buried." S.S. Decl. ¶ 70 [Doc. # 1748-24]; *see also* M.A.G.Z. Decl. ¶ 11 (". . . ICE said we could fight using *Flores*, but that it was not going to help us.").

3. ICE's Materials Do Not Provide Meaningful Notice of Class Members' *Flores* Rights.

ICE contends it satisfies its *Flores* notice obligations through (1) a generic immigration video, (2) a resident handbook, and (3) two documents (FSA Exhibit 6 and the I-770 form) that reference only the right to use the telephone, to a lawyer, and to a hearing before a judge. *Flores* ICE Juvenile Coordinator's Annual Report 2026 at 14, 18 [Doc. # 1802-1] ("ICE JC Report 2026"). Neither the video nor the handbook even mentions *Flores*, and the two documents do not address the vast majority of class members' rights. None of these materials comes close to informing class members of their comprehensive *Flores* rights. Welch Decl. ¶¶ 11-12.

The immigration video purportedly shared with families covers topics such as asylum eligibility, voluntary departure, and stipulated removal. Welch Decl. ¶ 11. It tells viewers that children have the same rights as adults and makes no mention that children

in immigration custody possess specific rights under the FSA. *Id*. ¶ 11. The video itself actually recognizes the need for individualized legal assistance: it informs viewers that they cannot ask questions or obtain additional information during the presentation and instead must use the law library or consult individually with a pro bono attorney. *Id*. ¶ 11. In any event, many families report never having seen the video. *See* E.N.P. Decl. ¶ 10 ("We have not been shown a video about our legal rights"); Y.P.R. Decl. ¶ 8 ("They have never given us an orientation or shown us a video about our legal rights."); L.Z. July Decl. ¶ 11 ("We have never seen a video about *Flores*, and no one talked to us about *Flores* rights besides what the paper said."); I.O.R. Decl. ¶ 8 ("They have never shown me or told me there was an immigration video we could watch."); A.C. Decl. ¶ 12 ("They have not shown us a video about our immigration rights"); T.C. Decl. ¶¶ 17-18 ("I do not remember ever seeing a video about my rights here . . . . I have never heard about *Flores* before."); Y.W. Decl. ¶¶ 14-15 (same); W.T.P. Decl. ¶ 8 ("The only video showing was *Bluey*—just *Bluey* the whole time. We were so tired."); K.O.C. Decl. ¶ 23 ("I was not shown a video that explained my rights."); J.O. Decl. ¶ 8 ("We were not shown a video about my children's rights or immigration. My friend told me that children have the right to be released after 20 days, but no one here has talked to me about that.").

To the extent families are provided the Resident Handbook, it similarly makes no mention of *Flores* rights.[1] *See* J.M.O. Decl. ¶ 49 ("The [hand]book doesn't mention

[1] Notably, the Resident Handbook that CoreCivic purportedly provides to Dilley detainees expressly authorizes "open access" to "group presentations on U.S.

Flores."); S.R.A. Decl. ¶ 26 ("The only type of handbook I've seen is the one in the room that explains how to use the phones."); Y.D. Decl. ¶ 9 ("They did not give us a handbook of the rules."); W.D.B. Decl. ¶ 18 ("We never received a handbook.").

4. Lack of Language Access Compounds Class Members' Confusion About Their *Flores* Rights and the Ability to Exercise Them.

Limited language access for documents and day-to-day communication compounds families' confusion about their *Flores* rights, leaves them unable to understand or verify what ICE tells them, and impedes their ability to exercise their rights. *See supra* Section II.A.2; J.C.M. Decl. ¶¶ 10-11 [Doc. # 1811-13] ("These papers are all in English. . . . [W]e don't receive the papers in our own language. For the *Flores* document, an ICE agent told me what it means, but the paper was still in English. We didn't get a copy of that one."); S.R.A. Decl. ¶ 22 ("When we have to sign something in English, the ICE agent just explains what it means to us, but we don't get it in Spanish."); D.L.R. Decl. ¶ 18 ("Everything I've signed here has been in English. There is no official translator; someone from ICE or CoreCivic just explains it to us."); X.W. Decl. ¶ 9 ("The language barrier makes life very difficult here. We mostly use hand gestures to express ourselves."); L.Z. July Decl. ¶ 30 ("There are a few workers who will use their phones to help translate. But most of the staff here will not."); Y.Z. Decl. ¶ 30 ("We cannot

---

immigration law and procedures and all other relevant issues related to the immigration court, appeals, and discharge processes, including a resident's legal rights." Dilley Immigration Processing Center Resident Handbook at 45 ("Resident Handbook"); Welch May 2026 Decl., Attachment A at 45 [Doc. # 1779-2]. Despite the handbook's statements, ICE has blocked service providers from providing *Flores* trainings. *See infra* Section II.A.6.

communicate with the staff. They do not have translators or staff who speak our language.").

5. Families Face Barriers to Accessing Legal Service Providers to Help Them Understand Their Children's *Flores* Rights.

Families also face barriers to understanding their children's *Flores* rights because they are unable to make free legal calls or reliably send emails to their attorneys. Welch Decl. ¶¶ 16-18; Mukherjee July Decl. ¶¶ 38-43 [Doc. # 1811-4]. The FSA provides for broad access to attorney-client communication. FSA ¶¶ 32.A (allowing class counsel to meet with class members despite not knowing their names), 24.D(b)-(c), Ex. 6 (allowing class members to call lawyers and providing for class members to receive a list of free legal services); *see infra* Section III.A. Families at Dilley consistently report they have no way to make free phone calls to counsel. *See, e.g.,* M.A.B.H. Decl. ¶ 32 [Doc. # 1811-6] ("I have not been able to call lawyers and do not have money for lawyers."); O.B. Decl. ¶ 12 [Doc. # 1779-18] ("I have not contacted lawyers because I thought I have to pay. This is the first time I am hearing I don't have to pay for calling lawyers."); S.D.C. Decl. ¶ 21 [Doc. # 1779-8] ("I haven't been able to make any free pro bono calls here by using the system where you are supposed to mark 6. I saw a woman try it recently, and it did not work."); Z.V. Decl. ¶ 24 [Doc. # 1748-21] ("I cannot call my lawyer for free either. I have to pay to call him on his cell phone. I have never heard anyone tell me I should be able to call my lawyers for free."); E.N.P. Decl. ¶ 20 ("There is no way for me to place a call to my lawyer for free."); M.M.V. Decl. ¶ 32 ("There is no way to call our attorney for free here. We have to pay each time we call our lawyer. Without money, we cannot

do that."); W.D.B. Decl. ¶ 27 ("[I]f I called my lawyer, I would have to pay for it."); L.Z. July Decl. ¶ 28 ("I can call the attorney at RAICES for free, but I have to pay to call my attorney in California."); Y.Z. Decl. ¶ 27 ("I have never been shown a list of free legal service providers or been told that I can make a free call to a lawyer."). Notably, one family reported that ICE or CoreCivic "showed [them] a list of legal services but told [them] that [they] couldn't have a copy of the list because the legal services wouldn't help a case like [theirs]." K.O.C. Decl. ¶ 16.

The last ICE Juvenile Coordinator Annual Report states that indigent residents may request free legal calls, ICE JC Report 2026 at 18 [Doc. # 1802-1], yet no family with whom counsel has spoken has ever known of that option. Welch Decl. ¶ 16.

> We never received information about how to call lawyers or how to call people for free. I only learned how to call *Flores* attorneys, because other people detained here gave me your information. I used my money to pay for that call, because I do not know how to make calls any other way.

M.L.S. Decl. ¶ 28 [Doc. # 1748-36]; *see also* W.P.P. Decl. ¶ 21 ("If we don't have money, we can't call anyone. That's my understanding of how it works here.").

Families also face constant barriers to emailing their lawyers. One family reports:

> In the library, there is no real access to the internet or email. The facility claims there is access, but I think they also know that in reality, there is not. . . . They say there is Gmail, but they know that it requires two-factor authentication, and no one here has access to their phones or other ways to complete the authentication, so Gmail is simply not available to people. Atomic mail is extremely unreliable, and people's emails often go undelivered. It is actually harming people and their cases. For example, my prior immigration attorney told me that she never received the emails I sent her from my Atomic email account. Finally, they allowed Proton mail. But Proton mail is only free for two weeks, and then it requires a subscription that costs about $5 per month,

> and which also requires a way to pay electronically. Most people cannot pay the fee, so after two weeks, they have to set up a brand-new email account, and they lose access to the previous one. This makes consistent communication with anyone, including legal counsel, difficult or impossible.

M.T. Decl. ¶¶ 12-13. Recently, families reported to Dilley staff that their emails were being blocked, which staff denied outright. *See* W.P.P. Decl. ¶ 28 ("We had a meeting where someone explained that our emails are blocked, and they just said that's not true."); *see also* L.Z. July Decl. ¶ 29 ("We also cannot sign in to Gmail because it requires two-factor authentication."); M.M.V. Decl. ¶ 34 ("We cannot use email here, and the computers are not helpful here because we cannot look things up. Most websites are blocked."); J.O. Decl. ¶ 26 ("I am not able to access my Gmail account here. It's a restricted URL. We are not permitted to access most public websites."); D.Z.C. Decl. ¶ 23 ("We can't access email. We can't search for anything. We try to look up information, and everything says that it's not available. None of the websites work, not even the ones that are on the list. The librarians are of no help. They said the websites on the list work, but it always just loads without opening.").

6. Defendants Have Refused to Allow Legal Service Providers to Present Know-Your-Rights Trainings About Class Members' *Flores* Rights.

Legal service providers are ready and willing to provide what a video, handbook, or untranslated document cannot. RAICES[2] has repeatedly offered to give regular presentations at Dilley to explain to class members their *Flores* rights. Altillo Decl. ¶¶

[2] Refugee and Immigrant Center for Education and Legal Services ("RAICES") is a legal and social services nonprofit organization based in Texas.

29-30 [Doc. # 1811-5]. Defendants have refused. After Plaintiffs asked in May 2025 that RAICES begin its previously approved training, Defendants first responded that ICE was assessing it, then that ICE had no plan to allow a KYR training, and then that the previously approved training was deficient, with no further explanation. Welch Decl., Attachment D at 3 ("Pls.' June 4, 2025 Dilley Letter"); Welch Decl., Attachment F at 2 ("Pls.' August 14, 2025 Dilley Letter"); Welch Decl., Attachment H at 3 ("Pls.' September 18, 2025 Dilley Letter"). Plaintiffs raised the problem again in letters and in filings with the Court. Welch Decl., Attachment I at 2 ("Pls.' October 23, 2025 Dilley Letter"); Welch Decl., Attachment J at 2-3 ("Pls.' November 25, 2025 Dilley Letter"); Pls.' September 2025 Resp. to Suppl. Juvenile Coordinator Reports and Data at 6 [Doc. # 1656]. Although ICE asserted that "[l]egal orientation programs (LOPs) are made available to educate minors" along with "free phone calls to legal counsel," families reported never receiving a rights training, and RAICES remained barred from providing one. Juv. Coord. Dec. 2025 Suppl. Rep. at 33 [Doc. # 1692-4]; Pls.' Resp. to Dec. 1, 2025 ICE Suppl. Rep. at 13-16 [Doc. # 1706]; Hidalgo Dec. Decl. ¶¶ 24-25 [Doc. # 1706-2].

In early 2026, Plaintiffs asked why ICE refuses to allow trainings by independent legal service providers. Defendants responded that in-person trainings are not required by the FSA and that outside organizations will not be permitted to conduct them at Dilley. Welch Decl., Attachment K at 2-3 ("Pls.' January 22, 2026 Dilley Letter"); Welch Decl., Attachment L at 2-3 ("Pls.' February 19, 2026 Dilley Letter").

Prior to Dilley's closure as a family detention center in 2021, RAICES provided in-person know-your-rights trainings to class members:

> In prior years, RAICES services included group legal presentations that would provide know-your-rights ("KYR") information to class members. Such presentations were essential in countering misinformation and lack of information detained class members commonly experience . . . . [P]resentations were also an important opportunity for detained class members to ask questions about their rights.

Hidalgo Dec. Decl. ¶ 24 [Doc. # 1706-2].

RAICES' training remains barred to this day, and its June 2025 FOIA request for the reason for the denial remains unanswered. Altillo Decl. ¶ 30 [Doc. # 1811-5]; Welch July 2026 Decl. ¶ 19 [Doc. # 1811-2]; Hidalgo Mar. Decl. ¶ 23 [Doc. # 1748-16]; Pls.' March 2026 Resp. to Suppl. Juvenile Coordinator Reports and Data at 13 [Doc. # 1748]; Pls.' Resp. to May 4, 2026 ICE JC Rep. at 14 [Doc. # 1779].

B. Defendants' Failure to Advise Children of their Comprehensive *Flores* Rights Prevents Families from Effectuating their Children's Rights.

Defendants' persistent failure to advise children of their *Flores* rights has concrete consequences, preventing class members from challenging ongoing FSA violations at Dilley. The lack of information and understanding of *Flores* rights also compounds the harm of ongoing FSA violations and contributes to the physical and psychological harm class members experience at Dilley

Children remain detained for prolonged periods. Class members and their parents consistently express distress about their prolonged detention and lack of information about their release. *See, e.g.,* L.Z. July Decl. ¶¶ 14, 16 ("We do not know

when we will be released from here. . . . We feel like we have been lied to and tricked. It feels horrible."); S.N.K. Decl. ¶¶ 10-12 (confusion and lack of information caused mom distress-induced fainting spells); D.L.R. Decl. ¶ 52 (seven-year-old son continually asks mom at Dilley to "tell [him] what day" they will leave); E.N.P. Decl. ¶ 11 ("I am worried about my children and feel overwhelmed. My older son has been biting the inside and outside of his hands due to the stress of being here."); M.T. Decl. ¶ 39 ("The anxiety and depression we feel are the most logical outcomes of being plucked out of your normal life and shipped to a place you don't know, and then being locked up with no end in sight. This is a prison sentence that has no release date . . ."); W.T.P. Decl. ¶ 19 ("I hate being locked in here. I don't get any information about what is happening outside of here."); K.O.C. Decl. ¶¶ 13, 15 ("It's been so difficult to be detained with my daughter. . . . No one has given me information on when I'll leave, but they did tell me that they would try to deport me as soon as possible."); M.A.G.Z. Decl. ¶¶ 22-23 ("It feels like a prison. . . . The thing that really stresses us out is that we don't know when we are going to get out of here."); J.O. Decl. ¶ 10 ("When my kids first arrived here, they were very confused. I had tried to explain to them about immigration detention, but they were debating whether this place was a prison.").

Medical and mental health care remain inadequate. *See, e.g.,* L.R.O. Decl. ¶ 11 (20-week pregnant mother in a great deal of pain with continuous bleeding could not get ICE to approve a visit to obstetrician-gynecologist); X.W. Decl. ¶ 13 (eight-year-old son regresses behaviorally and wets the bed several times a week at Dilley); J.M.O. Decl. ¶¶

23-25 ("My son has regressed so much here. He doesn't talk anymore. He used to talk before coming here. There is no therapy here for children with autism. . . . Now, he gets no therapy. He is biting other people now, especially me. He is crying a lot. He is hitting. This is unusual behavior for him."); E.N.P. Decl. ¶ 17 (took four weeks for medical unit to treat severe eye infection); L.Z. July Decl. ¶ 22 (when medicine ordered, it can take up to five days to receive it); G.Z.R. Decl. ¶¶ 12, 17 (child experienced untreated serious rash and asthma symptoms, while mother experienced untreated hernia pain despite constant requests for medical aid); D.L.R. Decl. ¶¶ 37, 43 (child with respiratory issues denied breathing machine and mother with tumor denied appropriate medical care); M.M.V. Decl. ¶ 26 (no dental care besides extracting molars is available at Dilley); Y.Z. Decl. ¶ 23 (medical unit did not assist mother in excruciating pain when she suddenly stopped breastfeeding due to separation from her baby).

ICE continues to deprive children of sleep due to the 24/7 lights and noisy nighttime patrols. *See, e.g.,* T.C. Decl. ¶ 25 ("Sleeping is hard here because the light is on for 24 hours and because our worries keep us up all night."); X.W. Decl. ¶ 18 ("He is also afraid to go to sleep because of the nighttime patrols, but then in the morning, he does not want to wake up. At night, the lights are too bright for him, and the staff do rounds and make noise, so it is very hard to sleep."); Y.P.R. Decl. ¶ 12 ("We suffer a lot because they make us keep the lights on throughout the night. My daughter and I can't sleep, and we try to put something up to block the lights. It doesn't work. My daughter often stays up until 11:30 p.m. or later because she can't fall asleep."); A.D.G. Decl. ¶ 10

("It's really hard to sleep here with the lights on all night."); M.M.V. Decl. ¶¶ 21-22 (sleeping is impossible due to the thin mattresses, lights on all night, noise, and cold rooms).

Children continue to lack healthy, child-friendly foods and potable water. *See, e.g.,* S.N.K. Decl. ¶¶ 18, 20 ("The food here is not good. My brothers aren't really eating the food. . . . The water smells here. I tried drinking it, but I couldn't drink that water. It has some kind of bad, different flavor. We buy the bottled water from the commissary."); L.R.O. Decl. ¶¶ 8-9 ("They don't have food for small children here. My son isn't eating most of the food. It's too processed and spicy. . . . I don't have the money to buy water, so we're not really drinking any."); M.T. Decl. ¶ 18 ("The food here is also a big problem. It is not fresh, and it is not prepared well, and there is not a variety of nutritious food."); L.Z. July Decl. ¶ 24 ("We have to buy water from the commissary because the water here tastes horrible. We have stayed away from the water since we got here. I cannot describe what it is like; there is just this awful smell. So, for the over 160 days we have been at Dilley, we have always bought water."); J.P.R. Decl. ¶ 33 ("I feel hungry a lot here.").

Guards continue to treat class members harshly and without regard for their vulnerabilities as children. *See, e.g.,* D.L.R. Decl. ¶¶ 30, 34 ("An officer threatened to hit my seven-year-old the other day . . . . [A staff member] said the officials . . . where we live[] are not prepared to be around kids."); J.M.O. Decl. ¶ 32 ("One time, an officer told my son to sit and play quietly. I explained that he has autism, and the officer said, 'Oh, so

now everyone has autism,' because another child had recently arrived with autism."); M.G.O. July Decl. ¶ 6 ("The staff here continue to be extremely rude and yell at the kids. . . . They are always threatening us with reports even when our children are having normal childhood behaviors."); J.O. Decl. ¶ 16 (five-year-old and three-year-old both started wetting the bed once they arrived at Dilley and staff would not let mother wash the sheets); N.A.P. Decl. ¶¶ 30-31 (child with autism is not shown patience or respect by staff).

III. ARGUMENT

A. The FSA and This Court's Orders Require Meaningful Notice of *Flores* Rights.

The FSA requires Defendants to provide minors in its custody "with a notice of rights, including the right to a bond redetermination hearing if applicable." FSA ¶ 12.A. This Court has already defined that duty, holding that Paragraph 12.A "must be read to provide a broader notice of rights than provided for elsewhere in the FSA, and at minimum should include a notice of rights pertaining to custody and release such that Class Members may act upon them." Sept. 18, 2020 Order at 5-6 [Doc. # 987]. The Court noted that the "lack of notice regarding the FSA and its provisions" prevents children from enforcing their rights. *Id*. at 8 n.4.

Further, the Court ordered the Parties to develop a process for providing that notice in a manner that does not "cause[] confusion and unnecessary emotional upheaval." Order re Updated Juvenile Coordinator Reports at 2, May 22, 2020 [Doc. # 799]. In a parallel context, the Court has held that legal service providers should have "near-

unfettered access to minors in custody." Sept. 4, 2020 Order re Plaintiffs' Motion to Enforce Settlement as to 'Title 42' Class Members at 16 [Doc. # 976]; *see* FSA ¶¶ 32.A, 24.D(b)-(c), Ex. 6. The Court has also approved language stating that class members may consult attorneys about their *Flores* rights "as often as needed." *Flores* Settlement Agreement Notice of Rights Pursuant to September 18, 2020, Court Order, January 5, 2021 at 2 [Doc. # 1056-1] ("2021 Notice of Rights"). And in January 2021, the Court approved a Notice of Rights, finding it ready for "dissemination." Mar. 19, 2021 Order at 2 [Doc. # 1098]; Order re Order Discharging Order to Show Cause and Appointing Special Master and Independent Monitor, August 17, 2026 at 15-16 [Doc. # 1827] ("Aug. 17, 2026 Order").

These orders followed the Court's prolonged efforts to remedy the absence of an adequate know-your-rights protocol at Dilley. *See* Order re Defendants' [Ex Parte] Application to Stay Proceedings at 2, July 25, 2020 [Doc. # 887] ("Until the Parties evidence some agreement regarding a know-your-rights protocol, there is none"); Order re August 7, 2020 Status Conference, August 7, 2020 at 2 [Doc. # 914] (Court "impose[d] a remedy [to the missing know-your-rights protocol] for Defendants' past and ongoing violations of Paragraphs 12, 14, and 18 of the FSA" regarding the right to release).

Plaintiffs ask that the Court apply these holdings to current conditions at Dilley to ensure that (1) class members receive notice of their *Flores* custody and release rights sufficient to "act upon" them; (2) legal service providers have "near-unfettered access" to

class members such that they can provide know-your-rights trainings; and (3) class members may consult with attorneys about their *Flores* rights "as often as needed." 2021 Notice of Rights at 2.

B. Defendants' Materials and Practices Do Not Satisfy These Obligations.

Defendants assert that the immigration video, handbook, and documents satisfy their obligations. They do not. Defendants' position guarantees no meaningful notice of rights for children just arriving at Dilley after traumatic arrest experiences and exhausting travel or for children detained in prison-like conditions for weeks and months on end.

First, none of these materials tells families what the FSA requires. A video and a handbook that never mention *Flores* cannot inform a child of rights under the FSA, including the standards for safe and sanitary conditions, medical and mental health care, food, education, and recreation, and the right to release. Showing families a document they cannot read, telling them it says something about a 20-day detention limit, and providing no explanation of what their rights are in the detention facility or how to pursue release simply cannot adequately or meaningfully inform children of their rights. A child who does not know these rights exist cannot identify a violation, seek assistance, or take steps to vindicate them. *See* Pls.' Sept. 22, 2023 Resp. to JCM Report at 6-7 [Doc. # 1362].

Second, the materials are poorly suited to their audience. The video uses complex language delivered by an artificial voice and devotes much of its time to asylum disqualifications and forms of removal. Chiapetta Decl. ¶ 3 and Attachment A; Welch

Decl. ¶ 11. To the extent that ICE officials instruct some families to sign documents they don't understand, this only leads families to feel intimidated and confused. *See supra* Sections II.A.2, II.A.4.

Third, Defendants provide no process for class members to ask questions about their *Flores* rights. The video itself specifically says viewers cannot do so. Families consistently report that they remain bewildered about their children's *Flores* rights. *See supra* Section II.A.2.

Defendants' own standards reject use of a video. The ICE Family Residential Standards state that "[a]n electronic presentation will not be considered a replacement or substitute for an in-person or live [legal rights] presentation, when available." U.S. Immigr. & Customs Enf't, Family Residential Standards § 6.4(M) at 416 [Doc. # 1567-13] ("FRS"). Plaintiffs rely on § 6.4(M) not as an independent source of obligation, but as ICE's own recognition of what an adequate notice of rights requires. The Resident Handbook likewise authorizes "open access" to "group presentations . . . including a resident's legal rights." Welch May 2026 Decl., Attachment A at 45 [Doc. # 1779-2]. Live presentations are available and could be easily provided. Altillo Decl. ¶ 30 [Doc. # 1811-5].

C. The Court-Approved Notice Should Be Updated to Reflect Current Detention Practices.

As discussed above, nearly six years after this Court's orders, Defendants have yet to finalize a process for notifying class members of their comprehensive *Flores* rights, despite deciding to re-open family detention in 2025. Plaintiffs are aware of no child at

Dilley who has received the court-approved 2021 Notice of Rights or anything like it. Meanwhile, circumstances have changed in this iteration of family detention such that an updated notice of rights is necessary. For example, ICE has barred legal service providers from giving know-your-rights presentations. Welch Decl. ¶ 13. Families repeatedly tell class counsel that they have difficulty making calls to attorneys and scheduling timely meetings with legal service providers. *Id*. ¶ 16. Additionally, most of the families Plaintiffs' counsel have met with over the past year and a half were arrested in the interior of the United States, not at the border. Many of these class members lived here for years and had close ties to their communities and schools, including to potential caregivers in their communities. *See, e.g.*, M.T. Decl. ¶¶ 4, 7 ("We are lawful permanent residents and have lived in California for the past 12 years . . . . I love this country, and I have served it in my work as a community college professor and training PhD students"); S.N.K. Decl. ¶ 5 ("We have been living in Seattle for two years. I was a senior in high school and the captain of my soccer team."); K.O.C. Decl. ¶¶ 5-6 (after having lived in New Orleans for two years with seven-year-old daughter, "[w]hen [her] [non-detained] husband told her [daughter's] teachers she was detained, they were so upset."); M.A.G.Z. Decl. ¶¶ 2, 9 ("I have been living in El Paso for over four years. . . . I am on the varsity cheerleaders dance team . . ."); M.M.V. Decl. ¶ 5 ("I was living with my mom and dad for four and a half years in Chicago and California. . . . I had a GPA above 3.5 and played on the varsity soccer team as the goalie."); L.R.P. Decl. ¶¶ 5-6 [Doc. # 1811-11] (lived in the United States for 3.5 years, and her siblings missed graduation because they were

detained at Dilley). Our interviews with class members show that these families have different questions about their children's custody and release rights than recent border arrivals. Welch Decl. ¶ 5.

Unfortunately, one thing has not changed in this iteration of family detention: children's prolonged detention. The need for meaningful information about class members' *Flores* rights is all the more acute because so many children are held at Dilley for extremely long periods. ICE's prior JC reports indicate that nearly 1,560 children were detained at Dilley for over 20 days during just one six-month period. Pls.' Resp. to ICE JC Annual Report at 3 [Doc. # 1811]. For the thousands of children held over 20 days, understanding *Flores* rights concerning conditions, medical care, education, and release are of paramount importance. *See, e.g.*, M.M.V. Decl. ¶ 38 ("[S]peaking with the *Flores* lawyer now is one of the first times we are hearing about our rights. In the 36 days we've been here no one else has explained anything."). Plaintiffs proposed an updated notice to Defendants in April 2026. Welch Decl. ¶ 5. Defendants have never offered a meaningful response to this proposed notice. *Id*. ¶¶ 8-9.

D. Regular Know-Your-Rights Presentations Are Necessary to Inform Class Members of Their *Flores* Rights.

A clear, comprehensive notice is the first step toward ensuring class members understand their *Flores* rights, but it is not enough. Whether a family wants or is able to pursue a child's release depends on individual circumstances that a parent, let alone a child, cannot assess without a lawyer. The Court has recognized that families may consult attorneys about *Flores* rights "as often as needed," and Defendants' own standards

promote live presentations whenever they are available. 2021 Notice of Rights at 2; FRS § 6.4(M) at 416 [Doc # 1567-13]. Weekly live presentations by qualified providers would allow families to learn that the Settlement exists, ask questions, and arrange individual consultations.[3]

The relief Plaintiffs seek is narrow: Provide a clear and comprehensive notice of *Flores* rights and make that notice meaningful through access to legal services. This includes implementing what CoreCivic's Resident Handbook already promises: allow legal service providers to give know-your-rights presentations, announce them in advance, and give all class members and their parents an opportunity to attend. Welch May 2026 Decl., Attachment A at 45 [Doc. # 1779-2]. After more than a year of ongoing violations and no cure, an enforceable process is warranted.

IV. REQUESTED REMEDIES

Plaintiffs therefore respectfully request the Court order Defendants to implement the following:

1. **Notice of Rights.** Within 24 hours of arrival, Defendants must provide every class member and accompanying parent(s) or guardian (s) with a copy of Plaintiffs' proposed *Flores* Settlement Agreement Notice of Rights that they are able to keep. Welch Decl., Attachment T at 1-2. The notice must be provided in a language the class member and their family understand and, if the class

[2] Notably, when the Parties last considered a notice of rights, DHS was permitting in-person know-your-rights presentations weekly. Welch Decl. ¶ 5.

member or their parent is unable to read, Defendants must provide an oral translation using an interpreter.

2. **Information on legal assistance.** Defendants must provide every class member and accompanying parent(s) or guardian(s), upon arrival and in a language they understand, an updated list of free legal service providers and written instructions for contacting them, their previously retained attorneys, and *Flores* counsel free of charge by telephone and email. Defendants must also ensure the free legal call and email systems are operational, and provide a means to report and promptly remedy malfunctions.

3. **Weekly live know-your-rights presentations.** Defendants must permit and facilitate weekly in-person presentations by qualified, independent legal service providers on class members' rights under the Settlement, including a suitable, confidential space, reasonable advance notice to residents, time for questions, and information on scheduling individual consultations.

4. **Records and reporting.** Defendants must maintain and share regularly with Plaintiffs records showing, for each class member, the date and language in which the Notice of Rights was provided, the legal assistance information provided, and the dates live know-your-rights presentations were offered. Defendants must file a status report with the Court regarding compliance within 30 days of the order and provide updates in the Juvenile Coordinator reports.

V. CONCLUSION

Plaintiffs respectfully request the Court grant their motion to enforce the *Flores* Settlement Agreement and enter the proposed order filed concurrently herewith. The rights the Settlement guarantees cannot protect children if Defendants never tell them those rights exist or give class members meaningful access to the legal service providers who can explain them.

Dated: November 20, 2026

CENTER FOR HUMAN RIGHTS AND CONSTITUTIONAL LAW
Carlos Holguín
Bardis Vakili
Sarah Kahn

NATIONAL CENTER FOR YOUTH LAW
Mishan Wroe
Diane de Gramont
Rebecca Wolozin

CHILDREN'S RIGHTS
/s/ Leecia Welch
Leecia Welch
Eleanor Roberts

Attorneys for Plaintiffs

EXHIBIT 2

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, W[redacted] D[redacted] B[redacted], declare as follows:

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

2. I am from [redacted].

3. I speak Spanish.

4. I have been detained at Dilley for 24 days with my 12-year-old son. He was in sixth grade in San Antonio before ICE detained us. We really want to leave this place. We do not like being locked up. It's been too long, and my son is always saying he wants to get out of here and go back to school.

5. No one has told us why we have been detained for so long, though we heard that there is a law called *Flores* that says we should not be here for more than 20 days. There is an ICE office at Dilley where I think you can ask questions, but we have not gone there because we are scared to go there.

6. No one who works here has mentioned *Flores* to me, though I heard about it from RAICES attorneys, who told me we should only be here 20 days.

7. Before our arrest, we were living in San Antonio for about three years. My son misses his friends, his sports, and learning. He likes math and being with other kids. He misses his old life here.

8. When ICE arrested me, they cuffed me and held me for three hours before they went to get my son to detain him with me.

9. I was surprised because I have been going to all my immigration court dates and my next court date was scheduled for November 2027. I have my ID, Social Security number, and license.

10. They did not tell us more about our rights after we was detained.

11. We spent one night in an ICE office in San Antonio, and then ICE took us to Dilley in the morning.

12. They brought us here on a bus full of detained people, most of whom were going to another facility. Then they moved us to a van and took us here.

Dilley ICE Detention Center

13. No one has told us whether we will be able to get out of here.

14. We do not feel good here because we are locked inside. Being detained brings up a lot of trauma for us. When we first crossed the border, my son's mom drowned, and then right after, CBP detained us for seven days. That was the last time we were detained. Being back here brings up all those feelings from when we spent seven days detained right after she died. My son should not have to go through these feelings. He should be at home playing sports.

15. When we got here, they took our old clothes and belongings and did DNA tests on both of us, as well as medical tests. They did not tell us why or what happened with our DNA test. They just did the exam, and then we did not hear anything else after that.

16. Then we went to our rooms.

17. There was no know your rights training. They do not do that. There is a wall with a paper with numbers for lawyers like RAICES, but that is all.

18. No one ever showed us a paper about *Flores*. I have never seen this paper that you are showing me that says Exhibit 6. We never received a handbook either. I do not recall the staff here giving me any papers or talking about *Flores* at all.

19. I think there may have been a video that had some animations on it when we got here, but we did not understand what that was about at all. I do not remember that video saying anything about *Flores* either. I think it said something about voluntary departure. The video came in Spanish, too.

20. I don't remember anyone who works for ICE or Dilley saying anything about my son's rights while here one way or another.

21. There was a paper that an ICE officer showed me in English that he did not read to me. Instead, he passed it to me and said there was one line to sign if we wanted to take voluntary departure and another if we wanted to stay here. Since the man who worked here told us which line to sign if we were not taking voluntary departure, I just signed the

line he said meant we would not do voluntary departure. There was a woman next to me who signed for voluntary departure. No one who works here has commented about *Flores*.

22. We buy water here because we are worried the tap water will make us sick. We have not been sick here, and we are trying to do what we can to remain safe.

23. We eat in the dining area, but the meat always has too much sauce, and we are not used to eating that sort of food. Sometimes that means my son loses his appetite and does not eat much, so we buy some soups in the commissary.

24. We do not sleep well here because our backs always end up hurting. The cushions we sleep on are really thin, and we can feel the iron on our backs. It can also be hard to sleep with lights on because we are not used to that either, but there is no dark option. When the staff walks by on the metal walkway throughout the night, we hear each step pretty loudly, and that keeps us up throughout the night. It's really distracting.

25. We have to pay to make calls here. We can call abroad, but it costs money. We have no way to make free calls to family. The only free time we got was when we first arrived here. During that time, they give each adult five minutes to make a call and a child three minutes to make a call. But that is just one time, and after that, anyone without money cannot make any more calls.

26. We have been able to get a visit from our pastor here.

27. There is no free way to call my lawyer, and if I called my lawyer, I would have to pay for it. He can set up a free legal meeting with me.

28. I have not called any of the lawyers on the pro bono list because I have a lawyer. Still, no one at ICE explained how to make the free calls. While I have gotten in contact with RAICES, it was because my pastor put us in contact; I do not really know how to call them for free from here.

29. I do not know how to use email here and have not used it.

30. I have never heard about a bond hearing.

31. At night, we have to go into our rooms starting at 8 p.m., and we can only go outside to the bathroom, but we cannot go anywhere else.

32. My son studies in his room instead of going to the classes here because it's so different from his school at home. I bought him a notebook and pen at the commissary to write with.

33. There is foamy liquid soap in the shower that doesn't feel right or clean fully, so we buy soap in the commissary instead.

34. The toothbrushes they give us here are too small, so we buy ours in the commissary.

35. We pay about $60 a week to get things from the commissary. Anyone who has money buys hygiene items from the commissary because the hygiene items are not great.

36. My son wants to be a soccer player when he is older and write songs.

I declare under my duty to tell the truth and penalty of perjury that to the best of my knowledge, all the information I have here given is correct and complete and I understand the legal consequences of testifying falsely to the authorities. Executed on this 6 day of October 2026, at Dilley, Texas.

[redacted]

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: 10/06/2026

EXHIBIT 3

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, T[redacted] C[redacted] declare as follows:

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

2. I am from [redacted].

3. I speak [redacted].

4. I have been detained at Dilley for 143 days. I am here with my two children and my wife. My son is eight years old, and my daughter is 10 years old. My children feel really anxious about being here for so long and not knowing what will happen.

5. After we crossed the border in May of 2026, CBP locked us up in the CBP prison for one night. They separated me from my kids, who they left with their mom; they kept me apart from them.

6. CBP held me in a room with more than 100 people, and it stank in there. There was an open bathroom, so you could see everything when you had to use the toilet.

7. They did not give us clean clothes, and the only food they provided was bread and some snacks.

8. We could not sleep there. They only gave us one mat and one piece of aluminum foil and nothing else. It was quite chilly. My daughters had the same experience.

9. After one night there, they sent us on a flight to Dilley.

Dilley ICE Detention Center

10. ICE officers have told us that they are detaining us for so many months because we are waiting here for travel documents. They say we will be here until they get those documents. The officers have also told us that if we do not cooperate with them, they will just force us onto a flight.

11. I feel very worried because we have been here for so long, and it is affecting my kids. They feel anxious and cannot sleep at night because of it. They are constantly thinking about their worries.

12. My kids used to go to school every day when we first got here, but gradually, they stopped going because they cannot understand the teacher. While some staff use translation services, they only do that when we ask, and the teacher does not use it in class. So, they do not go to school here anymore.

13. ICE did a DNA test of all of our cheeks when we got here.

14. We did not get any paper with our rights on it, and we have never received any rights-related papers over the past few months.

15. One day, about two or three days after we got here, a manager showed up to tell us the rules, the schedule, and where we can and cannot go. I remember that they told us they have zero tolerance for crimes. I do not know who that person was. I do not know the names of the staff here.

16. There are not that many [redacted] people detained here, so we do not have many resources to get information. I do not know how the staff decides when to use translation for us, but it seems like it's provided only when we request it.

17. I do not remember ever seeing a video about my rights here, either.

18. I have never heard about *Flores* before. No one who worked here ever mentioned this to us or told us about how long our child could be detained. I know that it's supposed to be 20 days from when I searched online, but we have been detained for many more days than that.

19. No one ever told us about any of our children's rights.

20. My son gets abdominal pain a lot because of the food here. It is often fried, and it hurts him. Often, he only eats one meal a day.

21. There was one time when he had intense stomach pain and chills, and he started vomiting. The doctor looked at him, but the examination did not seem very detailed, and then the doctor said it was because of the food. He continues to have stomach pain from time to time, and he does not eat very much. The doctor never mentioned that he could have a special diet.

22. My son also has four broken teeth with cavities, but only one has been extracted. It makes it really inconvenient for him to eat.

23. We cannot get used to the food here because it is fried, and it hurts the rest of our stomachs, too.

24. Our family buys bottled water when we are thirsty. There is a smell that comes with the tap water.

25. Sleeping is hard here because the light is on for 24 hours and because our worries keep us up all night.

26. We can make phone calls here, but we have to pay for them. Whenever we use up the money on our card, we need to go to the commissary to add more money.

27. There is an immigration lawyer list, but it is in English. I have never called anyone on that list because of this language barrier.

28. I have met multiple [redacted] families who have experienced ICE separating children from their parents since being here. There is one family who has been detained here for months who has an 18-year-old daughter, and ICE separated her on her 18th birthday. There is another mother and daughter who ICE detained here, but the father and son are not here. There is also another [redacted] mother and daughter who are here, even though ICE already deported the father and son.

29. When we got here, the staff seemed very strict, but my children have gotten used to that. The truth is that we have almost no interactions because of the language barrier.

30. If I could file any complaints, I would like to complain that they are detaining my children so much longer than they should. But I have not been told how to make a grievance.

31. Anyone under 12 needs to be accompanied by an adult, so I need to be with my children whenever they go to the bathroom. It makes my wife feel exhausted to have to stay with the children at all times.

32. We have to buy soap and shampoo here.

33. In truth, we cannot say we have a life here because there is no freedom, and we cannot eat well or sleep well. We live in horror about what will happen the next day.

34. My son is looking forward to going to the beach when he gets out of here. He wants to see the ocean and catch crabs. Most of all, we want to be released.

I declare under my duty to tell the truth and penalty of perjury that to the best of my knowledge, all the information I have here given is correct and complete and I understand the legal consequences of testifying falsely to the authorities. Executed on this 7 day of October 2026, at Pilley, Tx.

[redacted] 2026. 10. 7

CERTIFICATE OF TRANSLATION

My name is Sheilson Lee and I swear that I am fluent in both the English and [redacted] languages and I translated the foregoing declaration from English to [redacted] to the best of my abilities.

Dated: 16/10/2026

[redacted]

EXHIBIT 4

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, Y[redacted] W[redacted], declare as follows:

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

2. I am from [redacted].

3. I speak [redacted].

4. I have been detained at Dilley for 13 days with my nine-year-old daughter. We have been separated from my husband and my son.

5. Before being detained, I was living in Los Angeles for over two years with my husband and children. We got detained when we went to our ICE check-in on September 24, 2026. ICE told us we needed to come in to submit our fingerprints that day, but when we got there, they detained us. ICE has already deported my husband and my son.

6. Someone asked me to sign a paper and told me that my daughter could stay with me if I signed it, but it was in English, and I did not understand it, so I did not sign it. No one said anything about how to keep my daughter with her father.

7. No one told us what was going to happen next, but they separated my husband and son, and I had no idea where ICE sent them.

8. We spent the day at the ICE office, and then someone put us on a flight and took us here. We landed around 2 a.m., spent one night at a hotel, and then they put us on a bus to this detention center.

9. No one told us anything about our rights.

Dilley ICE Detention Center

10. When we first got here, we felt so afraid.

11. No one did any kind of know your rights training, but when we got to our dorms, a staff person told us about the rules.

12. On day two, ICE told us we could contact pro bono lawyers, but they told me the lawyers do not speak [redacted].

13. I never received any sort of handout or handbook in [redacted].

14. I have never seen a video about my rights since being here.

15. I have never heard about *Flores* before.

16. Someone from ICE said that children cannot be here for more than 20 days. They showed me a paper, but it was in English, and I did not want to sign anything because I did not know if they were tricking me into signing deportation papers.

17. No one has told me how long I will be here or why we are here.

18. I can pay to make calls here, but I have not been able to talk with my husband or son. The only way I have heard about them is through our friends at the church.

19. We were only given one free five-minute call when we got here to call our friends and family outside.

20. The tap water and food do not taste good. My daughter barely eats and struggles to swallow it down. She mostly eats noodles from the commissary.

21. The lights are so bright, and we cannot turn them off, which makes sleeping hard. When I tried to cover the light, staff told me that was not allowed, and I am only allowed to use an eye mask, but we cannot get used to sleeping with one. We are so tired. My heart is tired, too.

22. When my daughter gets up in the morning, she always feels like she wants to go back to sleep.

23. I have not been able to call an attorney from here. I am so worried about the costs, since we no longer have financial support. I am concerned.

24. My daughter tells me she misses her dad and her brother.

25. It is hard to get enough clothes to be warm when the air conditioning is always on. Two weeks ago, I asked for long trousers, and I asked again last week, but I did not get them.

26. The toothbrushes they provide here are not easy to use, so we have to buy our own.

27. It's hard here because I do not understand English.

28. One staff member here seems very strict with us. For example, when we get up to go to the bathroom, we have to put our ID and shoes on. One morning, my daughter needed to go to the bathroom, but they made her go back for her ID, and she cried.

29. My daughter is not allowed to have toys in the room. That makes her feel bored.

30. We have to be together all the time, and my daughter feels a bit annoyed that she has to stay with me whenever I go to the bathroom.

31. I do not think it is good for children to be detained. It will negatively affect their social communication, and there is not enough space to play. It is all too limited.

32. My daughter is just looking forward to seeing her father.

I declare under my duty to tell the truth and penalty of perjury that to the best of my knowledge, all the information I have here given is correct and complete and I understand the legal consequences of testifying falsely to the authorities. Executed on this 7 day of October 2026, at Pilley, TX.

[redacted]

CERTIFICATE OF TRANSLATION

My name is Marvellous and I swear that I am fluent in both the English and [redacted] languages and I translated the foregoing declaration from English to [redacted] to the best of my abilities.

Dated: 15/10/2026

[redacted]

EXHIBIT 5

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, J[redacted] P[redacted] R[redacted], declare as follows:

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

2. I am nine years old. I am from [redacted].

3. I speak English and Spanish.

4. I have been detained at Dilley for 21 days. I am here with my mom.

5. My mom was outside our house in New Mexico in her car one morning when ICE came and blocked her car.

6. They made her call me on the phone to get me to come outside.

7. The agent put handcuffs on her to get her in the car. Then, they took them off when she was in the car. I heard them tell my mom they were taking off the handcuffs because I was with her.

8. We had to wait in an office for three to four hours until a van came. The agents gave us chips and water. Then, we went into a van and went to another office in El Paso. We stayed there for 12 hours. We got food during that time.

9. At 1 a.m. or so, three people came and gave us some shirts, pants, and shoes, and then we got in another van to go to the airport.

10. At the airport, we had to wait a bit for the plane. Then, we went into the airplane. Five minutes later, we took off and started flying, but something happened to the plane. The wings were damaged, and we had to land again in El Paso at the same airport.

11. They fixed it, and three hours later we had to go out again on the same plane. The second attempt of the flight was successful. We went to Houston, waited for two hours, and then flew to San Antonio.

12. Then we took a van from there to Dilley. The lady driving almost crashed into another car. She was listening to music and singing loudly. We were in the car with her for about an hour. I fell asleep, and when I woke up, they took us to intake at Dilley.

13. The travel from New Mexico to here was very long and difficult.

Dilley ICE Detention Center

14. I have a dog at home. His name is Firulais. He's being taken care of now, but we want him to meet with us in [redacted] if we're deported. He's only one year old.

15. I was in fourth grade before coming here. It was the fourth week of the semester. I liked my school a lot.

16. I liked math, multiplication, and geometry.

17. I walked home from school often and would play outside. I would play soccer and football with my friends.

18. I miss my friends. I haven't been able to talk to them on the phone.

19. I miss my dad a lot too. He wasn't detained with us. We talk to my dad and aunt on the phone, but it's not free.

20. At intake, when we arrived at Dilley, they told us to bathe and change our clothes. We had to put our things in a bag, and we were told they'd give us a code for the bag when we leave here. We were at intake for about six hours.

21. They did a DNA check on us, but it wasn't that first day; maybe 10 or 11 days after arriving.

22. We didn't see a video about *Flores*; the video was just about the rules of being here.

23. It's pretty boring here. Sometimes we can't go out if it's too hot outside.

24. I feel like I'm in a jail here.

25. It's like a good jail, but not that good. I get homesick sometimes and miss my family.

26. Sometimes, I get sick here. I got wet the other day because it was raining, and that got me sick.

27. Sometimes, when I wake up, my throat is sore. When the air conditioning is on, it gets really dry. It's cold in the bedrooms.

28. Today, I actually ate well. They served us a burger for lunch.

29. Normally, the food smells bad. When I look at it, it looks good, but when I taste it, it's just oily.

30. We buy ramen noodles from the store. I usually eat at night after dinner because dinner is served at 4 p.m., so I get hungry later.

31. In the morning, we eat at 6 a.m. to get eggs or cereal, and then we get lunch at 11 a.m., and I go back to school at 12:15 p.m.

32. I've lost weight since coming here. I had a little belly before, but I don't anymore.

33. I feel hungry a lot here.

34. I wish there were oranges or grapes here. I wish there was pasta with meat or rice or empanadas. I miss my mom's cooking. She can't cook here.

35. We buy bottled water here. Sometimes there is no water in the cafeteria, and the juice in the cafeteria gives me a headache.

36. I tried the tap water yesterday because we didn't have bottles of water. It tasted gross and salty. It hurt my stomach. It gave me diarrhea.

37. The mattress and lights are very annoying here. I wish we could sleep with the lights off. I think there is a sensor, and if the lights are off for too long, it pops back on.

38. ICE told us a few days ago that we'll need to be here for at least two more weeks, even though all we want to do is get on a flight. That was a hard day, I was crying a lot. I just want to be with my family.

39. I have to translate a lot for my mom here. She doesn't speak English.

40. I like the school here. I like to go and see my friends. I like my school at home more.

41. I want to be a farmer when I grow up.

42. If I could change one thing about Dilley, it would be to use a cellphone and call people for free. And, I'd let us go outside and see outside this facility. We don't even know what is outside the front doors.

I declare under my duty to tell the truth and penalty of perjury that to the best of my knowledge, all the information I have here given is correct and complete and I understand the legal consequences of testifying falsely to the authorities. Executed on this 07 day of Oct 2026, at Dilley, TX.

[redacted]

EXHIBIT 6

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, M[redacted] M[redacted] V[redacted], declare as follows:

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

2. I am 15 years old. I am from [redacted].

3. I speak Spanish and English.

4. I have been detained at Dilley for 36 days with my dad. I was with my dad when ICE grabbed us, and they separated me from my mom. I feel so sad being apart from her. I know she cries all day, every day because she is separated from me. I want to be with her.

5. Before detention, I was living with my mom and dad for four and a half years in Chicago and California. I was a great student in my sophomore year. I had a GPA above 3.5 and played on the varsity soccer team as the goalie. My school in Chicago had really good teachers. It has been hard not being able to be there for over a month. I haven't been able to talk to my friends, and I know they are all worried about me. Everything was going so well for us before ICE grabbed us.

6. ICE arrested us after we left Walmart, when we walked outside and got in our car. Five trucks surrounded our car. They did not realize I was in the car and cuffed my dad. They never showed us any warrant. They just detained us. They spoke to us in a brusque way. When they took my dad out of the car, they slammed his hand in the car door and hurt his finger.

7. While they were arresting us, I felt really worried about finishing high school, and stressed about what would happen. I did not know whether they would keep me away from my mom.

8. First, they took my dad and me to an ICE building with multiple cells, and they put us in one cell. They wanted to trick us into signing papers that said we would take voluntary departure. The papers were only in English, and ICE provided no translator. The ICE officials told us that we just needed to sign the papers and did not explain what they were. I started to read them because I speak English. When ICE realized that I spoke

and read English, they told me I was too young and that, because I was under 18, I was not allowed to look at the papers. They put me in another room. Then, they threatened my dad and told him he had to sign the paper on the third line. He said that he did not want voluntary departure. He asked for the paper in Spanish, and they said no and just kept saying he had to sign that line. Only afterwards, when I could see him again, did I see the paper and know that they had been coercing him to sign the voluntary departure form. That form included language indicating you had no issue with going to your former country, which is not true for us. Those officers treated us terribly.

9. The ICE staff tried to intimidate us. Whenever ICE wants you to sign something, they use so much intimidation to coerce people into signing papers against their interest. This can be especially bad for people who do not speak English, who have no way to know what is happening.

10. During this time, the officers told us that they were going to send my dad to another jail for at least six months and deport me without my dad back to [redacted]. They never said that I could go stay with my mom and not be detained. Actually, they called my mom and threatened to send me to a juvenile detention facility, even though I have never been arrested for any sort of crime. They told me I had no rights and that I did not even have the right to talk.

11. We were detained in that building for about 11 hours. When we asked ICE what was going on, they said that they were going to deport us.

12. Then some people came and transported us to Dilley. Those people were not ICE officers, and they actually gave us food to eat. They let us sleep in a hotel for a few hours and then put us on a flight to Dilley.

Dilley ICE Detention Center

13. They took a DNA swab of us when we first got here, but they never told us why or what they were doing with it.

14. No one ever gave us a know your rights training, nor have we ever received a handout with our rights printed on it.

15. The second day after we got here, ICE told us that we cannot spend more than 20 days here under *Flores* and that we needed to sign a paper. That was the only time that anyone from ICE talked to us about *Flores*. But I read the paper, and it did not mention *Flores,* nor 20 days, nor anything about rights, so it seemed suspicious that they wanted us to sign. They kept asking us to sign the paper, but we refused. The paper had an area to sign, but it did not look like the Exhibit 6 document that you are showing me. They also did not let us keep it. They just showed it to us, so we cannot show it to you because we do not have it.

16. There was a time when I saw an animated video here that said that we had the right to call our lawyers, but I do not remember it saying anything about *Flores*. I think it was maybe 15 minutes long. It did make me happy to know I could call my lawyer.

17. ICE has never told us that they would let me go stay with my mom, who is not detained. All they ever say is that they will deport us at any time and that we do not have rights.

18. We have never heard anything about any sort of bond hearing or release hearing. I have sent messages to ICE telling them I want to go to court for a bond hearing. They just responded and said that we cannot request that and that an attorney must do so.

19. We have heard about *Flores* from people who are detained here, too, but we have been here longer than 20 days.

20. No one has ever explained to us why we have been detained here for so long. When we asked ICE about why we are still here, they just said that we are waiting for a deportation flight. But after they forced my dad to sign voluntary departure forms—despite him not understanding what they were—he very clearly stated he never wanted to sign voluntary departure forms.

21. It's so hard to sleep here because the mattress is really thin, and it hurts our backs. At night, it is so cold in our room because they keep the A/C on, and our blankets are not

warm enough. I have to bundle up with my blanket and socks each night. It is noisy, too, throughout the night because the staff stomp on the metal grates, and their radios make noise all the time.

22. They also make us keep the lights on all night, and that makes it so hard to sleep. It's so much worse for the people on the top bunk because the lights are in their faces. Sometimes they let us turn the lights off in the back of the room but not in the front of the room. After we were here for four days, one guard told us all lights had to be on all the time. It made it impossible to sleep.

23. They also make us all share a room with other people even though other rooms are empty. It feels unfair that there are empty rooms, yet we all have to sleep in the same room together with strangers.

24. I am an athlete, but some people who work here are always trying to stop me from playing soccer outside. When the sun is out, they say that the sun is too strong, we cannot be outside, and we can only be in our rooms or in the gym. Even though there are two exercise machines in the gym, the staff do not let me use them either because they say they are only for adults.

25. The food is also not good here. Sometimes it has too many condiments, and there have been times when the meat they served was undercooked and raw or the potatoes were still hard. It does not always seem edible. We cannot eat when that is the case. A lot of people do not eat the food here. There is one kid I know who can only really eat rice and bread here.

26. My dad has a pain in his tooth and went to the medical area here, but they said dentists can only pull out molars and that they cannot provide any other type of dental care. They say they do not have the resources or people to provide any other dental support. My dad's problem has been ongoing for a while.

27. Also, if you have a headache and ask for Tylenol, they will say they cannot give it to you until they have done exams, so it might take a few days until you can be seen by a medical staff member and get the pain relief that you need. It is just too slow.

28. No one drinks water in the dorms, because everyone who has tried to has gotten a stomachache. The staff says it is purified, but it makes us sick, so we only use it to wash our hands. The only water we drink is the water that we buy in the commissary or the water in the dispenser in the cafeteria.

29. You have to pay to make calls here. But they are all monitored, so it does not feel like we can have private calls with our family members. We do not feel like we can tell my mom everything that is happening here because we do not want to get in trouble. It costs $0.77 per minute. There is no way to make free calls to your family members other than when you first get here. The money that we had in our commissary at the beginning of being here was added from the money we had on us when ICE arrested us. This helped us make calls. But when families are detained without any cash on them, it makes it so hard to get money added to their commissary. There is a family that got here and had no cash on them when they were detained, and they cannot pay for calls.

30. We also cannot make international calls from here. When I have tried to call abroad, the call does not go through.

31. You can have visitors but only from people who have citizenship, and since we are so far from Chicago, we cannot realistically have anyone travel all the way here to visit us.

32. It is hard to find lawyers from here. There is no way to call our attorney for free here. We have to pay each time we call our lawyer. Without money, we cannot do that.

33. It also takes so long for the money to show up in your account after it is deposited. One time we needed to make an urgent call, but it took three days for the money to be added to our account, so we could not make any calls. We've seen this happen to other people, too.

34. We cannot use email here, and the computers are not helpful here because we cannot look things up. Most websites are blocked.

35. The staff has not explained our rights to us. What we learn is from the other people detained with us.

36. It's so clear that ICE does not care about the *Flores* rules because there are people who have spent many months here. ICE has never tried to explain why we have been here for over a month despite them telling us we would be here for a maximum of 20 days.

37. We have seen ICE separate a girl from her mom when she turned 18 years old.

38. We have never been assigned a case manager. ICE officers only spoke with us when we got here, and speaking with the *Flores* lawyer now is one of the first times we are hearing about our rights. In the 36 days we've been here no one else has explained anything.

39. I do not go to the school here because the classes are all below my school level. Before, I was taking chemistry, geometry, and economics in school, but they do not offer those classes here.

40. The shoes here break easily. While mine are okay, others do not get ones that are as high quality.

41. The soap they have here is only for handwashing, so we all have to buy soap in the commissary. We have to buy most of our things like other hygiene products there. People without money do not have toothbrushes, deodorant, shampoo—they really do not have almost anything. For example, they do not give us shampoo. There is no way to get shampoo for free. The prices are very high. For food, they have sold cereal for as expensive as $11, so when people are detained with no family members to send money, they have to ask friends here to get them those items.

42. I think the first week was the most expensive because we did not have anything. We needed $100 to buy shampoo and everything, but that does not even count the money we needed to make calls.

43. There are people who are very depressed or anxious here. I try to keep those feelings away because they do not serve me.

44. The only thing I want to do after I get out of here is continue my studies to get a scholarship. I hope I can rejoin my soccer team and go to university. I also want to be able to work.

I declare under my duty to tell the truth and penalty of perjury that to the best of my knowledge, all the information I have here given is correct and complete and I understand the legal consequences of testifying falsely to the authorities. Executed on this 6 day of October 2026, at Dilley, Tx.

[redacted]

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: 10/06/2026

Eleanor Roberts

EXHIBIT 7

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, D[redacted] Z[redacted] C[redacted], declare as follows:

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

2. I am 42 years old. I am from [redacted].

3. I speak Spanish.

4. I have been detained at Dilley for 13 days. I am detained in Dilley with my partner and our two daughters, who are 17 and 11 years old. Our oldest son, who is 26, is detained in Otero County, New Mexico. We're all very worried about him and wish we hadn't been separated. We haven't seen him or spoken to him since we were detained.

5. We have been living in El Paso, Texas for about four years. We like living there. My daughters really enjoyed school. [redacted] is in fifth grade, and [redacted] is in her senior year of high school. My 17-year-old daughter always got straight A's. She wants to study medicine, and we want to be able to help her accomplish her dreams.

6. I was working when I received a phone call from my daughters. They were crying as they told me that they were detained with their dad on their way to school. I left work immediately and met with my son. We were going to go to our apartment to collect our documents, but on our way to the apartment, we were followed and stopped by ICE officers. The ICE officers handcuffed both of us and took my son in another car. That's the last time I've seen my son since being detained.

7. They took me to the ICE office in El Paso, where I was reunited with my daughters and partner. We were at the office until 11 p.m., and then they drove us to Dilley. We got to Dilley the next morning; we were in the car all night, and we were all exhausted.

Dilley ICE Detention Center

8. When we got here, they told us to sign a paper if we wanted to leave. They didn't explain what the paper said, but I think it was for voluntary departure. We refused to sign. They told us we were going to be here 2–3 days.

9. They did not tell us about our *Flores* rights at all. We never received a paper with our rights.

10. They gave us a list of legal services. My partner and I both tried to contact legal services, but the calls never went through, and we were unable to contact anyone on the list.

11. I feel discouraged and sad. Being detained has especially affected my 11-year-old. Whenever she saw the news about immigration, she would always get very nervous. I was so worried for her when she was detained. She has never liked seeing violence or arguments. Her friend's dad was recently deported, and she was worried sick about her friend and her dad. It's so hard being separated from my oldest son, too.

12. It's so hard; we've seen a lot of people from our community be deported.

13. I have a rash across my body from using the hygiene products here. Medical gave me a cream that has helped a bit, but I still have the rashes.

14. We don't really eat here. I've lost weight, and I've noticed my daughters are getting skinnier. My youngest daughter really likes cereal, but they don't give cereal every day. Whenever there is cereal, my partner and I will give her our cereal so that she can have more to eat.

15. When my daughters don't eat, I get upset. I wish I could make food come from thin air for my girls to eat.

16. I don't understand why they don't let us take food out of the cafeteria.

17. My partner had a fever a few days ago, and we couldn't see him for two days because he was recovering in his room. It was hard being unable to see him during that time and being unable to take care of him. He wasn't eating anything during that time.

18. My partner and I drink from the sink, even though the water has an odd taste. We leave the bottled water for my daughters because they need it more. We buy from the commissary sometimes, but it's expensive. One packet of water is $12. With all the heat and sweat, the bottled water doesn't last us long.

19. My daughters are having a hard time here. I do my best to uplift their moods, but it's hard to do that while we're in here.

20. We had to buy the hygiene products because the hygiene products they gave us are terrible. The deodorant they gave us is the first deodorant I've used that worsens armpit odor instead of masking the odor. The toothbrushes are only good for cleaning a thin wire, not for teeth.

21. Calls to [redacted] are really expensive. I call for four or five minutes, and it's already about $15. I wish I could call my mom more often, but I can't. I have to save my money for the food in the commissary to feed my daughters.

22. ICE took away our personal documents, like work permits and passports. We would like to know where they are.

23. We can't access email. We can't search for anything. We try to look up information, and everything says that it's not available. None of the websites work, not even the ones that are on the list. The librarians are of no help. They said the websites on the list work, but it always just loads without opening.

24. I have not had the grievance system explained to me.

25. I've used the tablets to ask ICE for information about my son, but they never respond.

26. I have had a lot of headaches since being here.

27. One time, I tried to lay my head on my partner's shoulder, and a guard yelled at us and told us we're not allowed to touch. It's so weird that even that's not allowed here.

28. Being detained has affected me a lot. I feel shut down, and it's hard to keep my hopes up. I feel so different than who I am. Sometimes I'll suddenly start crying. I try to be strong for my daughters and try to make them feel better, but it is so hard.

29. We always did our best to be cautious and stay safe. We wish we could do more for our daughters. We've always wanted to take them to Disney World and give them happy experiences. We want them to be able to accomplish all of their goals and dreams.

I declare under penalty of perjury that the foregoing is true and correct. I understand that I have to tell the truth in this declaration. The interviewer read the declaration to me and everything in it is true and accurate. Executed on this 4th day of November 2026, at Dilley, Texas.

[redacted]

CERTIFICATE OF TRANSLATION

My name is Katherine Mora 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: 11/4/2026

Katherine Mora

EXHIBIT 8

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, K[redacted] O[redacted] C[redacted], declare as follows:

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

2. I am 25 years old. I am from [redacted].

3. I speak Spanish.

4. I have been detained at Dilley for eight days. My daughter is seven years old. She is a dual citizen of [redacted] and [redacted].

5. Before I arrived at this facility, I was living in New Orleans, Louisiana for about two years. I lived in Miami before that for about nine months. I lived with my husband and my daughter. I was working as a delivery driver.

6. My daughter was in second grade, and she was getting good grades. Her favorite class is art. When my husband told her teachers she was detained, they were so upset.

7. I was working on a delivery when three large black cars surrounded my car. They forced open the door and pulled on my arm very painfully. I was trembling, and I began to scream. It was one of the worst things that has happened to me. They handcuffed my hands and my ankles. I fainted twice and vomited. The officers were all men, and I don't understand how men are able to treat women so cruelly.

8. I asked them if I could be reunited with my daughter, and the ICE officers told me I had to sign a paper to have my daughter brought to me. They did not explain what the paper said. They told me that if I didn't sign, my detention experience would be worse. They told me that if my daughter came, they'd take us to a hotel or a shelter.

9. They brought my daughter to me at around 5 p.m. I was handcuffed the whole time. My daughter saw me in handcuffs. She came to see me, hold my hands, and ask why I was handcuffed. They removed the handcuffs after my daughter came.

10. The treatment I received from the ICE officers was horrible. They harassed my daughter and me on the flights here. One ICE officer kept threatening to handcuff me again in front of my daughter. We took two flights to get here. At the airport, they told me not to escape, and that if I did try to escape, I wouldn't see my daughter until she was

an adult. They did not allow me to communicate with my husband. I kept trying to call my husband, and they kept hanging up for me.

11. They took my phone and my wallet. It worries me because my belongings and personal information are there.

12. I got here at three in the morning. We were so tired and weary. Once I got here, I realized it wasn't a shelter or a hotel as they'd said; it was a detention center.

Dilley ICE Detention Center

13. It's been so difficult to be detained with my daughter. She has struggled to adjust to living here. She's always asking for her dad and asks, "Mommy, is daddy going to come suffer with us here?"

14. I signed a paper when I got here, but I don't know what it said. I was just recently traumatized and couldn't think straight.

15. No one has given me information on when I'll leave, but they did tell me that they would try to deport me as soon as possible.

16. They showed me a list of legal services but told me that I couldn't have a copy of the list because the legal services wouldn't help a case like mine.

17. ICE asked if I wanted to have an optional DNA test done to make sure I was with my daughter. I declined.

18. My daughter barely eats here. I'm so worried about her. I'm worried she'll experience malnutrition or become dehydrated. She only wants to eat cornflakes.

19. I asked the staff if they could please give my daughter more cornflakes. They only put out cornflakes on certain days. They refused. They said they have to respect the system in place, and they can't give my daughter cornflakes every day. This made me feel so upset, because it can't be that hard to give my daughter cornflakes. I pleaded with them, telling them it's the only thing she'll eat, but they did not care. I don't understand why the staff here don't care about children. Don't they have children? Don't they know how to care for children?

20. I had some cornflakes from the cafeteria in my room, and the staff inspected my things, found the cornflakes, and threw them away. I got so upset again, because I only took them to be able to feed my daughter.

21. The people who work here have stone-cold hearts.

22. It feels like a dictatorship here. We have to follow all their strict rules that make no sense.

23. I was not told about my rights or my daughter's rights. I was not shown a video that explained my rights.

24. I learned about *Flores* from another person detained here. No one has told me that my child has a right to be released in 20 days.

25. I've had to buy soap at the commissary because the hygiene products they give are bad quality.

26. I have to buy the water here. I tried the water, and it tastes bad, and it's warm. The bottled water is safer for my daughter.

27. One time, another mom and I asked a staff member for a water bottle because he had a lot. He told us that if we picked up the balls in the gym for him, he'd give us water. We refused.

28. We haven't been able to sleep well. We're used to sleeping in the dark. Everyone in our room struggles to sleep with the lights on. I tried to put up sheets to block the light to help my daughter sleep, but a guard came running, as if I were escaping, to tell us to put the sheets down. They're always watching us.

29. I have not had the grievance system explained to me.

30. My daughter likes the school here. I'm grateful that it gives her something to do here.

31. My daughter's pants are ripped. I asked a staff member about it, but she didn't take it seriously; she didn't think it was necessary. Her pajamas are also ripped. I've been waiting for new clothes for her for a few days. When I asked again, they said they didn't have more clothes, but I saw other young girls arrive and get new clothes.

32. There was a fall festival for the kids on Halloween. All the staff dressed up in costumes, and it looked weird because the kids should be in costumes, but they were in their detention uniforms.

33. If I could change anything about this place, it would be to have more respect for people. I want them to respect our sleep and to respect our bathroom spaces. The shower and toilet are always dirty. Another thing I would change is to make the food better. If a child wants food, they should find a solution for it.

34. Our stay here shouldn't be long; they should respect the 20-day rule and release children as soon as possible.

I declare under penalty of perjury that the foregoing is true and correct. I understand that I have to tell the truth in this declaration. The interviewer read the declaration to me and everything in it is true and accurate. Executed on this 4th day of November, 2026, at Pilley, TX.

[redacted]

CERTIFICATE OF TRANSLATION

My name is Katherine Mora 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: 11/4/2026

Katherine Mora

EXHIBIT 9

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, P[redacted] G[redacted]-P[redacted], declare as follows:

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

2. I am 49 years old. I am from [redacted].

3. I speak Spanish.

4. I have been detained at Dilley for 13 days. I am detained in Dilley with my partner and our 17-year-old and 11-year-old daughters. My oldest son, who is 26, is detained in Otero County, New Mexico. I'm very worried about him. It's so painful to not be with him right now or not know anything about him.

5. We were living in El Paso for about four years. I lived with my partner, my daughters, and my son. I worked as a local mechanic. Since being detained here, I've missed being able to work and provide for my kids.

6. I was taking my daughters to school, as I did every morning before going to work. Suddenly, my car was surrounded by ICE agents. They yelled at me and my daughters, telling us to step out of the car and that we had no rights to anything. They handcuffed me in front of my daughters and took us to the ICE office in El Paso. It was horrible for my daughters to see their dad handcuffed. They'd never seen me in handcuffs before. My daughters were crying the whole time. I don't understand why they treated us so badly. We're not criminals and have always done our best to be responsible.

7. At the ICE office, the officers threw away the lunches my daughters had packed for school. We didn't eat anything the whole day. They brought in my partner later in the day and then drove us to Dilley. We got here the next morning.

Dilley ICE Detention Center

8. When we got here, the ICE officers tried to make us sign a paper, saying that if we wanted to leave Dilley we should sign there. They told us that if we signed, we'd each get $3,000. We refused to sign.

9. They said we'd be here for 2-3 days, but we've been here for almost two weeks now.

10. I was not told about my children's *Flores* rights.

11. They gave us a list of legal services, but when my partner and I tried calling, the calls never went through. I would get an automated response saying the call was rejected.

12. I've tried using the computers in the library to find information about where my son is, but the search engines on the computers don't work. I tried searching "potatoes" and nothing came up, that's when I knew that I wouldn't be able to find anything on those computers.

13. We barely eat here. I've lost about eight pounds. It's always the same food, and there's no appetite when you're under so much stress.

14. I had a fever a few days ago. I went to medical and they gave me medicine, but I felt so sick I had to stay in my room for two days. I didn't eat anything during those days. It was really hard to not be able to see my kids or partner for those two days.

15. It's hard to be separated from my daughters and partner here. During our outside time, they have me in a different section than my partner. We try to meet up and talk from within the spaces we're supposed to stay in, but the guards tell us we're not allowed to talk and to step away from each other, even though we're technically in the spaces we're supposed to be in.

16. Another time, my partner laid her head on my shoulder because she had a headache. A guard immediately barked at us that we're not allowed to touch.

17. It's so hard and sad to have to say goodbye to my daughters and partner every night. I don't understand why they don't let us stay together. It's like a never ending nightmare.

18. I think they treat us badly here to pressure us to leave.

19. I was out one day with the other dads at Dilley, and one dad was looking towards the group of single women detained here at Dilley. I went up to him and asked him what

he was doing, and he told me he was trying to get a glimpse of his mother who was also detained here. That made my soul hurt.

20. Being here has affected my health so much. I loved my freedom. I do my best to be a good person and teach my kids to be good people, and I feel like all my efforts were trampled on. We thought being law abiding would mean things would work out for us.

21. I wish they would shut this place down and not detain people here anymore. I really hope we can leave soon.

I declare under penalty of perjury that the foregoing is true and correct. I understand that I have to tell the truth in this declaration. The interviewer read the declaration to me and everything in it is true and accurate. Executed on this 4th day of November 2026, at Dilley, Texas.

[redacted]

CERTIFICATE OF TRANSLATION

My name is Katherine Mora 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: 11/4/2026

Katherine Mora

EXHIBIT 10

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, Y[redacted] M[redacted] P[redacted], declare as follows:

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

2. I am from [redacted].

3. I speak Spanish.

4. I have been detained at Dilley for 22 days with my five-year-old son.

5. We were living in Arkansas, but I came to San Antonio and turned myself in around October 2. All of my family was removed to [redacted], and I was left here alone with my son. I want to join my family in [redacted].

6. I told them I want to be back in my country. I learned there was a $3,000 incentive that ICE provides, and this could help my son and my family when I get back. I asked if we could get that; they told me that if my son and I applied, we might both qualify for the payment.

7. Then, they arrested us.

Dilley ICE Detention Center

8. When I arrived at Dilley, they told me that I would be here 20 days, but it's been more than 20 days, and they have told me nothing else.

9. No one told us our rights. No one told us about my son's rights or a case called *Flores*.

10. Since arriving at Dilley, I have contacted ICE through the tablet, but they only told me that they have no flight seats available.

11. I have two daughters who are 12 and 10 years old in [redacted] who are with my grandmother, but now my grandmother has become too sick to care for them. My cousin is there trying to help with the kids, but they need me. My 12-year-old has epileptic attacks; she is waiting to see a neurologist. She needs an appointment with the doctor, but I cannot help her or pay for her doctor appointment because I am here.

12. I just keep asking them, "Please, let me get on a flight as soon as possible."

13. No one has told me anything about my rights. They asked if I wanted a lawyer, and I told them no; I turned myself in. I just want to get to my daughters.

14. I have been the parent to my kids. My grandmother used to help us, but she has cancer and can no longer help care for my girls.

15. I am sick. I have a fever, and my son has been sick. I have had a fever since Thursday, and they gave me some medicine over the weekend, but they stopped giving me medicine on Monday. They told me I didn't need it anymore, even though I was still flushed from fever.

16. The truth is, my son doesn't want to eat this food; he can't stand the food here.

17. It is extremely hot at night. The thermostat is locked, and we cannot change it.

18. I don't sleep; my son doesn't sleep.

19. The calls to [redacted] are too expensive, so we never use the phone. It costs too much to call my family, and I don't have family here in the US anymore.

20. We are allowed one hour a day at the library. I wish that we had more time. When I'm in the library, I email my family, and if they have electricity, then they will try to email me—that is how we can communicate.

21. The staff during the day are fine, but the night staff snaps at us; they won't let us ask for a more comfortable temperature, and they scold us if we try to move around the room or outside.

22. I am not aware of any way to file a complaint or grievance. I don't know how I could do that or if there is an option to file a grievance.

23. My son goes to school about six hours per day.

24. They don't give us soap; there is only a liquid soap in the bathroom that gives my son a rash. I have to pay for shampoo, conditioner, body wash, and toothpaste at the commissary. It is very expensive for small amounts, and, of course, none of us can work while we are here.

25. The days here are all the same. We buy instant soup for my son from the commissary because he hates the food. I try to entertain him in the outdoor area; we spend a lot oftime in our dorm.

26. All I want is to be with my daughters—who need me—and to bring my son home to our family. The reality is that my son is not ok. There's nothing for him here. He is living on instant noodles. This is not a place for children. I just want to bring him home.

I declare under my duty to tell the truth and penalty of perjury that to the best of my knowledge, all the information I have here given is correct and complete and I understand the legal consequences of testifying falsely to the authorities. Executed on this 4th day of November 2026, at Dulles.

[redacted]

CERTIFICATE OF INTERPRETATION

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

Dated: 11/05/2026

Jose Luis Velazquez

EXHIBIT 11

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, Y[redacted] Z[redacted], declare as follows:

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

2. I am 36 years old. I am from [redacted].

3. I speak [redacted].

4. I have been detained at Dilley for a little bit over a month with my seven-year-old daughter.

5. Before we were detained, I was living in Los Angeles for three years.

6. I went to an ICE check-in around October 2 with my seven-year-old daughter and my son. He is not yet even two years old yet and was still breastfeeding.

7. ICE told us that we have a final removal order and that we would be detained.

8. At my check-in, they told me that my case was over and that I have a removal order, but my lawyer never told me that we had lost our case. I never received a letter, a notice, anything. I don't know if I lost my case or if it is still open.

9. My toddler is a citizen; my daughter and I are not citizens.

10. My attorney was with me, and she told the officer that my son is a citizen. ICE told me they would detain me with my daughter. I did not want to part from my son, but they forced us to separate and gave him to the attorney who took him away.

11. I told them, "Please, if you are going to deport me, let me stay with both of my children and deport me with my son." But, I haven't heard anything from them since about my case or what is happening. Now, my son is sick, and I cannot take him from the country until he is cured.

12. My son cries at night, he has been crying since I left. He barely sleeps. His mother was taken from him. I was his primary caregiver, I was still breastfeeding.

13. My son has never been away from me, we have never been separated since he was born. My husband works and I was at home with the children. The first time we have been separated was by ICE a month ago. My son is suffering.

14. My son became so sick from severe separation anxiety that my husband took him to the hospital. When my husband goes to him, he cannot comfort him. Often, when he goes to my son, he sees he is gripping his fists tightly and shaking. The doctor explained that he may be having seizures from the shock of our separation.

15. When my son was upset, I would be the one to soothe him, to care for him; I was the one to feed him. He needs me.

16. They cannot even visit me because his father is still awaiting his asylum interview and it isn't safe for him to travel here until his case is completed.

Dilley ICE Detention Center

17. When we arrived at Dilley, there was an orientation but I only remember that they told me I would be deported. I don't know if my case is over.

18. I just need to be with my son, he needs medical care so he can be cured.

19. Someone told me something about my rights, but all I could think about was my son, I can't remember what they told me. They mentioned that my children can go to school here, something along those lines, but I could not think or process what they were saying.

20. My daughter goes to the school here, but she tells me all the time how much she misses her teachers and classmates from her previous school. Most of the kids here speak Spanish and she cannot understand them.

21. No one has ever mentioned *Flores* to me or told me that my child and I have any rights related to conditions or release.

22. My daughter has stomach problems, she is not able to digest the food. We went to a doctor who told her to drink water and gave her some medicine, but the capsule was too large for her to swallow. She is not getting any better.

23. I also saw a doctor. I was having horrible pain because I stopped breastfeeding suddenly. The doctor didn't give me anything; there is no breast pump available here. They told me just to squeeze my breasts in the shower to expel milk.

24. My daughter hates the food here.

25. My daughter sleeps but I cannot sleep, I wake up throughout the night. There are two lights on at night.

26. We were previously in a different area of Dilley with more people. People were very loud until late at night, not sleeping until midnight.

27. We can use the phone, but it costs money. Any call costs money, no matter who I am calling. I have never been shown a list of free legal service providers or been told that I can make a free call to a lawyer.

28. I am able to use my email while I am in the library, but we are only allowed one hour a day there. Websites are censored.

29. I wanted to find something for my daughter's schoolwork, but the site was unreachable. They block websites and content, which makes it more difficult for us.

30. We cannot communicate with the staff. They do not have translators or staff who speak our language. We can speak only with the other families from our country. Because of the language barrier, it is difficult for us to communicate and ask for anything we need.

31. Nobody has told us that we can write a grievance if something that violates our rights happens. I do not know how to do that. I do not know that there is such a process.

32. Sometimes they organize the children to draw together, but there is really not very much for my daughter to do.

33. The commissary sells almost expired items. Some of the coca cola they sell today, for example, is expiring in less than a week. Yet, everything is extremely expensive.

34. At night, my daughter tells me how she misses her brother and her dad and how she wants to go back home.

I declare under my duty to tell the truth and penalty of perjury that to the best of my knowledge, all the information I have here given is correct and complete and I understand the legal consequences of testifying falsely to the authorities. Executed on this 4th day of November 2026, at Dallas.

[redacted]

[Name: _____]

CERTIFICATE OF INTERPRETATION

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

Dated: Nov. 20, 2026 Juan Jin

EXHIBIT 12

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, W[redacted] P[redacted] P[redacted], declare as follows:

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

2. I am 28 years old. I am from [redacted].

3. I speak Spanish.

4. I have been detained at Dilley for 35 days with my two sons. [redacted] is 10 years old. [redacted] is eight years old. My siblings are here in the United States. We lived with my sister in Utah.

5. Before I arrived at this facility, I was living in Utah for about two years. We entered the United States with CBP One. We initially lived in Oklahoma for about a month, and then we moved to Utah to live with my sister.

6. In Utah, I enrolled the boys in school. They are excellent students and made a lot of friends. My younger son had a best friend, and they were always together. The kids loved going to the pool and playing. Life was calm, safe, and joyful. We had a good community, and we were happy to be living with family.

7. One day in the middle of the day, I had gone to a friend's house. Then, ICE banged on the door. It was really frightening. It turned out they were looking for a different address, but because I was there with my friends, they arrested me. It seems that although I updated our address to our Utah address with immigration, I did not receive notifications about our case. So, because we did not get the information about our court date, the court gave us an expulsion order *in absentia*. Because I had that *in absentia* order, they detained me. They let my two friends go.

8. My boys were at home with my sister. They asked me for my address, but I was too afraid to give them my address right then because I did not want to send ICE to my family's house to get my kids. So, I convinced ICE to let someone help the boys pack backpacks and bring the boys to me. ICE agreed to allow the boys to be dropped off at the ICE office. Then, they brought me to a women's prison for the rest of the day and the

night. It was really scary. ICE said if the boys didn't arrive by 8 a.m. the next morning, they would deport me alone without them.

9. Luckily, the boys arrived in time. We were all taken to Dilley together by plane.

Arrival at Dilley

10. We arrived in the middle of the night, around 2 a.m., and it took about three hours for us to go through the intake process. I don't remember any informational video playing when we were in there. Mostly, they gave us clothes, food, let us go to the bathroom, took our picture—all the intake things.

11. Even though we didn't get to go to bed until about 5 a.m., they woke us up at 7 a.m. to go have breakfast. The boys were crying a lot and so afraid.

12. The woman who was sharing our room with us was very nice. She explained to us how things worked here. The boys were terrified—they have never been in detention of any kind before. She explained that we can't turn off the lights, that there were certain hours for eating, and other things about life here. After she helped us understand, the boys calmed down a little bit. But they were still so sad. It was really rough those first days here.

13. Now they have moved our roommate, who was so kind, to a different section. I don't know why.

14. Several days after we arrived, maybe five days, there was an official who gathered us in a group and told us about *Flores* and said we could only be held here for 20 days. I don't remember learning anything else about other *Flores* rights. And anyway, we have been here far longer than 20 days.

15. We have had some medical issues here. My youngest son has an ear infection, so I took him to the medical area. They said they did not have the formula to make the treatment for an ear infection then. Eventually, they gave me some ear drops, but they did not give me anything to clean his ear out with. They only gave me the drops for five days, but it didn't help. When I went back, they gave it to me for five more days. But it's not

helping. He still has his ear infection, and his ear has been hurting him more and more. When I look in his ear, I can see that there is an infection. It looks like puss is collecting in there. I am really worried that the medical staff do not seem to be treating it as an infection or giving him antibiotics or anything.

16. My youngest son also got a strange rash in his private areas. I don't know how he got it or what the rash is from, because I cannot really bathe them myself. I am not allowed in the men's bathroom, and I bring them into the women's bathroom, but only when I have to go to the bathroom for myself, to shower or use the toilet or something. So basically, I don't think I am allowed to bathe them, even though they're so young.

17. I went to medical, and they did give me a cream for the rash. I think it was an allergy cream. I don't know how well it's working because it's so itchy for him, and he's scratching and it stings. It was my older son who realized it, because they have to bathe by themselves. My older son has to be the parent to help his little brother bathe sometimes. It made me worried that maybe there are other medical issues I am not even able to see because everything is so controlled here.

18. My older son has a dry cough every night. It's really bad. We went to medical, and they gave him an allergy pill and a nose spray. The cough is still the same. The medicine doesn't seem to be changing much.

19. We all have to go to the same place to get the medicines. It's a pill line and they give us specific hours when we can go stand in line to get the pills. You can only go at specified times.

20. We got three minutes for the kids to make a call when we arrived. They have never told us that my children can receive any other type of free call to family. I didn't know the boys or I could call a lawyer for free either. I thought my five minutes and their three minutes each at the beginning when we arrived here were the only free calls they got.

21. My children have never gotten to call my siblings or anyone for free, even though we lived with my sister for almost two years. We can only make phone calls if we pay. If

we don't have money, we can't call anyone. That's my understanding of how it works here.

22. My sons don't want to go to school. They don't like it. They don't like the teacher because she is scolding them all the time. But it doesn't make sense because they are all together with a wide range of ages. My younger son doesn't know how to do division, but my older son does. But they are in the same class, and the teacher is scolding both of them for not knowing or for wanting to learn different things. They mostly just get paper assignments. They don't like it.

23. To help my kids cope, I have created a routine for us every day. It's a circuit we do each day—we eat, we spend time playing outside, we move to the gym, we eat, we just go from area to area. We do it together with a few other families, so the boys have friends we do our routine with. It has been a big effort by us as parents so we can help our children feel safer and less afraid. Our daily routine is always the same. They get bored, but it's some structure and they get time to play with friends. We have to be back in the rooms by 8 p.m., and we are not allowed to leave after that.

24. The food here is not good. We honestly often don't eat it. Or I just give the kids rice and beans. It's also always the same, and it's not at all appetizing. My older son really isn't eating a lot. He says it's always the same, and he doesn't want to eat. I am always asking him to please eat something because I'm worried he is not getting enough calories. I tell him to eat so he can grow and stay strong.

25. Sometimes I buy him tuna or ramen in the commissary because he will eat it. And they get hungry at night because they don't eat well at meals, and the meals are really early in the evening. So, by the time nighttime arrives, they are hungry again. I buy some food in the commissary so I can make them something to eat. I think my older son is losing weight. It's really worrying me.

26. We buy water. We don't drink the water from the tap or the water dispensers here.

27. The lights are always on. It's a fact of life here. We just have to learn to live with it, even though it makes it hard to sleep.

28. It seems like they have blocked our emails. I don't have email now because even though I tried to make a new one, it's also blocked. We had a meeting where someone explained that our emails are blocked, and they just said that's not true. So, it seems some people have a disagreement about what is actually happening.

29. I just try to avoid problems. If you complain or file grievances, people say it just hurts your case. And you get punished too—like you get sent to different residential areas or other bad things happen. I try to just avoid problems for me and my sons.

Removal and Return to Dilley

30. On [redacted], my two sons and I were put on a bus that took us to our deportation flight to go back to [redacted]. It was going to be a 10-hour trip. About nine and a half hours into the flight, they told us that there had been a big [redacted] in [redacted], and they could not land the plane. They turned the plane back around and brought us back to Dilley.

31. The whole experience was terrifying, and we didn't even know about the [redacted] until we could not land. Then, we were terrified not just for ourselves but for all of our family and friends.

32. My siblings thought we had been killed in the [redacted] because they knew we were being deported that day, but they could not reach us because we were being flown back to Dilley. When I was finally able to call them, it was a relief. I get so emotional thinking about what would have happened if they had deported us a day before—I think we would not have been alive today.

33. After we got back to Dilley, we went through the same intake process all over again. It was the same as the first time, even though we had just left Dilley and come back a day later. It was intense to be back. I was so worried for my family. I was shocked that we had gotten so close to being deported to [redacted] and then were not. I was grateful to be alive, but so upset to be still detained with my boys instead of with our family during this big tragedy. My oldest son was also feeling the intensity and confusion

of the situation. He was so upset to be back at Dilley, but also surprised and hopeful that we would be allowed to stay here in the United States with our relatives and community, and his school and friends.

34. Just recently, they asked me to agree to be deported to Mexico. Mexico would be very dangerous for us, so I said no. Now, I am fighting my case because we cannot go back to [redacted]—the [redacted] made it even more dangerous for us. What I want is for my children and me to leave this place and go back home to Utah and be with my family, free.

35. The past three weeks have been so difficult. We are worried for our family still in [redacted], we are worried for ourselves, and we are stuck here in detention.

36. There are so many [redacted] families here. What is ICE's plan? Are they just going to hold everyone indefinitely until the [redacted]? No one knows when they might actually start [redacted]. Even today, they told us the [redacted]. I think people might end up spending six months here just to be able to leave and go back to [redacted]. One person asked if we are supposed to be here for another four months if it takes that long to rebuild the airport there. Some families were asking what they were supposed to do if they have already been granted voluntary departure and they are supposed to leave by a certain time, but they are still being detained here and cannot leave. It's a mess. And they shouldn't just be able to hold people—children—here in a jail with no end in sight.

37. Recently, the heat has been terrible. It makes us itch and it hurts. The heat comes into our rooms when you open the door and the vapor rushes out. The heat is everywhere. You can't even go outside when it's so hot.

38. As a mom, I am really proud of my boys and I'm also devastated that they have to continue their childhoods here in this prison. We are just locked in here.

39. I feel so much pressure here. I am trying to create a routine and hold so much so that I can protect my children and lessen the pressure they feel. But that puts even more pressure on me. What we need is to get out of here.

I declare under my duty to tell the truth and penalty of perjury that to the best of my knowledge, all the information I have here given is correct and complete and I understand the legal consequences of testifying falsely to the authorities. Executed on this 15th day of 15th 2026, at Dilley, TX.

[redacted]

CERTIFICATE OF INTERPRETATION

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

Dated: 07/15/2026

Rebecca Wolozin

EXHIBIT 13

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, Y[redacted] P[redacted] R[redacted], declare as follows:

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

2. I am 43 years old. My daughter is 13, and my son is seven. We are from [redacted].

3. I speak Spanish.

4. My children and I have been detained at Dilley for 70 days.

5. Before coming to Dilley, my son and I had been living in the U.S. for three years, and my daughter had been living here for two years. We lived in Pecos, Texas. It is a nice and peaceful town. My children were doing very well in school. My daughter was also involved in sports, like volleyball.

6. A couple of months ago, my children were on their way to school with their aunt. ICE pulled them all over and asked my sister-in-law if she was me. They thought I was driving because they had been investigating our family, and my children were in the car. They asked my sister-in-law where I was, and she said she didn't know. They asked my children for their names and then made them get out of the car and get in a car with ICE agents. Then, ICE called me and said I needed to come get my children. They said if I didn't get there soon, they would take my children to a shelter, and I wouldn't see them again. ICE eventually picked me up at a supermarket and brought me to the car where my children were being detained. They took all of us to the ICE office, and we were there until around 1 a.m. Three people picked us up at 1:20 a.m., and then we drove for nine hours to Dilley. We arrived at about 9:30 in the morning. It was awful.

7. When we got to Dilley, they took some x-rays, gave my daughter and me pregnancy tests, gave us some clothes, and then took us to the room. They did not give us an orientation. All the staff did was tell us about some of the paths here and some of the rules about when my daughter could be by herself.

8. They have never given us an orientation or shown us a video about our legal rights. The only thing they have ever said about *Flores* is that under *Flores*, children are not

supposed to be here longer than 20 days. They had us sign a paper about that. But we have now been here for 70 days.

9. My children have not been feeling well here. When we first got here, my son was constantly sneezing. He got a small boil on his nose. They gave him allergy medicine, and the boil went down, but now it's back. I would take my son to medical, but he would never get to see a doctor. My son also has a kink in his neck that is always bothering him. I think it is because the beds are so uncomfortable, and the pillow is very thin.

10. My health has really suffered here, too. I have been sick a lot. I have been getting growths and abscesses that have made it hard for me to walk. They have given me some antibiotics, but they haven't been working. When you go to medical here, you don't get to see a doctor. They only allow you to talk to a nurse. I don't understand why they never let you speak with a doctor.

11. I have noticed that a lot of the families here have a sort of fungus on their skin. I don't know if it is from the water or the mattresses that we sleep on, but I see the same kinds of patches on lots of people's skin. It is sometimes on my elbow—and they have given me a cream. I see it on other people's backs or necks—it's on many people.

12. We suffer a lot because they make us keep the lights on throughout the night. My daughter and I can't sleep, and we try to put something up to block the lights. It doesn't work. My daughter often stays up until 11:30 p.m. or later because she can't fall asleep.

13. Being here is very hard on my children. For my son, he has always been very calm, but since we got here, he has been doing things like standing on a table or hiding under the table and not responding to me. He says he feels stressed. My daughter is extremely sad. She misses her friends and her teacher. It is hard for her to not be in touch with them, especially since they closed our email accounts. I notice that she is seeking out God a lot. She has become very quiet, and she spends all her time lost in her thoughts and very pensive. My daughter worries me because she won't really talk to me, and I don't know what she is thinking. I try not to share any bad news with her because

she gets so upset. She has told me that she has a lot of hope that she will see her teachers again. She especially does not want to spend her birthday here.

14. I have had two anxiety attacks from being here—and I have seen other mothers have serious mental health crises. The other night, a mother had a horrible panic attack. She left her room and started yelling and taking off her shirt and saying she needed air. She was extremely upset. I feel bad for the children here. It is so hard for my children to have to witness all of this.

15. My son and daughter are eating very little here. My son looks thinner. He won't eat the breakfast or most of the meat and other foods. The food is too spicy and overuses condiments. He eats rice and beans, except when they have a hamburger. He prays every day for a hamburger. Otherwise, he mainly eats the food that I buy from the commissary. My daughter will just eat some chicken nuggets or the soup and tuna from the commissary.

16. We usually buy water at the commissary. We have tried drinking the water from the tap and sometimes it is okay, but other times it comes out more yellow or tastes really bad. I notice that none of the workers here drink the water.

17. My children are not able to make free phone calls to our family members. No one has told us that is an option.

18. The calls to lawyers are also not free. We have tried, but the numbers do not work. The only option is for the lawyer to call us on the phones in the visiting areas or to call the counselors.

19. My son only has one pair of shoes. I have been asking for another pair for eight days, but they told me they do not have his size in boy's shoes. With all the rain, it's a mess. The mesh on the shoes collects the dirt, and the shoes stay wet. It takes a while for them to dry, and they smell really bad.

20. We have to buy hygiene products at the commissary. They give us deodorant, insect repellant, cream, and a toothbrush and toothpaste. But the toothbrushes fall apart, the toothpaste doesn't taste good, and the deodorant didn't work. We buy basics like

shampoo and soap, along with many other things. They give you a small kit at the beginning, but that's it.

21. There are not recreational activities here for children. In the gym, there's a schedule of things on the wall, but they never do any of them. From the list you read to me of activities, they have done bracelet-making a couple times and there is bingo with five games. Bingo can get crazy because everyone wants to go since they don't have any other activities.

22. Children cannot have personal items like stuffed animals here. They have some games in the gym, but they won't let you take the games out of there. It is hard for the little children to play games in the gym when there are a lot of older children there. One time, we tried to take a board game out of the gym for my son to play outside, and the staff said no.

23. I am grateful to God to be with my children, but this is a place where we feel completely powerless and sad. Children should not be at a place like this. They should not have to go through so much at this age. It is so hard not to know what is going to happen to us or when we will be able to leave.

I declare under my duty to tell the truth and penalty of perjury that to the best of my knowledge, all the information I have here given is correct and complete and I understand the legal consequences of testifying falsely to the authorities. Executed on this 15th day of July 2026, at Dilley, Texas.

[redacted]

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: 7/15/2026

Diana Cano

EXHIBIT 14

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, D[redacted] C[redacted] S[redacted], declare as follows:

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

2. I am 23 years old. I am from [redacted].

3. I speak Spanish.

4. I have been detained at Dilley for 43 days. I am here with my daughter, who is six years old. She is from [redacted].

5. We have been in the U.S. for three years—most of that time in Austin, and a little in Seattle.

6. Before we got here, my daughter was in kindergarten.

7. I decided to leave the U.S. voluntarily and willingly turned myself in to ICE. I signed voluntary departure on September 9, 2026, but we are still here. I don't understand why.

8. Every time I ask ICE why we are still here, they say "Next week you'll leave." This just keeps happening. Other people have left, but not us.

9. I asked if the issue was that my daughter doesn't have a passport and is from another country, and they said no and not to worry.

Dilley ICE Detention Center

10. When we arrived, we received information about our *Flores* rights, namely that we can't be here longer than 20 days. I signed a piece of paper about that. It was in English, and I couldn't understand it.

11. I have asked why I'm still here, but the ICE official just keeps saying there is a process that we have to follow.

12. There was a video also. I didn't really pay attention.

13. When I signed my voluntary departure form, it was in English. ICE translated it, but there was no official translator there.

14. When I message ICE on the tablet, it sometimes takes five days or so for them to respond. They respond when they want.

15. The food sometimes is very bad. It repeats, and we are tired of it. The food here is not good for little kids, because it has too many condiments. My daughter just eats the rice; that's it.

16. She also eats ramen noodles that I buy from the commissary.

17. I don't think the water is safe, because various people have gotten sick from it. We buy bottled water at the store.

18. Sometimes at the gym we ask for bottled water, but they say no. The water in the coolers at the gym is not safe to drink.

19. If you go to the medical unit here, all you receive is Tylenol and Ibuprofen. The medical exams here don't seem to be real exams. My girl has had a cough for many days and still has one.

20. I think some of the officers here are really bad at dealing with kids. I've heard of officers threatening kids here. I have seen them treating kids poorly here.

21. We received shampoo when we arrived, but it was very bad and very small. The shampoo was the same soap for the body. There was no conditioner. We also received a toothbrush and toothpaste, but it was bad. We buy it at the store now.

22. Our backs hurt from the mattresses here.

23. The lights here are very annoying at night. They won't let us put something up to block the light.

24. When we call our family, we have to pay for those phone calls. It's a lot.

25. The worst part about being here is being enclosed. You can't last here more than one month. We are both so bored and so enclosed.

26. My biggest complaint is that my child is so bored here, even with school and with the gym.

27. If I could change one thing here, it would be that we can't stay here for so long. I want the process to move faster.

I declare under my duty to tell the truth and penalty of perjury that to the best of my knowledge, all the information I have here given is correct and complete and I understand the legal consequences of testifying falsely to the authorities. Executed on this 06 day of Oct 2026, at Dilley, TX.

[redacted]

CERTIFICATE OF TRANSLATION

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

Dated: 10/06/2026

EXHIBIT 15

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, S[redacted] R[redacted] A[redacted], declare as follows:

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

2. I am 33 years old. I am from [redacted].

3. I speak Spanish.

4. I have been detained at Dilley for 21 days. I am here with my son, [redacted], who is nine years old and also from [redacted].

5. We are separated from my partner, who is [redacted]'s father. He is still in New Mexico and wasn't detained with us.

6. One morning, I was outside my house, and six cars pulled up with 10 men in them. They were yelling at me and asking if I was paying taxes and other stuff. They asked if I received food stamps, Medicaid, and other things. They made me get [redacted] to come outside, and we got in the car.

7. We went to an ICE office. From there, we waited three hours. We just got chips and water. Then we were brought to El Paso in a van. Then, they asked again if I paid taxes, if I received food stamps, if I worked, and more.

8. We were at the ICE office in El Paso for 12 hours until 3 a.m.

9. Then, we went to an airport very early in the morning. We had a terrible issue with the first flight and returned to the same airport. Something was wrong with the airplane.

10. Then, we took the same plane to Houston once the issue was fixed. In Houston, we took another flight at 3 p.m. to San Antonio. We had not slept at all.

11. Once in San Antonio, we got in another van and arrived around 6:30 p.m. to Dilley.

12. We did intake until midnight. It was the worst two days.

Dilley ICE Detention Center

13. We've been here for 21 days today. I thought we'd be released by now. I don't know what to do. I just want to leave here. I just want to return to [redacted] and get on a flight.

14. Everyone I ask about when we can leave just says they don't know. The ICE person I spoke to through the tablet told me this past Sunday, "It seems like you have a flight in two weeks." When they say, "it seems," that's not a sure thing. It could be two weeks; it could be more.

15. When we got the news that we had to be here for two more weeks, my son cried the whole evening. We didn't go to church that day because we were so sad about the news that we'd be here for at least two more weeks.

16. I wrote with respect on the tablet, because I am afraid. I said, "Can you review my case?" I brought my passport and everything. We are not fighting; we are not appealing. I just want to go, and we are still here after 20 days.

17. It's weird because people who are appealing their case get taken in the middle of the night, but those of us who just want to leave can't leave.

18. I did not get any presentation about our rights. I had to sign two things when we arrived. One was confirming that I wasn't part of a gang.

19. The other was about *Flores*. The page was in English. It was much longer than the Exhibit 6 you are showing me.

20. It said *Flores* applies and you can't be here more than 20 days. I signed it.

21. But they didn't tell me that I'd sign it and it'd mean absolutely nothing. I believed it. I thought we'd only be here for 20 days, but it's been more than 20 days.

22. When we have to sign something in English, the ICE agent just explains what it means to us, but we don't get it in Spanish. We don't have an official translator, and we don't receive a copy.

23. I have never heard of a case manager. I just know that ICE comes on Thursdays with a computer, and they tell you that you have to wait.

24. I know other people are going to [redacted] within only three or five days of arriving here. Because of this, I don't understand why we're still here. I can't figure out what is going on.

25. There was a video that I saw the second day here about the rules of this facility. It was about the schedule of eating, stuff like that.

26. The only type of handbook I've seen is the one in the room that explains how to use the phones.

27. They gave us a free phone call when we arrived, but after that we had to start paying for them.

28. Beyond the *Flores* paper we signed, no one has mentioned *Flores*. Except that when I went to the chapel and asked about my case one day, ICE officers laughed at me because I was only here for six days.

29. My understanding is that they were laughing because it hadn't been 20 days yet. I didn't return last week because they would have laughed and bullied me again.

30. I went to the psychologist and told her my son isn't eating. She said he has to eat. I rolled my eyes. That was not helpful.

31. He doesn't like the taste. It hurts his stomach. He has to go to the bathroom immediately after eating. The same happens with the tap water. The food has too many condiments and is in cans—it's not fresh.

32. My son got sick here once. He was trembling, had red eyes, a fever, and his throat hurt. We thought it was a very bad fever. He couldn't eat. I brought him to the medical unit. They just looked at him and said, "He's good. He just has to eat and drink water."

33. I made him gargle with salt and hot water, and we did a home remedy in the room. That helped a lot, but the medical unit here didn't help at all.

34. Other kids have had the same experience.

35. We don't sleep well here. The mattresses are only a few inches thick, that's it. They're very thin. It's very hard to get comfortable.

36. If the guards pass with the radio at night, I wake up. It's loud.

37. The lights are always on. They never turn them off, and you can't cover them.

38. At 4 a.m., the guards enter and do the same at 6 a.m. They enter, review something, and sign something. I think they're checking the temperature, but it's very disruptive.

39. And they are walking the hallway all night. I think they're doing rounds, and we can't sleep through it.

40. In the library, you can just use email through a program called Atomic. You can also see your immigration case. You can't use Gmail or the internet. It's just one hour per day.

41. I had to create an Atomic email when I arrived here.

42. Three days before I arrived here, Congressman Castro visited Dilley. The workers were apparently running around painting the doors and fixing things right before he came. Also, his number is blocked. We cannot call his phone number from the phones here. I did not see him, though, as this was before I arrived.

43. I am nervous about retaliation sometimes. Some people are told not to tell *Flores* counsel anything.

44. I am nervous about writing grievances. I think I'll be punished if I'm doing too many. I wanted to do one once, but I didn't.

45. They gave us hygiene products when we arrived, like shampoo and toothpaste. But they were really bad; they left our hair all matted. You have to buy everything from the store now.

46. I think this place just exists to make money.

47. The bathroom smells disgusting. The room is closed up. The only thing to do is have the kids run around playing soccer. It's really incredibly awful to be enclosed, and it's very frustrating.

48. I cannot be here anymore. I feel very sad and depressed. Who would want to be enclosed like this?

49. I wish the lying would stop. I want them to tell us when we are going to leave. I want to know the day.

I declare under my duty to tell the truth and penalty of perjury that to the best of my knowledge, all the information I have here given is correct and complete and I understand the legal consequences of testifying falsely to the authorities. Executed on this 07 day of Oct 2026, at Dilley, TX.

[redacted]

CERTIFICATE OF TRANSLATION

My name is Katherine Tafoya 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: 10/7/2026

EXHIBIT 16

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, G[redacted] Z[redacted] R[redacted], declare as follows:

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

2. I am 30 years old and from [redacted]. I have three children, ages twelve, seven, and five months. My seven-year-old daughter is detained here with me at Dilley. My other two children are with their fathers in Chicago, including my five-month-old baby, who is a U.S. citizen.

3. I speak Spanish.

4. My daughter and I have been detained at Dilley for 15 days. We were picked up by ICE officers a couple of weeks ago after I had dropped off my baby at day care. We had just gotten some empanadas for breakfast and were about to go back-to-school shopping to get some new shoes for my seven-year-old when ICE agents suddenly swerved and surrounded our car in the front and the back. My five-month-old's father was driving the car. I went into shock, and my daughter started screaming, shaking, and went into a complete panic. The officers asked for my ID and my name and were very mean. Then one of them started yelling my name and ordered me to get out of the car. My daughter started to cry as I got out of the car. She kept saying she didn't understand why they were doing this. She was crying out, "My mother is a good person who has never done anything wrong" and "Please don't take my mom." Then, they ordered my daughter out of the car and detained both of us.

5. Next, they brought us to an ICE office in Chicago. We were there from around 11 a.m. until 6 or 7 p.m. While we were there, I asked to use the bathroom because I had been actively breastfeeding my baby and my breasts were starting to hurt a lot. I needed to use the bathroom to pump. They took me to a bathroom, but the toilet was completely out in the open, so I was not able to relieve myself or release any breast milk.

6. They took us by car, two trains, a plane, and then another car to get to Dilley. There were three people who brought us and were always with us. We arrived at Dilley late at night, around 1 or 2 a.m.

7. Throughout this nightmare, my daughter was screaming and crying the whole time. She kept yelling, "My mom is not a criminal! Please don't take her away!" and kept clinging to me. I was doing everything I could to comfort her and hold her. I had gotten a C-section not too long ago, and it was incredibly painful to be carrying her most of this time. At one point, she saw a man in Chicago get handcuffed, and she started yelling, "Please don't put handcuffs on my mom." It was all extremely terrifying for her.

8. Before we arrived at Dilley, we had been living in Chicago for about three years. My daughter was doing really well and was happy there. She enjoyed going to school, and we were about to transfer her to the same school as her older brother. My daughter misses her siblings so much. My children are all close to each other and have never been separated; it is hard to explain to her why we are here without them. She is always asking when we can leave here and be with her brothers. She makes drawings of her and her brothers together. She is always praying to God to let us leave here so we can be together again. I miss caring for all my children together — it's all I want right now, to be with all my children.

Dilley ICE Detention Center

9. When we first arrived at Dilley, they let me take a shower, gave us some clothes (which basically are our uniforms since everyone has the same clothes), and took us to our room. The next day they did a very basic medical exam. I told them about my daughter's asthma and her flat foot, but they did not do anything about it. I had to insist to the medical staff many times to get us an appointment with the doctor to treat her asthma and flat foot.

10. One of my roommates said they did a DNA test on her, but they have not done one on us, yet.

11. My daughter has really bad asthma, and the only thing that has helped her in the past is having access to asthma treatments. After a lot of insistence, we finally got an appointment with the doctor, and they gave her an inhaler and said that's all they can do.

The inhaler is not enough for her; she needs more serious treatment. She has not had a bad attack so far, but I am worried about what will happen if she does.

12. When we arrived here, my daughter started getting a really bad allergic reaction on her body. She has rashes all over her arms and legs, and she is always scratching herself. At medical, they gave her allergy medicine for only three days and Tylenol. This did not help her. I have taken her back again and again, and they don't do anything. In the past, these sorts of rashes have been related to her asthma, and the only thing that has helped has been her asthma treatments.

13. My daughter was also experiencing pain because of the shoes they gave her to wear. She has flat feet, and she was having trouble walking because the shoes were hurting her. She was seeing an orthopedic specialist for her feet back in Chicago and had received specialized soles. I asked the doctor if she could get different shoes with better arch support or inserts for her shoes. The doctor wrote down my request, but I do not know whether my daughter will actually receive the shoes she needs. The doctor said it might be too much work to get specialized shoes for her. In the meantime, the doctor told staff that my daughter is permitted to wear sandals instead.

14. It hurts me to see my daughter in pain here. The staff doesn't care at all about the pain my daughter is going through.

15. I also have pain from the shoes. They have been giving me awful blisters. All they will give me for the blisters at medical is Tylenol.

16. The day after arriving here, the pain and inflammation in my breasts was getting worse, and I was becoming feverish, so I asked to be sent to medical. They gave me a manual extractor that I could use in my room. Even with the extractor, my breasts still feel extremely heavy and painful. I don't use the extractor that much because it hurts me and leaves my breasts sore; it feels like I'm mistreating my body when I use the extractor. I had been constantly breastfeeding my five-month-old baby, and my body has had a hard time adjusting to the sudden stop. As a mother, the only way to truly alleviate the pain is to be with my baby. It's not the same to have a baby nurse from the milk versus using an

extractor for breastmilk. It's emotionally painful, too, because I would rather my baby drink the milk. I have suffered constantly from breast pain ever since I have been detained. I wish I could receive a pill to dry my breasts but they don't have that here. I want to leave here to be with my son. During a call, my baby's father told me my son is teething and had a fever last week, and I just want to be there for him and take care of him. My son is still an infant, and infants need their mothers.

17. I also have a hernia near my uterus and was scheduled for surgery in Chicago on September 17th. The pain from the hernia is difficult to bear, and when I menstruate, the pain becomes worse, and, again, the only medicine the medical staff offer is Tylenol. A medical staff member told me they have obtained my medical records for my hernia, but they have not updated me on anything about treating my hernia despite my constant asking. I am tired and bored of medical only offering Tylenol when we need more specific medications and treatment.

18. My daughter is not able to make free phone calls to family. When we first arrived, they gave my daughter a 3-minute phone card, and they gave me a 5-minute phone card —but that is it. We have to pay for calls to family, and it is very expensive. It is important for my daughter to be able to talk to our family for emotional support.

19. Since she got here, my daughter is barely eating anything. I try to encourage her to eat more, but it is hard to convince anyone to eat food they don't like. I think it is because the food has so many condiments. Some food is also very spicy. The vegetables have no flavor at all and are so poorly prepared, so my daughter won't eat them, either. The only fruit they have here regularly is red apples, but even they taste dry and stale. One day they gave the children oranges, and it was like a blessing for them, but that is it. My daughter will mainly just eat the cornflakes when they offer them. Yesterday, she ate because they brought out a special meal with pizza and chicken for lunch, but then she didn't eat anything later in the day. I have to buy the noodles and cereal at the commissary to have things she will actually eat.

20. I have to buy the water here because the water they give here is horrible, it tastes like dirt.

21. The hygiene items they give us here are really bad. The deodorant, toothbrush, and tiny shampoo they give just don't work—they are useless. They have foam soap in hand dispensers for showers, but it doesn't work to get the dust and sweat off from this place. For soap that actually cleans us, we have to buy it at the commissary. It's a problem because my daughter is allergic to a lot of the soaps that are here, including the detergent for the clothes. We are not able to choose the detergent; it comes automatically from the washing machine. Back at home, I used sensitive soap and detergent for my daughter. I think the sudden change in detergent and soaps is part of why my daughter has such bad rashes.

22. One time, my daughter was sent to the childcare room here when I had an appointment, and she got very upset. When I picked her up, she asked me why I had left her in a jail for kids. I tried to explain to her that it was like a daycare, but I understand why it feels that way since this place feels like a prison for everyone. We cannot control anything about our day. They tell us we can go anywhere, but that is not true. We have to follow a strict schedule and go where they tell us to go. That is not freedom—we are not free here at all.

23. My daughter doesn't want to be here. She is always asking, "When are we leaving?" It's sad, but it's almost become like a song of hers: "Mama, when are we leaving? When are we leaving? When are we leaving?" I try to explain to her why we are here and what is happening, but she'll just ask me again an hour later, "When are we leaving?"

24. When I got here, I was presented with a paper in English to sign. I think it said something about our rights, but it was not translated. I refused to sign it because I did not understand what it said.

25. It's horrible to sleep here. They leave the lights on all night. I hung my towels to dry overnight on the bed, but the staff took them away because they thought I was trying to block out the light. My daughter has had a hard time sleeping too.

26. I have not had the grievance system explained to me, and I do not know what it is or how it works.

27. My daughter is going to school. At first, she didn't want to, but I encouraged her to go, and she liked it.

28. If I could, I would change everything about this place. I wish there could be more empathy from everyone, and I especially wish there were better care for children. There are stray cats here that are treated better than our kids, it's sad.

I declare under my duty to tell the truth and penalty of perjury that to the best of my knowledge, all the information I have here given is correct and complete and I understand the legal consequences of testifying falsely to the authorities. Executed on this 9th day of September 2026, at Dilley, Texas.

[redacted]

CERTIFICATE OF TRANSLATION

My name is Katherine Mora 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: 9/9/24

Katherine Mora

EXHIBIT 17

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, I[redacted] O[redacted] R[redacted], declare as follows:

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

2. I am 38 years old, and my children are 17, 15, and 13. We are from [redacted]. My oldest daughter just had her 17th birthday while we were detained here at Dilley.

3. I speak Spanish.

4. We have been detained at Dilley for almost a month — since August 18, 2026. We had been living in San Antonio for two years.

5. In July, I had an ICE check-in for me and my oldest daughter to update my address. During that appointment, they gave me another check-in appointment for August 17, 2026. They said to bring all my children. At the August 17th appointment, they told me we had a deportation order. That was confusing to me because my court date was not until 2029. They said that they had sent a letter moving up the date, but apparently it went to an old address because I never received it. During that appointment, they detained us. My husband, who is a U.S. citizen, was waiting for us outside the office, and they wouldn't even let us say goodbye to him.

6. We waited all day in the ICE office. Around 10 p.m., they put us on a bus that was highly secured. We stopped at several different detention centers to drop people off. Dilley was the last stop. We arrived around 4 a.m.

7. When we arrived, they made me and my daughters take pregnancy tests, which I thought was weird and distasteful for my young daughters. They also gave us DNA tests both when we arrived at Dilley and in the ICE office in San Antonio. We took showers, were given some clothes, and had our pictures taken. Then they took us to our room.

8. The next day, I met with a staff person who gave me a rule book. She did not tell me about our legal rights or my children's rights under *Flores*. A day or two later, some immigration people talked with a group of residents about *Flores,* but all they said was something about 20 days. They gave me a paper in English to sign, but I didn't sign it

because I couldn't understand what it said. They have never shown me or told me there was an immigration video we could watch.

9. Since we have been here, we have had little information about what is going on. We meet with ICE on Tuesdays. At the first meeting, they said we had a final deportation order, and we would be deported. By the next meeting, my husband had filed a petition on our immigration case, and ICE said they were waiting on a decision from the judge. That was the last we heard.

10. This place is very depressing — that's how I would describe it. There's nothing to do. I send my kids to the school here so that they can be distracted. In this country, we were used to being busy and working all the time. To get here and do nothing is very hard.

11. My kids say the school is very easy and really just feels like it's geared for little kids. They mainly tell them things they already know. It's really just good for keeping their minds busy. Before coming here, my oldest daughter was into tennis; my son was into baseball; and my younger daughter liked challenge games, like chess. They don't have tennis or baseball here. Sometimes my daughter can play chess when my husband comes to visit us. Sometimes my kids will play volleyball, but there is not much else to do. About once a month, they have someone come in to make bracelets — but that's about it. The hours are long here.

12. We don't drink the water here. It tastes bad, gives us a bad feeling in our stomachs, and sends us to the bathroom. We buy bottled water from the commissary. We also buy ramen, rice, tuna, Oreos, and corn flakes. My kids eat dinner around 4 p.m., and by 8 or 9 p.m. they are hungry again. If we didn't have food from the commissary, they would be starving at night.

13. The deodorant, shampoo, and toothpaste they give you here are really bad. The deodorant almost worsens the smell. It's really unfortunate for people who come on Thursdays and have to wait the whole week for the commissary to open on Wednesday.

They go the whole week being smelly. We have to buy deodorant, shampoo, toothpaste, and pills for headaches.

14. The clothes they gave my kids are okay, but the shoes are really bad. The shoes are very low quality and break down quickly. When one woman complained about how thin the soles on the shoes were and asked for better quality, she was scolded by a supervisor even though staff had told her to explain the complaint.

15. It's hard for us to sleep with the lights on all night. We are not used to it. It's especially hard for me because I sleep right in front of the clock, and I wake every hour and see the time. Sometimes my son sleeps on the couch because he will sleepwalk. One time he fell from the top bunk because he was sleepwalking.

16. It's really hard being here with the accumulation of everything we have been through. It's hard to wrap your brain around it. My children have suffered through so much, and now that we finally had a chance at a stable life with my husband, we find ourselves here. We are so sad.

17. Most of the moms here are constantly crying — especially the ones who are worried about not being reunited with their U.S. citizen children. We have lots of worries here.

18. When we first got here, my children and I were given five-minute phone calls, but after that, my children have had to pay for phone calls to family.

19. They told me about how to use the grievance system, but most people here try to avoid using it because they don't want to have issues with staff or face retaliation. Most people don't feel safe making complaints.

20. We have been locked in our rooms when the Congresspeople come to Dilley. They make us stay in our room or in the activity room of our living quarters. They won't let us do anything except drop off our kids at school and then go back to our rooms.

21. I wish they would let us go back home. It's so frustrating to be here for so long. Even people who agreed to voluntary departure suffer here for a really long time.

I declare under my duty to tell the truth and penalty of perjury that to the best of my knowledge, all the information I have here given is correct and complete and I understand the legal consequences of testifying falsely to the authorities. Executed on this 9th day of September 2026, at Dilley, Texas.

[redacted]

CERTIFICATE OF TRANSLATION

My name is Katherine Mora 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: 9/9/2026

Katherine Mora

EXHIBIT 18

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, M[redacted] A[redacted] G[redacted] Z[redacted], declare as follows:

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

2. I am 17 years old. I have been living in El Paso for over four years. I was born in [redacted].

3. I speak English, Spanish, and a little Portuguese.

4. I have been detained at Dilley with my mom, dad, and 11-year-old sister for about 13 days.

5. One morning we were driving to school with my dad around 7:30 a.m. My mom works very early, so she had already left the house for work around 4 a.m. We pulled up to a stop sign, and then three cars quickly surrounded us. We didn't know what was happening. My dad told us not to be scared and try to stay calm. About five or six officers came up to the window of the car. We were so scared, but I was trying not to cry. We asked if we could still go to school, and they said no. The officers ordered all of us out of the car. They told my dad to leave the car parked on the street. When my dad got out of the car, they put handcuffs on him. It was horrible to see my dad like that because he's not a criminal. I had never seen anything like that. When they did that, my sister and I started crying really hard. The officers asked us if we wanted to go with our dad, and we said yes. We were in shock. Then the officers ordered us to get into a black truck. While we were driving, I texted my mom to let her know what happened and where we were going. My dad didn't even get a chance to call her. My mom was telling me everything would be fine, and she would see us soon.

6. They drove us to an immigration center in El Paso. They tried to convince us to take $3,000 for each of us to go back to [redacted]. They kept pressuring us to sign papers, but my dad said he wanted to wait for my mom before making any decisions. When my mom came, she said we were not going to sign anything. The ICE officers said that because we weren't signing anything, we were going to have to go to San Antonio.

They told us we would just be at a detention facility for 2–3 days, and then we would be out. But it's now day 13, and we are still here, and nothing is happening.

7. After about eight hours at the El Paso center, they drove us to Dilley. We were up all night and arrived at Dilley around 5 a.m. When we got here, they took everything away from me. They took my backpack with all of my things, including my phone and all of my materials for the CCTE certificate I was getting in high school for cosmetology. I had all my work supplies for my nail classes—like acrylics, acetone, nail polishes, nails, cups, and pencils. These were supplies I was using to get the certificate. They would not let me keep anything. They told me that they wouldn't give me the materials back, and I was so worried about what I would tell my program. They also lost some of our important documents, like my mom's work permit. I was feeling very upset about all of that.

8. At intake, they made all of us take showers, and it was annoying. I did not feel like doing that. I just wanted to get out of there. They took our clothes and gave us different clothes to wear. They swabbed our cheeks and made us do pregnancy tests. That felt really weird for me, and it made my younger sister, who is only 11, feel very uncomfortable. Then they took us to our room after about two hours.

9. When we got here, I had so many thoughts. I was really worried that I was not going to finish my senior year of high school. I also had my senior night coming up, and I was worried I would miss it. Senior night is a really special night at my high school. It's the last football game of the season. I am on the varsity cheerleaders dance team, and we all walk in with our families for the last game. They take pictures with your family, and it's a fun celebration. My mom was planning a lot of things for that day. I was also worrying about lots of other things—my classes, my grades, my credits, college scholarships—all the things that seniors worry about.

10. When I got to Dilley, it was sad to call my friends to tell them what was happening. I told a friend where we were, and they were all very worried because I had just disappeared and was not at school. I called my boyfriend, and he was really sad. I

told him I was sorry because maybe people might think we did something wrong, but we didn't do anything wrong, and this wasn't our fault.

11. No one has told me anything about our legal rights except ICE said we could fight using *Flores,* but that it was not going to help us. They said that *Flores* lawyers would just talk to us and not do anything about our case. They said we should sign for voluntary departure so we could go back to [redacted]. My mom said she wasn't going to sign anything and that we would fight our case.

12. When we first got here, they gave us a free phone call, but now I have to pay to talk to my family.

13. It's the same thing here every day. Wake up at 6:30 a.m.; take a shower; brush my teeth; put some water on my hair so it's not a mess since there aren't any products here; get breakfast; go to school; go to lunch; go back to school; eat dinner; take a shower and go back to the room—and that's all. People may say it's okay to put us here because they feed us, but no one comes to a country to live like this. It's so sad and boring. We don't do anything here.

14. The school here is not the same thing as an actual school. There aren't teachers teaching us lessons or showing us how to do projects. In my classroom, there are just two teens sitting at a computer from 8 a.m. to 11 a.m. We do the same thing on the computer after lunch. At my high school, I was taking forensics, college math, college English, government, and economics. I can get some of these subjects on the computer here—but not much. Here, I am just doing multiplication, and when I was at my high school, I was learning algebra and geometry combined in one class. I was also on the cheerleader dance team. I was hoping to join the cross-country team, but I missed the tryouts, and now the deadline has passed. I am planning to go to the cheerleading dance competitions, which would give me the opportunity to go to California. I am hoping that I can get out of here in time to go.

15. I want to be a Texas Longhorn. They have a good premed program, and I am thinking about either being a dentist or a plastic surgeon.

16. My sister and I were excited before we came here because we were supposed to move into a new apartment, and we would each be getting our own room. I had been sharing a room with my sister for so long, and we were finally going to have privacy—we were so happy about that. While we have been here, we are worried that we have lost our new place. My mom is trying to make it work out and is getting a friend's help so that we can still get the new apartment.

17. The food here is not that good. I will just eat the rice and beans, and sometimes cereal in the morning. That's the only thing I eat every day—every day for thirteen days. My little sister just eats rice and beans and sometimes cereal, too. Even the fried chicken is no good. It's sticky and weird, and I don't want to eat it. The food is also really oily. It all tastes fake.

18. Sleeping is hard because we can't turn off the lights. We also hear the guards talking on their radios. It's super loud. I try to sleep, but I wake up a lot.

19. The showers here only have hand soap to use on your body. It has made my chest get red. Yesterday, I got in the shower, and there wasn't even hand soap in any of the four showers. I had nothing to wash myself. When we got here, they just gave us body lotion that smells weird and a deodorant that doesn't work and gives you a really bad odor. From the commissary, we buy shampoo, conditioner, deodorant, toothbrushes, and toothpaste. The toothbrushes they give you here are really rough; they hurt your gums; and they don't really clean your teeth.

20. When we arrived here, they gave us one pair of shoes, five pants, four shirts, and one sweater. They only gave us sweatpants when we arrived because they said it was going to be cold soon, but it's still really warm during the day, and we get hot.

21. The moms here get mad because they will ask the staff for new pants for their kids when they are broken or ripped, but it takes a long time to get them.

22. If my sister and I had to describe this place in one word, I would call it "horrible," and she would call it "sad." It feels like a prison.

23. If I could change one thing about this place, it would be to get out of here and not have been lied to about being here for just three days. They shouldn't be able to tell people it will just be three days when lots of people have been here more than twenty days. The thing that really stresses us out is that we don't know when we are going to get out of here. We have lost everything: our beds, our TV, everything we had in our house, our cars—we had to leave everything when they arrested us.

24. When we got to the center in El Paso, my little sister and I saw a paper that called us "aliens." That made us feel really awful and like there is something wrong with us. They treat us like we are something bad when we are just kids. That makes us feel horrible.

I declare under penalty of perjury that the foregoing is true and correct. I understand that I have to tell the truth in this declaration. The interviewer read the declaration to me and everything in it is true and accurate. Executed on this 4th day of November 2026, at Dilley, Texas

[redacted]

EXHIBIT 19

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, E[redacted] N[redacted] P[redacted], declare as follows:

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

2. I am 27 years old, and my boys are nine and seven years old. We are from [redacted].

3. I speak Spanish.

4. We have been detained at Dilley for 57 days.

5. We first came to the United States in 2023. We lived in Manhattan for two years. We then decided to move to Canada because my mother was moving there. We wanted to stay with her—so we all moved to Canada together. We lived there for about 10 months. The boys were doing well, but then my mother decided to move back to the U.S. It was really a struggle to be in Canada without my mother's help. It was difficult to pay the rent, and financially we could not do it anymore. We decided to move back to the U.S., and our plan was to live in the Bronx.

6. We packed up all our things and were walking back to the United States when we were apprehended by border patrol about five hours away from New York City. A green and white car pulled over and stopped us. The officers immediately drove us to a police station. They put us in a room with a metal door and asked for our documents. They went through my paperwork and saw that I had a social security card, asylum paperwork, and a work permit that showed I had been working in the U.S. They asked me if I had money to pay to fly back to [redacted], and I said no. Then they spoke amongst themselves but didn't tell me anything or what would happen next.

7. We were then isolated in a room with a metal door for two days. There was a wall with small holes, and a camera on the top of the wall. There was an iron bench in one corner, and there was an open toilet in the other corner. There was nothing for the kids to do besides some coloring pages. We were not allowed to leave the room. They detained us on a Saturday, but they didn't allow us to shower or make a phone call until Monday. They gave us thin mattresses for sleeping on the floor. They only fed us once a day.

They gave us rice and spicy beans, and the kids got Pringles as snacks. My kids were very sad and traumatized. They kept asking me why we were arrested when we hadn't committed any crimes.

8. On Monday, three people showed up and drove us to an airport. I'm not exactly sure where we were in New York. They flew us to Chicago. We only know that because we saw a sign. From the airport, the three escorts drove us to a hotel about two hours away. We arrived at 2 a.m. and were only able to sleep for a few hours before we had to leave at 6 a.m. When we got to the hotel, the first three people that had been with us stayed in another room. Three new people arrived and stayed with us in the same hotel room. There were six of us—it was very odd and hard to be in a room with these strangers. The next morning, the three previous escorts drove us for two hours back to the airport and then flew with us to San Antonio. We then drove to Dilley. We arrived at Dilley on Tuesday around lunch time.

9. When we arrived, they did an intake and took us to our room. The next day they gave an orientation about the rules of the facility. They told us things like kids under twelve have to be with their parents at all times and that if there's a problem you can talk to a counselor. They did not tell us about our legal rights.

10. The next day, we met with four ICE agents and they had me sign a paper that said that under *Flores,* children are not supposed to be here for more than 20 days. That is the only thing I have heard about *Flores*. We have not been shown a video about our legal rights, and no one has given us information about my children's *Flores* rights other than that piece of paper.

11. I am worried about my children and feel overwhelmed. My older son has been biting the inside and outside of his hands due to the stress of being here. I see him biting and eating the skin on his hands all the time. It's constant. Even his little brother tells him to stop. You can see the damage on his knuckles from biting them. He has a lot of anxiety from being detained at Dilley. All of this started when he got here. He didn't have any of these behaviors before. They gave him a stress ball to help with the anxiety,

but it broke. We have been asking for three weeks to get another one. They have not offered him any other therapeutic supports.

12. There is very little for the children to do here. The list of recreational activities in the report you just read to me is a bunch of lies. I have never heard of children having jewelry box making, birdhouse building, Zumba, or crocheting—or anything on the list except for bingo. There is bingo once a week—but that is more for the adults. They have done bracelets, but I have only seen it as an activity for the adults. In the two months I have been here, they have never done a Zumba class. They always have a reason why it can't happen.

13. The kids can only play with a couple of games in the living area. They are not allowed to have anything in their rooms. They can't have a stuffed animal or blanket or anything for comfort in their rooms.

14. My children will not eat most of the food here. I try to force them to eat something, but it is hard. The food is not good for children. My seven-year-old has lost weight. I will buy food at the commissary like ramen noodles, cereal, and saltine crackers so that my children have food at night. Dinner is at 5 p.m., so by 8 p.m. they are already hungry.

15. We don't drink the tap water in the rooms. I tried it and didn't like the taste—so we buy the bottled water. The tap water just doesn't taste right to me.

16. At 8 p.m., they turn off the back lights in our room, but they leave on the rest of the lights all night. That makes it really hard for my kids to sleep. It takes so long for them to fall asleep—often until midnight. Before we got here, they were always asleep by 9 p.m.

17. I had a horrible infection in my eye that took multiple visits to the infirmary to address. It looked really awful and sometimes it would bleed. It was often painful. When I first went to infirmary, they just gave me eye drops. I went again a while later because my head was hurting, and they just wanted to give me Tylenol. I told them Tylenol was not going to address the eye issue, and I stormed out because I was

frustrated by the lack of medical care. Later that day, I went back to the infirmary for a third time with a supervisor and then they finally gave me antibiotics. It took me about four weeks to get the medicine I needed. After 8-9 days with the medicine, my eye infection finally resolved.

18. The next day, they told me that the nurse had written up a report on me because I stormed out of the infirmary. Her report states that I made a rude comment about her, but that is not true. They told me that because of my behavior I couldn't shop at the commissary for a week as punishment. I asked them if there was audio of me saying the word, and they said the audio on the cameras was not working. I think they have audio, but they just didn't want to listen to it. I was really surprised that they would do something like that when it meant taking food away from my children.

19. Other than the five-minute phone cards we got when we first arrived, there are no free phone calls for my children to speak to their family. No one has ever told me that we could request free phone calls.

20. If I need to speak to my lawyer for something quickly, I have to pay for it. Otherwise, the lawyer has to set up a call in the visitation offices. There is no way for me to place a call to my lawyer for free.

21. This place is not okay for any child. I see what it is doing to my children, especially my older son, and it is awful. I see the toll it takes on them. We are at the point where they just have a small triangle of places they can go. We go from our room, to the cafeteria, to the school—over and over like a triangle. It is so hard on them to be stuck here and to not be able to go anywhere or do anything. It's just the same boring routine day after day.

22. I hope we can go back to New York City. We had built our lives there, and my children need to get out of here.

I declare under my duty to tell the truth and penalty of perjury that to the best of my knowledge, all the information I have here given is correct and complete and I understand the legal consequences of testifying falsely to the authorities. Executed on this 14th day of July 2026, at Dilley, TX.

[redacted]

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: 7/14/2026

Diana Cano

EXHIBIT 20

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, L[redacted] Z[redacted], declare as follows:

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

2. I am 41 years old. I am from [redacted].

3. I speak [redacted].

4. I have been detained at Dilley for 45 days with 17-year-old and 14-year-old daughters during this most recent detention, though this is the second time ICE has detained us at Dilley this year.

5. In February 2025, the government detained us in CBP for two days and then sent us to Panama, which is not a country we have any connection to. We reentered the United States in October 2025, and ICE detained us at Dilley. ICE detained us here for 120 days, from October 26, 2025 until February 24, 2026. On February 24, 2026, ICE released us from Dilley.

6. After being released from Dilley in February, we continued to go to ICE check-ins in California. My daughters started going to school again in California. My older child was in high school, and my younger child was in middle school. Both of my daughters like to learn. Since being detained here, my daughters miss going to school and their friends. The semester is about to start, and they are anxious to be able to study.

7. Four months after ICE released us from Dilley, we had our second scheduled check. This was our June 12 ICE check-in. We were at the office, and they said we had to sign something. Then, ICE detained us again. Two officers arrested us, and then we stayed in the office a little bit. We were surprised that what we thought was an appointment ended up with us being arrested. We did not know why.

8. For one day, ICE kept us in a motel room by the airport. There were two guards in the room with us the whole time.

9. Then they sent us to Dilley, and we arrived in the middle of the night. We have been here ever since.

Dilley ICE Detention Center

10. When we arrived at Dilley the second time, they had us sign papers about *Flores* that said we cannot be detained for more than 20 days without a hearing. There was a lot of paperwork, because they had each of us sign. We were allowed to keep one copy.

11. We have never seen a video about *Flores*, and no one talked to us about *Flores* rights besides what the paper said.

12. No one told me anything else about *Flores*. But I researched it myself on the computers in the library.

13. No one who works at Dilley has told me about my daughters' rights to release from Dilley without me. A lawyer mentioned it to me though. I do not really know what to think about it. I am just waiting for my lawyer to tell me more.

14. We asked an ICE officer why we are still here after more than 40 days, and they just said, "There's nothing that can be done." We do not know when we will be released from here.

15. No one has mentioned anything about an individual release hearing.

16. It feels worse being here than it did last time we were here. We feel like we have been lied to and tricked. It feels horrible. It just feels like a lie because ICE said we had all these rights, but once they brought us here, we did not. They just lied and violated my daughters' rights.

17. My daughters just really want to leave. It's very sad. The older one cries a lot.

18. We are not used to the extreme temperatures in the environment here. It is so hot outside in the Texas summer, but then inside they blast the air conditioning, and it is too cold. So, we have to choose between being too cold and too hot.

19. Even though we have blankets, my daughters cannot sleep at night because it is so cold. It was so cold that my younger daughter had a fever yesterday. Although we have clothes that keep us a little warm, they still are not warm enough to keep us warm inside our room.

20. We have enough clothes, but not enough shoes. We filled out paperwork asking for more than one pair of shoes for both of my daughters two weeks ago because both of theirs are broken, but we have not received any new shoes.

21. I go to the doctor here a lot due to a longstanding scalp and rash issue that I was able to control before I was detained. Some of the doctors here are not good. I've gone to the medical staff asking for treatment, but the nurses did not give it to me and told me I should just wash my hair. The condition got a lot worse. I kept having to go back four times, and the last time, I was crying before they were willing to prescribe the medication to me.

22. Then, the staff ordered the medicine, and I had to wait for five days to get it. Now, I have to wait in the pill line each day during the day to get that medication.

23. We got DNA swab tests at the ICE office in June, and then they did it again when we arrived at Dilley. The staff said they are doing it to make sure everyone is biologically related at Dilley.

24. We have to buy water from the commissary because the water here tastes horrible. We have stayed away from the water since we got here. I cannot describe what it is like; there is just this awful smell. So, for the over 160 days we have been at Dilley, we have always bought water.

25. The food here tastes bad, too, so we buy ramen from the commissary to eat. It has not changed since the last time we were detained. My children are not able to eat enough food here. My children feel hungry every day. They always try to eat a little bit right before bed because they are too hungry otherwise.

26. It is so expensive to purchase all of this. Every family needs to buy water and food to survive. Some families who cannot afford it get friends to share food with them.

27. We have to pay for phone calls here. The money that gets put on our commissary account also goes to calls. I call family in the United States. You can make international calls, but I only make calls within the United States because it is so much more exorbitantly expensive to make international calls. One of the families that stayed in the

same room as me had no money to call their family. I lent them money so that they could stay in contact with family members who are not here.

28. I can call the attorney at RAICES for free, but I have to pay to call my attorney in California.

29. The computers here have a translation program, but the program can only be used once a day, so if you are not in the first group of people to use it, then it cannot be used. This is so frustrating, because it means we are blocked from communicating in writing via email a lot of the time. We also cannot sign in to Gmail because it requires two-factor authentication. So, we try to use Atomic Mail. I cannot tell if my messages ever aren't sent to my lawyer or family.

30. There are a few workers who will use their phones to help translate. But most of the staff here will not. For the most part, I do not communicate with people here because of that. If I know I have to speak to an ICE officer in the future, I will plan to use the computer first thing 24 hours in advance to translate what I have to say.

31. The doctors will provide interpretation, but the other staff will only do it if there is something urgent they want to say to me.

32. My daughters cannot communicate with anyone here either.

33. They cannot go to the school because of the language barrier. They give out worksheets in our language, but that is it. My daughters do not go to school because of this, but they really want to go to school if they get out.

34. This language isolation makes them very sad. It's really lonely and oppressive. It's not even just that they cannot speak, but the little English they know is not useful a lot of the time, because the other people detained here mostly speak Spanish.

35. This is even lonelier than last time, because last time there were more families who spoke our language. Now, very few people speak our language, and the others only have small children.

36. A few of the staff could not care less about us. It's in their mannerisms. They show us by how dismissive they act that they think they are superior to us. It makes my daughters really unhappy to be treated like that.

37. I have seen a few staff who seem to retaliate against other people. For example, sometimes when children want to do activities, those staff will just take things away, so we try not to interact with the staff who do that.

38. I have heard about families being separated.

39. We have never filed a complaint here. No one explained the process to us, and we do not think we can because of our language. We do not know how we would.

40. I have never interacted with anyone who works for ICE who is asking me about conditions.

41. There are no recreation classes or organized activities for birdhouses or Zumba. My daughters are really bored and just want to leave. They always ask me, "When can we leave?" This is what's making my older daughter cry so much.

42. There are counselors, but they cannot really help. They force us to go see them once a week, and if you do not go, the staff will keep calling you and telling you to go. So, we go, but it is not helpful. The sessions are just about five minutes. Then, they just keep asking us to take antidepressants.

43. We have to buy shampoo and soap here. The staff have never told us there is a way to get those items for free. It costs us five or six dollars to buy shampoo here.

44. The bathroom stalls are so dirty that my daughters refuse to go. I have to go into one stall and clean it myself before they will go. So, each time before anyone of us uses the bathroom, the three of us will use that one cleaned stall.

45. Dilley has not changed since last time we were here, except that the bathrooms are dirtier. We are just so sad to be back.

46. My daughters want to go back to California and continue to learn English.

I declare under my duty to tell the truth and penalty of perjury that to the best of my knowledge, all the information I have here given is correct and complete and I understand the legal consequences of testifying falsely to the authorities. Executed on this 29 day of July 2026, at Dilley, Texas.



CERTIFICATE OF TRANSLATION

My name is Theresa Cheng and I swear that I am fluent in both the English and [redacted] languages and I translated the foregoing declaration from English to [redacted] to the best of my abilities.

Dated: 07/29/2026

Theresa Cheng

EXHIBIT 21

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, A[redacted] C[redacted], declare as follows:

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

2. I am 28 years old. I am from [redacted]. I have been living in the United States for almost nine years. I have four children, ages ten years old, seven years old, three years old and two months old. My three younger children are U.S. citizens, and my ten-year-old daughter has lived in the U.S. since she was one.

3. I speak Spanish.

4. We had been living in San Antonio, and my children were doing well. My ten-year-old was in 5th grade, and school was going really well for her. She's very smart. Her favorite subject is math. She also likes skating and playing games with her siblings.

5. Before we were apprehended a month ago, I was busy taking care of my infant and my other three children. I was having a really hard time with being postpartum. I was crying a lot, getting really emotional, and having a lot of mood swings. It was a really hard time for me. I told my partner I needed help, and I wanted to go to South Carolina to be with my mom. My partner became very upset with me and worried, and he called the police. I don't know exactly what he said because he was speaking in English. When the police came to our house, they asked for my passport. At first, the police officer said he would not do anything because I had a four-week-old baby, but then he came back from his car and said he had to arrest me because of my immigration status.

6. The police took me to prison by myself. It was excruciating to be separated from my children and especially my baby. No one asked if they could help me physically with that sudden separation from my baby. I was imprisoned in a jail for four days. Eventually, they made me pay $2500 to get out. After that, they returned my possessions to me and put me in a room by myself to wait for ICE.

7. When ICE arrived at the jail, officers handcuffed me around my wrists, waist, and feet like a dangerous criminal. Then they took me to an ICE facility at around 5 a.m. I asked about reuniting with my children. They told me that only my oldest daughter could

be in immigration detention because my other three children are U.S. citizens. I told them that I wanted my ten-year-old daughter brought to me because I was worried they would deport me without her. Since she is not the biological child of my partner or a U.S. citizen, I was worried about what might happen to her if I was deported. Around 2 p.m., they brought my daughter to me, and then we left around 8 p.m. to drive to Dilley.

8. We have been detained at Dilley for 36 days. It has been horrible. I have been going through this awful process, and they don't give us answers. They just say we will be deported.

9. When we got here, they took us to the intake area. They took my daughter's clothes and her two bags of personal things. They gave my daughter a pregnancy test, which really scared her. She is just ten years old. Then they brought us to our room.

10. I think the pregnancy test really affected my daughter because she still asks me about it all the time. She asks me, "Mommy, why did they make me take a pregnancy test when I'm just a little girl?"

11. They did not tell us much of anything about my daughter's rights. They just said we could talk to an attorney. They gave us a piece of paper that I think was about *Flores* that said that kids couldn't be here for more than 20 days. They had us sign it. I didn't really know what it was about.

12. They have not shown us a video about our immigration rights or given me a resident handbook.

13. ICE has told me that they would deport me. I have told ICE that if I have to leave, I want all my children to come with me, but they don't have passports. I don't know if that is why they haven't deported me yet. They don't tell you anything here.

14. When my daughter first got here, she thought we would just be here for a short amount of time. She started going to the school and, at first, she seemed like she was doing okay. But about a week ago, she came home from school and was really angry. I asked the teacher how she was doing at school, and the teacher told me she was very sad and depressed a lot of the time. The teacher said she thought being here was affecting her.

15. My daughter says she is sad because she doesn't want to be here. She has become very quiet and reserved. She has mood swings and also gets upset and mad easily. She doesn't want people to talk to her, and she gets offended by small things. She just doesn't want to be here.

16. I took her to the psychologist here because of these behaviors. All the psychologist said was that she needed to read and write about how she was feeling. But my daughter didn't want to write about how she was feeling. She doesn't want to go back to the psychologist.

17. The food here has too many condiments and is too spicy for kids. Kids also need variety in their food, or they get bored with it and won't eat it, but here the food is always the same.

18. Around the first ten days of being here, my daughter started getting stomachaches and diarrhea. I don't know why, but everyone here is getting stomachaches, and some kids have been throwing up. My daughter has been having diarrhea and stomachaches regularly.

19. About six days ago, my daughter basically stopped eating. She said she didn't want to eat because it made her stomach hurt. I have been trying to get her to eat rice and salad, but she just won't eat anything. She won't eat a sandwich. She won't even eat the ramen from the commissary here. She just doesn't want to eat at all. It is so hard to watch your child deteriorate like this. I am so worried that being here is causing her serious mental distress. She doesn't want to play or do anything.

20. It's also hard for my daughter because she has never been separated from her three siblings before. It is so hard for all of us to be apart from one another. I don't sleep. I just never imagined this could happen.

21. I have taken her to medical, but all they say is that she needs to eat.

22. It's hard for families because the lights are always on. Another mother told me that her three-year-old with autism can never sleep because the lights are always on. In the beginning, I tried to put a towel over my face, but they said we couldn't do that.

23. At first, when we arrived, my daughter could sleep more, but then she started waking up a lot. I think she has developed a sleep disorder. Sometimes she will have trouble sleeping, and other times she will have trouble getting up. She is not regulated anymore. She also just seems weak—probably from not eating or sleeping well.

24. We have to buy water here. The tap water here hurts our stomachs. One time they brought in a tank of water. We saw something greenish around the inside and around the spout. It looked like something dirty. When we told the guards about it, all they did was dump out the water and put in more water without cleaning the tank. That could be the reason all of our stomachs are hurting

25. My daughter's skin has been really messed up and bumpy since we got here. It itches and irritates her a lot. I took her to medical, and they gave us a cream, but it doesn't help her.

26. My daughter has to pay for phone calls to her family. When we first arrived, they gave my daughter a three-minute phone card and me a five-minute card, but that is it. Since then, she has had to pay for calls.

27. I try to keep my distance because I don't want any problems here, but other families tell me the guards have said they're going to hit their kids. A lot of the moms with younger kids have had problems because the guards here just don't have the patience to work with children.

28. There's not much for my daughter to do here other than the school. They just have some balls for her to play with, but that's about it. Outside of school, there is not really anything to entertain her.

29. It's so hard for kids to come here and not have their stuffed animals and their beds and their things. They get used to having these things to feel safe. When my daughter was at home, she had lots of stuffed animals and toys. She would skate, and she had squishy toys. She can't have any of that here.

30. My daughter is really quiet, and only I can read her emotions. When she's happy, I can tell, and when she's sad, I can tell. At this place, she just cries and cries. I am so worried about her and all of my children.

31. For adults, we can handle a place like this. We can endure it. But for a child—this place is just so bad for them psychologically. They just want to go home.

I declare under my duty to tell the truth and penalty of perjury that to the best of my knowledge, all the information I have here given is correct and complete and I understand the legal consequences of testifying falsely to the authorities. Executed on this 6th day of October 2026, at Dilley, Texas

[redacted]

CERTIFICATE OF TRANSLATION

My name is Zara Escobar 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: 10/06/2026

EXHIBIT 22

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, W[redacted] T[redacted] P[redacted], declare as follows:

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

2. I am 10 years old. I am from [redacted].

3. I speak Spanish.

4. I have been detained at Dilley for a long time—more than a month. I am here with my mom and my eight-year-old brother.

5. We used to live with my aunt in Utah. We were there for almost two years. I loved living in Utah. I loved my school and my friends. I love going to the pool. We had a good life in Utah, and I really hope we can go back.

6. When my mom was arrested by ICE, we were at home with my aunt. It was really scary. Our family helped us pack bags and then explained what was happening and what I should say when I got to the ICE office with my brother to meet my mom. It was a lot of responsibility. We walked into the ICE office just the two of us, because my family was very afraid. I had to know all of our information, like our names and birthdays and my mom's information. My little brother is more shy than me. And I am the big brother, so I was in charge of making sure we were able to find my mom. I even carried my little brother's backpack and my own backpack.

7. We felt a lot better when we were with my mom again. We were all taken to Dilley together by plane.

Dilley

8. We arrived in the middle of the night, I think around 2 a.m. Then we were in the first intake area for hours. The only video showing was *Bluey*—just *Bluey* the whole time. We were so tired.

9. Finally, we got to our room and lay down in the beds. But then they woke us up very quickly. It was really scary, and my brother and I were crying a lot.

10. I have a dry cough every night. It's really bad. We went to medical, and they gave me a pill and a nose spray. The cough is still the same, so I don't think it's helping.

11. Things are better and less boring since I made some friends here. But when friends leave, then it becomes boring again.

12. I really don't like the food here. I don't want to eat. I think I'm losing weight. The food I miss the most is pizza and *salchipapa*, which is like salty, crispy French fries with chicken or other things on top. I also miss [redacted]. The food here is not good.

13. They did have a party on July Fourth, and they gave us better food that day. But all the other days, it's the always same food, and it's not good.

14. I don't like going to the school because the teacher is not very nice to me or my brother. She's always yelling at us. And we just get worksheets, and we have to just sit there and do them on our own.

15. The day of the [redacted] in [redacted], my mom and brother and I were on a deportation plane going back to [redacted]. I really did not want to leave the United States, but I talked a lot with my mom and was trying to be strong and find the positive side of things. So, I had gotten myself to look forward to seeing my grandparents and other relatives there, even though I was so sad to leave my family and friends in Utah.

16. Then when we were almost in [redacted], they told all of us on the plane that they could not land because there had been an [redacted]. They said [redacted] were [redacted].

17. I was so afraid, and I was full of so many different emotions. I had been excited to see my family, but also really sad to leave, and now that flipped. I was sad not to see my family in [redacted], but so hopeful that now we were going back to the United States.

18. Then they took us back to Dilley. I was so disappointed! I had thought they would take us back to the United States and let us go home to Utah, and I would be able to go back to my house, so I had been excited. But we were taken back here instead. At the same time, I knew Dilley was safer than [redacted] in that moment because of the

[redacted]. It was like a storm of feelings. I don't like it here, and I want to go home to Utah and be free. But I am also happy to be alive.

19. I hate being locked in here. I don't get any information about what is happening outside of here. We only get small pieces of information from time to time. You can't see anything on the computers if you want news. They just sometimes have news that pops up on the TVs. We don't have our phones, and we can't learn what is going on.

20. I want to stay here in the United States and go home to my life in Utah. There is nowhere else for me to safely be.

I declare under my duty to tell the truth and penalty of perjury that to the best of my knowledge, all the information I have here given is correct and complete and I understand the legal consequences of testifying falsely to the authorities. Executed on this 15th day of July 2026, at Dilley Tx.

[redacted]

CERTIFICATE OF INTERPRETATION

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

Dated: 07/15/2026

Rebecca Wolozin

EXHIBIT 23

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, J[redacted] O[redacted], declare as follows:

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

2. I am 34 years old, and my children are seven, five, and three years old. My two older children and I were born in [redacted], and my younger son was born in [redacted].

3. I speak English and [redacted].

4. We have been detained at Dilley for about 25 days. We have been in the U.S. for almost two years. We lived in San Diego for about two months and then moved to San Antonio. It was a little difficult to get work papers, but once I arranged that, we were doing well. I was working in the quality assurance division for a call center. My kids were feeling happy at their school and preschool. Our church helped us feel connected to our community. Between my job and the kids' school, we were finally feeling settled. My children and I have been through so much, and this was the first time in their lives that they had lived in the same place for a year.

5. Then about a month ago, my children and I went for our second ICE check-in. We arrived at 7:30 a.m. for an 8 a.m. appointment. We waited at the office for about four hours. Once it was our turn, the ICE officers told us we were being detained. Then, they kept us isolated in an ICE office for about 12 hours. My children were upset and crying. My daughter was crying over and over that she wanted to go home. My children were also scared because they saw men shackled in chains. They had never seen that before. They asked the ICE agent if they would have to be chained up.

6. They finally drove us to Dilley around 1 a.m. There were men in shackles in the back of the bus, which was upsetting to my children. When we arrived at Dilley, they would not let us into the facility for a couple of hours. We all had to wait on the bus. I don't know why.

7. They let us in Dilley at around 3 a.m., and we went through their intake process. We filled out some paperwork, and the staff did an inventory of our clothes and property.

We took showers and were given new clothes, shoes, linens, and towels. Then, we were taken back to our room. All of that took about two hours.

8. The next morning, they gave us some papers to read. One paper said something about *Flores* and that my children would be able to see a judge. The other paper was something they gave me to sign about the first paper. This was the only orientation that we had. We were not shown a video about my children's rights or immigration. My friend told me that children have the right to be released after 20 days, but no one here has talked to me about that.

9. When I first arrived, ICE tried to give me a DNA test, but I refused. They said it was to ensure that these are my kids, but I said, "I already know these are my kids. I don't need a test for that."

10. When my kids first arrived here, they were very confused. I had tried to explain to them about immigration detention, but they were debating whether this place was a prison. When they saw the high fences around the edges of the facility, my seven-year-old said: "Oh, we are definitely in a jail." My daughter thought the same. But then they would say, "But we don't have to wear orange jumpsuits or have chains on our legs," and they noticed there was a library and a playground. It was very hard for them to process this place and that we couldn't go home.

11. At first, my kids were excited about the food here because it was different from what we have at home. They don't get things like chicken nuggets at home. I make them fresh food. But they soon started refusing to eat the food. My kids don't want to touch the food at all now. I don't really know why. When we start getting close to the cafeteria, my three-year-old will say: "What is that smell?" That's when I know he's not going to eat.

12. The limited windows for the meals may also be part of the problem. If the kids don't want to eat when the meal is served, there is nothing you can do because they don't let you take food out of the cafeteria for later. My kids say the veggies taste weird. At home, I would find ways to mix or hide the vegetables in other foods, but that's not possible here. Sometimes my kids eat the canned fruit, but sometimes not. In our house,

we always had a lot of fresh fruit in the fridge, and my kids would snack on it. Here, the only option they have is a red apple. They won't tell me why they don't want to eat the food; they just don't eat it. A lot of the time, they won't touch the food on the tray, and they will want to go right for the peanut butter and jelly. I don't want that for them every day.

13. I notice that a lot of the food on the trays goes directly in the trash.

14. We don't drink the water here. I don't think the water here is really filtered. I don't see anything blinking on the filter to show the water is okay like the one we have at home, and I have never seen them change the filter. We are not going to drink it. We only drink the bottled water here. Most people here mainly drink the bottled water.

15. It has been hard to sleep here with lights that stay on all night and the loud sounds from the AC going on and off all the time. In our house, we always had lights out at night. Here, you can't do that. I try to wear my children out before bed. If I'm not able to tire them out, they will want the TV on until late and cry when we have to turn it off.

16. I have seen behavioral and emotional changes in all of my children since coming here. My five-year-old and three-year-old both started wetting the bed frequently. They have been potty trained for a long time, but they started bedwetting after three days here. It was extremely hard because they would not let us wash the sheets here. You can wash your clothes, but not the sheets and towels. You have to wait until the laundry service comes each week. If you want to clean your child's dirty sheets, you have to sneak into the washing machine area and wash the sheets without anyone seeing you. After my children repeatedly wet the bed, I requested pull-ups from the guards, but they told me that all they had were diapers. I told them that diapers were not okay for older kids.

17. Finally, I went to medical and told the doctor I was worried about the changes in my children's behavior. I said that my children had started wetting the bed since we got here. Eventually, the doctor said they would place an order for pull-ups. The doctor said this was a special accommodation and that I should not tell other people about it. Medical gave me two packs of pull-ups. My kids are still struggling with bedwetting a few nights

per week, but now they are wearing pull-ups. My children don't want to talk about the bedwetting.

18. My daughter also started sleepwalking since we got here. One night, she left our living area and walked out the door in the middle of the night when I was asleep. It was probably to use the toilet, which is down the hall in another building. She didn't make it to the toilet. She peed herself, and got disoriented and went into a different room. The guards found her in that other room around 1 a.m. She had climbed up a different bunk bed and fallen asleep. Since that night, I try to stay awake most of the night until 1 or 2 a.m. so I can take her to the restroom again during the night. I have a hard time sleeping until then.

19. I'm also concerned about my seven-year-old's behaviors since coming here. He's getting very upset about every little thing. He used to get over things quickly, but now behaviors linger through the whole day. He's also having more conflict with children—maybe because of the lack of structure and children not being able to communicate with each other. He also started using bad words like the f-word and cussing us out. This is not something our family has ever done.

20. It's also not been going well for my three-year-old. Before we got here, he had been going to preschool, but now he can't go because the school here does not allow his age. He gets very upset each day when we drop my older children off at school and when we pick them up. Each day he has tantrums and cries because he can't go to school. It's been really disruptive for him.

21. My older children like going to the school, but the classes are really not at their level. My children learn quickly, and this school is much easier than what they're used to at home. It feels like my daughter is going backwards. At her school, she was reading and doing math. Here, they are just learning their letters.

22. The hygiene products here are terrible. When you arrive, they only give you a small bottle of body wash that just lasts a couple of days. After that, they expect you to use the foam hand wash in the restrooms unless you want to buy hygiene products from

the commissary. They say you can get more of the little bottles, but it is very difficult to get any. The foam wash is fine for washing your hands but not for your body. It is hard for us because we have sensitive skin, and most of the products here don't work for us. We had to go to medical to get unscented soap for my three-year-old because he had bad eczema and was getting rashes. Medical eventually gave us some unscented soap and a small amount of petroleum jelly in a little cup. To get more petroleum jelly, we had to go to medical every day to get the little cups refilled. We eventually started buying it from the commissary.

23. The towels and washcloths are old and dirty looking. They are super harsh on your skin because they have been used so much. They just keep recycling the same washcloths and towels, and they don't seem to get clean anymore.

24. It takes a long time to get clothes and shoes here. They say you get two pairs of shoes, but for most of our time here, my children only had one pair. With all the rain, their shoes were broken and soaking wet. I requested new shoes several times, but it had been days, and we had not gotten them. We didn't want to go to the cafeteria with wet shoes, so we wore our flip-flops. The guards at first said they were not going to let us go in because we weren't wearing the regular shoes, but then one said we could. I said we didn't have shoes to wear because they were too wet. After the meal, a guard went to my room and told me I was getting a report for not wearing our shoes and that I was not allowed to go out again without wearing them. I explained that I had put in a request days before but had never received them. Later that day, we finally got the shoes.

25. When my children first arrived, they were given a three-minute phone card, but since then they have had to pay to make calls to our family.

26. I am not able to access my Gmail account here. It's a restricted URL. We are not permitted to access most public websites.

27. It's been hard for my kids to be locked up here. At home, we would go to church, or to different fairs or to playgrounds with splash pads. My children also loved listening

to music and playing their instruments. They can't do any of that here. Now they're just glued to the TV at night.

28. You can see the sadness on the kids' faces here. They will cry when they see their friends leave. They don't understand why some kids get to leave and they cannot. They also see the sad faces of their parents, and I know that must be hard for them.

29. We really want to leave this place. It's not fair or okay that we have been detained here against our will. We have lost everything. I lost my job; we haven't been able to pay our bills. I am worried we could lose our apartment because I can't pay for it. We would have lost our car if my friend hadn't been able to get it from the ICE office parking lot. I keep focusing on what we can do to put things back together again, but when we leave here, we will have to start from scratch.

I declare under penalty of perjury that the foregoing is true and correct. I understand that I have to tell the truth in this declaration. The interviewer read the declaration to me and everything in it is true and accurate. Executed on this 3rd day of November 2026, at Dilley, Texas.

[redacted]

EXHIBIT 24

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, J[redacted] M[redacted] O[redacted], declare as follows:

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

2. I am 33 years old. I am from [redacted].

3. I speak Spanish.

4. I have been at Dilley for 15 days, but I have been detained for longer than that. I am with my son, [redacted], who is three, and my daughter, [redacted], who is five. My son was diagnosed with autism before we arrived at Dilley.

5. We were living in Utah before all of that.

6. I was arrested and put in prison for six days for not having car insurance. I was not with my children during that time.

7. An ICE officer came, and I explained that I have children and want to be with them. ICE told me that my children and I would go to a hotel for one day and then be deported to [redacted].

8. At 6 a.m., my children arrived at an ICE office in Salt Lake, and I was brought there to meet them. We were there until 2 a.m. the following morning, almost 24 hours later. Then, we got in a van. The officials told me we all had to eat. I explained that my kids were sleeping now and would not eat. The van took us straight to an airport, not a hotel. The ICE officer told me then that we were going to some type of shelter.

9. I started to have a panic attack at the airport. My daughter was white and trembling. My son was screaming. I'm trying to control two little kids who have barely slept, and we don't know where we're going.

10. I asked the officers if they could treat me with respect. I told them I need to know what we're doing and where we're going. I said I can't be running through the airport with no information. My son was stimming, and it was difficult to calm him down.

11. One officer said to me, "You don't need to know what we are saying."

12. When we finally got on the airplane, we didn't know where it was going. I had no clue.

13. As we were landing, one officer finally told me about this place, but another officer told him to stop talking to me. He just said we'd be treated okay, have clothes, and other children would be there. That was all he said.

14. When we landed, I knew we were in Texas, but that was mostly it.

15. I asked if I could call my husband, who was in Utah, and was told no.

16. We got in a car at the airport with a woman. She worked for a foundation that transported people from place to place, but she was not an ICE officer.

17. She told me I couldn't speak to my husband until I arrived at Dilley and asked me to stop asking that question.

18. The only thing she cared about was that we ate. That was it.

Dilley ICE Detention Center

19. When we arrived here, everyone said we're going to be okay; we'll have food and be able to rest and bathe.

20. I explained immediately upon arrival at Dilley that my son has autism. One of the things he needs is melatonin at night in order to sleep. If he doesn't sleep, his stimming and other behaviors can get worse. It took five days for him to receive melatonin.

21. I also take medicine for anxiety and depression. I had my medicine with me and explained that to them, but they would not give it to me. After five days, I finally got it.

22. The weird thing is I only got my medicine after I asked in a very mean way. The people here do not respond to kindness and respect.

23. My son has regressed so much here. He doesn't talk anymore. He used to talk before coming here. There is no therapy here for children with autism.

24. Before Dilley, he attended therapy at a place called [redacted]. They practiced speaking, following instructions, and other stuff like that. Now, he gets no therapy.

25. He is biting other people now, especially me. He is crying a lot. He is hitting. This is unusual behavior for him.

26. He can't sleep because of the lights being on all night. It will be three in the morning, and he's awake. He can't sleep well here.

27. One officer lets me put up something to block the light for him at night, but then another officer comes and takes it down in the middle of the night.

28. My son is lactose intolerant. When we arrived, I informed the people here of this. They said we don't have non-lactose milk, but we can buy it. To this day, I still haven't received lactose-free milk.

29. I have to distract my son every single day. There's nothing to do. We go to the park, but that's basically it. There is no school or daycare for him.

30. Every day there is something that negatively affects him. An officer is always telling him: stop this, be quiet, don't drink too much. It makes it worse.

31. I can't even go to the bathroom in the middle of the night when he's sleeping.

32. One time, an officer told my son to sit and play quietly. I explained that he has autism, and the officer said, "Oh, so now everyone has autism," because another child had recently arrived with autism.

33. The officers here don't treat the children well.

34. The officers don't have any information or knowledge on how to treat kids with autism.

35. I wish there was a way here to have him wear a certain color or something so that all the staff knew he had autism and could treat him with a bit more patience.

36. In the rooms too, he should be able to sleep with a sheet over the light.

37. They told me I'd get headphones for my son, but we've never received them. When there is a lot of sound, headphones would definitely help him.

38. The doctor wanted to do an x-ray on him when we first arrived for some reason. They wanted to ensure he didn't come here with some sort of illness. He didn't need one though, and I explained he won't sit still through one. It was two days of trying to do an x-ray, and he was very stressed the whole time.

39. The staff here are not equipped to deal with autistic kids.

40. Also, my son will only wear Crocs as shoes. He won't wear anything else. It took two days for us to receive Crocs, so he was just shoeless for two days.

41. There is not clothing for my son's size. For my five-year-old daughter, the clothes are either too big or too small for her. Her feet also hurt because the quality of shoes is very bad.

42. We received a little shampoo when we arrived, but that was it. Now, we have to buy it.

43. The water we also buy and it's not free. The tap water is not good. It has a filter, but it's not good.

44. My daughter is not doing well emotionally. She is seeing people yell and fight at each other, and she doesn't know how to handle it.

45. She keeps asking me if we'll see the same blonde woman again when we leave because she is scared of her. The blonde woman is the one who brought us to Dilley.

46. The officers are always angry at the kids. They're always saying we are breaking the rules.

47. I received a handbook about my rights. It says when you are sleeping, the officers will pass with flashlights to see if everything is good. That doesn't happen. The lights are just on all the time.

48. The book also said there would be a translator when needed. This doesn't happen either.

49. The book doesn't mention *Flores*.

50. No one ever told me I can't be here for more than 20 days.

51. When I ask my assigned ICE officer, Officer [redacted], he just says I have to wait longer and thanks me for my patience.

I declare under my duty to tell the truth and penalty of perjury that to the best of my knowledge, all the information I have here given is correct and complete and I understand the legal consequences of testifying falsely to the authorities. Executed on this 07 day of Oct 2026, at Dilley, TX.

[redacted]

CERTIFICATE OF TRANSLATION

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

Dated: 10/07/2026

EXHIBIT 25

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, Y[redacted] D[redacted], declare as follows:

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

2. I am from [redacted] and speak Spanish.

3. I have been detained at Dilley for 22 days with my fourteen-year-old daughter and my husband. My daughter was in eighth grade and doing well. She was speaking English very well and was happy in school and hanging with her friends.

4. We had been living in San Antonio for a year and six months. We entered through CBP One. When we switched addresses, we missed a court date because they moved up our court date by a year, and the information did not come to us. At that hearing, the judge closed our case and issued a deportation order for my husband. We were not aware of this until my husband applied for work authorization and it was denied.

5. We had been going to our ICE check-ins each month since we arrived. Then my husband had an ICE check-in on September 15th. We went to that check-in, and they detained all of us. We got there at 7:15 a.m., and they kept us in the office until 11 p.m. They gave us a piece of paper that said we had missed a court hearing, gave us a $5130 fine, and said we would be banned from re-entering for ten years.

6. When we left the ICE office to get on the bus, they handcuffed my husband and chained him around the waist. He was a police officer back in [redacted]—I would have never expected to see him treated like that here—like a criminal who had committed a horrible crime. He was handcuffed like that from 11 p.m. until 5 a.m. All the men on the bus were chained and handcuffed the same way. Some of the women were handcuffed and chained, too. It was so uncomfortable for all of them. It was awful for my daughter and other little kids on the bus to see people chained up like that. My daughter kept asking why they were treating her dad and people like that.

7. They drove us to Dilley throughout the night because they had several other people to drop off at different facilities. It made the drive take so long. We finally arrived at Dilley at 5 a.m. Even though we were only about an hour from San Antonio, they drove

the families around for six hours with little kids sprawled out sleeping on chairs in the middle of the night. Maybe it was just bad coordination, but that really messes with your head. It feels like it was meant to torment the families.

8. During orientation at Dilley, they gave us DNA tests and had me and my daughter take pregnancy tests. I did not understand why they were doing that to my fourteen-year-old.

9. They did not give us a handbook of the rules or an orientation about my daughter's rights. They just told us the rules and showed us where we can go and can't go. They just said that my daughter can't be here for more than 20 days under *Flores*. They gave us a piece of paper in Spanish that said that but did not explain anything else.

10. I don't drink the water here. It tastes bad. Before coming here, I would drink water all day, but here I don't. I don't know where it is coming from or what happens with the filters. They won't let you fill up water bottles in the dining area, and they wouldn't let my husband take a bottle of water with him from the medical area. Everything here is so rigid with the rules.

11. They don't give the children fresh fruit at meals. They will give canned pineapple or pears. In the kitchens, there are red apples and sometimes a pear, but the kids get bored of them.

12. For several days, my daughter has been crying and crying and asking, "When are we leaving? When are we leaving?"

13. My daughter does not like the school. She went one day and did not want to go back.

14. My daughter is bored here. There is not much for her to do—especially since a friend she had made just left.

15. With the lights on all night, no one can sleep here. There are a lot of rules we do not understand. The beds are uncomfortable for the kids. At home, she had a computer and her own comfortable bed, but here she doesn't have any of her things or anything she likes.

16. My daughter has seen a psychologist two times here, but it was only for five minutes. The visits are always quick. I am not sure what they accomplish.

17. The first week here, we used the hygiene products they gave us, but it was not good for my daughter. She has really long hair. We have to buy shampoo, conditioner, and soap. We don't like the choices, but we have to buy what is available here. We didn't use the foam hand soap in the showers for a while because it did not clean us or work.

18. When we arrived, my daughter was given a five-minute phone card, but that was it. She has had to pay for calls to talk to family since then.

19. It's hard to be here for the kids. Parents try to keep them distracted, but you notice the depression and how hard it is for them to be here. Kids should not be here.

20. I've noticed such a change in my daughter. When we first got the news from ICE that we were being detained, she started crying and was so upset. Since we got here, it has just been harder and harder for her. She wants to go back to her school, get a hamburger, go to Walmart, or go to Starbucks. She is not happy here and just really wants to leave. It is so hard to watch this happen to her.

I declare under my duty to tell the truth and penalty of perjury that to the best of my knowledge, all the information I have here given is correct and complete and I understand the legal consequences of testifying falsely to the authorities. Executed on this - 7th day of October 2026, at - Dilley, Texas -

[redacted]

CERTIFICATE OF TRANSLATION

My name is Zara Esteban 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: 10/07/2026

EXHIBIT 26

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, D[redacted] L[redacted] R[redacted], declare as follows:

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

2. I am 38 years old. I am from [redacted].

3. I speak Spanish.

4. I have been detained at Dilley for 41 days. I have two sons with me. [redacted] is 14, and [redacted] is seven. They are both from [redacted] too.

5. My seven-year-old and I have been living in New York for the past four years. My 14-year-old has been with us in New York for just the past year.

6. We have been separated from my partner. We are not married, but he has been my partner for a few years. My youngest son sees him as his father. He is still in New York. That's where we were living before we were detained, but he wasn't detained.

7. My 14-year-old applied for asylum already, within one year of entering the U.S. My seven-year-old is in the process of applying for Special Immigrant Juvenile (SIJ) Status. Even so, ICE brought them both here.

8. I was detained at an ICE check-in in New York. I was called for an ICE check-in, like I have been every other year. This year alone, I went to check-ins in March and May. After those, I received an email saying I had to present myself with my kids on August 26, 2026, and that is when we were detained.

9. This was at Federal Plaza. We were at Federal Plaza from 6 a.m. to 11 p.m. without any food or water.

10. I wanted to call my partner to tell him what was happening at Federal Plaza, but they wouldn't let me.

11. My 14-year-old just wanted to text a family member that we weren't going to come back, and they snatched the phone from him, and he began to cry. They didn't let us tell anyone.

12. My seven-year-old just slept on the floor of Federal Plaza for most of the day.

13. At 11 p.m., we were put in a car, driving around for about two hours. All the hotels were full. That's what I understood, so we just slept a few hours in the car.

14. The next day, we took an early flight to Texas. There were two planes. It was a normal commercial flight.

15. We arrived at Dilley around 2:30 p.m. on August 27, 2026.

Dilley ICE Detention Center

16. When I arrived, I received instructions about this facility. It said who we can call, how to use the phone, that we can't misbehave, that we can file a report, how to get clothes, how to use the commissary, and stuff like that.

17. I signed something. The official said it was about our *Flores* rights. He said it applies only to the kids, not me. He said we couldn't be here more than 20 days under *Flores*. The paper was in English. I didn't even read it, but it did not look like the Exhibit 6 you're showing me now.

18. Everything I've signed here has been in English. There is no official translator; someone from ICE or CoreCivic just explains it to us.

19. One day, I was told I had court, but when I arrived, there was no court. They asked me if I would sign voluntary departure for money. I said no, but they kept trying to get me to sign it.

20. When I said no again, they said I would be forced to leave anyway, but that time without money.

21. I have been here for more than 20 days, and ICE just says we have to keep waiting.

22. I wrote to ICE on September 14, 2026, asking about [redacted]'s case, and they didn't respond until September 30, 2026.

23. In the chapel, we go on Fridays to talk to ICE. They always tell me the same thing: wait.

24. Some friends I have here asked why they are still here past 20 days, but ICE just says you have to wait more.

25. We went to court here 15 days ago and have another court appointment at the end of October. The Judge said, "I don't know what's going to happen in your case or if you'll be able to leave here, but [redacted] has to apply for asylum." So, we are in the process of filling those forms out for him. I'm not sure why we can't do that in New York.

26. The food is very bad here. My kids only eat out of hunger. The food is very processed and overuses condiments. My youngest only eats once a day. The food is the same every single day.

27. The water that is not from water bottles here gives us stomachaches, same as the food. We just take water from the bottles.

28. The officials here are also very aggressive. They don't have patience with the kids. The staff is always saying that the kids can't do this or can't do that.

29. My seven-year-old is biting his nails a lot. He is very anxious and very stressed. He doesn't want to be here.

30. An officer threatened to hit my seven-year-old the other day in the gym. [redacted] accidentally picked up someone else's hat because they all look the same here. The officer saw this and said, "You have to respect people's personal space, or I will hit you, and if that happens it'll be your fault, not mine."

31. The official also said, "Don't call me 'señora,' call me 'señora official.'"

32. My seven-year-old was afraid. He told me he didn't want to go to the gym anymore—that they just yell and threaten him there. I have tried to get him to go back, but he's too scared.

33. I did make a report against this officer, but I have not heard anything back about it. I wrote this grievance about two weeks ago, and I have not received any response.

34. I told one staff member here about what happened. He said the officials in Blue Butterfly, where we live, are not prepared to be around kids.

35. My seven-year-old does not sleep well here. He cries a lot. He cries for his dad.

36. The medicine here is Tylenol and Ibuprofen for everything.

37. My seven-year-old has a history of respiratory issues. He needs a machine that's like an oxygen mask and uses vapor to clear his sinuses and breathing. It's more powerful than an inhaler. They don't let him use that here.

38. He has had a really bad cough here. He's also had a fever and hasn't been able to run around or play. He needs to use this machine to clean his lungs, but they just give him Tylenol.

39. He still has a very bad cough.

40. Medical staff says he doesn't need this machine. They think what he has is just an allergy.

41. My 14-year-old says seeing the psychologist is a waste of time. If you say you're good, nothing happens. If you say you're bad, they put you on medicine. The only option is depression medicine, even though the cause of his depression is being here.

42. My fourteen-year-old has a doctor's appointment in December to check his foot after a surgery that he had. It's hurting him a bit, and I'm nervous we'll still be here by the time December comes.

43. The medical staff here know that I have a tumor on my arm and need surgery. It was scheduled for late September, but then I was detained. They have not told me about any plans to reschedule it here.

44. For 20 days, they just gave me Tylenol for my pain. Now, they don't give me anything anymore, but I still feel pain in my arm.

45. I was DNA tested here. They did this around the fifth day or so to confirm I was the mom of my kids.

46. I have heard some families are separated if the DNA is not a match.

47. It is not free to call my family from here.

48. Regarding the school here, [redacted] likes the robotics class, but he does not like the other classes because he isn't learning anything. As for [redacted] my youngest, he likes school.

49. Some kids have autism here. I try to help the mom with this child, but it's very difficult for her and for the child.

50. One mom across the hallway from me tried to put up a sheet to block the light from her kids, and the officials came in and took it down.

51. There's another woman here who signed voluntary departure on September 9, 2026, but is still here. She just wants to leave. She has her daughter with her.

52. [redacted] is always asking me when we will leave. I just say soon, and he says, "Tell me what day, Mom."

I declare under my duty to tell the truth and penalty of perjury that to the best of my knowledge, all the information I have here given is correct and complete and I understand the legal consequences of testifying falsely to the authorities. Executed on this 6 day of Oct 2026, at Dilley, TX.

[redacted]

CERTIFICATE OF TRANSLATION

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

Dated: 10/06/2026

Katherine Johnson

EXHIBIT 27

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, X[redacted] W[redacted], declare as follows:

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

2. I am 35 years old. I am from [redacted].

3. I speak [redacted].

4. I have been detained at Dilley Detention Center for 59 days with my husband and our two children. My daughter is 10 years old. My son is eight years old.

5. We crossed the border and were detained in San Diego, and then we were transferred here to Dilley in Texas.

6. We spent about a day in the border station in San Diego before being transferred here.

7. My understanding is that we have been detained here for so long because ICE denied our asylum claim, but we arrived without our passports. Now they are working to get travel documents for us in order to deport us. I don't know if they will be able to get them. They told us they will not be able to get us passports, but they are trying to get other travel documents.

8. I have a friend who was here for three or four months, and they couldn't get travel documents, so they finally released her. She is a mother with two children. Then they re-detained her, and she is here again with her children.

9. The language barrier makes life very difficult here. We mostly use hand gestures to express ourselves. A lot of people speak Spanish, and they can get their necessities much faster than we can.

10. Here, they only used [redacted] interpreters for introducing the rules and regulations of the facility on the first day, and if we go to medical. They also sometimes have some interpretation if we ask for some supplies we need. Other than that, we don't get interpretation. We can understand only a few basic daily things in English.

11. The other day, I was asking for shoes. They told me they would give me the shoes the next day, but it took four days to get them. They gave them to me today, after I met

with a *Flores* lawyer yesterday afternoon. But they are the wrong size. So now I have to bring the shoes back to them and ask again for the correct size. Everything is so complicated for us.

12. Before coming here, I told the person in charge of the items that the shoes are very big. He said I cannot just exchange the shoes like that. He said I have to bring my daughter there with the shoes in order to exchange them.

13. My son and my daughter are very scared of the staff members here. My son pees in his pants a lot. He has accidents a lot because he is so afraid of the staff here and is afraid to use the bathroom. He wets the bed, or he says he has to go to the bathroom, but then he has an accident quickly and wets his pants instead. This never used to happen. But he has had at least three accidents during the day since we got here. And since we got here, he frequently wets his bed at night, three or four times a week. This is unlike him. He is eight years old and never had this problem before.

14. I had to apply for more clothing for my son. They did provide me some additional sets, so now he has three to four sets of clothing. I wash his clothing every day. But now, if I want new clothing or more clothing for him, I have to bring what we have with me to exchange it. They will not just give me additional sets of clothes.

15. I also change his sheets every time he has accidents and wash them in the washing machine and dry them that day. I don't know if we're allowed to put the sheets in the washer or dryer, but I can't communicate with anyone here. So if there's a problem or something I need to solve, I just need to figure it out myself.

16. Here, there are so many rules and regulations. The children have to be accompanied by an adult anywhere they go. And the adults get very annoyed when we ask for things. So the children get very anxious. The children don't dare to tell us what they need or to ask for anything.

17. My son also is not eating properly. He does not like the food here, so he doesn't eat. He will only eat if they have fruit, which they don't have every day—like he ate watermelon recently, and he will eat the canned fruit. But that is it. I think no matter what

the food is, if it is always the same, he would get bored of it and stop eating. But a couple days ago, he did mention that he wished he could have some [redacted].

18. He is also afraid to go to sleep because of the nighttime patrols, but then in the morning, he does not want to wake up. At night, the lights are too bright for him, and the staff do rounds and make noise, so it is very hard to sleep. Then, when it is time to wake up in the morning, it is very hard for us to wake him up because he is still sleeping. Everything is off for him.

19. Our daughter just keeps asking us when we are getting out of this place. She is very afraid of the people here. ICE just says they won't let us out and that ICE will keep us here by force. Sometimes they say they will send us on the airplane. So, my daughter is just afraid about how much longer we will be stuck here. I tell her soon we will leave, so she does not have to feel afraid. But she is having some post-traumatic stress about this because when we were in Mexico, Mexican immigration officers grabbed us and forced us to get into their car, and it scared her. The children cried so much when we were in Mexico. So, when she hears ICE say things like that here, she panics and becomes afraid.

20. The food here is terrible. We have been here for two months, and the food is the same every week. So, we don't feel like eating any more. The kids don't want to eat. We don't usually eat at breakfast because it's almost the same every day: bread, eggs, milk, potatoes. At the other meals it is almost always the same: burgers, nuggets, hot dogs, rice. Just things like that. The kids just eat instant noodles from the commissary for a lot of meals. It feels like there's nothing we can do about the food here. Sometimes we take the biscuits and the milk, and we make small little cakes for them. We don't know how to get them to eat more.

21. The other big problem is getting the daily supplies we need. We do not have enough clothing or shoes, and it is hard to request more and get the right things. It rained a lot in June, and the shoes were soaking wet. But there were not extra shoes to wear, so we just all had wet feet all the time.

22. It feels like we are treated very differently than other families who are fluent in English or Spanish. They do not face the same delays and difficulties that we do. For us, they don't give us many of the supplies we ask for. I also heard there is some kind of way to get donated phone credit or commissary credit. But it was really hard for me to understand what it was, or how to get it. I don't know if it comes from here or from someone outside. It's just so hard to understand anything about how this place works or how to survive here.

23. What would we change if we could change something to make it better for our children? We don't have the right to change anything here to make it better for our children. If I could change anything, I would just ask, can they just let us out? I don't want my children to be here anymore. Not even for a minute.

I declare under my duty to tell the truth and penalty of perjury that to the best of my knowledge, all the information I have here given is correct and complete and I understand the legal consequences of testifying falsely to the authorities. Executed on this 15th day of July 2026, at Dilley, TX.

[redacted]

CERTIFICATE OF INTERPRETATION

My name is Yap Lik Ken and I swear that I am fluent in both the English and [redacted] languages and I interpreted the foregoing declaration from English to [redacted] to the declarant to the best of my abilities.

Dated: 22/7/2026

EXHIBIT 28

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, M[redacted] T[redacted], declare as follows:

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

2. I am 43 years old. I was born in [redacted], and I am a lawful permanent resident of the United States.

3. I speak English.

4. I have been detained at Dilley for about 100 days with my 16-year-old son, [redacted]. We are lawful permanent residents and have lived in California for the past 12 years, always with legal status.

5. My husband and I are professors. I am a professor of psychology and statistics at [redacted]. My husband is a professor of business psychology at the [redacted]. We have lived in California with my son since he was four years old. He has been in the California education system since TK. This year, he almost finished his sophomore year of high school.

6. They arrested my husband in the afternoon, the day before ICE arrested us. We were arrested the next morning when I was driving my son to school so that he could take a final exam. From the beginning, ICE separated my husband from my son and me. They sent him to Pearsall. They classified him in some category—orange—with no basis. I feel this was in order to keep him apart from us. They told my son he would be able to talk to his father for ten minutes every two weeks when we were separated. But they have not made that happen after the first three calls, and told us to ask our lawyers to set it up instead. My son has rarely been able to speak with his father over the past three months we have been detained.

7. We are seeking voluntary departure to [redacted] to escape this government that is hurting us. I love this country, and I have served it in my work as a community college professor and training PhD students, but we are being abused by the current government, and I prefer my son to be free and prosper rather than staying here detained indefinitely. We are devastated to leave our lives and our community here, but I don't want my son to

stay in a place that would do this to him, with a government that would hurt us like this. But DHS is refusing to agree to voluntary departure. It makes no sense. They do not want us here, but they refuse to let us leave.

Experience at Dilley Detention Center

8. When we arrived at Dilley, we were isolated in a building by ourselves. We were alone in a room and a building, apart from all the other families being held here. Now I have gotten used to being by ourselves, but when we first arrived here, it was a real disadvantage. Being isolated meant no one was there to help us learn how things work here. It took a week for me to figure out how to use the phone, for example. It took two weeks for me to realize that we were the only family being held in isolation by ourselves. It took me twelve weeks to learn that families were able to receive donated commissary funds from charitable organizations. When a family first arrives here, it is so important to be able to ask other families questions and learn how things work. We did not have that chance, and it made the experience incredibly disorienting for my son and me.

9. Being detained has been extremely hard for my son. He has grown up in California. He was an excellent student and about to graduate his sophomore year of high school. He speaks English and is a regular American kid. He is a tennis player and likes playing soccer too. He won leadership awards in his magnet program for social and environmental justice in middle school. He was volunteering at a children's hospital through a high school volunteer club. He and his friend had started planning to start a club to volunteer with veterinary hospitals in the area. He's a really incredible kid. In the 40 hours we had to gather letters and support recently to fight our detention, seven of his friends wrote letters about his kindness. It was really beautiful. But being here, he has lost everything. He lost his dad, his friends, his school, his whole life.

10. Because we were isolated, at first, we did not learn that there were any school options for children. After a month of being at Dilley, we found out about the school. I went to talk to the teacher to learn more and learned that the teacher really was not qualified to teach above the sixth grade. They didn't offer us anything else, but the

teacher did mention that the library had Khan Academy. Of course, the library does not post or share that it has Khan Academy, so we had no idea. After we learned about it from the teacher, my son was able to make a Khan Academy account, which he uses sometimes now.

11. They did start offering Khan Academy on the classroom computers also, but only allowed my son to do it if he committed to doing Khan Academy for the full school day. He does not want to be stuck in the classroom at the computer doing Khan Academy for five or six hours, so he doesn't go. Khan Academy is not a substitute for his high school education anyway. Now he will just use it sometimes in the library during our library time.

12. In the library, there is no real access to the internet or email. The facility claims there is access, but I think they also know that in reality, there is not. Most websites are blocked. There is one website that has computer games for children, but most of the games don't work. It is not possible to access news sites, other websites, or click on links.

13. There is not reasonable free access to email either. They say there is Gmail, but they know that it requires two-factor authentication, and no one here has access to their phones or other ways to complete the authentication, so Gmail is simply not available to people. Atomic mail is extremely unreliable, and people's emails often go undelivered. It is actually harming people and their cases. For example, my prior immigration attorney told me that she never received the emails I sent her from my Atomic email account. Finally, they allowed Proton mail. But Proton mail is only free for two weeks, and then it requires a subscription that costs about $5 per month, and which also requires a way to pay electronically. Most people cannot pay the fee, so after two weeks, they have to set up a brand-new email account, and they lose access to the previous one. This makes consistent communication with anyone, including legal counsel, difficult or impossible. So, there is not really free, reliable email access for anyone at Dilley.

14. Together, the lack of email access and all the blocked internet sites prevent many people's ability to access legal counsel or fight their immigration cases, because they

cannot search for important information, access past relevant information and evidence that they may have had in their email accounts, or communicate freely with lawyers or family. It feels like it is designed to obstruct access to counsel and people's basic legal rights to work on their own cases. In fact, one staff member here told me that there used to be a lot more internet access, but then people were abusing the system and contacting and finding a lot of lawyers. They say that, or they imply that people were trying to watch porn. I doubt people were trying to watch porn in the library in front of all the staff and other people detained here. I think it is because people were able to send information about Dilley to the outside, and they are trying to prevent that.

15. There was a big problem with the pro bono legal services information here. No one was able to call pro bono lawyers with the instructions they provided. The numbers did not work. I think they finally corrected the numbers about a month ago. But until then, people really didn't have access to the pro bono legal service providers that were on the list.

16. They say we have access to Google Translate and Copilot, but for 85 days, I did not have access. The instructions they provide for Copilot do not actually work. I asked for 85 days, and finally someone told me a different way to get to Copilot, which was never provided in any of the instructions. It really obstructs people's ability to even use the technology that they say is available here, and it makes it impossible to do anything to support your case. Also, Copilot is only available in English or Spanish. So it is completely inaccessible to the many families here who do not speak those languages.

17. I also do not think people's legal information is actually private. We put our legal documents on USBs here that we have to check out from the library in order to print them out. But when you go bring your USB to the library to print the documents, you have to hand over your USB. You have to give them access to your documents to print, copy, or scan anything. I specifically ask them to delete everything after it is printed. I don't know if they do. I also know that they read what we print. For example, one time I asked them to print my contract from the community college where I am a professor, and they gave it

back to me and said, "Oh you are a professor! This is the college where you teach?" I believe that ICE also comes and collects the USBs and reviews what is on them after we give them back. I have heard one staff tell the library staff to put all the USBs in a box, and that ICE was coming that day to collect them. It feels so illegal what is happening here.

18. The food here is also a big problem. It is not fresh, and it is not prepared well, and there is not a variety of nutritious food. One grievance I filed was called in my favor because I said there were not good dairy options for the children to get calcium and vitamin D. They only offer 1% milk, which tastes like it is bleached. Many babies and young children need whole milk, and there are no cheese or yogurt options which would provide much-needed calcium. The solution to my grievance that they said was in my favor was to just provide shredded cheese in the salad bar once a week. And the beef here is the lowest possible quality. It is not edible—it's like plastic. So much money and so many resources are being wasted because the food is so bad.

19. The things in the salad bar are also not fresh. I have seen a lot of bugs around the salad bar and a lot of spoiled salads that they don't remove. I take things out of the dressing if I see it has fallen in, but I don't think the cafeteria changes the salad bar items frequently. I have pointed out that the lettuce looked very unfresh in the salad bar one time to a supervisor, and the person I told just picked up the lettuce bin, shook it a few times to move the lettuce around, and put it straight back.

20. They also do not prepare food well. When they serve pizza, for example, it is a frozen pizza that gets warmed up. It is not heated properly. The cheese on top looks white and the pizza crust is still uncooked cold dough. It's so sad because I know the kids really want pizza, and then this is what they are given. It's like teasing them to put something that looks like pizza out there that is so bad they don't even want to eat it. At the Fourth of July celebration, they gave all the families and kids that poorly heated frozen pizza, but they ordered the staff pepperoni pizza and colorful cupcakes that the kids could see but were not allowed to have.

21. They also are terrible at cooking rice. It is always very clumpy and nearly inedible, with no taste or salt. It is like eating cardboard. It's concerning because they say, "Today is red rice," or "Today is green rice," but what did they put in it to make it red or green?

22. They are also killing us slowly with all the Styrofoam materials they use. The cups, and sometimes the plates, are Styrofoam and full of microplastics.

23. Our building, Brown 1, had been empty for a long time before we were there, and it was not cleaned before we were put there. It was covered in spiders, and it smelled terrible.

24. Our shower curtains were covered in black mold. About two months ago, I filed a medical grievance about the black mold, which was all over the shower curtains and the bathrooms. I explained that the black mold was dangerous and was causing so many children to be sick and have allergies. I didn't get a response to that grievance. In the past few weeks, it has finally been cleaned.

25. They use extremely harsh industrial cleaning supplies here for everything. It is causing so many children to have rashes and allergies. I have also filed a medical grievance about the use of these harsh chemicals and the medical issues it was causing for so many children.

26. The cleaning is not routine or thorough either. Cleaning people come and do some limited cleaning, and then they leave. There was a spider web in the stall I use that was there for weeks, even after I told them about it. The cleaning is just a show—nothing really gets cleaned deeply at all. To address mold in the rugs, the cleaning people use a cleaning spray on the carpet, which doesn't make any sense. It just makes the environment more moist and better for mold to grow.

27. Even the commissary here is concerning. I have filed four grievances because they kept selling expired food. They also do not have a variety of options. The food options at the commissary are so unhealthy. The best option that I heard about was tiny single-serve packets of tuna for $3.50. My son has been living on ramen and candy for over three months. I also have filed a grievance with medical about several of the food products

available in the commissary because they contain cancer-causing ingredients that should certainly not be fed to children.

28. The costs at the commissary are astronomical. A box of tampons is between $8 and $20 dollars. The tuna is too expensive for such a little amount of food. It is impossible to afford for us in here. It's like shopping at Whole Foods, but for gas station items. I have to spend $70-90 per week to feed my son, and that's if I only buy the cheapest items, which are not healthy. And they have increased the price of things by about 30% since we arrived. Even a small pack of peanuts is $1.

29. It also is not true that snacks are available 24/7 like they say. They lock the small kitchens in the residential areas that hold the snacks at 8 p.m. until 8 a.m. And because the food is bad and dinner time is very early, all the children are very hungry around 8 p.m., but there is no food available unless their parents buy food at the commissary. For the longest time, they always gave the same snacks every day. We have been here over three months, and only recently did they get some new snacks. It really was only after the second congressional visit that they started changing the snacks. They changed the fruit, so now instead of just red apples, there were some oranges available. It's an improvement, but it's not enough of an improvement to make much of a difference for most kids.

30. The rules here feel arbitrary and cruel. For example, we are not allowed to refrigerate our bottles of water. We have to drink them at room temperature or mix them with unfiltered ice if we want cool water, which defeats the purpose of spending our limited money to have safe, clean bottled drinking water. The Brita filters on the sink do not change the taste or appearance of the water. It is still bad. I do not think the filters are doing much of anything. None of the staff or officers seem to drink from the taps. I have only seen them drinking bottled water.

31. The idea that there is "open movement" from 8 a.m. to 8 p.m. is also not true, even though that's what they say. Because throughout the day, maybe sometimes six times a day, our residence is closed to movement—the guards yell or say over their walkie

talkies, "Cease the family traffic." And then we are not allowed to go anywhere while other groups move through the passageways. The families in the Brown area are basically in a double cage. There is double fencing, but there is no logic or justification for it except that it was there when they re-opened this place more than a year ago. You cannot see anything around you from the inside. You can only see the sky if you are outside and look up. I don't know why they keep the families and young children there. It doesn't make sense, and it's very restrictive and disruptive.

32. Medical is also absurd. My son and I had sore throats a couple weeks ago. The first thing to do with a sore throat is to gurgle a bit of salt water. So, I went to medical to ask for salt water. At medical, they agreed, and printed three letters so I could get salt for my son and myself to gurgle—one was for the cafeteria, one was for medical, and one was for our unit. But then, I had to spend three hours going around from person to person at the cafeteria to try and just get a cup of salt, and finally the solution was that I had to go into the medical unit itself, not even the pill line, to be given a small amount of salt. I had to go three times a day to be able to have salt to gurgle because we had sore throats. And it is about a five-minute walk between our unit and the medical unit, so we had to do this in the heat when we were sick and exhausted in order to get something small to try to get well again. The other treatment they gave was allergy medicine and ibuprofen. That seems to be what they usually give people here for any illness.

33. The grievance system is so problematic. First, as with so many other things, it took me a very long time for me to even learn how to file a grievance. I did not know how to file a grievance for two months. I was filing incident reports, because whenever I told the staff about a problem or a complaint, they handed me an incident report to fill out. So, I filled it out, but I didn't realize that incident reports only go to the unit manager and are not considered grievances. For the first two months we were here, incident report papers were posted in the units, but there were no grievance reports or papers available in the units, at least in English. If we had a problem, they just pointed us to the incident reports.

34. I only learned about the grievance form when I wanted to submit a complaint to medical. They accidentally handed me the incorrect form that was for a staff complaint, so I filled it out as best I could, but then they came back and told me I should file a grievance form instead.

35. I keep a copy of every grievance that I filed. I request a copy of every grievance I file. I write my grievances out because I want copies of them. If you file a grievance on the tablet, you cannot have a copy of your grievances. But, they encourage you to file grievances on the tablets.

36. I have only had two grievances substantiated. One was the commissary selling expired food, because they kept the expired items on the shelf and sold them for an additional week after the grievance was filed. So for that, they apologized. And the lack of dairy in the food options. Otherwise, they have not responded, or they denied them.

37. It is impossible to fully describe what conditions are like here. I reviewed what the *Flores* settlement requires, and they are not meeting those requirements. There is absolutely no privacy here. Staff, even male staff, will just walk in and out of our rooms sometimes without knocking. They ignore your existence while they go about their daily shift tasks, like checking temperatures or phones or whatever they have to do on their shift.

38. If I wanted to write a book about their policies, the title would be: "How to Design Policies that are Dehumanizing and Infantilizing at the Same Time." They make us go through them for every single thing we have a right to have. I shouldn't have to go ask a person for every single small thing that I have a right to have. But it's required. We are not allowed to do anything for ourselves. We are infantilized 24/7.

39. The anxiety and depression we feel are the most logical outcomes of being plucked out of your normal life and shipped to a place you don't know, and then being locked up with no end in sight. This is a prison sentence that has no release date and is not based on any crime you committed or anything you could have prevented. It is our existence they take issue with, not our conduct. I can't think of anything more un-American.

40. I never had mental health issues needing medication before this detention. As a community psychologist, I had tools to make sure that I stayed healthy. But the cruelty of what has happened to us has nullified all of my coping mechanisms. Now, I have to concede and take anti-anxiety medications for the first time. They were prescribed to me by a psychiatrist-nurse after the telehealth psychiatrist didn't show up to the appointment that the mental health office in Dilley made.

41. My son is definitely showing signs of PTSD and asking me many, many times a day if I am good: "Mom, are you ok? Did you sleep well?" I know this place has a long-lasting negative impact on him. It is so hard and harmful for the kids here to see their parents struggle this way, and as children to take on a feeling of responsibility for their parents. Even though I do all I can to prevent that, it is impossible.

42. No child deserves to be detained. They don't deserve to be detained in this place or any other detention facility.

I declare under my duty to tell the truth and penalty of perjury that to the best of my knowledge, all the information I have here given is correct and complete and I understand the legal consequences of testifying falsely to the authorities. Executed on this 15th day of July 2026, at Dilley, Tx

[redacted]

EXHIBIT 29

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, S[redacted] N[redacted] K[redacted], declare as follows:

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

2. I am 17 years old. I am from [redacted].

3. I speak English, French, Spanish,[redacted], and Portuguese.

4. I have been detained at Dilley for 29 days with my two younger brothers and my mom.

5. We have been living in Seattle for two years. I was a senior in high school and the captain of my soccer team. I have been playing soccer since I was six and really love it.

6. About a month ago, we went to an ICE check-in appointment with my mom. When we arrived, ICE told me that we were going to be deported. I started crying and told them that we had paid a lawyer, and they must have made a mistake. They didn't listen. They drove us to an airport to fly to Texas. We were supposed to fly to San Antonio, but they had to make an emergency stop in Dallas because my mom passed out suddenly on the plane and was not feeling well. When we landed in Dallas, they took my mom directly to the hospital. They took my brothers and me to a hotel. We were with some strangers who stayed in the room and watched us all the time. We were all very scared and crying and worried about our mom. It was not a good moment for us. My mom came to the hotel around 10 p.m.

7. The next morning, we woke up at 7 a.m., and they put us on another flight to San Antonio. Then they drove us about three hours in a van to get here.

8. When we got here, they took us to the shower. They gave us food and took us to the room.

9. That night I was feeling so bad. I was worried about not graduating from my high school because I am a senior. I was feeling so depressed and started spiraling. I was crying and crying and went outside to get some air. My mental health got bad, and they took me to the hospital for about three days. They took me to the mental health area to

talk to someone, but I really didn't want to talk to them. They were saying things to try to make me feel better, but it wasn't working.

10. At the hospital, ICE came and told us that children are not supposed to be in detention for more than 20 days. Then they gave us a paper to sign. They didn't tell us anything else. They just told us not to fight with anyone.

11. Then they brought us back to Dilley. After 14 days, we talked to ICE again. They told us we needed to take pictures to send to the [redacted] consulate. We said we did not want to go back there, and we have a lawyer who is fighting for us. They didn't make us take the pictures. My mom was very upset.

12. When we got back to our room, my mom passed out again. I was so worried and called the guards. They took my mom back to the hospital. My mom was saying that she would kill herself if they were sending us back to [redacted] She said if they sent her back to [redacted] she would be killed. The guards brought her to the ER. We were then all at the hospital with her for about another week.

13. When we were in the hospital that week, I just slept in a bed. I was not feeling good; I was so upset. My brothers were going to school each day.

14. I went to school at first, and they said I could get credit for my school if I came. They said to come back and talk to the counselor about how to do that, but when I went back, the counselor was busy and couldn't help. Then the next day, I went back to school, and all they had us doing was some painting. It was all stuff for kids. I told them I am a senior, and I cannot be doing this kind of children's stuff. They said that this is all they had for me. I haven't gone back after that. At my school, I would be taking computer science, history, geometry, and language. The school here had nothing for me. It was nothing like what I was learning.

15. My twelve-year-old brother doesn't like the school because he says it's boring. My four-year-old brother says he likes the school. I think it's fine for little kids but not for older grades.

16. We stay in a room with just my family. We don't sleep because the lights are on all night, and the guards are always opening the door. They will let us turn some lights off, but it's still really bright all night.

17. It is so hard for our family. We cry every day. My mom cannot eat—every day she just cries and cries.

18. The food here is not good. My brothers aren't really eating the food. They just bring their plates to the table and then put them in the garbage. Sometimes they eat the cookies.

19. About a week and a half ago, I had not been eating for three days because I just wasn't feeling well. Then I tried to eat some chicken. I ate chicken at lunchtime, but it looked like it had blood inside it. It made me feel bad right away, and I started vomiting. The next morning, I was still feeling bad, so I went to medical. They gave me medicine that made me sleep. I slept all day.

20. The water smells here. I tried drinking it, but I couldn't drink that water. It has some kind of bad, different flavor. We buy the bottled water from the commissary.

21. My brother needs glasses because he's not able to see well. He couldn't see in school, so the teacher said he should go to medical to get help with glasses. He went to medical a couple of weeks ago, but he still doesn't have his glasses.

22. I feel like I am in jail. I can't do anything or go anywhere I want to go.

23. I want to get out of here and train to be a mechanic for airplanes. I am really good at fixing things. I like finding a way to solve hard problems. It's really hard to be in this place where I am powerless. I don't think I will ever get over the trauma of being detained by ICE and seeing my mom go down on the airplane. These memories keep replaying in my head.

I declare under my duty to tell the truth and penalty of perjury that to the best of my knowledge, all the information I have here given is correct and complete and I understand the legal consequences of testifying falsely to the authorities. Executed on this 7th day of October 2026, at Dilley, Texas

[redacted]

EXHIBIT 30

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, L[redacted] R[redacted] O[redacted], declare as follows:

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

2. I am 21 years old. I am from [redacted], and my two-year-old son is from [redacted].

3. I speak Spanish.

4. We have been detained at Dilley for 15 days. I had been living in Texas for a year and seven months. I was going to ICE check-ins and had an ankle monitor since March 2025. I had probably gone to around 20 ICE check-ins prior to being detained a couple weeks ago. I showed up for my regular ICE check-in appointment around 8 or 9 a.m. and then waited for about an hour. When the ICE agents met with me, they told me I was being detained and could not leave. Later that day, they told me that someone was coming to pick me up but didn't tell me where I was going. I waited with my son until about 7 p.m. Finally, two people showed up and then drove us to Dilley. We drove about seven and a half hours and finally arrived at Dilley around 2:30 a.m.

5. When we arrived at Dilley, they processed us. They did a medical exam, gave us clothes, and had us take a shower. We got to our room around 4:30 a.m.

6. We have never received a legal orientation here. ICE spoke to us in a group and gave us a list of pro bono attorneys. They told us that kids can't be here for more than 20 days, but that it depends on each case.

7. I have a pending U-Visa relating to a crime that happened to my son and me. On [redacted], I was nursing my son in our home when a gun was shot from outside our home and the bullet went through our wall. The bullet entered and exited my arm and grazed my son's face. He needed to have stitches and plastic surgery on his nose and above his mouth. You can see the scars on my arm and on his face and nose. My U-Visa relating to this incident is currently pending.

8. They don't have food for small children here. My son isn't eating most of the food. It's too processed and spicy. He mainly just eats rice, beans, and bread or pancakes.

9. I don't have the money to buy water, so we're not really drinking any. The tap water here doesn't taste right—it tastes like salt. They say it's filtered, but I don't trust it.

10. The medical care is bad here. They don't really check us or take tests when you're sick. I have been to medical about ten times, and I don't know if I have ever talked to a doctor.

11. I am about 20 weeks pregnant, and it is very hard to be pregnant here. I had a lot pain in my abdominal area and they didn't really do anything. I have also bled a couple times, and they just tell me to rest. I have requested an OB-GYN appointment with medical, but they say ICE has to approve it. I am just waiting for ICE's approval. I am worried because I haven't been able to hear a heartbeat since I first arrived here. With the abdominal pain and bleeding—it's worrying me a lot.

12. There isn't really anything for my son to do here. He's not allowed to have a stuffed animal or something to go to sleep with at night. When he was at home, he slept with his blanket to provide comfort, and he had his special toys—but those things are not allowed here. It is really hard for him not to have his own things and to be confined all the time.

13. My son has a difficult time sleeping with the lights on all night in our room. He is not used to that. It's not normal for children to have to sleep like that.

14. I am most stressed about not knowing when I will be able to have an OB-GYN appointment. I worry about it all the time.

I declare under my duty to tell the truth and penalty of perjury that to the best of my knowledge, all the information I have here given is correct and complete and I understand the legal consequences of testifying falsely to the authorities. Executed on this 15th day of July 2026, at Dilley, Texas

[redacted]

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: 7/15/2026

Diana Cano

EXHIBIT 31

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, A[redacted] D[redacted] G[redacted], declare as follows:

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

2. I am 17 years old. I was born in [redacted], but I have been living in Florida for ten years. I liked living there. It is a beautiful place.

3. I speak Spanish, [redacted], and English.

4. I have been detained at Dilley for around 40 days with my mom and my thirteen-year-old brother. I have four other siblings who are U.S. citizens and are not allowed to be here with us. They are two, five, seven, and ten. I am seven months pregnant.

5. Prior to coming here, ICE grabbed us when we were coming from work. They kept us in a cold office for two nights, and then they took us to an ICE check-in. During the ICE check-in, they gave my mom an ankle monitor, released us, and said we could pursue our case. They said we could look for a lawyer to fight our case. But two weeks later, they told my mom to bring my thirteen-year-old brother and me to her ICE check-in. When we went to the ICE office, they detained us again.

6. At our ICE check-in, we were sitting there for hours. Then they called my mom in and told her that we would be in a hotel for just a few nights and then be deported. But instead, they sent us to Dilley. There were three people who drove us to Miami and then flew us to Texas. They were watching us and with us all the time. They drove us from the airport, and we got to Dilley around 5 a.m. Then, it took several hours for them to do intake. We didn't get to our room until around 10 a.m. They did a basic medical exam and took our DNA.

7. They never gave us an orientation. We didn't even know when or where the meals were. We missed breakfast, lunch, and dinner the first day and breakfast the second day because we didn't know where to go.

8. When we got here, they said if we signed the papers and took voluntary departure, it would only take a week or so. But it has now been more than a month.

9. When we first got here, we were able to move around. But now whenever we go out of our room, they tell us to go right back. We only leave our rooms to eat and come back. It's hard to be stuck in our room all day. It feels like a prison.

10. It's really hard to sleep here with the lights on all night. At first, we would turn them off, but then they told us that wasn't allowed.

11. If we go to medical, we just have to wait and wait. Once we do see a doctor, the doctor will say he can't do that now.

12. My mom has had really bad tooth pain. There's a hole in one of her teeth, and she gets a lot of pain when she eats. When we went to medical, they just gave her a paste or a cream that made the pain much worse. They are now saying the tooth needs to be removed, but they have not made an appointment for it.

13. I have been to the hospital to check on my pregnancy four times. Every time I have gone, they have not given us meals the entire day. We come back starving and then only eat some ramen noodles from the commissary. My brother has to stay in the daycare when we go, and he says he feels like he's enclosed like a dog.

14. My mom and I barely eat the food here. The food has too many condiments, too much oil, and sometimes the plates look dirty, and it makes us lose our appetites. Sometimes we buy food from the commissary.

15. We buy the water from the commissary, too. We think the water here is dirty. They say it's okay, but we don't trust them.

16. The clothes they gave us were in bad shape. It would be better if kids could get newer clothes.

17. When we first got here, ICE said they would help our family all leave for [redacted] together. They told my mom her four little kids couldn't come to Dilley because they are U.S. citizens. But they said they would help us reunite with them. They said the kids could meet us at the airport and we could leave together. My mom did a lot of work to get permission from their Dad and get all the paperwork ready so that we could all fly to [redacted] together. But they were giving us very confusing information

about it. First, they said I needed a doctor's appointment; then they said there was a paperwork issue because we needed something from the doctor; then they said there was a problem with the airplane. There was always an excuse.

18. Then on Friday, they told my mom that we were being deported and that my siblings were not going with us. We were all extremely upset because we had been waiting here for them to be able to go together. We got on a bus, and they drove us to an airplane. When we got to the airplane, they told us we couldn't go because of some missing paperwork. Once that was fixed, we were waiting for the airplane again, but then they told us there was a problem with the plane and we would have to go back to Dilley. We were waiting on the bus for over 24 hours. Other people all around us on the bus were shackled. They gave us some food, but it looked awful to us, and we didn't eat it. If I had eaten that food, I would have thrown up — and where would I do that because we couldn't even use a bathroom?

19. We have been back at Dilley for three days, and no one has told us what is happening next. We are just waiting for them to come to take us again. They told us it could be this week, but we don't know when.

20. We are scared of what will happen when we get to [redacted]. We have no money, and we don't know where we will sleep or what we will eat once we get there. We are really scared that we could arrive there in the middle of the night with no one to help us. We are also worrying all the time about being separated from our siblings.

21. We would rather stay here and fight our case, but if not, we just want to get out of here. We are done with this place.

I declare under my duty to tell the truth and penalty of perjury that to the best of my knowledge, all the information I have here given is correct and complete and I understand the legal consequences of testifying falsely to the authorities. Executed on this 8th day of September 2026, at Dilley, Texas.

[redacted]

EXHIBIT 32

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, M[redacted] G[redacted] O[redacted], declare as follows:

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

2. I speak Spanish.

3. This is an update to my earlier declaration in this case. We have now been detained for 96 days between our time at CBP and Dilley. I am here with my children, who are nine and seven years old.

4. I am extremely worried because we have been separated from my youngest child, who is a U.S. citizen, for about nine months. His father brought him across the border without my permission. My child is now staying with his father's family, but they are not taking my calls. The last time we spoke was in April.

5. Being here so long has been really hard on my kids. All of us have lost our appetites and don't want to eat the food here. It's always the same. My children will just have toast with jam or peanut butter and some fruit. When they do eat the other food, they immediately get diarrhea. We still buy the water because the tap water has made our stomachs hurt, and I don't want to risk getting sick again.

6. The staff here continue to be extremely rude and yell at the kids. Yesterday, there was an issue between my son and another child, and the staff yelled at us to get out of the gym even though my son had not started the problem. They are always threatening us with reports even when our children are having normal childhood behaviors.

7. My kids go to the school and to the gym, but there aren't recreational activities most days. Yesterday, they had an activity for the kids with hula hoops for the first time since we've been here because there was not school. They have bingo once a week and some staff will allow children to make bracelets. But those are the only things on the list of recreational activities you read that I have ever seen here. My kids have never made jewelry boxes or birdhouses—and it sounds ridiculous to hear that. My kids really miss their school in Brownsville, their brother, and going out to do fun things like getting

pizza or going out to play. Here they are just locked up. They are constantly bored and start fighting with each other.

8. My kids still struggle to go to sleep each night because of the lights. They go to sleep around 11 p.m. or 12 a.m.

9. My kids are so sad—they just want to get out of here. Their little brother's birthday is [redacted], and all of us hope we won't miss it.

I declare under my duty to tell the truth and penalty of perjury that to the best of my knowledge, all the information I have here given is correct and complete and I understand the legal consequences of testifying falsely to the authorities. Executed on this 14th day of July 2026, at Dilley, Texas.

[redacted]

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: 7/14/2026

Diana Cano

EXHIBIT 33

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, N [redacted] A [redacted] P [redacted], declare as follows:

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

2. I am 28 years old. I am from [redacted].

3. I speak Spanish.

4. My son and I have been detained at Dilley for 35 days. My son is four years old and autistic. We have lived in San Antonio for over two years with the father of my son.

5. The father of my son has been detained in Karnes since September. My son and I were detained by ICE about a month later.

6. When ICE detained me, I told them my son is autistic and that he couldn't be detained for long. ICE told me that I'd be in [redacted] in no more than three days. They lied to me.

7. I had to wait for about six hours in the ICE office in San Antonio. They threw away my belongings at the office. I had medicine and hygiene products for my son, and they threw all of it away. They said I couldn't have it because it had alcohol, but I came here, and the items in the commissary also have alcohol.

8. We got to Dilley at around midnight. It was raining.

Dilley ICE Detention Center

9. We've received discrimination and harassment from the staff here almost every day. They don't understand that my son is autistic, which causes him to be hyperactive. There's nothing I can do to stop him from being hyperactive; all I can do is take care of him. They scold my son and me at every moment.

10. My son has regressed since being detained. He is using diapers now, but he used to not use diapers. I have told the staff he has regressed, but they don't do anything to help me.

11. I now have to keep my son in the room all day because we would get harassed everywhere we'd go. Keeping him in the room all day is affecting his health so much. I see him getting worse every day.

12. When I got here, they gave my son the incorrect size for his clothes. I had to wait two weeks for them to give me the right size of clothes. The new set of clothes they gave my son was still the incorrect size. They only gave my son one set of shoes, although I've been told he was supposed to have two.

13. My son has always been a picky eater. He barely eats here. At most, he eats about three spoonfuls of the food here. He'll only eat fruit when they give us fruit.

14. The milk they put in the fridge in our residence is often expired. The apples they give us are often rotten.

15. In the cafeteria, I had a sausage that was green and rotten inside—what kid would want to eat that? I can't give my child rotten food.

16. I know my son has lost weight; he's gotten so skinny here because he's not eating.

17. We have to buy the water because the water from the sink doesn't seem safe for us.

18. The prices at the commissary are always increasing. Every time I go, everything is more expensive. An ice cream is almost $4. How am I supposed to buy my son that? How is someone who doesn't have anyone supporting them outside of Dilley supposed to buy stuff at the commissary? I feel like they are taking advantage of the people here.

19. I speak to my family at the library via email. I don't call them because it's way too expensive to call my family in [redacted]. It's almost $1.50 for a minute. If I speak for 20 minutes, it's almost $30. No one has explained my rights or my son's rights to me since I've been here. I have not received a paper with my son's rights on it. I only know about *Flores* from the people detained here.

20. I have no information on when I'll be released. It has been difficult to get information on the status of my case.

21. I used the tablet to communicate with ICE, but they always say the same thing: to be patient and that they're still processing our case. ICE officers play with people's minds here. They lie and deport people.

22. The staff gives me diapers and wipes for my son every now and then. Sometimes a few days will pass, and I won't have any diapers or wipes because they'll say they don't have any.

23. Before being detained, my son would sleep well. Now, he doesn't fall asleep until midnight and wakes up at around 4 or 5 a.m. He's averaging about four or five hours of sleep a night. He can't sleep well because the lights are on all night.

24. It's also difficult to fall asleep because there's always a lot of noise. The hallway of our residence is very loud, and I can hear every step in the hallway. I'm in the room next to the bathroom, so there is always a bunch of noise from people using the bathroom at night. Some staff also come in the morning to check the temperature, and they make noise that wakes up my son.

25. For as much as we'd like to sleep, we can't.

26. My son advanced a lot in the two months he was in school in San Antonio. He learned colors, he was potty trained, and he was overall doing a lot better. I want him to have therapy so that he can continue getting better. It's very difficult to see him regress here.

27. There's another mother here with a child who has autism. They put us in the same room as her—the staff here put two children with autism in the same room. That's basically medical negligence. We both had to talk to the staff because we were worried about an accident happening between our kids.

28. My son and I were approved to have a room to ourselves, but they'll often put people in our room. I have to remind the staff that we're supposed to have the room to ourselves. They are so disorganized here.

29. I feel like I'm not allowed to complain. We have to act like we're happy here. If we complain or cry, the staff just looks the other way or makes our lives more difficult.

Issues with Staff at Dilley

30. On one of my first days here, a staff member came into my room because I reported the phone was broken. She told me that I had to calm my son down because my son was hyperactive and running around the room. I told her I couldn't calm him down because he has autism. The staff member rolled her eyes at me and told me in a disrespectful tone, "So now everyone has autism." It felt like bullying; it felt like she was mocking me.

31. On October 30, I had an issue in the cafeteria. I took my son in a stroller with me to the cafeteria for breakfast. A cafeteria worker told his supervisor that the stroller couldn't come into the cafeteria, or else I wouldn't be allowed to eat. He told me I needed to take my son out and lay him on the table. I was shocked. I had to take my son and lay him on the table, or they wouldn't let me in the cafeteria. My son hit his head as he was waking up from the seat.

32. On November 3, I went into the cafeteria with the stroller again. The same cafeteria worker told the supervisor again that I couldn't go in with the stroller. The cafeteria worker then shook the stroller, made my son wake up, and forced him out of the stroller. Everyone in the cafeteria saw. After my son was shaken off the stroller, the cafeteria worker took the stroller outside of the cafeteria.

33. I submitted a grievance about both incidents, but I haven't received a response to either one. I submitted the grievances through the tablet and on paper. I don't think they care about my grievances. All they say about the incidents is that they're sorry about it and that they'll report what's happening, and that's it.

34. I'm sick of the discrimination; it's not fair how much we have to bear here because of my son's condition. Why should it bother them that my son is asleep in his stroller in the cafeteria?

35. In the library, one of the librarians told me that my son can't be in the library if he can't sit still, and if he keeps moving around in the library, he'll be banned. We get scolded everywhere.

36. Most of the staff here are not capable of taking care of children.

Medical Issues at Dilley

37. My son got rashes all over his body after I washed him with the foam soap in the bathrooms here. This had never happened to him before. I took him to medical, and they gave him cream, but it made him worse. I took him to medical again, and they changed the cream, but it still has not helped. They tried to say it was allergies, or that it was because my son sleeps with his bottle. My four-year-old has skin tears around his ears and cries all the time. The sweat makes it worse too. We are experiencing medical neglect.

38. I don't know what other soap to use for my son; there isn't any sensitive shampoo or soap for children in the commissary.

39. About two weeks ago, my son had a fever. I waited for three hours in medical and then left because it felt like they were never going to attend to us. I just watched them walk around us. I think he had a fever because of his rashes.

40. They have never offered my son treatment or therapy for his autism, even though I've told medical staff multiple times that my son needs help.

41. I don't understand why medical is full of nurses and no doctors. It's so hard to see a doctor; it's just a nurse who assesses you, and that doesn't seem adequate.

42. I went to medical because I also broke out in rashes from the hygiene products they gave us. I had a fever. They gave me an antibiotic, but I had to stop taking it because it gave me horrible kidney pain. I don't even trust that the medicine they give us actually helps us.

43. I'm afraid of going to medical now because everything they've given my son or me has only made us feel worse.

44. Whenever the psychologist sees me, she asks about my son, but she has never given us therapy or given my child treatment. She just checks off the box that she spoke to us but doesn't actually help. I told her my son's condition was worsening. I've asked everyone for help, but it feels like no one is listening to me.

45. I speak for all the children, and my own son, that they don't know how to treat us well here. My son tried to take a cookie with him from the cafeteria, and they stopped him and made him throw his cookie away. It just doesn't make sense. Why do they have to make my child throw away a cookie and make him cry? I've seen things like this happen to so many kids, not just my son. They make our children unhappy for no reason.

46. No one defends us here. Everyone here covers each other's backs. It's horrible. Neither the adults nor the kids have protection from anyone. The laws aren't followed here. Children's rights are not respected here.

47. My son needs to have access to healthy food, school, and therapy again. I don't want my son to regress anymore.

I declare under penalty of perjury that the foregoing is true and correct. I understand that I have to tell the truth in this declaration. The interviewer read the declaration to me and everything in it is true and accurate. Executed on this 4th day of November 2026, at Dilley, Texas

[redacted]

CERTIFICATE OF TRANSLATION

My name is Katherine Mora 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: 11/4/2026

Katherine Mora

EXHIBIT 34

Declaration of Miguel Chiapetta

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

1. I am a student at Harvard College and an intern at Children's Rights. My age is 22.

2. On November 18, 2026, I reviewed and transcribed the video that ICE provided to Plaintiffs on February 2, 2026.

3. The voice that delivered information in the video sounded robotic.

4. I watched the video through three times.

5. I typed everything that is said in the video word for word into the transcript, which has been attached to my declaration as Attachment A.

I declare under my duty to tell the truth and penalty of perjury that to the best of my knowledge, all the information I have here given is correct and complete and I understand the legal consequences of testifying falsely to the authorities. Executed on this 18th day of November 2026, at Cambridge, MA.

Miguel Chiapetta

ATTACHMENT A

[00:02] Please note that the following presentation is a basic overview and does not contain specific details about the topics discussed or individual circumstances that may apply in your case. You may consult with an attorney and/or review the information available to you at the facility's law library to obtain more information.

[00:21] Your rights under the law. You have the right to have access to an attorney; to get an attorney at no cost to the government; and to have your attorney represent you in legal proceedings or matters. A list of attorneys that may represent you at no cost or low cost is available. You may have the right to have an immigration judge review and/or adjudicate your case depending on what kind of removal document you received and what you qualify for. It may also depend on the past history of your immigration case. You have the right to explain that you are here because you fear returning to your country. You have the right to ask the judge to let you return to your home country.

[01:02] Your children have the same rights as explained above. Children have the same right to a hearing and to hire an attorney. Your children may also be eligible for any form of relief that is available to an adult. For example, your child may have an independent asylum claim unrelated to your case. We will explain more about that later. Your children also have the right to call witnesses, present documents on their own behalf, and provide evidence in immigration court or in administrative proceedings. In addition, children may also be eligible for specific forms of relief such as special immigrant juvenile status. We will discuss these forms of relief later in this presentation.

[01:46] If you were placed in removal proceedings, you were given a document called a Notice to Appear, Form I-862. This document is very important because the immigration judge will use it to decide important issues in your case. This document has two parts. The first part contains the facts the government is relying on to charge you with an immigration offense. These facts may include, for example, that you are not a citizen of the United States and you had no visa to enter the United States. The second part of the document describes the section of the law that the government alleges you violated.

[02:23] In immigration court, the immigration judge decides all the issues in your case, including whether you should be removed from the United States or receive any relief from removal. There is also an attorney that represents the government and will argue in favor of your removal from the United States. If you hire an attorney, they will speak for you and defend you in your case. You can also represent yourself. If you don't speak English, there will also be an interpreter who speaks your language.

[02:53] It's very important to keep the immigration court updated with any changes of address or contact information. If you don't do this, you may miss important notices from the court about

future court dates and decisions in your case. Failure to appear at your scheduled hearings may result in the immigration judge ordering your removal from the United States.

[03:15] The government may also place you in other forms of removal that may limit your ability to obtain relief from removal.

[03:23] For example, you may have been placed in expedited removal proceedings. In that case, you will have received a Form I-860, which contains the basis for placing you in this alternative form of removal. If you are not afraid to return to your country, you will be removed to your country.

[03:42] However, if you were placed in expedited removal proceedings, you still have the right to claim fear of returning to your country. If you claim fear, your case will be sent to the asylum office for an interview, which is referred to as the credible fear interview. In this interview, you will be able to explain to an asylum officer why you are afraid to return to your country. If the asylum officer finds that you established a credible fear of return, a notice to appear will be issued to you, and your immigration case will continue before the immigration court. If the asylum officer does not find you have a credible fear, you may accept the decision as final, and you will be removed to your country, or you may request a review of that decision by an immigration judge. If the judge agrees with the asylum officer, you will be returned to your country. If the judge disagrees, a notice to appear will be provided to you, and you will continue your case before the immigration court.

[04:39] If you were previously removed from the United States under an order of removal and then afterwards reentered the United States without permission, your prior order may be reinstated without a hearing. In that case, the government will provide you with a Form I-871. If you are not afraid to return to your country, you will be removed to your country.

[05:02] However, you still have the right to claim fear of returning to your country, although you are not eligible for asylum. You are only eligible to apply for withholding of removal under the Immigration and Nationality Act, or deferral or withholding of removal under the Convention Against Torture (CAT). In that case, your case will be sent to the asylum office for an interview, which is referred to as the reasonable fear interview. In this interview, you will be able to explain to an asylum officer why you are afraid to return to your country.

[05:35] If the asylum officer finds that you established a reasonable fear of return, your case will be transferred to the immigration court, and you will be able to present your applications for withholding of removal and CAT before the immigration judge. If the asylum officer does not find you have a reasonable fear, you may accept the decision as final and be returned to your country, or you may request a review of that decision by an immigration judge.

[06:00] If you request review of the negative decision before the immigration judge and the judge agrees with the asylum officer, you will be returned to your country. If the judge disagrees, your case will be sent to the immigration court, and you will be able to present your applications for withholding removal and protection under the Convention Against Torture. Other forms of relief from removal are not available.

[06:25] It's possible to be placed in other forms of removal that are less common. If you enter the United States via the visa waiver program or as a crewman, different procedures may apply. The law library at your facility will have information about these forms of removal.

[06:42] If you are in immigration proceedings before an immigration judge, you may be able to apply for relief from removal. In the next few sections, we will focus on some common forms of relief that you may qualify for. There are other forms of relief that people may qualify for that this orientation does not cover.

[7:02] Asylum is one form of relief from removal that you and your family may qualify for if you are afraid to return to your country. To qualify, you must be afraid to return to your country because someone has hurt you or a family member, or you are afraid someone may hurt you or a family member in the future because of your religion, political opinion, race, nationality, or because you are a member of a particular group.

[07:24] You may not qualify for asylum if you have been in the United States for over a year, if you have hurt others in your country, if you are a member of or supported terrorist organizations, if you have legal status in a third country, and if you have committed serious crimes.

[07:39] In addition, since 2023, you may not be eligible for asylum if you entered between May 11, 2023, and May 11, 2025, after COVID-related travel restrictions were lifted and you traveled through a country that is not your own to get to the United States. This restriction does not apply if you and/or your family had permission to travel to the U.S., you presented yourself at a U.S. port of entry because you had an appointment, or you can show you were unable to make an appointment due to technological problems or due to personal limitations that prevented access to the system, or you applied for asylum in another country and were denied.

[08:16] Also, you can show that you should be eligible for asylum because exceptional circumstances existed in your case that forced you to enter without inspection or permission such as you or your family member suffered a medical emergency, a serious threat to life or safety, or suffered due to severe human trafficking. Even if you are not eligible for asylum, you may still be eligible for withholding of removal or protection under the Convention Against Torture.

[08:42] It's important to note that in order to obtain withholding of removal, the judge must first order removal. To qualify for withholding of removal, you must show that it is more likely than not you will be harmed or your freedom taken away in your country because of your religion, political opinion, race, nationality, or because you are a member of a particular group such as a family. You may not qualify for withholding of removal if you have hurt others in your country, if you committed a serious crime in your country, if you are a danger to the United States, and if you have been convicted of a serious crime. Even if you are granted withholding of removal to your country, the government may seek to remove you to a different country that is not your country of origin.

[09:23] Like withholding of removal, this form of relief also requires the issuance of a removal order. There are two types: Deferral of Removal under Convention Against Torture if you cannot apply for asylum or withholding due to criminal convictions or due to national security reasons, and Withholding of Removal under Convention Against Torture if you are unable to show that the harm you suffered was on account of your religion, political opinion, race, nationality, or because you are a member of a particular group.

[09:53] To obtain protection under the Convention Against Torture, you must show it is more likely than not you will be tortured if you are returned to your country. Torture means very serious harm that is beyond what you need to show to get asylum or withholding of removal under the Immigration and Nationality Act.

[10:11] You and your family may be eligible for other forms of relief from removal in addition to the ones already discussed. For example, if you have family members who are U.S. citizens or lawful permanent residents, they may be able to petition for you, and you may eventually become eligible for permanent residence, sometimes called a green card. There are also visas for victims of crimes—this is called a U-Visa—and for victims of trafficking—this is called a T-Visa. In addition, your child may be eligible for special immigrant juvenile status if he or she was abandoned, neglected, and abused by the other parent.

[10:48] Another form of relief from removal you may apply for is one where removal is cancelled if you have lived in the United States without interruption for 10 years and you have U.S. citizen children, spouse, or parent that would suffer significant harm if you were removed from the United States.

[11:04] This is not an exhaustive list, so you should speak with an attorney and/or look in the law library resources to learn about how your personal circumstances may qualify you for relief from removal if you wish to remain in the United States.

[11:17] If you are in immigration proceedings before an immigration judge, you are also entitled to request return to your country without going through immigration proceedings by requesting voluntary departure.

[11:30] If you depart under an order of voluntary departure, you can avoid the consequences of a removal order, which may include being prohibited from returning to the United States or being subject to criminal charges if you return without permission. You may also obtain voluntary departure at the beginning of your case or at the end of your case. If you ask for voluntary departure at the beginning, you will have more time and less conditions to get the order. At the end of your case, the judge may require you pay a bond and give you less time to depart.

[12:02] If you would like to depart voluntarily, you may ask your deportation officer. The Department of Homeland Security can agree to voluntary departure in removal proceedings or may be able to approve voluntary departure before you even get placed into proceedings.

[12:19] If you decide you do not want to apply for relief from removal, you may also be eligible for stipulated removal, which allows you to be removed quickly without a hearing. You can talk to a deportation officer or, if you are represented, to an attorney about a stipulated removal order before your next hearing.

[12:38] To obtain stipulated removal under INA section 240(d), after you or your attorney discuss your case with your deportation officer, inform the immigration judge, in writing, of your desire to be removed from the United States and that you and the U.S. Department of Homeland Security jointly request that a stipulated removal order be issued without showing up for court.

[13:00] The most important points to remember: You have the right to be represented by an attorney at no cost to the government, and a list of free or inexpensive lawyers will be provided to you; you have the right to have an immigration judge review and/or adjudicate your case depending on what kind of removal document you received; you can ask for asylum or other related forms of relief if you are afraid of returning to your country; you can ask for voluntary departure.