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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

Jenny Flores, *et al.*,

Plaintiffs,

v.

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

Defendants.

Case No. CV 85-4544-DMG-AGRx

PLAINTIFFS' RESPONSE TO MARCH 13, 2026 ICE JUVENILE COORDINATOR STATUS REPORT AND DATA

Judge: Hon. Dolly M. Gee

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TABLE OF EXHIBITS

Exhibit Index to Plaintiffs' Response to March 13, 2026 ICE Juvenile Coordinator Status Report and Data

Exhibit No.	Exhibit Description
1	Declaration of Leecia Welch, March 20, 2026 ("Welch Decl.")
2	Declaration of Lucía Y. González, March 20, 2026 ("González Decl.")
3	C.C.A. Declaration (Dilley), February12, 2026 ("C.C.A. Decl.")
4	M.S.P. Declaration (Dilley), March 12, 2026 ("M.S.P. Decl.")
5	M.M.S. Jan.[1] Declaration (Dilley), January 15, 2026 ("M.M.S. Jan. Decl.")
6	C.R.B. Jan.[2] Declaration (Dilley), January 15, 2026 ("C.R.B. Jan. Decl.")
7	N.P.V. Declaration (Dilley), March 11, 2026 ("N.P.V. Decl.")
8	E.C.M. Declaration (Dilley), March 12, 2026 ("E.C.M. Decl.")
9	M.T.H. Declaration (Dilley), March 11, 2026 ("M.T.H. Decl.")
10	J.A. Declaration (Dilley), March 11, 2026 ("J.A. Decl.")
11	T.M. Declaration (Dilley), March 11, 2026 ("T.M. Decl.")
12	C.H.H. Declaration (Dilley), January 15, 2026 ("C.H.H. Decl.")
13	D.P.C.S. Declaration (Dilley), January 14, 2026 ("D.P.C.S. Decl.")
14	S.K. Declaration (Dilley), March 12, 2026 ("S.K. Decl.")
15	Declaration of Javier Hidalgo, March 20, 2026 ("Hidalgo Decl.")
16	N.C.C. Declaration (Dilley), February 12, 2026 ("N.C.C. Decl.")
17	L.R.C. Declaration (Dilley), February 12, 2026 ("L.R.C. Decl.")
18	M.B.O.D. Declaration (Dilley), January 14, 2026 ("M.B.O.D. Decl.")
19	J.V.G. Declaration (Dilley), February 11, 2026 ("J.V.G. Decl.")
20	Z.V. Declaration (Dilley), February 11, 2026 ("Z.V. Decl.")
21	A.P. Declaration (Dilley), January 14, 2026 ("A.P. Decl.")
22	Y.H.H. Declaration (Dilley), January 14, 2026 ("Y.H.H. Decl.")

[1] M.M.S. has both a November (previously filed) and January declaration.
[2] C.R.B. has both a January and October declaration.

23	S.S. Declaration (Dilley), January 15, 2026 ("S.S. Decl.")
24	A.K. Jan.[3] Declaration (Dilley), January 14, 2026 ("A.K. Jan. Decl.")
25	A.M.P. Declaration (Dilley), February 12, 2026 ("A.M.P. Decl.")
26	N.M. Declaration (Dilley), January 14, 2026 ("N.M. Decl.")
27	J.B.A. Declaration (Dilley), March 12, 2026 ("J.B.A. Decl.")
28	D.R.R. Declaration (Dilley), January 15, 2026 ("D.R.R. Decl.")
29	O.S. Declaration (Dilley), August 12, 2025 ("O.S. Decl.")
30	L.T.P. Declaration (Dilley), January 14, 2026 ("L.T.P. Decl.")
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32	N.S.R. Declaration (Dilley), March 12, 2026 ("N.S.R. Decl.")
33	C.R.B. Oct. Declaration (Dilley), October 10, 2025 ("C.R.B. Oct. Decl.")
34	K.P.L.R. Declaration (Dilley), November 18, 2025 ("K.P.L.R. Decl.")
35	M.L.S. Declaration (Dilley), February 12, 2026 ("M.L.S. Decl.")
36	M.P.P. Declaration (Dilley), February 11, 2026 ("M.P.P. Decl.")

Previously Filed Declarations

Docket No.	Description
1706-09	Ex. 8 to Pls.' Resp. to Dec. 2025 Suppl. JC Reports and Data, A.K. Declaration (Dilley), November 19, 2025 [1706-09] ("A.K. Nov. Decl.")

[3] A.K. has both a November (previously filed) and January declaration.

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I. INTRODUCTION

Since the parties' last status conference on December 15, 2025, children and families at the South Texas Family Residential Center in Dilley, Texas ("Dilley") have experienced crushing lengths of stay, an epidemic of illnesses, and harsher operational restrictions, limitations, and lockdowns following the high-profile detention of five-year-old Liam Conejo Ramos. Welch Decl. ¶ 7. In accordance with this Court's orders, the parties have simultaneously been attempting to mediate Plaintiffs' concerns regarding the length of detention and harmful conditions children endure at Dilley. *Id.* ¶¶ 3-4.

Despite some progress in mediation and some recent improvements, the March 13, 2026 ICE Juvenile Coordinator Status Report, Dkt. No. 1736-1 ("ICE JC Status Report" or "JC Report") and supporting data confirm Plaintiffs' ongoing concern that ICE remains woefully out of compliance with the *Flores* Settlement Agreement. The ICE JC Status Report and exhibits document that **nearly 600 children spent more than 20 days in ICE custody in December and January alone**[4]; that families complain in meetings with Dilley staff about "food quality," "baby food availability," and "soap and hygiene products" (JC Report at 38); and that lights are still kept on all night while children try to sleep (*Id.* at 31).

Although the JC Status Report states there were "no reportable critical incidents," "no placements on suicide watch," "no residents requiring hospitalization or emergency room referral[s]," "no . . . administrative or disciplinary segregation," "no facility-wide lockdown," and disputes any and all medical complaints (*Id.* at 7, 16-19, 32), multiple families share a vastly different experience – one where class members and their families have experienced hospitalizations, lock downs, room sweeps, and retaliation for filing grievances. *See* Section II.B.1. One family spoke with class counsel from disciplinary segregation, and another reported a suicide attempt by their 13-year-old daughter. *See* C.C.A. Decl. ¶ 27; Welch Decl. ¶ 15, Attachment B. Plaintiffs also present overwhelming

[4] Dec. 2025 ICE Family Residential Center 20-Day Report, Dkt. No. 1736-2 (Dec. 20-Day Census Chart); Jan. 2026 ICE Family Residential Center 20-Day Report, Dkt. No. 1736-3 (Jan. 20-Day Census Chart) (collectively, "20-Day Census Charts"). *See* González Decl. at ¶¶ 5-14 for Plaintiffs' data analysis methodology.

evidence from class members documenting ongoing FSA violations enumerated below, all of which underscore ICE's failure to treat children commensurate with their vulnerability. Welch Decl. ¶ 5.

II. ICE continues to violate the *Flores* Settlement Agreement.

The ICE JC Status Report documented an alarming increase in detention time for class members at Dilley in December 2025 and January 2026 – with nearly 600 children languishing at Dilley for over 20 days.[5] 20-Day Census Report; González Decl. ¶ 6. Plaintiffs also present voluminous evidence that children at Dilley continue to suffer. Welch Decl. ¶¶ 5, 10, 13, 21. Ongoing FSA violations include inadequate medical care, lack of information about *Flores* rights and access to counsel, lack of access to healthy and safe child-friendly foods and snacks, the inability of class members to sleep due to lights on in their living areas all night, lack of free calls to family members, and inadequate education and developmentally appropriate activities. *Id.* ¶¶ 5, 11, 16, 19, 22, 27-30. Families consistently report their children are hungry, exhausted, perpetually sick, and despondent from the conditions of confinement at Dilley. *Id.* ¶ 5.

Plaintiffs' counsel have conducted nine site visits at Dilley since the government began incarcerating families in April 2025. *Id.* ¶ 2. After each site visit, Plaintiffs' counsel provided Defendants with a detailed, comprehensive list of *Flores* violations. *Id.* ¶ 3. As directed by Defendants, Plaintiffs' counsel also raised emergency time-sensitive concerns about particular children via email on multiple occasions. *Id.* Plaintiffs and Defendants have met and conferred five times (May 14, May 30, July 24, September 17, and October 6, 2025) about the *Flores* violations at Dilley identified in our correspondence. *Id.* In accordance with this Court's orders, the parties also began conducting mediation sessions in January 2026. The parties met on January 23, February 4, and March 2, 2026, and Plaintiffs' counsel sent two additional meet and confer letters

[5] The 20-Day Census Reports again undercount actual length of stay because they only provide facility length of stay from a book-in date, rather than total custody length of stay from the date of apprehension. *See* González Decl. ¶ 6. The 600 number provided above is from Plaintiffs' own analysis. *Id.*

and two emergency emails since mediation began. *Id.* ¶ 4. While Plaintiffs have repeatedly reported over the last year that Dilley remains seriously out of compliance with the FSA, *Id.* ¶ 10, the ICE JC Status Report states unequivocally that Defendants find Dilley in full compliance. JC Report at 8, 57. Despite some progress in mediation regarding possible reductions in children's length of stay, and an agreement to have Dr. Paul Wise conduct medical site visits at Dilley, the parties still fundamentally disagree as to FSA compliance at Dilley.

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

1. Prolonged Detention at Dilley

During December and January, ICE detained at least 595 children for more than 20 days. 20-Day Census Charts; González Decl. ¶ 6. At least 265 of these children were detained for more than 50 days and a shocking 55 children were detained more than 100 days. 20-Day Census Charts; González Decl. ¶ 16. The minimal explanations listed in the 20-day Census Charts again demonstrate that Defendants are failing to comply with their obligations to release children without unnecessary delay and make and record prompt and continuous efforts toward family reunification and release. FSA ¶¶ 14, 18; *see also* González Decl. ¶ 14 (explaining data issues regarding release explanations).

Despite the Court's order to provide "detailed reasons" for detentions over 20 days, the reasons given in the 20-Day Census Charts do not appear to be individualized and remain vague. 20-Day Census Charts. The Charts label almost all children with stays over 20 days (who were not released in each month) as being detained because they had pending immigration cases and appeals or pending voluntary departure and "Immigration and Nationality Act (8 U.S.C. 1101 et seq.) [Hold]/Significant likelihood of removal/Flight risk." *Id.* Detaining children because of pending immigration cases and appeals is an insufficient basis for prolonged detention. *See* Order re See Order re Pls.' Mot. to Enforce, Apr. 24, 2020, Dkt. No. 784 at 13-14. Additionally, ICE does not include any information about the individualized reasons that any particular child was determined a "Flight risk"; for many children it is unclear whether their prolonged

detention is allegedly justified by "significant likelihood of removal" or because of "flight risk".[6]

Moreover, ICE provided no individualized explanations for the class members who were released after months of detention. The 20-day Census Charts document that 38 children were held in custody for over 100 days and then released with no explanation in December and January. 20-Day Census Charts. These charts also show 121 children were held in custody for over 50 days and then released with no explanation. *Id.*

The 20-day Census Charts again suggest that Defendants are failing to make individualized determinations as to whether removal is imminent and whether class members are eligible for release. For example, one family who ICE reported had been detained for 88 days awaiting a deportation flight in December, was still detained an additional 37 more days prior to removal. Dec. 20-Day Census Chart at 3 row 11; Jan. 20-Day Census Chart at 3 row 8. For another family, nothing in the report indicates that ICE did any individual screening to determine whether the family could be released while their immigration appeal was pending. This family eventually withdrew their appeal and was removed after 129 days in custody. Dec. 20-Day Census Chart at 3 row 9; Jan. 20-Day Census Chart at 3 row 11. ICE reported in the December data that another family, who agreed to voluntary departure and had already been detained for 58 days by the end of December, was not scheduled for a departure flight until January 30, 2026. ICE provided no specific information about why this family remained detained until their removal. Dec. 20-Day Census Chart at 10 row 9.

As this Court has concluded, continued detention when removal is not imminent or "ready to take place" is a violation of paragraphs 14 and 18 of the FSA. *See* Order re Pls.' Motion to Enforce, April 24 2020, Dkt. No. 784 at 13-14. In addition, continued

[6] Further, all six children with stays over 20 days whom courts forced ICE to release because of a successful habeas petition, are listed without a "Flight Risk" designation. This begs the question of which individualized reasons ICE used to justify those lengthy detentions prior to a federal court's ruling them unlawful. In the absence of federal court interventions, these six children might have continued to remain in unjustified prolonged detention without individualized determinations, like so many of the other children at Dilley. *See* González Decl. ¶ 14 for explanation of data analysis.

detention of class members, even where the child has a final removal order, is a violation of FSA paragraph 14 *unless* ICE has provided an individualized assessment that determines continued detention is necessary for safety or because of a flight risk, which is not happening. *Id*. at 17-18; Order re Pls.' Mot. to Enforce, June 27, 2017, Dkt. No. 363 ("June 2017 Order") at 24, n. 16 (Class members awaiting removal should not "be treated any differently . . . with regard to the release provisions under the Agreement . . .").

ICE's choice to add the words "Flight risk" with no justification to almost every class member's reason for length of stay shows a complete absence of individualized assessments. Plaintiffs have raised concerns about prolonged detention of class members at Dilley for many months, and the December and January census data demonstrate hundreds of children experienced extremely prolonged lengths of stay. González Decl. ¶ 16. Based on Plaintiffs' Dilley site visit last week, lengths of stay show signs of improvement, but only time will tell whether this trend will continue. Welch Decl. ¶ 9.

2. Prolonged detention of children in hotels

The December 2025 ICE Hotel Stays Report, Dkt. No. 1736-6, and January 2026 ICE Hotel Stays Report, Dkt. No. 1736-7 again reveal unexplained prolonged detention of children in hotels that appears to violate the Court's Orders limiting the use of hotels to "*brief* hotel stays (not more than 72 hours) as necessary and in good faith to alleviate bottlenecks in the intake processes at licensed facilities." Order re Defs.' *Ex Parte* Appl. to Stay, Sept. 21, 2020, Dkt. No. 990 at 5; *see also* Order re Pls.' Mot. to Enforce Settlement as to "Title 42" Class Members, Sept. 4, 2020, Dkt. No. 976 at 17 (permitting exceptions "for one to two-night stays while in transit or prior to flights . . .").

The December and January Hotel Stays Reports reveal that 43 children spent more than 72-hours in hotels, including one eight-year-old child who spent more than 16 days detained in a hotel only to eventually be released from custody. Dec. 2025 ICE Hotel Stays Report, Dkt. No. 1736-6 (Dec. Hotel Stay Rep.); Jan. 2026 ICE Hotel Stays Report, Dkt. No. 1736-7 (Jan. Hotel Stay Rep.) (collectively, "Hotel Stays Reports"). Additionally, during our March *Flores* site visit to Dilley, counsel for Plaintiffs met a family that had spent nine days in a hotel, during which time ICE told them they could

not alert family members or their attorney where they were, and that they were not allowed to look out the window. *See* M.S.P. Decl. ¶¶ 10-14.

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

Plaintiffs' counsel have now met with approximately 150 families at Dilley since it re-opened in April. Welch Decl. ¶ 10. While there were some improvements in March 2026, children detained at Dilley continue to suffer. *Id.* ¶¶ 5, 10, 13, 21. Class members and their families consistently report serious concerns regarding Dilley's secure, prison-like environment, inadequate medical care, lack of information about *Flores* rights and access to counsel, lack of access to healthy and safe child-friendly foods and snacks, the inability of class members to sleep due to lights on in their living areas all night, lack of free calls to family members, and lack of adequate education and developmentally appropriate activities. *Id.* ¶¶ 5, 12, 17, 20, 23, 28-31.

1. Children are kept for prolonged periods in an unlicensed, secure, prison-like environment.

Dilley remains an unlicensed, secure ICE facility operating under a contract with CoreCivic. Welch Decl. ¶ 6-9. In January and February 2026, children and families at Dilley reported feeling even more like prisoners as the facility instituted even more severe operational restrictions, practices, and lockdowns after the high-profile detention of five-year-old Liam Conejo Ramos resulted in increased media attention and public outcry about the incarceration of children. Welch Decl. ¶ 7; M.M.S. Jan. Decl. ¶ 24 ("After three months, this place feels like a prison more than ever. Every day they have new rules that are more restrictive and make you feel even worse."); C.R.B. Jan. Decl. ¶ 12 ("A lot of things are even worse and more strict than when I arrived in October."); N.P.V. Decl. ¶ 20 ("I never got to see the little boy, Liam, when he was here, but I saw him on the news. I was happy when he was released, but I couldn't help but think 'what about the rest of us?'").

Families consistently reported a marked increase in the harshness of their treatment by guards at Dilley. S*ee, e.g.,* E.C.M. Decl. ¶¶ 15, 27 (guard yelled at family for being animals and provoked child with autism); M.T.H. Decl. ¶ 13 (staff are rude to children);

J.A. Decl. ¶ 15 (same); M.M.S. Jan. Decl. ¶ 13 ("Some of the guards are awful to the children."); T.M. Decl. ¶ 19 (staff mock family who was in medical isolation); C.H.H. Decl. ¶ 46 ("[The staff] treat us like animals . . ."); D.P.C.S. Decl. ¶ 23 ("[Workers] laugh at the kids' pain."); C.C.A. Decl. ¶ 20 (staff laughed in child's face as he ripped up her drawing); S.K. Decl. ¶ 30 (staff threatened to separate family when toddler wouldn't stop crying from untreated toothache). Families also reported frequent hours-long lockdowns following an escape attempt, a peaceful internal protest, multiple external protests, reported cases of measles, and congressional visits. Welch Decl. ¶ 7; Hidalgo Decl. ¶ 13; M.S.P. Decl. ¶ 36 (lockdown because "[c]ongresspeople had come here to investigate the detained mariachi brothers."); E.C.M. Decl. ¶ 24 (class member locked in room due to congressional visit); N.C.C. Decl. ¶ 16 (since the protest, sometimes families are forced to stay in their rooms); L.R.C. Decl. ¶ 19; M.B.O.D. Decl. ¶ 26 (officers yelled and locked families in their rooms with no explanation); J.V.G. Decl. ¶ 30 ("There have been four separate days when they locked us down in our rooms."); Z.V. Decl. ¶ 21("On those [lockdown] days, they have prevented us from leaving [our rooms] even to take our pills.").

Families also reported limitations on mealtimes, library time, computer time, and access to the Internet,[7] in addition to restrictions on their movement throughout the facility. Welch Decl. ¶ 7; Hidalgo Decl. ¶ 13; C.R.B. Jan. Decl. ¶ 12 ("[M]ealtimes are limited to one hour now when they used to be two hours. . . . Also, they changed the rules so that now all kids have to be with their parents most of the time . . ."); A.K. Jan. Decl. ¶¶ 17-18 (receive only one hour for meals now); C.H.H. Decl. ¶ 40 (now there is no Gmail, ChatGPT, or Google); A.P. Decl. ¶ 32 ("[W]e can't use anything at all on the computers. Nothing works. Everything is blocked."); A.K. Jan. Decl. ¶ 18 (staff now

[7] Class members routinely report that they are impeded from contacting their lawyer without access to Gmail.*See* Section II.B.3. Class members routinely report that they cannot contact their lawyer without access to Gmail. *See*, A.P. Decl. ¶¶ 34-36; M.M.S. Jan. Decl. ¶ 12; Y.H.H. Decl. ¶ 11; C.H.H. Decl. ¶¶ 40-42; S.S. Decl. ¶¶ 57-58; M.S.P. Decl. ¶ 35.

require young children to be held in parents' arms while waiting in line for food, which can take 30 minutes); A.P. Decl. ¶ 60 ("When [the single women] move around the facility, the children and I are locked in."); S.S. Decl. ¶ 56 (same).

Families also reported increasingly aggressive room searches and sweeps resulting in the confiscation and destruction of children's drawings. Welch Decl. ¶ 7; Hidalgo Decl. ¶ 14; Z.V. Decl. ¶ 20 ("The officers have used false fire alarms to make us leave our rooms so they can search them."); A.M.P. Decl. ¶ 18 (After protest, staff "said they were throwing away the crayons for our security and so the children would not write more letters about the conditions at Dilley."); C.C.A. Decl. ¶ 8 ("[S]taff came into our room and took drawings from my daughters where they wrote down that they are in prison."); N.C.C. Decl. ¶ 17 (during searches, staff confiscate things like toothbrushes, letters, hair products, and drawings of Bratz dolls). In the wake of these increasingly aggressive practices, families also consistently report fear of meeting with politicians, talking to media, and utilizing the internal grievance system[8] due to concerns of retaliation by staff. Hidalgo Decl. ¶ 13; A.K. Jan. Decl. ¶¶ 23-29 (family was threatened with separation due to complaints about lack of baby food); M.M.S. Jan. Decl. ¶ 19 (staff discourage people from making grievances and say it will impact their immigration case); N.M. Decl. ¶ 24 (same); C.V.H. Decl. ¶ 38 ("Every time we write grievances, we are afraid they are going to retaliate against us."); A.M.P. Decl. ¶ 17 (Staff threw away flyers that said make grievances to inform *Flores* Counsel); E.C.M. Decl. ¶ 24 (staff don't want families to speak with media); C.C.A. Decl. ¶¶ 5-6, 13-14 (people who filed lots of grievances were not allowed to speak with congresspeople and staff retaliated against

[8] There is a notable disparity between the number of reported grievances each month and the number of grievances that ICE deems "founded." Report at 36. In November 2025, 78 grievances were filed and none were apparently founded; in December 2025, 76 were filed and only 14 were founded; in January of 2026, 89 were filed and only four were founded; and, in February 2026, 26 were filed and only one was founded. *Id.* Class members also report that Dilley staff do not read the grievances, rarely respond, and rip them up. *See* C.H.H. Decl. ¶ 83; S.S. Decl. ¶ 59; A.K. Jan. Decl. ¶ 51; A.P. Decl. ¶ 37; D.P.C.S. Decl. ¶ 22, M.B.O.D. Decl. ¶ 21; M.M.S. Jan. Decl. ¶ 5.

family after they spoke to media/Flores); S.K. Decl. ¶ 50 ("[T]hey said they would write a report against me once they realized I was going to talk to Flores counsel.").

These harsh tactics and restrictions make the children at Dilley feel even more like prisoners and create additional stress. S.S. Decl. ¶ 52 ("[I]t's like being in a prison here or a concentration camp."); J.A. Decl. ¶ 23 (family feels like they are in jail); J.B.A. Decl. ¶ 18 ("[O]ur son . . . feels like a prisoner here."); A.K. Jan. Decl. ¶ 20 (two-year-old and parents are crying everyday); A.P. Decl. ¶ 19 (mom hears child crying from the showers, constantly sobbing); C.H.H. ¶ 51 (child cries while praying for release).

In stark contrast to these first-hand accounts, the ICE JC Status Report asserts that Dilley maintains a "stable operational environment with no reportable critical incidents," "no administrative or disciplinary segregation," no destruction of personal property "unrelated to protest activity," and "no facility-wide lockdown." JC Report at 7, 31, 32. Plaintiffs do not know how these terms are defined by CoreCivic, but it simply does not seem possible for both families' and the ICE Juvenile Coordinator's assertions to be true.

2. Dilley still provides inadequate medical care to children.

Dilley continues to provide dangerously inadequate medical care to children. In December 2025, Plaintiffs informed the Court that Dilley families had raised concerns over inadequate medical care to RAICES attorneys ***on at least 360 occasions***. Pls.' Resp. to Supp. Juvenile Coordinator ICE Report, Dec. 8, 2025, Dkt. No 1706 at 15; Hidalgo Decl. ¶¶ 17-20. Since that time, RAICES attorneys have received at least 375 additional concerns over medical care. Hidalgo Decl. ¶¶ 17-20.

Following Plaintiffs' January, February, and March 2026 site visits to Dilley, class counsel alerted Defendants to multiple examples of children's medical needs not being met, resulting in escalating and sometimes life-threatening health problems, including: a 10-year-old child with Hirschsprung's disease who lacked proper medical care and diet resulting in no bowel movements for over a month (D.R.R. Decl. ¶¶ 4-7); an 18-month-old baby who went to the hospital for 10 days when her oxygen levels plunged to a life-threatening level (Welch Decl. ¶¶ 11-12, Attachment B); a nine-year-old girl who left scratch marks across her entire body due to allergies and no special diet provided (A.P.

Decl. ¶¶ 4, 38-40); a two-year-old with an infected gum that Dilley staff did not treat for over 23 days, leading her to have a fever, infection, cry relentlessly, and be on a liquid diet the whole time (S.K. Decl. ¶¶ 4, 21, 24, 26, 30); a teenager with appendicitis who needed emergency surgery in part because he hesitated going to medical, knowing the nurses would turn him away, which the first nurse did (O.S. Decl. ¶¶ 11-38); a mother who had to be hospitalized for three days without her child due to Dilley's inability to treat a UTI (MMS. Jan. Decl. ¶¶ 14-15); and a pregnant mother with Hepatitis B who was in extreme physical distress due to inadequate treatment options at Dilley (N.M. Decl. ¶¶ 14-17).

Families continue to report that Dilley staff not only belittle their illnesses but actually mock them. A.P. Decl. ¶ 50 ("For any illness, the only advice is to drink more water, which is undrinkable."); D.P.C.S. Decl. ¶ 29 ("I started throwing up. I asked to go to the doctor, but because I only speak Spanish the guards I asked just watched and laughed at me."); L.R.C. Decl. ¶ 7 ("[The n]urse was just laughing and not putting our information in. I got so angry because it was an urgent medical problem . . ."); T.M. Decl. ¶ 19 ("[The g]uards who knew I was in isolation because of tuberculosis now mock me and say, 'TB, no TB, TB, no TB' when they see me. This is embarrassing for me."); S.K. Decl. ¶ 30 (staff accuse mother of beating her child instead of providing necessary medical care to crying two-year-old with an infected tooth).

Dilley staff also frequently ignore medical issues or actively make things worse. L.P.T. Decl. ¶¶ 11-12 (medical staff would not give mother and child with autism prescribed medications and said nothing could be done about child's hives outbreak); M.B.O.D. Decl. ¶¶ 9, 11 (inadequate tooth removal led to another removal days later and child not allowed to see doctor despite persistent stomach pain on his right side); C.H.H. Decl. ¶ 23 ("The first time I went to medical because [my son] had [a] fever, they told me he was big enough to tolerate the fever, so they would not give him any medication."); M.S.M. Decl. ¶ 14 (sickness broke out in entire facility and children could not get examined or receive medicine in timely manner); M.M.S. Jan. Decl. ¶¶ 14-17 (after discharge from hospital, staff took one week to dispense prescribed medication); A.P. Decl. ¶¶ 15-16

(family told by medical to eat bananas after severe stomach issues, but facility has never offered bananas).

Children with disabilities and chronic medical conditions continue to deteriorate from Dilley's harsh, restrictive environment, separation from their medical providers, and interruption of their medical and mental health care plans. Welch Decl. ¶ 13. For example, an 11-year-old child on the autism spectrum regressed developmentally from his prolonged detention in Dilley. S.S. Decl. ¶¶ 16-28 (more stimming, more aggression, increased repetitive behaviors, continuous crying, and less talking). This same child was also denied a special diet despite medical documentation that he could not eat gluten, sugar, or lactose. *Id.* at ¶¶ 31-32. Another little boy with ADHD is no longer receiving proper treatment, causing severe aggression and deterioration. J.B.A. Decl. ¶¶ 10-11 (Dilley staff confined the boy to his room and took away his toys, despite the psychologist's orders). Another young girl with autism and an intellectual disability was denied necessary medication and therapy that she was receiving before Dilley. C.C.A. Decl. ¶ 4 ("She also used to receive psychological and speech therapy, but she hasn't received any of that here. Her condition has gotten worse now that she's detained."); *see also* L.T.P. Decl. ¶¶ 11-12 ("I am autistic and so is my youngest child, and they are not giving us our prescribed medications, even though we have to take them every morning and evening."). A five-year-old nonverbal child who was being tested for autism and other developmental delays pre-apprehension has been unable to get test results or services at Dilley and has become increasingly aggressive and anxious. N.S.R. Decl. ¶¶ 8, 11-13.

Parents are often particularly alarmed about their children's worsening mental health. Welch Decl. ¶ 14; Hidalgo Decl. ¶ 21; A.P. Decl. ¶¶ 18-20 (child who stopped wearing diapers years ago has begun wetting herself); C.H.H. Decl. ¶ 35 ("He is a big kid who has slept alone for years, but here, he always asks if he can sleep with me."); A.K. Jan. Decl. ¶ 44 (two-year-old started hitting himself at Dilley); N.M. Decl. ¶ 25 ([The children] chew their nails, many have regressed to wetting the bed again, they are all deteriorating psychologically); Y.H.H. Decl. ¶¶ 12 (child is deteriorating). Families

report children being anxious, stressed, and depressed. E.C.M. Decl. ¶ 12 ("I feel so much anxiety and nerves that I have to use the bathroom every 5 minutes here. I keep wondering what is wrong with me."); N.C.C. Decl. ¶ 14 (child cannot eat from depression); N.S.R. Decl. ¶ 4 (severe stress has caused child's constipation for nine days). For some teenagers at Dilley, mental health deterioration has been particularly dire, resulting in panic attacks, suicidal ideation and, in at least one known case, a suicide attempt. Welch Decl. ¶ 15, Attachment B; C.R.B. Jan. Decl. ¶ 5 ("Being at Dilley this long has been extremely hard on my mental health. It is really getting to me. I am having panic attacks. I have had a couple of medical emergencies in the past couple of months.").[9] For class members with pre-existing mental health issues, any treatment provided by the staff psychologist is painfully inadequate. C.R.B. Oct. Decl. ¶ 16 (psychologist appointments last 10 minutes, aren't helpful to youth, and state that they should just not worry); A.K. Jan. Decl. ¶ 44 (psychologist implied that toddler hitting himself is normal by saying her child does that too); A.P. Decl. ¶ 22; C.C.A. Decl. ¶ 4 (therapies for autism not provided); S.S. Decl. ¶¶ 16-28 (same).

Again, the ICE JC Status Report presents a vastly different picture of children's medical care at Dilley than the one experienced by families. Welch Decl. ¶¶ 11-15. The report states that "no residents require[ed] hospitalization or emergency-room referral" (JC Report at 7); there were "no reportable critical incidents." (*Id.* at 7); "[n]o systemic medical or behavioral health deficiencies were identified" (*Id.* at 12) and that "available documentation does not substantiate" any of the medical concerns raised by Plaintiffs' counsel (*Id.* at 19). Moreover, while it may be true that there were "no placements [of residents] on suicide watch" (*Id.* at 7), the ICE JC Status Report fails to acknowledge that a thirteen-year-old girl tried to slit her wrist with a plastic knife from the cafeteria "after guards took away drawing materials," and she was "put into isolation without seeing a doctor." Welch Decl. ¶ 13, Attachment B.

[9] The ICE JC Status Report acknowledges that mental health services at Dilley are generally limited to "orientation" and "psychoeducation" rather than "structured treatment plans" due to the "short lengths of stay" (JC Report at 22) but fails to account for the fact that some children have remained at Dilley for four to six months or longer.

3. Children are still not being provided notice of their Flores rights.

Since May 2025, Plaintiffs' counsel have repeatedly voiced concerns that children at Dilley are not being apprised of their *Flores* rights. Welch Decl. ¶ 16. Moreover, despite the availability of willing legal services providers to conduct Know Your Rights trainings, there is still no legal orientation program for children and families at Dilley beyond a thirteen-minute animated immigration law video that never once mentions *Flores*. *Id.*; Hidalgo Decl. ¶ 23.[10]

Although the ICE JC Status Report states that families "receive I-770 forms, Notice of Rights (Exhibit 6) forms, a list of free legal services, a Sponsor Information Form, and a legal orientation" at intake (JC Report at 3), class members consistently report they have not received any handouts or other written materials[11] addressing their *Flores* rights. Order Approving Final Notice of Rights, Jan. 5, 2021, Dkt. No. 1056; M.L.S. Decl. ¶¶ 21-22 ("I have never seen something that looks like the I-770 form that you are showing me before.") Z.V. Decl. ¶ 16 ("I have not received any training about my rights either. I have never seen the I-770 form that you are showing me."); J.V.G. Decl. ¶¶ 18-19 ("No one has ever given us a know your rights paper either. I do not recognize the I-770 paper that you are showing me or the Flores Settlement Agreement Notice of Rights paper that you are showing me either. I have never seen one of those papers here."); J.A. Decl. ¶ 8 ("I don't remember receiving any paper with a notice of my

[10] Notably, the CoreCivic Resident Handbook explicitly authorizes "open access" to "group presentations on U.S. immigration law and procedures and all other relevant issues related to the immigration court, appeals, and discharge processes, including a resident's legal rights." CoreCivic Resident Handbook at 31 (July 25). Moreover, ICE's own Family Residential Standards ("FRS") expressly provide that "An electronic presentation will not be considered a replacement or substitute for an in-person or live [legal rights] presentation, when available." 2020 Family Residential Standards, FRS Section 6.4 (M), at page 8; https://www.ice.gov/doclib/frs/2020/6.4_LegalRightsGroupPresentations.pdf; https://www.ice.gov/detain/detention-management/family-residential.

[11] Even when written materials are provided, they are often inaccessible to non-English speakers. *See* K.P.L.R. Decl. ¶ 9; N.S.R. Decl. ¶ 7; S.K. Decl. ¶ 45; D.P.C.S. Decl. ¶ 43 ("I keep getting paperwork that I do not understand because it is always in English, and the staff here will not let us know what exactly it says.").

rights."); M.S.P. Decl. ¶ 25 ("No one has ever told us about our rights, given us a 'know your rights' training, or given us a paper with information about my children's rights here. I have never seen an I770 form either. . . . [O]fficial told me that when we got here, we should have gotten a packet with information about free lawyers. I tried to tell him that I never got those papers . . ., [but] [h]e told me I was lying and that I must have received it."); L.R.C. Decl. ¶ 25 ("The only thing they told us about [the rights of] kids in particular is that they should not experience sexual abuse.").

Class counsel have never spoken with a single family who recalls learning about their child's *Flores* rights in a video or training provided by ICE or CoreCivic at Dilley. *See, e.g.*, N.C.C. Decl. ¶ 15 ("We have never gotten an orientation here about our legal rights. They haven't told us about our children's rights under Flores or their right to a bond hearing."). A.M.P. Decl. ¶ 16 ("We have never been given a know your rights orientation or told about our rights here. They never told us anything about Flores. They have only told us what we cannot do – for example, they told my husband and I that we cannot hold hands or kiss or go to one another's rooms."); M.P.P Decl. ¶ 15 ("When we first got here, they told us at intake that we would come back the next day to watch a video about our rights. We came back the next day, but they said it would need to be another day. They haven't called us back about it. They haven't told me anything about Flores or my son's rights or anything about a right to a bond hearing."); S.S. Decl. ¶¶ 69, 74 ("We received no Know-Your-Rights training. I also remember very clearly the day we entered Dilley and no video at all was playing. . . . No one has explained that our children have the right to be released without us."); M.S.M. Decl. ¶ 32 ("No one has ever mentioned *Flores* or talked to me about my children's right to be released."); C.R.B. add month Decl. ¶ 15 ("Since we have been here, no one has told us about our rights. In three months, there hasn't been a know your rights presentation."); D.P.C.S. Decl. ¶ 18 ("I have not seen any sort of videos since I got here that say anything about rights."); L.T.P. Decl. ¶ 5 ("I have been detained at Dilley for 90 days. . . . We do not know whether we have any rights and we have been terrified the entire time we have been here."); J.A. Decl. ¶ 8 ("I don't remember watching a video or learning about my rights. When we first

arrived there were videos on in the room we were sent to, but I didn't understand what it was talking about."); M.T.H. Decl. ¶ 14 ("I was not shown a video about our legal rights. I was not told about Flores by the staff here . . ."); N.P.V. Decl. ¶ 12 (no video or orientation about rights); T.M. Decl. ¶ 13 ("I don't remember them showing any videos about our rights. No one has ever talked to me about my son's rights as a child here."); E.C.M. Decl. ¶ 16 (no training or video about rights); J.B.A. Decl. ¶ 9 ("[W]e have never received a training about our child's rights or learned about Flores. I have only gotten an orientation about what we are supposed to do and not do at this facility."); L.R.C. Decl. ¶¶ 25, 30, 32. ("No one has ever given us any information about our daughter's rights in detention. They showed us an animated video about the norms that we have to follow here, but the video never said that kids under 18 years get certain kinds of treatment or talked about rights at all."); M.M.S. Jan. Decl. ¶ 22 (ICE never informed mother of daughter's *Flores* rights, and when she learned about her rights through attorneys, ICE denied the mother's Flores request citing family unity policy).

Compounding this utter lack of information about *Flores* rights, class members also continue to face barriers to making free legal phone calls to counsel, including *Flores* attorneys or other private lawyers. Welch Decl. ¶ 18; M.B.O.D. Decl. ¶ 29 ("If we want to call Flores lawyers . . . we have to pay. I have asked and the staff have said that there's no other way to make calls."); M.L.S. Decl. ¶ 28 (used money to call *Flores* attorneys). While there is an ICE-provided list of pro bono attorneys, there are only four firms on the list to whom families can make a free legal call using the telephone system at Dilley, one of which is the ABA. Welch Decl. ¶ 18; C.H.H. Decl. ¶ 53 ("The only numbers we can call for free are the pre-programmed pro bono contacts on a specific list, but any other pro bono contacts not on that list cannot be called for free."). Otherwise, families struggle to make initial contact with outside lawyers and have no way to reach them without paying for it. Welch Decl. ¶ 18; M.B.O.D. Decl. ¶ 29 (have to pay for any lawyers not on the list); J.V.G. Decl. ¶ 13 ("We have never been allowed to call our lawyer for free.") (had to wait for family to add money to account to contact lawyer); M.S.M. Decl. ¶ 31 ("I have a lawyer but I do not get to make free calls to him. I have to

use my money if I want to call him."); T.M. Decl. ¶ 17 ("It costs us money to use the phones, even to call our attorney . . ."). Lastly, many class members report not ever being told they could access pro bono lawyers or receiving the pro bono attorney list at all. M.S.P. Decl. ¶ 25 (never received list of pro bono attorneys, no staff explained to us that list existed, staff accused family of lying when they said they didn't receive it, and family still hasn't been able to use it); N.P.V. Decl. ¶ 12 (was told there was a list of free attorneys but was never able to get ahold of them); M.L.S. Decl. ¶ 28 ("We never received information about how to call lawyers or how to call people for free.").[12]

4. Children still lack access to child-friendly foods and healthy snacks.

The vast majority of families Plaintiffs have spoken to over the past 10 months raise concerns about their children's poor nutrition at Dilley. Welch Decl. ¶¶ 19-20. Families report that the food makes children sick; express concern that the only fresh fruit provided to their children for months on end has been red apples; complain about the food taste, variety, and quality; and describe snacks as limited to cookies and sometimes granola bars. *Id.*; kj has to add cite to dec. L.R.C. Decl. ¶ 21 ("Recently, they served fried shrimp, and all the kids started throwing up after eating them. Kids were vomiting on to the tables. So much of the food is dirty, left out too long, or undercooked that it is no wonder it makes kids sick.); A.P. Decl. ¶ 45 ("There's no proper nutrition here. Almost all the food is spicy or fried in oil, like burgers and hot dogs."); D.P.C.S. Decl. ¶ 27 ("Some of the sauces truly look like vomit, and their smell makes the kids gag."); M.B.O.D. Decl. ¶ 13 ("The food here is terrible"); M.M.S. Jan. Decl. ¶ 6 ("My grievances about the food have to do with the fact that my daughter has been given the same food every day for months. There are few options, especially for a vegetarian[s]."); J.V.G. Decl. ¶ 43 (four-year-old girl stopped eating because she doesn't like the food); N.C.C. Decl. ¶ 10 (food at Dilley is very bad); S.K. Decl. ¶ 35 ("All my kids here hate the food. It's too salty. It's inedible. The last three or four days they've improved the

[12] Lawyers can make appointments through CoreCivic to speak to their clients and those calls are free to families, but families cannot initiate calls to their lawyers for free. Welch Decl. ¶ 18. Thus, if a detained person wants to speak with their lawyer for free, they must wait and hope their lawyer schedules a call with them.

food. It's because there have been people from Congress here and now Flores counsel is here."); J.B.A. Decl. ¶ 13 (food is too spicy for eight-year-old boy); N.S.R. Decl. ¶ 9 ("Most kids here do not get fresh fruit other than red apples.").

Class members report that food served to them has been contaminated with worms[13] and mold, causing many children to become ill and vomit repeatedly. During our January 2026 site visit, one mother reported:

> The only fresh vegetables are a mix of cabbage and lettuce, which aren't always fresh. Sometimes they're served moldy. If we show the staff the visible mold, they just take it out. Sometimes, people would bring the moldy cabbage to the staff, and they'd take it and eat it and say this is normal food. They'd just destroy the evidence so it wasn't brought anywhere else. In November, there was an incident where boiled vegetables were served with live worms. We received no specific explanations regarding the worms. Some families got sick from it though. One family was vomiting, and they were told if their daughter vomits more than 8 times, then they can go to medical. If she vomits less than that, then don't.

A.P. Decl. ¶¶ 46-47; *see also* M.B.O.D. Decl. ¶ 14 ("In December, there were worms in the broccoli and chicken. A woman showed worms in the chicken to an official and made a grievance."); C.H.H. Decl. ¶ 30 ("There was one day that there were worms and mold in the broccoli. Sometimes there is also hair in the food."); N.C.C. Decl. ¶ 10 ("Back in December, the salad had worms and we were told that it's just normal. We know that some kids here have been vomiting up black from the food."); Ex. 8 to Pls.' Resp. to Dec. 2025 Suppl. JC Reports and Data, [Dkt. No. 1706-09] A.K. Nov. Decl. ¶¶ 11 ("A.K. Nov. Decl.") ("[L]ast week, I was given broccoli and cauliflower that were moldy and had worms."); L.R.C. Decl. ¶ 21 (lettuce had worms).

Families continue to report that due to the lack of child-friendly, varied food, their children are constantly hungry, especially babies and toddlers. *See* A.K. Nov Decl. ¶ 11

[13] In response to multiple reports that food served to children was infested with worms, the ICE JC Status Report responds that: "A review of facility records did not identify any grievance, report, or documentation supporting the allegation that wormy food was served to residents. However, there was an isolated event in which residents reported a batch of broccoli and cauliflower was discolored, and some residents stated there were bugs in the food." JC Report at 15. It is unclear whether these are two separate incidents or whether the identified bugs were, in fact, worms.

("Every day I am crying because there is not food for our son to eat. . . . I am so sad all the time that there is not baby food here."); A.K. Jan. Decl. ¶ 41 ("No one ever told me there was Gerber baby food that was available here. One time, I noticed in the playroom that there was a box of that food. I asked the staff if they have this. They said yes, and that was after we had already been detained for 2 to 2.5 months. I was so infuriated."); S.K. Decl. ¶ 36 ("It would be great to have French fries, soup, puree, and pasta for the kids. We would also love to have bananas for the kids. They like bananas, and they're soft. I have never seen Gerber baby food or pouches for the kids here."); M.L.S. Decl. ¶ 13 ("The staff have not given us any baby food for our 15-month-old. She just has to eat the regular food in the cafeteria, so she barely eats anything."); M.B.O.D. Decl. ¶ 15 ("The only items we can have for snacks are apple juice, apples, cookies, and milk. If the dorm runs out of snacks in the morning, which often happens, we have to wait until the night to get more snacks."); L.R.C. Decl. ¶ 22 ("We keep asking the staff why babies have no option for soft food here."); Welch Decl. ¶¶ 19-21; Hidalgo Decl. ¶ 25.

Some children are constantly hungry, in part, because Dilley staff refuse to accommodate documented medical allergies and food sensitivities. *See, e.g.,* A.K. Jan. Decl. ¶¶ 22-26 (special diet requested for toddler-friendly food was denied and parents were threatened with separation); A.P. Decl. ¶¶ 38-41 (certain foods cause little girl to feel itchy and scratch her whole body until it bleeds; mom's request for special diet was denied and doctor refused to write it in medical records); D.P.C.S. Decl. ¶ 27 ("[They] do not make [food] accommodations for medical issues."); M.B.O.D. Decl. ¶ 13 (staff said child could not receive a special diet because there was no religious reason); M.M.S. Jan. Decl. ¶ 7 (vegetarian diet originally not respected until mom got doctor's note from home country); O.S. Decl. ¶¶ 5-9 (for at least 56 days, Halal diet not provided or respected); D.R.R. Decl. ¶¶ 4-6 (child with Hirschsprung's was refused special diet); S.S. Decl. ¶¶ 31-35 (child with medically documented intolerances to gluten, lactose, and sugar was refused special diet).Many children and teens have told us they are eating nothing more than bread with jam, and rice. *See, e.g.,* A.P. Decl. ¶ 48 ("My children aren't getting proper nutrition, and because of this, they're gaining weight, as they mostly eat bread and

jam or cookies and milk."); J.V.G. Decl. ¶ 43 ("Now [my child] is eating just rice, because everything else looks so bad."); M.B.O.D. Decl. ¶ 13 ("Because they will not provide plain food, my youngest daughter only eats bread and coffee with milk."); L.R.C. Decl. ¶ 22 ("[A]ll the babies are getting thin because they can only really eat pieces of bread.").

The ICE JC Status Report again ignores the concerns repeatedly raised by families regarding the lack of varied, child-friendly foods and simply repeats previous assertions that Dilley provides "balanced, age-appropriate meals" (JC Report at 46); that "no food-related deficiencies were identified" in resident interviews (JC Report at 30); and that "infants and toddlers are provided with age-appropriate nutrition consistent with pediatric standards" (JC Report at 49). There is a vast discrepancy between the ICE JC Status Report's assertions and the mountain of evidence we have gathered that children's health is suffering due to the nutritional deficiencies in the food served to children at Dilley. Welch Decl. ¶ 29.

Despite installation of water filters in the living quarter following months of complaints from class members, families report continued concerns about the taste of the water and specifically the ongoing lack of access to bottled water for baby formula. S.K. Decl. ¶¶ 31-33 (Lots of bottled water provided to baby when Congresspeople/*Flores* visit; family used to receive three bottles of water per day and now only get two); M.L.S. Decl. ¶ 14 ("Our 2-month-old is taking formula here with the water from the sink, and it is giving him diarrhea all the time. . . . The guards said we would have to buy water bottles from the commissary if we need it. When I went to the medical area to explain that my son had nonstop diarrhea from the water, the doctor put an order that the guards should give me four bottles of water a day for him. But many guards will not give me the water bottles when I ask."). Families also worry that they do not want to cause their children to have digestion issues from the tap water but cannot afford to purchase bottled water for $1.21 per bottle at the commissary. *See* E.C.M. Decl. ¶ 21 ("They do not even give us clean water here. The only way to get clean water is to buy water bottles, and it costs $30 to buy 24 bottles."); J.B.A. Decl. ¶ 14 ("We drink the water from the faucet, but

we think the water has given our son diarrhea. The bottled water is $30 for 24 bottles and we cannot afford that."); N.S.R. Decl. ¶ 10 ("I am drinking the water here because bottled water is so expensive at the commissary and we want to save all of our money to buy bottled water for our son."); A.P. Decl. ¶ 49 ("The water smells foul, and there's a white residue on the sink. All Dilley employees drink the bottled water they're given, but we have to buy it from the store; a half-liter bottle costs $1.20."); A.M.P. Decl. ¶ 10 ("We are having to drink the water from the faucet because we can't afford to buy the bottled water from the commissary. Both of my daughters have gotten diarrhea from it."); J.V.G. Decl. ¶ 47 ("I had tap water, I got diarrhea and started vomiting and went to the medical area and they did not give me anything all night. After hours gave me acetaminophen. I could not eat anything, and then I went back to my room and kept vomiting and having diarrhea. We bought medicine at the commissary and I just kept taking it all week. I was sick for a whole week. Since then, we have had to buy water here to stay safe. You can buy 24 bottles for $30.").

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

Families also repeatedly raise concerns that their children cannot sleep because lights are kept on in living areas all night. Welch Decl. ¶ 22; A.P. Decl. ¶ 24 ("The lights are constantly on in the rooms, causing disorientation and preventing proper sleep. The children have difficulty falling asleep and wake up several times during the night."); M.B.O.D. Decl. ¶ 18 ("The rooms where we live smell terrible because kids sometimes wet themselves on the carpet. The lights are always on and cannot be turned off. This is really hard because it means my daughter cannot get relief even when she has a headache."); S.S. Decl. ¶ 46 ("[T]he overheads lights are on 24/7 in this facility and the indoor temperature is always freezing. This is really intolerable for [my autistic son's] sensory needs. His sleep patterns have been disrupted. He struggles to fall asleep and frequently wakes up throughout the night."); J.V.G. Decl. ¶ 41 ("My daughter cannot sleep well here. The lights are on all night, and even though they turn off a couple of lights on the beds, they leave the rest of the lights on. Then the officers do a count with radios on at midnight and dawn, and the children always wake up and feel scared."); Z.V.

Decl. ¶ 33 ("It is hard to sleep here because the lights are on 24/7. Even if you want to try to cover your eyes with a towel, they come and take it off. They say that it's because they need to see you. But I don't think a towel over my eyes stops them from seeing me. We have forgotten how to sleep through the night, without waking up every 2-3 hours. This is bad for our brains, because we cannot produce melatonin we need from uninterrupted sleep."); N.C.C. Decl. ¶ 13 ("One of the things that is most difficult is that the light in the room is on all night. . . . There are eye masks, but they hurt our heads because they are so tight. When we tried using them, we would wake up with headaches from how tight they felt."); S.K. Decl. ¶ 43 (mom tried to hang blanket in front of the lights for kids to sleep and was told not allowed); J.A. Decl. ¶ 12 ("It's hard to sleep here because of the loud air conditioning unit and because lights are on and people are always opening the door while we are trying to sleep."); N.P.V. Decl. ¶ 16 ("We have never been given eye masks for sleeping, and I am seeing one for the first time during this interview."); T.M. Decl. ¶ 15 (all are struggling to sleep); E.C.M. Decl. ¶ 23 ("I close my eyes and feel like I can still see as much light as when they are open."); M.S.P. Decl. ¶ 24 (impossible to sleep with lights on, towels not allowed, and guards make lots of noise).

Countless families report their children are exhausted from lack of sleep, which also exacerbates their illnesses and makes it difficult to recover. Welch Decl. ¶ 22; D.P.C.S. Decl. ¶ 38 (lack of sleep is causing everyone headaches); M.B.O.D Decl. ¶ 18 (child who suffers from headache can't get relief when lights are always on); S.S. Decl. ¶ 47 ("Our daughter [] struggles from the lights being on all the time and the air conditioner. These conditions have led to persistent colds, requiring frequent medical attention.").

Sleep is a basic human need that is especially vital for children's healthy development. Welch Decl. ¶ 22, Attachments C and D. Medical professionals and human rights organizations have long recognized the devastating psychological and physiological effects of disrupted sleep. *Id.* This is true even over periods as short as two weeks. *Id.*

The ICE JC Status Report acknowledges that "two of four overhead light banks remain illuminated overnight" and asserts that "nightlights were previously evaluated but determined insufficient for staff to conduct required safety and welfare checks . . .". JC Report at 31. While Plaintiffs' counsel appreciate that lower intensity light bulbs have been installed and nightlights have been considered, the status quo continues to harm children on a daily basis. Welch Decl. ¶ 23, Attachment E (Even CoreCivic's own employee stated: "A lot of these kids have bags under their eyes, which is something you don't see with kids. . . . They have worse bags than their parents."). Nightlights are a commonsense solution used by parents, as well as congregate facilities across the country. Welch Decl. ¶ 24. They should give staff adequate visibility into living areas without disrupting children's sleep. *Id.*

6. Children still lack access to adequate hygiene products.

Although the ICE JC's Status Report states that "[r]esidents are provided with basic hygiene items such as soap and shampoo at no cost *upon intake and through routine distribution*" (JC Report at 16) – the list of hygiene products referenced on page 54 does not include soap or shampoo. JC Report at 54. Infants may be eligible to receive baby shampoo,[14] but older children and teens do not receive soap and shampoo in hygiene kits. Welch Decl. ¶ 25. Families' only option is harsh all-purpose hand soap in the showers, which parents frequently complain causes their children's skin to get dry and rashy. M.S.M. Decl. ¶ 16 ("The[re] is only one soap that we have for our hands, hair, and body, but when we complain the staff just say to buy it in the commissary."); A.P. Decl. ¶ 54 ("The poor-quality soap in the showers, combined with the poor-quality water, causes itching and damages hair."); M.B.O.D. Decl. ¶ 17 ("The soap they have here hurts our skin and hair and make us break out in hives. It is making my and my daughter's hair fall out in big clumps."); C.H.H. Decl. ¶ 25 ("[My son] has had a scaly rash all over his body from the water since week one and it never went away. I am not sure if it is the

[14] Some families report that baby shampoo is not consistently available. *See* A.K. Jan. Decl. 46 (sometimes received baby shampoo for two-year-old but sometimes only available to buy at commissary); J.V.G. Decl. 44 (same).

laundry soap, the soap in the showers, or the water, but it just will not get better."); M.S.M. Decl. ¶ 16 ("Our skin has been hurting from the soap in the bathrooms."); J.A. Decl. ¶ 20 (family buys soap from commissary to avoid skin problems); N.S.R. Decl. ¶ 12 ("[T]he hand soap they have in the shower is too harsh for my son's skin.").

7. Children still lack access to free phone calls to their family members.

Plaintiffs' counsel have repeatedly identified that ICE denies children free phone calls to non-detained family members beyond their initial call upon entering the facility. Welch Decl. ¶ 6; C.R.B. Jan. Decl.¶ 13 ("We have to pay for my calls to my sisters."); D.P.C.S. Decl. ¶ 9 (must ration minutes on phone calls to family so communication can continue); M.M.S. Jan. ¶ Decl. 20 ("My daughter has never been given free calls to our family. We spend about $100 weekly on phone calls."); C.H.H. Decl. ¶ 52 ("All the calls to family cost money and no one has ever said there is any way to call family for free."); Z.V. Decl. ¶ 23 ("There is no way to make free phone calls to family members, except for the original 5-minute call when we were first detained."); L.R.C. Decl. ¶ 38 (people spend all of their money on water and phone minutes); T.M. Decl. ¶ 18 ("It is very frustrating that we are spending so much money to make phone calls . . ."); E.C.M. Decl. ¶ 24 ("I have to pay to call my dad."); M.S.P. Decl. ¶ 33 ("When we first got here, they gave us a free phone call during intake, but now we have to pay for calls."). Class members have the right to speak to family members for free under the Order Approving Finaly Notice of Rights, Attachment 1, Notice of Rights [Dkt. No. 1056-1] at 2 pursuant to the Court's September 18, 2020Order, Dkt. No. 987[15] and it is unacceptable to deny children communication with family for months at a time. FSA ¶ 11, 12.A, Ex. 1.A ¶ 11.

8. Children's education at Dilley has improved but remains inadequate.

The ICE JC Status Report notes that the education program at Dilley was expanded in March 2026. JC Report at 41. The new program, which is currently run by CoreCivic

[15] Order re January 29, 2021 Status Conference, Dkt. No. 1077, at 2 ("[T]he Court approved the final language of the Notice of Rights").

staff, is a long-awaited change for younger children at Dilley.[16] Welch Decl. ¶ 28. During Plaintiffs' March site visit, we toured the new classrooms and noted significant improvements from previous tours. *Id.* However, the classrooms are currently divided among only three age groups: PreK-2nd grade, 3rd grade-6th grade, and 7th grade -12th grade. *Id.* This renders the current program inadequate for middle and high school youth at Dilley, many of whom were attending school in the U.S. for years before being apprehended. *Id.*; C.R.B. Jan. Decl. ¶ 11; C.H.H. Decl. ¶ 54; M.P.P. Decl. ¶ 12; E.C.M. Decl. ¶ 12; M.S.P. Decl. ¶ 5.[17]

The ICE JC Status Report also notes improvements to the recreation offered at Dilley, including a schedule of activities such "sand activities," "playscapes," karaoke, bingo and exercises. JC Report at 46. During our recent site visit, we did not observe any of these activities occurring, and reports from families over many months of visits stand in stark contrast to the report's purported schedule. Welch Decl. ¶ 29; M.P.P. Decl. ¶ 12 ("We watch TV together and do the word search worksheets. They don't really have any activities for my son. We mainly just stay in the room."); M.M.S. Jan Decl. ¶ 10 ("There is still very little for my daughter to do. There are even fewer activities for her age than when we arrived."); S.K. Decl. ¶ 20 (two-year-old, one-year-old, and 10-month-old daughter are bored here).

Finally, although the ICE JC Status Report notes that "recreational and educational programming is provided consistently with age and developmental needs" (JC Report at 5), parents continue to report that their toddlers and young children have little to do and desperately need more toys. Welch Decl. ¶ 31; A.P. Decl. ¶ 29 ("My youngest daughter really suffers from the lack of personal toys. She makes her own toys out of scraps. She collects pebbles from the street and paints them into the shapes of minions. The other

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[16] The ICE JC Status Report states: "Formal special education services are not currently warranted onsite." Report at 42. However, families shared on our March site visit that children with disabilities were not being served by the education program due to the lack of needed supports. *See* J.B.A. Decl. ¶ 12.

[17] In addition, Defendants only expanded the educational program in March, and Plaintiffs have yet to determine whether or not it will be adequate.

day, she found a medical glove and made Patrick from SpongeBob SquarePants. She also makes dolls and clothes for them out of paper."); S.K. Decl. ¶ 53 ("[My three kids] can't play here and there aren't enough toys."); A.K. Jan. Decl. ¶ 53 ("We just walk around outside and there is nothing for him to do and not enough toys."). In particular, children with special needs have been struggling with this lack of toys. *See,* J.B.A. Decl. ¶ 11 ("Usually, children can only have toys in the common room and are not allowed to bring them to their rooms, but the psychologist made an exception given our son's isolation. But when my son switched rooms, a new officer saw the toys in his room and took them. He said he could not have them in his room. When my wife explained the psychologist gave permission for the toys, the officer said he didn't care what the psychologist said about the toys, he gives the orders. My son became very upset and went into a crisis mode. He started crying really loudly and hitting the walls."); S.S. Decl. ¶ 24 ("Today, we saw [my son with autism] liven up for the first time when he got to play with the fidget spinner that you brought. He became cheerful and smiled. Lately, you cannot expect any smiles on his face.").

III. Conclusion

The ICE JC Status Report's depiction of conditions at Dilley stands in stark contrast to the evidence from class members and their families incarcerated there, as well as press coverage and reports from Congressional delegations. It simply cannot be that both versions are true. The parties have been following this Court's order to mediate Plaintiffs' concerns about conditions at Dilley, but the ICE JC Status Report's categorical denial of FSA violations begs the question: is mediation an exercise in futility? In the meantime, children continue to suffer.

Dated: March 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

CERTIFICATE OF SERVICE

I hereby certify that on March 20, 2026, I caused a copy of Plaintiffs' Response to the March 13, 2026 ICE Juvenile Coordinator Status Reports and Data to be served to all counsel through the Court's CM/ECF system.

Dated: March 20, 2026

/s/ Leecia Welch
Leecia Welch
Attorney for Plaintiffs

TABLE OF EXHIBITS

Exhibit Index to Plaintiffs' Response to
March 13, 2026 ICE Juvenile Coordinator Status Report and Data

Exhibit No.	Exhibit Description
1	Declaration of Leecia Welch, March 20, 2026 ("Welch Decl.")
2	Declaration of Lucía Y. González, March 20, 2026 ("González Decl.")
3	C.C.A. Declaration (Dilley), February12, 2026 ("C.C.A. Decl.")
4	M.S.P. Declaration (Dilley), March 12, 2026 ("M.S.P. Decl.")
5	M.M.S. Jan.[1] Declaration (Dilley), January 15, 2026 ("M.M.S. Jan. Decl.")
6	C.R.B. Jan.[2] Declaration (Dilley), January 15, 2026 ("C.R.B. Jan. Decl.")
7	N.P.V. Declaration (Dilley), March 11, 2026 ("N.P.V. Decl.")
8	E.C.M. Declaration (Dilley), March 12, 2026 ("E.C.M. Decl.")
9	M.T.H. Declaration (Dilley), March 11, 2026 ("M.T.H. Decl.")
10	J.A. Declaration (Dilley), March 11, 2026 ("J.A. Decl.")
11	T.M. Declaration (Dilley), March 11, 2026 ("T.M. Decl.")
12	C.H.H. Declaration (Dilley), January 15, 2026 ("C.H.H. Decl.")
13	D.P.C.S. Declaration (Dilley), January 14, 2026 ("D.P.C.S. Decl.")
14	S.K. Declaration (Dilley), March 12, 2026 ("S.K. Decl.")
15	Declaration of Javier Hidalgo, March 20, 2026 ("Hidalgo Decl.")
16	N.C.C. Declaration (Dilley), February 12, 2026 ("N.C.C. Decl.")
17	L.R.C. Declaration (Dilley), February 12, 2026 ("L.R.C. Decl.")
18	M.B.O.D. Declaration (Dilley), January 14, 2026 ("M.B.O.D. Decl.")
19	J.V.G. Declaration (Dilley), February 11, 2026 ("J.V.G. Decl.")
20	Z.V. Declaration (Dilley), February 11, 2026 ("Z.V. Decl.")
21	A.P. Declaration (Dilley), January 14, 2026 ("A.P. Decl.")

[1] M.M.S. has both a November (previously filed) and January declaration.
[2] C.R.B. has both a January and October declaration.

22	Y.H.H. Declaration (Dilley), January 14, 2026 ("Y.H.H. Decl.")
23	S.S. Declaration (Dilley), January 15, 2026 ("S.S. Decl.")
24	A.K. Jan.[3] Declaration (Dilley), January 14, 2026 ("A.K. Jan. Decl.")
25	A.M.P. Declaration (Dilley), February 12, 2026 ("A.M.P. Decl.")
26	N.M. Declaration (Dilley), January 14, 2026 ("N.M. Decl.")
27	J.B.A. Declaration (Dilley), March 12, 2026 ("J.B.A. Decl.")
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29	O.S. Declaration (Dilley), August 12, 2025 ("O.S. Decl.")
30	L.T.P. Declaration (Dilley), January 14, 2026 ("L.T.P. Decl.")
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33	C.R.B. Oct. Declaration (Dilley), October 10, 2025 ("C.R.B. Oct. Decl.")
34	K.P.L.R. Declaration (Dilley), November 18, 2025 ("K.P.L.R. Decl.")
35	M.L.S. Declaration (Dilley), February 12, 2026 ("M.L.S. Decl.")
36	M.P.P. Declaration (Dilley), February 11, 2026 ("M.P.P. Decl.")

Previously Filed Declarations

Docket No.	Description
1706-09	Ex. 8 to Pls.' Resp. to Dec. 2025 Suppl. JC Reports and Data, A.K. Declaration (Dilley), November 19, 2025 [1706-09] ("A.K. Nov. Decl.")

[3] A.K. has both a November (previously filed) and January declaration.

EXHIBIT 1

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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

WESTERN DIVISION

JENNY LISETTE FLORES, *et al.*,

Plaintiffs,

v.

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

Defendants.

No. CV 85-4544-DMG-AGRx

DECLARATION OF LEECIA WELCH IN SUPPORT OF PLAINTIFFS' RESPONSE TO MARCH 13, 2026 ICE JUVENILE STATUS REPORT AND DATA

Honorable Dolly M. Gee
Chief United States District Judge

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DECLARATION OF LEECIA WELCH

I, Leecia Welch, declare as follows:

1. I am Chief Legal Counsel at Children's Rights. I represent Plaintiffs in the above-titled action. If called to testify in this case, I would testify competently about these facts. This declaration is an update to my previous declaration filed on December 8, 2025, in support of Plaintiffs' Response to the December 1, 2025 Supplemental ICE Juvenile Coordinator Report and Data.

2. Plaintiffs' counsel have conducted nine site visits in our role as *Flores* counsel at the South Texas Family Detention Center ("Dilley") since the government began incarcerating families there in April 2025. I have attended all of them. We interviewed class members at Dilley on May 1-2, June 4-5, July 28-29, September 9-11, October 9-10, and November 18-19, 2025, and January 14-15, February 11-12, and March 11-12, 2026. We have spoken to approximately 150 families and amassed extensive evidence of the ongoing *Flores* violations at Dilley.

3. After each site visit, excluding last week's, Plaintiffs' counsel provided Defendants with a detailed, comprehensive list of *Flores* violations. To date, we have sent Defendants meet and confer letters regarding these violations on May 7, May 16, May 28, June 4, June 20, August 14, September 16, September 18, October 9, October 23, and November 25, 2025, and January 22 and February 19. 2026. As directed by Defendants, we also raised emergency time-sensitive concerns about particular children via email on June 6, June 17, July 30, August 5, October 15, and November 21, 2025, and January 16, February 13, and March 13, 2026. Plaintiffs and Defendants have met and conferred five times (May 14, May 30, July 24, September 17, and October 6, 2025) about the *Flores* violations at Dilley identified in our correspondence. We have also continued to raise Plaintiffs' concerns in confidential court-ordered mediation sessions over the past two months.

4. In accordance with the Court's December 15, 2025 Order, the parties began conducting mediation in January 2026. The parties met on January 23, February 4, and March 2, 2026. As referenced above, Plaintiffs have also sent two meet and confer letters and two emergency emails during this time. We are currently working on a follow-up letter to document concerns from our March 11-12 site visit. There has been some progress in mediation regarding possible reductions in children's length of stay and an agreement to have Dr. Paul Wise conduct medical site visits at Dilley.

5. However, Defendants have not addressed the vast majority of the violations at Dilley that *Flores* counsel have been raising since May 2025, including Defendants' failure to treat children appropriately, inadequate medical care, lack of information about *Flores* rights and access to counsel, poor children's nutrition, harmful sleeping conditions, lack of free phone calls to family members, and inadequate education and developmentally appropriate activities. Families consistently report their children are hungry, exhausted, scared, perpetually sick, and despondent from the conditions of confinement at Dilley.

Dilley Is a Secure Facility

6. Dilley is a 56-acre unlicensed, secure ICE facility located in Dilley, Texas. The facility continues to operate under a contract with CoreCivic. The perimeter of the facility is surrounded by a high metal fence. To enter the facility, visitors must proceed through a locked trailer-style building, be subjected to an extensive search for "contraband" items, and pass through a metal detector.

7. Children and parents consistently refer to Dilley as a prison or jail, and even a concentration camp. Some children and parents have described Dilley as a living hell, soulless, or a place where God no longer exists. In January and February 2026, children and families at Dilley reported feeling even more like prisoners as the facility instituted even more severe operational restrictions, practices, and lockdowns after the high-profile detention of five-year-old Liam Conejo Ramos resulted in increased media attention and public outcry about the incarceration of children. Families consistently reported a

marked increase in the harshness of their treatment by guards at Dilley, including yelling at children, aggressive room sweeps, and lockdowns. Families also reported limitations on mealtimes, library time, computer time, and access to the Internet, in addition to restrictions on their movement throughout the facility. The combined impact of these harsher tactics and restrictions has been to cause class members to suffer even more trauma and fear.

8. On most of our nine site visits, either CoreCivic staff or an acting ICE compliance office has led a tour of the facility. The grounds consist of five living zones for detainees with rows of beige trailers of various sizes and configurations. The facility has the capacity to hold 2,400 people, but there have been between 150-400 family members in total at Dilley during each of our site visits since July. As of March 11, 2026, there were 152 family members at Dilley, and the overall population at Dilley was 388 people, including single females.

9. On our recent site visits, we were particularly concerned by the alarming amount of time children were being detained. In January, the census at Dilley showed 22 class members had been detained at Dilley for over 100 days. In February, the census showed 32 class members had been detained for over 100 days, and 98 had been detained for over 50 days. In March, eight class members had been detained over 100 days and 20 had been detained over 50 days. The length of stay in March showed signs of improvement, but only time will tell whether this trend will continue.

Flores Violations at Dilley

10. Since Dilley re-opened in April 2025, we have met with approximately 150 families in person, in addition to the countless phone calls and emails we have received from detained families. With the exception of the few isolated improvements noted below, Dilley remains woefully out of compliance with the FSA, and children detained there continue to suffer. Defendants' assertions of compliance with the FSA in the ICE JC Status Report are again refuted by extensive evidence provided by class members and their parents.

Inadequate Medical Care

11. Following our site visits to Dilley, we have alerted Defendants to multiple examples of children's medical needs not being met, resulting in escalating and sometimes life-threatening health problems. We also reported medical needs of parents that impacted their ability to care for their children. Examples from January, February and March include: a ten-year-old child with Hirschsprung's disease who lacked proper medical care and diet resulting in no bowel movements for over a month; an 18-month old baby who ended up in the hospital for 10 days when her oxygen levels plunged to a life-threatening level; a nine-year-old girl who left scratch marks across her entire body due to allergies when no special diet was provided; a two-year-old with an infected gum that Dilley staff did not treat for over 23 days, leading her to have a fever, infection, cry relentlessly, and be on a liquid diet the entire time (brief hospitalization not helpful due to lack of dental care available there); a mom who had to be hospitalized for three days without her child due to Dilley's inability to treat a UTI; and, a 32-week pregnant mother with Hepatitis B who was in extreme physical distress due to inadequate treatment options at Dilley.

12. Despite the assertions in the ICE JC Status Report that "no residents require[ed] hospitalization or emergency-room referral" (Report at 7), I am personally aware of multiple children and parents who were hospitalized, including those noted above. One extremely troubling hospitalization was that of an 18-month-old baby who was finally hospitalized following weeks of substandard care at Dilley. She required hospitalization for ten days to treat her for pneumonia, RSV, Covid-19, and respiratory distress. A true and correct copy of a February 27, 2026 news article regarding this child is attached to my declaration as Attachment A.

13. Children with disabilities and chronic medical conditions continue to deteriorate from Dilley's harsh, restrictive environment, separation from their medical providers, and interruption of their medical and mental health care plans. We have met

many children with disabilities who have regressed developmentally and suffered worsening conditions while at Dilley. Parents consistently report concerning behaviors and regression in their children's development, including children hitting themselves in the face, becoming aggressive, and frequently wetting themselves after years of being potty-trained; children asking to sleep with their parents after sleeping alone for years; children becoming despondent and sitting alone in corners; and children regressing in their speech and becoming withdrawn.

14. Parents I have met at Dilley are often particularly alarmed about their children's worsening mental health. They report children becoming anxious, stressed, and depressed. Due to the long length of stay for some families at Dilley, I have been able to meet with some of the same children and teens across multiple site visits. Unfortunately, I have seen first-hand the toll detention at Dilley takes on these children, including worsening despondency, depression, trouble sleeping, and panic attacks. Many children look increasingly exhausted, pale, and weak.

15. Shortly before our Dilley site visit on February 11-12, 2026, our co-counsel team was alerted that a 13-year-old girl at Dilley had attempted to commit suicide. I had planned to meet with the family on February 11, but when we arrived at Dilley that morning, the family was already gone. It is my understanding that the family was deported earlier that morning. I subsequently learned the harrowing details of the child's suicide attempt in a news article. A true and correct copy of that February 28, 2026 news article is attached to my declaration as Attachment B.

Lack of Notice of Flores Rights

16. Since May 2025, Plaintiffs' counsel have repeatedly voiced concerns that children at Dilley are not being apprised of their *Flores* rights. Moreover, despite the availability of willing legal services providers to conduct Know Your Rights trainings,

there is still no legal orientation program for children and families at Dilley beyond a 13-minute animated immigration law video that never once mentions *Flores*.

17. This video, which I have viewed, discusses complex legal issues like types of visas and defenses. The video does not inform class members of the basic rights that all *Flores* class members are supposed to be afforded and informed of once detained. Class members repeatedly express distress at their limited access to information about their rights and the status of their cases.

18. Compounding this complete lack of information about *Flores* rights, class members also continue to face barriers to making free legal phone calls to counsel, including *Flores* attorneys or other private lawyers. While there is an ICE-provided list of pro bono attorneys, there are only four firms on the list to whom families can make a free legal call using the telephone system at Dilley. If a child's lawyer is not on the list, there is no way to call the lawyer without paying for it. The only option is for the child's lawyer to reach out to a CoreCivic's visitation email address to schedule a legal call with their client. Many families struggle for weeks to figure out how to make an initial call to their lawyer and regularly end up paying for legal calls because of the time-sensitive nature of their legal needs while at Dilley. We have had multiple class members call us and say that they have to pay for the phone call.

Lack of Children's Nutrition

19. The vast majority of families we have spoken to over the past 10 months raise concerns about their children's poor nutrition at Dilley. Families report that the food makes children sick; express concern that the only fresh fruit provided to their children for months on end has been red apples; complain about the food taste, variety, and quality; and describe snacks as limited to cookies and sometimes granola bars. Families also continue to report that their children are not eating and some are being denied the special diets they need to stay healthy.

20. I have toured the cafeteria and seen individual lunches at Dilly several times during my interviews with families. While the highly processed food may be tolerable for adults for shorter periods of time, the meals I have seen are inedible for most toddlers and young children. The meals are also highly sauced and spiced, and include no fresh fruit or fresh vegetables. Most concerningly, families repeatedly report there is no baby food available that is soft or mushed.

21. The ICE JC Status Report again ignores the reality on the ground of concerns repeatedly raised by families regarding the lack of varied, child-friendly foods. It simply repeats previous assertions that Dilley provides "balanced, age-appropriate meals" (Report at 46); that "no food-related deficiencies were identified" in resident interviews (Report at 30); and that "infants and toddlers are provided with age-appropriate nutrition consistent with pediatric standards" (Report at 49). There is a vast discrepancy between the ICE JC Status Report's assertions and the mountain of evidence we have gathered that children's health is suffering due to the nutritional deficiencies in the food served to children at Dilley.

Poor Sleeping Conditions for Children

22. One of the most consistent complaints we hear from families at Dilley is that children cannot sleep because lights are kept on in living areas throughout the night. Countless families report their children are exhausted from lack of sleep, which also exacerbates their illnesses and makes it difficult to recover. Sleep is a basic human need that is especially vital for children's healthy development.[1] Medical professionals and

[1] Attached to my declaration as Attachments C and D are true and correct copies of the following journal articles: https://journalofethics.ama-assn.org/article/sleep-human-right-and-its-deprivation-torture/2024-10 and https://www.nih.gov/news-events/nih-research-matters/childrens-sleep-linked-brain-development

human rights organizations have long recognized the devastating psychological and physiological effects of disrupted sleep.[2]

23. In a March 10, 2026 article, even a former Dilley employee stated: "A lot of these kids have bags under their eyes, which is something you don't see with kids. . . . They have worse bags than their parents." A true and correct copy of this article is attached to my declaration as Attachment E.

24. The ICE JC Status Report acknowledges that "two of four overhead light banks remain illuminated overnight" and asserts that "nightlights were previously evaluated but determined insufficient for staff to conduct required safety and welfare checks . . ." Report at 31. While Plaintiffs' counsel appreciate that lower intensity light bulbs have been installed and nightlights have been considered, the status quo continues to harm children on a daily basis. Plaintiffs have proposed that nightlights are a commonsense solution used by parents, as well as congregate facilities, across the country. Nightlights would give staff adequate visibility into living areas without disrupting children's sleep.

Lack of Adequate Hygiene Products

25. The December 8, 2025 ICE JC supplemental Report shows photos with soap dispensers that are labeled "Citrus Fresh Foaming Handwash," as proof that families have access to soap and shampoo for showering. December 8, 2025 ICE JC Suppl. Report at 29. The March ICE JC Status Report instead states that "[r]esidents are provided with basic hygiene items such as soap and shampoo at no cost *upon intake and through routine distribution*." Report at 16 (emphasis added). This is simply not true. The ICE JC Report later provides a list of hygiene products on page 54 that does not include soap or shampoo.

[2] *Id.*

26. Moreover, at all nine site visits, families have told me that the only option for washing their children is the harsh all-purpose hand soap in the showers. Parents frequently complain this hand soap causes their children's skin to get dry and break out in rashes. Because the harsh hand soap is the only option, families report that they must spend their limited resources on regular soap at the commissary. Despite raising this issue for months, Plaintiffs' counsel have never been provided an explanation for why CoreCivic cannot simply provide children at Dilley a bar of soap and a bottle of shampoo.

Lack of Adequate Education and Developmentally Appropriate Activities

27. The ICE JC Status Report notes that the education program at Dilley was expanded in March 2026. The new program, currently run by CoreCivic staff, is a long-awaited change for younger children at Dilley. Plaintiffs' counsel have been raising concerns about the minimal education at Dilley since it opened. During our March site visit, we toured the new classrooms and noted significant improvements from previous tours. However, the classrooms are currently divided among only three age groups: PreK-2nd grade, 3rd grade-6th grade, and 7th grade-12th grade. This renders the current program inadequate for middle and high school aged youth at Dilley, many of whom were attending school in the U.S. for years before being apprehended. During our tour, there were many children in the classrooms for the two lower grade-level sections, but only one youth in the 7th-12th grade classroom. We were told that a large shipment of computers was expected shortly as part of the planned expansion of Dilley's educational program. It is too soon to tell whether Dilley's educational program will ultimately be adequate for class members.

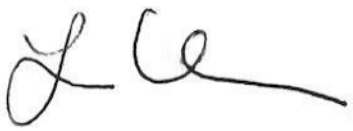
28. The ICE JC Status Reports also notes improvements to the recreation offered at Dilley, and includes a schedule of activities such as "sand activities," "playscapes," karaoke, bingo and exercises. Report at 46. During our recent site visit, we did not

observe any of these activities occurring, and reports from families over many months of visits stand in stark contrast to the purported schedule.

29. Although the ICE JC Status Report notes that "recreational and educational programming is provided consistently with age and developmental needs" (Report at 5), parents continue to report that their toddlers and young children have little to do and desperately need more toys. Parents consistently voice concerns about the lack of personal toys for younger children given the importance of play to healthy development. Children have reverted to making toys out of trash, rocks, and wrappers. Families report that children cannot have any personal toys in their rooms.

30. We are now permitted to bring toys and crayons to our client interviews at Dilley. Our agreement with CoreCivic is that toys must remain in our interview rooms. It is heartbreaking to see the look of desperation on children's faces when they are told they can play with our basic toys, but that we have to take them with us when we leave. One family whose son has autism told us that him holding the fidget spinner we brought was the first time they had seen him smile in weeks. Two parents had tears in their eyes as they took the toys back from their three-year-old girl when their *Flores* interview ended. One two-year-old gasped with excitement when he walked into an interview room and saw a few simple toys laying on the table. Two five-year-old twins hugged a stuffed animal we brought in March because they had been without theirs for months. The hug made them feel happy, but then we had to take the stuffed animal away. While the lack of toys is far from the most pressing issue at Dilley, I would be remiss not to raise how much it affects younger children.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 20th day of March, 2026 at San Francisco, California.



Leecia Welch

ATTACHMENT A

U.S. NEWS

911 calls capture kids burning with fever, struggling to breathe at ICE detention center

EMS crews were called to the Dilley Immigration Processing Center in Texas at least 11 times since September for children in medical distress, records show.

Listen: 911 calls from the ICE family detention center in Dilley, Texas

02:03

Get more news LIVE on NBC NEWS NOW >

Feb. 27, 2026, 5:00 AM EST

By Mike Hixenbaugh

Listen to this article with a free account

00:00 08:36 1x

The voices on the emergency calls sound calm. Matter of fact. Routine.

Subscribe to read this story ad-free
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"Frio County 911. What is your emergency?"

"I'm calling from the Dilley immigration center in Dilley, Texas. I'm calling for a little kid going through respiratory distress."

The callers – medical staff inside the remote facility that houses hundreds of immigrant children and their parents in South Texas – tick through the clinical details: symptoms, vital signs, ages.

ADVERTISING



"He's a 6-year-old male."

"Sixty?"

"Six-year-old."

On the calls, staff at the Dilley Immigration Processing Center struggling to breathe, burning with fever or appearing lethar detention center that lawyers, immigration advocates and pe suitable for children.

00:19 / 02:03

We have a child that is possibly having an allergic reaction. Male, little boy.

"It's a 13-year-old. Possible leg fracture."

"He's desatting. ... His oxygen level is 80."

"Five to 7 years old ... three seizures today."

Since mid-September, emergency crews have been dispatched to Dilley at least 11 times to treat children in medical distress, according to EMS call logs and 911 audio obtained by NBC News. The calls offer a glimpse into what happens when children fall seriously ill inside a detention center that has become a flashpoint in the national immigration debate.



00:19 / 02:03

— The Dilley Immigration Processing Center in Dilley, Texas, in Ja
crews have been dispatched to Dilley at least 11 times to treat children in medical distress. Brenda Bazán

Most of the children were taken to a nearby community hospital, the records show. In at least three cases, children were transferred more than an hour away to a specialized pediatric hospital in San Antonio equipped to treat complex or life-threatening conditions, according to the logs.

In one case involving a 22-month-old in respiratory distress, the boy's condition was so serious, first responders wanted to fly him to the hospital by helicopter but couldn't because of bad weather, the records show. Parents of another toddler with low oxygen refused to be transported.

The records don't include information about what happened after the ambulance rides.

In a more recent case not captured in the dispatch logs, 2-month-old Juan Nicolás was taken to a hospital last week with a respiratory illness after his mother said he choked on his own vomit. The family was later deported to Mexico.

Do you have a story to share about immigration detention? Contact reporter Mike Hixenbaugh at mike.hixenbaugh@nbcuni.com.

Dr. Lara Jones, a pediatric critical care physician based in California, said the emergency calls point to potential missed opportunities for earlier medical intervention that might have prevented some children from being hospitalized. She and other physicians argue that holding children in a prisonlike setting is fundamentally incompatible with their health.

"There is absolutely, unequivocally no appropriate way to detain a child, period," Jones said, citing studies showing that detention is associated with serious health consequences for children. "It is causing physical, mental, measurable, studied harm. And there is no context in which that's justified."

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— Detainees have complained of contaminated food and inadequate medical care at the Dilley Immigration Processing Center. Ilana Panich-Linsman / The New York Times via Redux

On Thursday, Jones and a group of physicians sent a letter to Homeland Security Secretary Kristi Noem and congressional leaders calling on the administration to free every child held at Dilley.

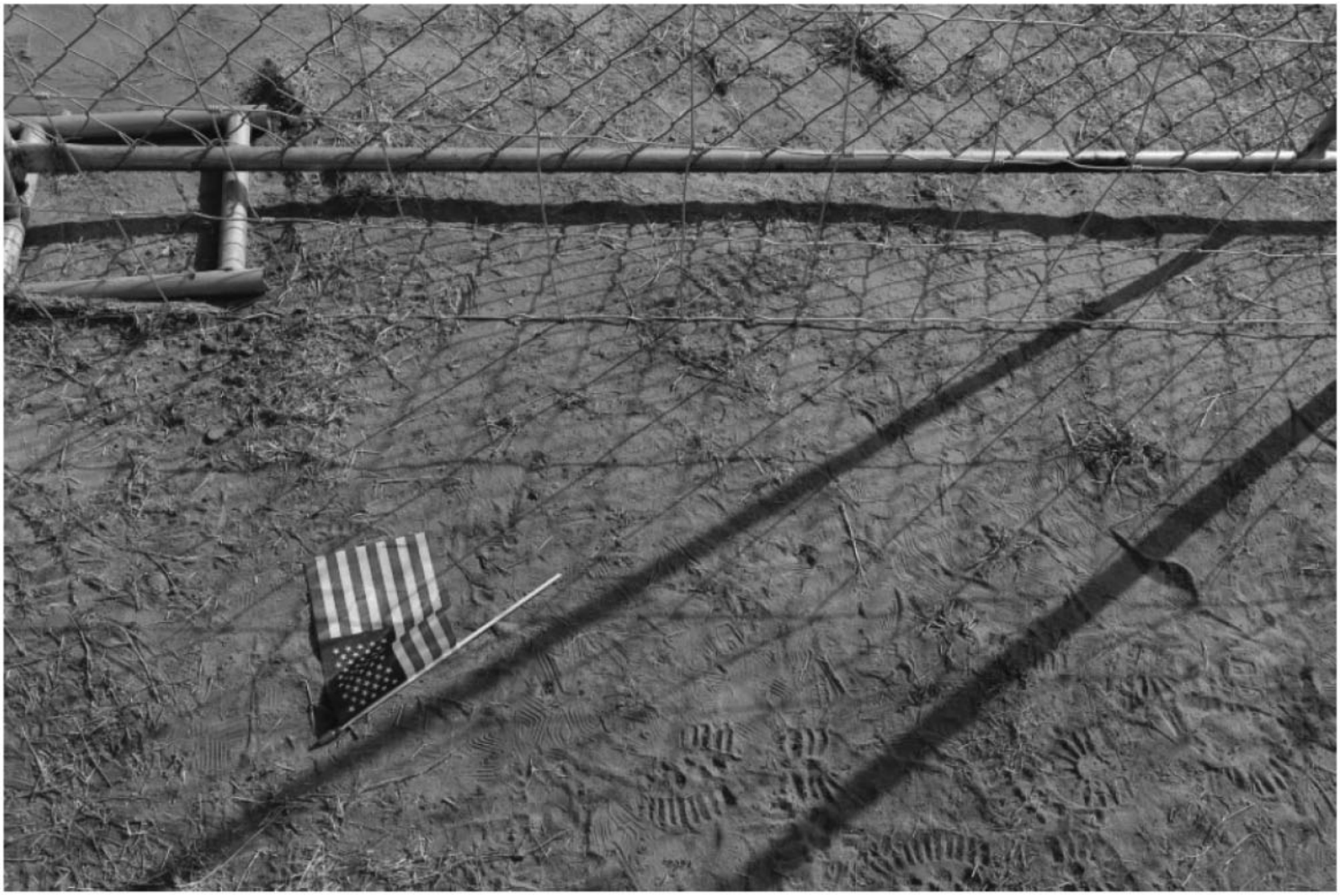
The release of the 911 calls and doctors' warning comes amid broader criticism of Dilley, where the Department of Homeland Security has sent hundreds of children with their parents since last spring as part of the Trump administration's expanding immigration crackdown. Lawyers, human rights advocates and families held at the facility have described contaminated food inadequate schooling and barriers to timely medical care.

In a statement to NBC News, Ryan Gustin, a spokesperson for under a federal contract, said no child "has been denied mec delayed medical assessment." Staff are trained to call 911 whe can be managed on-site, Gustin said, not because of inadequ of clinical precaution."

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DHS didn't respond to questions about the emergency calls.

This week, the agency published a statement it said was "correcting the record" on what it called "mainstream media lies" about conditions at Dilley, asserting that parents and children "are housed in facilities that provide for their safety, security and medical needs." The agency said families have access to a full medical staff, including a pediatrician, and described the care provided as "the best healthcare" some detainees have received "in their entire lives."



— An American flag is left on the ground following a protest this n [illegible] Processing Center. Kaylee Greenlee / Reuters

Kheilin Valero Marcano's account paints a different picture.

By mid-January, Valero Marcano knew something was seriou 00:19 / 02:03
Amalia. In the month since federal officers arrested the famil

immigration check-in in El Paso, Texas, and transferred them to Dilley, the 1-month-old's health had steadily declined.

For weeks, according to Valero Marcano and a habeas corpus petition seeking the family's release, Amalia struggled with worsening respiratory symptoms. It began with a fever, then a cough that wouldn't ease. Her nose clogged with thick mucus. Her breathing grew strained and wheezy. Echoing complaints from other families, Valero Marcano said her daughter's care was complicated by a policy at Dilley that requires families to line up outside – sometimes for hours in freezing temperatures or rain – for each dose of medicine.

They stood in line three times a day, she said – in the morning, after lunch and again in the evening – for pain medicine and antibiotics. On blistering cold days, they wrapped Amalia in a blanket, trying to keep her warm.

"Many times I had to take the girl with a fever," Valero Marcano said in Spanish this week in an interview with NBC News.

Amalia didn't improve. She spiraled on the evening of Jan. 18, when – according to Valero Marcano and the 911 logs – medical staff at Dilley noted dangerously low blood-oxygen levels. A nurse explained they were calling for an ambulance.

"Thank God," Valero Marcano remembered saying. "Because you haven't done anything."

After a brief stop at Frio Regional Hospital, Amalia and her mother were transported by ambulance to Methodist Children's Hospital in San Antonio. There, the girl was treated for more than a week for pneumonia, Covid-19, RSV and respiratory distress, according to the family, while Immigration and Customs Enforcement officers stood guard.

After Amalia was discharged, immigration officers returned them to Dilley, where medical staff withheld the nebulizer prescribed by doctors at the hospital, claiming that it was not necessary, according to Valero Marcano and the habeas corpus petition. The family was released from detention the following week, after a lawyer filed the petition

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— Stiven Arrieta Prieto and Kheilin Valero Marcano entered the U.S. in 2024 with their baby, Amalia. They sought asylum after fleeing Venezuela, saying they were persecuted for opposing President Nicolás Maduro.

NBC News

Valero Marcano said she was not surprised to learn that other children at Dilley had also been rushed to hospitals.

"They should change their ways," she said of the facility. "At l
who need it."

In a statement, DHS denied that Amalia's medication was wit
"immediately received proper medical care" when she fell ill
statement said, the girl "was in the medical unit and received

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company from commenting on individual medical cases.

Dr. Ashley Cozzo, a pediatrician and neonatologist based in Connecticut who also signed the letter calling for children to be released from Dilley, said Amalia's case – along with the other emergency calls – points to potential structural failures.

In pediatrics, she said, the focus is prevention: recognizing warning signs early enough to keep a child out of the emergency room. Based on firsthand accounts and public reporting, Cozzo said she's concerned that conditions at the facility may be contributing to the spread of infectious diseases – including measles, Covid-19 and RSV – and that once children become sick, care is not escalating quickly enough to prevent emergencies.

"Those calls are pointing in the same direction," Cozzo said. "A missed opportunity at early identification and appropriate intervention."



Mike Hixenbaugh

Mike Hixenbaugh is a senior investigative reporter for NBC News, based in Maryland, and author of "They Came for the Schools."

Roberto Daza contributed.

ATTACHMENT B

U.S. NEWS

Worms in food, poor medical care, lights on 24/7: Families tell of life in Texas detention center

BY GARANCE BURKE, ADAM GELLER AND VALERIE GONZALEZ

Updated 6:36 PM EDT, February 28, 2026

Leer en español

LAREDO, Texas (AP) — A month after ICE agents sent the young Ecuadorian mother and her 7-year-old daughter to a sprawling detention center 1,300 miles from their Minnesota home, they were finally free.

But when the bus pulled up to a migrant shelter in the border city of Laredo, dropping off a half-dozen families lugging bags stuffed with belongings, the stress of recent weeks tracked mother and daughter like the long shadows on that mid-February afternoon.

Night after night inside south Texas' Dilley Immigration Processing Center with hundreds of other families, the grade-schooler wept and pleaded to know why they were being held.



"She would tell me, 'Mom, what crime did I commit to be a prisoner?' I didn't know what to tell her," said the 29-year-old, who spoke on condition of anonymity for fear being identified could negatively affect their immigration case. Her husband was deported to Ecuador soon after they were taken into custody.



Immigrant families settle in for the night at the Holding Institute in Laredo, Texas, on Feb. 12,

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Many Americans were alarmed last month when photos circulated showing U.S. Immigration and Customs Enforcement agents in Minneapolis detaining a 5-year-old boy wearing a bunny hat and carrying a Spiderman backpack. The concern followed Liam Conejo Ramos and his father when they were sent to Dilley, surrounded by chain-link fences on a dusty plain about 75 miles south of San Antonio.

RELATED STORIES



Takeaways from AP's report on the ICE detention center holding children and parents



Attempted suicides, fights, pain: 911 calls reveal misery at ICE's largest detention facility



A timeline of the Trump administration's immigration crackdown in Minnesota

But Liam was hardly an outlier. ICE has been holding hundreds of children at Dilley — many for months.

"We are all Liam," Christian Hinojosa, an immigrant from Mexico, said by phone from Dilley, where she and her 13-year-old son were held for more than four months. They were released this month and allowed to return home to San Antonio where she works as a health aide.

She noted that Liam and his father were released from Dilley after 10 days, when members of Congress and a judge intervened.

"My son says, 'That's unfair, Mama. What's the difference between him and us?'"

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Ramping up family detentions

When the Obama administration opened Dilley in 2014, nearly all families detained there had recently crossed the border from Mexico. Detentions at the facility were scaled back by the Biden administration in 2021, before it was closed three years later.

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EDITOR'S NOTE — This story includes discussion of suicide. If you or someone you know needs help, the national suicide and crisis lifeline in the U.S. is available by calling or texting 988.

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Since being reopened by President Donald Trump's administration last spring, life inside Dilley — a compound of trailers and other prefabricated buildings — has been shaped by three decisive changes.

The number of detained families has risen sharply since last fall. The government is holding many children well beyond the 20-day limit set by longstanding court order. And many detainees have lived in the U.S. for several years, with roots in neighborhoods, workplaces and schools, according to lawyers and other observers.

University law professor and author of "Baby Jails: The Fight to End the Incarceration of Refugee Children in America."

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Suddenly you're in "a completely strange environment with the doors locked and guards in uniform roaming around," said Schrag, who counseled Dilley detainees as a volunteer lawyer during the Obama administration.

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ICE booked more than 3,800 children into detention during the first nine months of the new Trump administration, according to an Associated Press analysis of data from the University of California, Berkeley's Deportation Data Project. On an average day more than 220 children were held, with most of those detained longer than 24 hours sent to Dilley. More than half of Dilley detainees during that period were children.



A young immigrant girl who just arrived at the Holding Institute, a shelter in Laredo, Texas on Feb. 12, 2026, pets a cat as her mother and other families receive a welcome and instructions on how to purchase tickets to get back to their homes in the U.S. (AP Photo/Valerie

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Nearly two-thirds of children detained by ICE were eventually deported and almost 1 in 10 left the country when their parents accepted voluntary departure, according to an AP analysis of the latest comprehensive

legal cases proceed.

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The number of detainees at Dilley has risen sharply since the period covered by the data, nearly tripling between last fall and late January to more than 1,300, according to Relevant Research, which analyzes immigration enforcement data.

"We've started to use 100 days as a benchmark for prioritizing cases because so many children are exceeding 20 days," said Leecia Welch, the chief legal director at Children's Rights, who visits Dilley regularly to ensure compliance. In a visit this month, Welch said she counted more than 30 children who had been held for over 100 days.

The increased detention of children comes as the Trump administration has gutted a Department of Homeland Security office responsible for oversight of conditions inside Dilley and other facilities.

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"It's a particular concern that family detention is being increased," said Dr. Pamela McPherson, a child and adolescent psychiatrist contracted by DHS from 2014 until last year to inspect and investigate conditions at Dilley and other ICE facilities holding children.

"Just who's providing that check-and-balance now?"

Rep. Tony Gonzales, who represents the congressional district where Dilley is located, said multiple visits have convinced him criticism of the center is unfair.

He said he'd been impressed by Dilley's facilities and the professionalism and dedication of staff. "They're not doing policy. They're just fulfilling a duty," said Gonzales, a Republican.

DHS did not respond to detailed questions about Dilley submitted by the AP. But both DHS and ICE sharply refuted allegations of poor care and conditions there.

"The Dilley facility is a family residential center designed specifically to house family units in a safe, structured and appropriate environment," ICE Director Todd M. Lyons said in a statement this week. Services include medical screenings, infant care packages as well as classrooms and recreational spaces, ICE said.

But concerns about Dilley are personal for Kheilin Valero Marcano, a Venezuelan immigrant detained with her



Migrants from Venezuela, Stiven Arrieta Prieto and his wife, Kheilin Valero Marcano, with their 18-month-old daughter, Amalia Arrieta Valero, pose for a photo in Southern California on Tuesday, Feb. 10, 2026. (AP Photo/Damian Dovarganes)

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When the child got a high fever, Valero Marcano said Dilley staff told her it was just a virus. Two weeks later, Amalia started vomiting, then losing weight. Valero Marcano said she took her to the Dilley doctor's office at least eight times but was offered Tylenol and ibuprofen.

The baby was eventually sent to two hospitals, where doctors diagnosed COVID, bronchitis, pneumonia and stomach virus, she said.

ICE disputed Valero Marcano's account, saying in a statement the baby "immediately received proper medical care" at Dilley before being sent to the hospital. Back in Dilley, "she was in the medical unit and received proper treatment and prescribed medicines," it said.

The family's return to Dilley coincided with a measles outbreak there. They were released earlier this month after their lawyers petitioned the court.

"I'm so worried for all the families who are still inside," Valero Marcano said.

A teen in distress

After nearly two months in a cramped room at Dilley with three other families, the 13-year-old girl's depression turned increasingly dark.

The eighth grader stopped eating after finding a worm in her food, family members said. Staff sometimes withheld medications she'd long been prescribed to keep her anxiety in check and help her sleep.

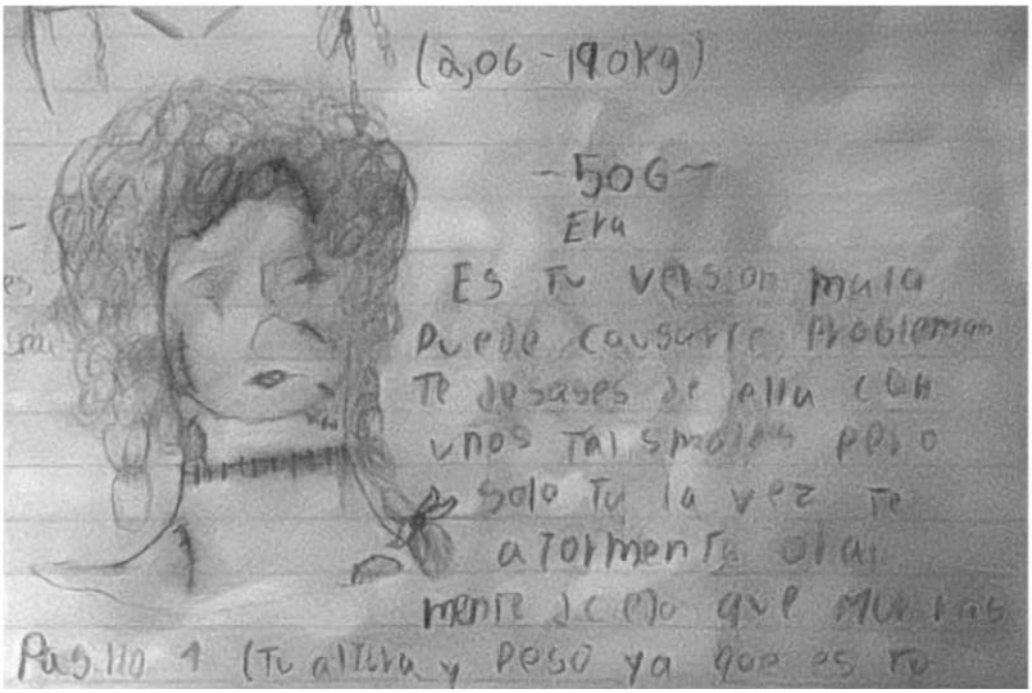
When a total lockdown was imposed, a guard blocked the teen from leaving the crowded room to join her mother and sister in the bathroom. She spiraled into crisis, and used a plastic knife from the cafeteria to cut her wrist.

"She said she didn't want to live anymore because she preferred to die rather than having to keep living in confinement," her mother, Andrea Armero, told the AP in a video call from Colombia, where the family was deported this month. The AP generally avoids identifying people who attempt or die by suicide.

The girl's struggles began before she arrived at Dilley. Soon after starting middle school in Colombia, she learned a family member had sexually abused her younger sister. Armero said she saw no option but to leave and in early 2024 she and her daughters traveled to the U.S. border with Mexico, applying for asylum.

attacks about being sent back to Colombia. Under a psychiatrist's care, she was prescribed anti-anxiety and anti-depression medications and regularly saw a therapist. Then, in December, ICE agents detained Armero and her daughters during a routine check-in.

At Dilley, the 13-year-old calmed herself by drawing, producing haunting pictures of a girl locked inside gates. But when she and other detainees took part in a protest after 5-year-old Liam and his father got to Dilley, guards took away drawing materials and ordered everyone to stay inside.



This image provided by the family in February 2026 shows a drawing made by a 13-year-old Colombian girl when she was detained at South Texas Family Residential Center in Dilley, Texas, where the Trump administration is holding immigrant families. (AP Photo) Read More

The teen's mental health collapsed. She tried to harm herself with the plastic knife, Armero said, and repeatedly hit her head. The family was put into isolation without seeing a doctor, then deported to Colombia on Feb. 11 after a judge ordered them removed, she said.

Dilley discharge documents described "active problems," including a "suicide attempt by cutting of wrist" and "self-harm," in addition to a "history of post-traumatic stress disorder" and "history of anxiety." AP also spoke with detainees and attorneys who independently described the girl's suicide attempt.

Responding to questions from AP, a DHS official acknowledged there had been "a case of self-harm" inside the facility, but did not specify what had happened, or how staff handled the incident. When AP asked for details, DHS did not respond to follow-up questions.

"No child at Dilley ... has been denied medical treatment or experienced a delayed medical assessment," said Ryan Gustin, a spokesman for CoreCivic, the for-profit prison company that operates the facility under contract with ICE. Gustin declined to answer specific question about the 13-year-old girl, citing privacy rules.

Detention weighs on children

On a phone call from inside Dilley, 13-year-old Gustavo Santino-Josa introduced himself to a reporter by name and the 9-digit identification number ICE assigned him when he was taken into custody with his mother.

"Until today I don't know what we did wrong to get detained," Gustavo said. "I've seen my mom cry almost daily and I ask God that we can go out and go home soon."

He worried they might never be released.

his mother, Christian Hinojosa, the health care aide originally from Mexico.

"All his friends have left already," his mother said. "Some were deported. Some got released recently. And it hurts. It hurts to see people leaving and you're staying here."



Andrea Armero, right, and her daughter, who were deported from the United States, sit in a park in Colombia, on Wednesday, Feb. 18, 2026. (AP Photo/Fernando Vergara)

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Dilley was built to hold 2,400 people, housed in clusters ICE calls "neighborhoods." Bunk beds are arranged side-by-side for up to four families, frequently putting parents with young children in close quarters.

Once in full operation, Dilley is expected to generate about $180 million in annual revenue for CoreCivic, according to the company's recent filing with securities regulators.

In a video on its website, CoreCivic says Dilley's "open campus layout allows residents to move freely and unescorted throughout the day."

It does not mention that parents and their children are locked inside.

In response to questions from the AP, CoreCivic's Gustin said the staff at Dilley includes a pediatrician, pediatric nurse practitioner, other trained medical professionals, as well as mental health services to "meet the needs of children and families in our care."

In talks with parents of children held at Dilley, however, the same problems come up repeatedly, said Welch, the children's rights lawyer.

Kids cry often and don't get enough sleep, in part because lights are on around the clock, she said. The water tastes terrible and causes stomachaches and rashes, so some families stick to what they can buy in the commissary.

Their children don't eat enough and have lost weight, Welch said. There are classrooms, but instruction is limited to an hour daily, mostly filling out worksheets.

A 14-year-old girl, identified in court papers by the initials NVSM, reported there were tensions with up to 12 people sharing their room. At night when she and her mother tried to sleep, others insisted on turning up the TV.

binding settlement governing detention and release of children. "My nerves are so high. I don't know what is happening. My muscles will twitch because I'm so nervous and on edge."

Concerns about oversight

As the government's detention of parents and their children came under scrutiny in 2014, an ICE official insisted that family detention centers, equipped with basketball courts and medical clinics, were "more like a summer camp."

The characterization irritated McPherson, the child psychiatrist who, along with another physician, was retained in 2014 by DHS to inspect family detention centers. Their contracts were not renewed by the Trump administration last year after DHS announced sweeping staff reductions.

"Having a clean place to sleep, having food, that's not the same thing as having family and community," McPherson said.

The doctors' investigations of family detention centers exposed consistently inadequate staffing and disregard by administrators for the trauma caused by detention, concerns they reported in 2018 to a Senate caucus set up to hear from whistleblowers.

At Dilley, the doctors noted a persistent shortage of pediatricians and the inability to hire a child psychiatrist from the time they began their inspections until they alerted senators.

Employees unsure how to deal with 2-year-olds biting and hitting each other placed the children and their parents in medical isolation for days, McPherson and her colleague told senators. Without supervision, a nurse at Dilley gave adult-strength hepatitis A shots to about 250 children in 2015, the American Immigration Lawyers Association reported.



Kheilin Valero Marcano, hugs her 18-month-old daughter, Amalia Arrieta Valero, in Southern California on Tuesday, Feb. 10, 2026. (AP Photo/Damian Dovarganes)

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DHS responded to many of the findings by making changes before a special committee recommended in late 2016 that the government discontinue family detention except in rare cases. The first Trump administration increased family detention before the Biden administration began phasing it out in 2021.

That the Trump administration is again holding families at Dilley after so many warnings feels "dystopian," McPherson said.

it," she said.

Worries even after release

Huddled around picnic tables at the Laredo migrant shelter, parents released from Dilley searched anxiously for flights back to the homes they left behind. They called relatives, friends, teachers, anyone who might help with money to get there.

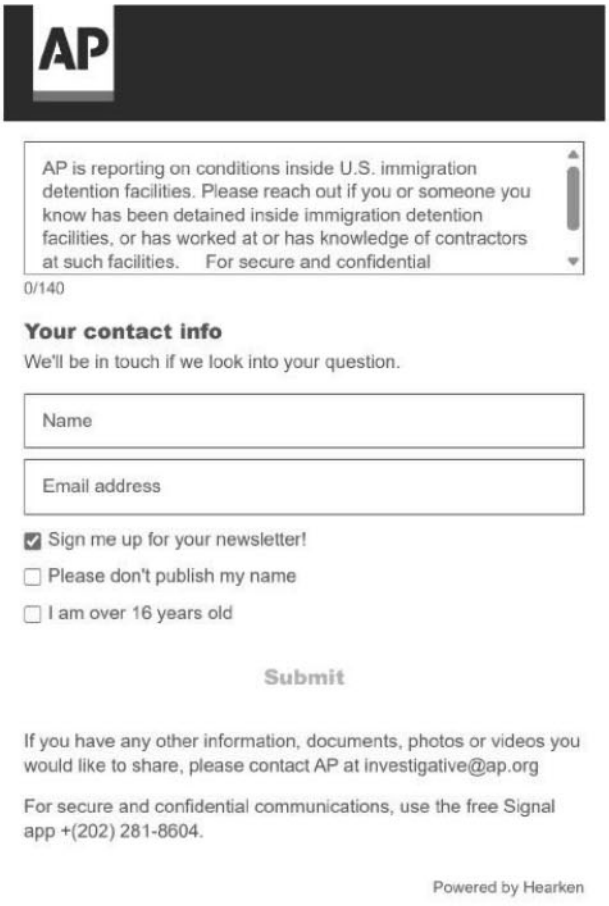
The young Ecuadorian mom talked of returning to Minneapolis, where her 2-year-old daughter, born in the U.S., was staying with a friend. With her husband deported, parenting will be entirely her responsibility.

That means getting her 7-year-old back in school. Then the woman, who had a work permit and a job in a Minneapolis restaurant before being detained, needs to keep her children fed.

"Let's go home, Mom, but don't go back to work because ICE is going to pick you up again," the little girl said. Her mother tried to reassure her.

That won't happen, she said, because now they have a special paper telling ICE to leave them alone.

She hopes that's a promise she can keep.



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AP Data Reporter Aaron Kessler contributed from Washington.

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ATTACHMENT C



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HEALTH LAW: PEER-REVIEWED ARTICLE

Sleep Is a Human Right, and Its Deprivation Is Torture

Caitlyn Tabor, JD, MBE and Katherine R. Peeler, MD, MA

Abstract

Sleep is integral to human health and well-being; it is recognized as a fundamental right by international bodies. Nevertheless, deliberate sleep deprivation is frequently employed as a form of torture, violating the right to health. Legal cases such as *LeMaire v Maass*, *Ireland v UK*, and *Huertas v Secretary Pennsylvania Dept of Corrections* illustrate the varying interpretations of sleep deprivation as torture or cruel and unusual punishment. Ambiguity in domestic and international legal definitions underscores the need for collaboration between health and legal professionals. Clinicians can offer expertise about physiological and psychological consequences of sleep deprivation, which informs what legally counts as torture. This commentary explores the intersection of sleep deprivation, human rights, and the role of medical professionals in addressing, identifying, and preventing sleep deprivation as a means of coercion and abuse.

Case Law on Sleep

Samuel LeMaire was imprisoned in the Disciplinary Segregation Unit (DSU) in the Oregon State Penitentiary.[1] The DSU contained cells that were "lighted 24 hours per day," which the plaintiff alleged disrupted his sleep and led to psychological problems.[1] The district court found the 24-hour lighting conditions to be unconstitutional, stating: "[t]here is no legitimate penological justification for requiring [inmates] to suffer physical and psychological harm by living in constant illumination."[1] In *Huertas v Secretary Pennsylvania Dept of Corrections*, Hector Huertas made a similar claim: Huertas alleged that the 24-hour lighting within the corrections unit violated the Eighth Amendment's prohibition against cruel and unusual punishment.[2] However, the Third Circuit Court of Appeals found that Huertas' claim did not reach the threshold of being unconstitutional, noting that "not all deficiencies and inadequacies in prison conditions amount to a violation of a prisoner's constitutional rights."[2] Differences in the outcomes of these cases highlight the subjective nature of identifying and defining torture inflicted via sleep deprivation tactics and reveal a need for proper liaising between medical and legal professionals to ensure adequate protection of people experiencing incarceration.

Sleep and the Right to Health

Sleep is an essential component of the body's homeostasis and physiological functioning. Quantifying sufficient duration and quality of sleep can prove difficult, as sleep patterns and needs vary not only between individuals but also for any given individual in response to aging, changes in routine, and physical demands. However, our understanding of sleep—its mechanics, cycles, and effects on the body—has improved dramatically over the last century, and thus our understanding of its converse—sleep deprivation—has concurrently grown deeper. As sleep is integral to health and the right to health has been recognized by numerous international governing bodies,[3,4] it follows that the purposeful deprivation of sleep violates the right to health though it is frequently used as a means of torture. Perpetrators often avoid accountability by justifying torture based on specific circumstances. Furthermore, the lack of a specific threshold of what constitutes sleep deprivation and the "justification" exemption as interpreted by some states present challenges in prosecuting it as torture. The ambiguity in legal definitions of torture, especially in the context of sleep deprivation, necessitates a careful examination of medical literature, existing laws, and international conventions to protect sleep as an essential human right and prevent its use as a means of coercion and abuse.

The World Health Organization defined health in its 1946 constitution as "a state of complete physical, mental and social well-being" and declared that "the enjoyment of the highest attainable standard of health is one of the fundamental rights of every human being."[3] As is common knowledge and as studied by numerous clinicians and scientists, optimal health is not possible without an appropriate quality and quantity of sleep (ie, proper sleep hygiene). Poor sleep hygiene is associated with cardiovascular disease, inattention, learning difficulties, mental health disorders, and numerous other medical problems in adults and children.[5] Sleep medicine experts consider good sleep to consist of 4 to 5 uninterrupted sleep cycles of light, deep, and rapid eye movement sleep.[6] While beyond the scope of this commentary, the intricacies of these cycles are what lead to the physiological restorative effects necessary for cognition and routine repair that the body performs, and, conversely, interruptions in these cycles lead to specific sleep disturbances and sequelae. Consequently, clinicians recommend 7 to 9 hours of sleep daily (preferably at night) and maintaining a consistent sleep schedule.[6] Sleep deprivation, whether intentional or unintentional, disrupts these processes, making it impossible for the body to function at its highest level.

Distinguishing Torture From Cruel, Inhuman, or Degrading Treatment

Based on the UN Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (UNCAT), torture is characterized by 4 critical elements: (1) "severe pain or suffering" (either physical or mental), (2) intentionality of the perpetrator to deliberately inflict such pain, (3) a specific purpose (such as "obtaining from him ... information or a confession," intimidation, or punishment), and (4) involvement of persons in an "official capacity."[7,8] This definition has evolved to encompass various forms of harm, including prolonged mental harm or deliberately disrupting senses or personality.[8,9]

The Geneva Conventions, particularly Geneva Convention III of 1949, highlighted the prohibition of torture in conflicts and for individuals not actively engaged in hostilities.[10] President Ronald Reagan signed the UNCAT in 1988, and Congress enacted 18 USC §2340A in 1994 to comply with the Convention.[11] This statute applies only to acts of torture committed outside the United States, although there is "Federal extraterritorial

jurisdiction over such acts whenever the perpetrator is a national of the United States or the alleged offender is found within the United States, irrespective of the nationality of the victim or the alleged offender."[12] The statute defines torture as specific acts intended to cause severe physical or mental pain,[12] omitting the original language about the purpose of harm, thereby introducing ambiguity and, as some have attempted to argue, a torture justification exemption.[13]

While the universally accepted UNCAT definition of torture involves the intentional infliction of severe physical or mental pain or suffering by a public official for a specific purpose,[12] other definitions have been offered. The Inter-American Convention to Prevent and Punish Torture offers a broader definition that does not necessitate severe pain and suffering.[14] In international humanitarian law, torture is not confined to public officials but can be committed by any individual.[15] Despite differing interpretations of torture, the UNCAT definition remains the core reference for defining torture. The UNCAT distinguishes between "torture" and "other acts of cruel, inhuman or degrading treatment or punishment" (CIDT) and *prohibits* torture completely while obligating states only to *prevent* CIDT.[15] Understanding the origins of these distinctions provides insight into the continued difficulty in reaching legal agreement on where the line is between them.

The UNCAT was initially developed in response to a UN General Assembly resolution. The Commission on Human Rights (now the Council on Human Rights) created a draft convention against torture to replace the 1975 declaration against torture,[16] which defined torture as an "aggravated and deliberate form of cruel, inhuman or degrading treatment or punishment." To achieve this goal, the Commission on Human Rights established a working group to examine the distinction between torture and CIDT.[16] The working group concluded that while torture could be defined with reasonable precision, drafting a precise definition of inhuman treatment was impossible.[16] Additionally, because State Parties to the convention would be legally bound to incorporate its terms into their national criminal law, attaching these obligations to a vague concept like CIDT was deemed impractical.[17] Taking into account the Commission on Human Rights' working group's discussions, the recommendations of the European Commission of Human Rights (European Commission), and the European Court's evaluations, the UN General Assembly adopted the definition of torture as outlined in the UNCAT in December 1984.

While the 1975 declaration against torture viewed torture as an aggravated form of inhuman treatment, the UNCAT clarified the distinction to be about purpose more so than severity. As such, Article 16 explicitly refers to "cruel, inhuman and degrading treatment or punishment which do not amount to torture" and only requires State Parties to "undertake to prevent," rather than prohibit, such acts committed under their jurisdiction.[7] This distinction is significant, as the UNCAT mandates that States Parties establish judicial remedies for torture victims, assert criminal jurisdiction over acts of torture and prosecute or extradite its perpetrators, and prohibit the submission of all statements obtained through torture in legal proceedings.[7] None of these obligations apply to inhuman treatment.

The issue of the severity of pain or suffering caused by torture was actually addressed earlier, however. In the 1969 "Greek case" involving Denmark and other states against the Greek military government,[18] the European Commission was tasked with interpreting Article 3 of the European Convention, which prohibits torture or "inhuman or degrading

treatment or punishment." The European Commission categorized Article 3's prohibition into 3 parts: "inhuman treatment" was defined as treatment deliberately causing severe mental or physical suffering that is unjustifiable in the particular situation; "degrading treatment" was described as treatment that grossly humiliates a person before others or forces them to act against their will or conscience; and "torture" was described as inhuman treatment that serves a purpose, such as obtaining information or confessions or inflicting punishment, and is generally a more severe form of mistreatment.[19]

While the European Commission's decision had a significant impact on the 1975 UN declaration against torture,[20] which also recognized torture as an aggravated form of inhuman treatment, the case of *Ireland v United Kingdom* in 1980 presented a challenge to the European Commission's purpose-driven test. This case involved the use of 5 interrogation techniques—including sleep deprivation—by British security forces on Irish Republican Army suspects.[21] The European Commission concluded that the purpose of these techniques was to obtain information and unanimously ruled that they amounted to torture, stating that the systematic application of the techniques for this purpose resembled methods of systematic torture.[21] However, the European Court of Human Rights disagreed with the European Commission's assessment. The European Court acknowledged that the techniques constituted inhuman treatment but did not consider them to be torture.[21] The European Court instead based its decision on a different interpretation of the distinction in Article 3 of the European Convention between torture and inhuman or degrading treatment, emphasizing that this distinction primarily hinges on the intensity of the suffering inflicted. According to the European Court, while the 5 techniques, when used together, undoubtedly amounted to inhuman and degrading treatment, they did not cause suffering of the specific intensity and cruelty associated with torture.[21]

Although both inhuman treatment and torture involve suffering, the European Commission emphasized that the purpose of the conduct is crucial in distinguishing between the two. It maintained that severe suffering might be justifiable in certain circumstances but that torture, with its additional purposeful element of obtaining information or confessions or inflicting punishment, can never be justified.[21] The European Court, however, argued that torture deserved a "special stigma" not attributable to other forms of inhuman or degrading treatment due to the intensity of suffering involved.[21] This distinction formed the basis of the court's decision to classify the 5 techniques as inhuman treatment rather than torture.[21] In summary, the European Commission distinguished torture from CIDT by the purpose of the act, whereas the European Court distinguished torture from CIDT by the severity of suffering from, more so than the purpose of, the act.

Post *Ireland*, the distinction between torture and CIDT based on the severity of suffering led some states to argue that, while torture is forbidden, CIDT might be justified in exceptional circumstances.[17] Both torture and CIDT are forbidden by the UN Declaration of Human Rights (Article 5), UNCAT, the International Covenant on Civil and Political Rights (Article 7), and the European Convention on Human Rights (Article 3).[7,22,23,24] The *legal* distinction between torture and CIDT hinges on the *purpose* behind the acts (torture aims to obtain a confession, while CIDT does not have a specific purpose).[25] However, *medical and psychological research* have demonstrated that there is no significant difference between torture and CIDT from a psychological or neurobiological perspective.[26] This research has led some practitioners to recommend abolishing the distinction altogether.[26]

Thus, there is no justification for torture or CIDT, as the legal distinction between acts of torture and CIDT does not align with their psychological impacts. It is known that torture leads to false confessions and inaccurate information.[27] If it is not the purpose of the offender to obtain false and inaccurate information, then the only other plausible motivation behind the torture is to cause intentional and purposeful harm to a targeted individual, which, by definition, is torture and is illegal under domestic and international law.[9]

Sleep Deprivation as Torture

Sleep deprivation is carried out in various ways: constant illumination, cold conditions, loud noises being played, constant and repetitive awakening, forced standing, and so on.[28,29] Although the UN Special Rapporteur on Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment has regularly declared that sleep deprivation is capable of amounting to torture, the threshold at which methods to cause sleep deprivation become torture is subject to interpretation.[30,31] Notably, the above conditions occurring in immigration detention centers in the United States have failed to be unanimously recognized as torture, despite various elements of torture—including duration, intentionality, and specific purpose—being behind their use.[28]

It should be noted that sleep deprivation occurs in numerous other circumstances that do not amount to torture. Around the world, work-life boundaries are blurred, as people are constantly on email and social media. Shift workers switch back and forth between day and night shifts. Many of us choose to forgo sleep for other activities despite knowing how poorly we may feel after insufficient or poor-quality sleep. But in all of these circumstances, we have at least limited agency to choose sleep. Persons subjected to sleep deprivation as a form of torture have no agency and no ability to modify their environments or habits to ensure sleep.

Prosecuting Perpetrators of Sleep Deprivation

Due to certain qualifications contained in definitions of torture and lack of proper documentation of torture tactics, the prosecution of sleep deprivation as a form of torture has been largely unsuccessful.[32] Furthermore, findings in US cases prosecuting sleep deprivation as torture vary significantly. This variation may be explained by the exemption justification that arises under the UNCAT's and earlier conventions' distinguishing torture from CIDT, as exemplified below.

In the United States, sleep deprivation has been historically considered a form of torture since the case of *Ashcraft v Tennessee* in 1944.[33] The individual in this case was subjected to 36 hours of bright lights that caused sleep deprivation, and the court acknowledged it as both physical and mental torture, citing and quoting from an earlier report: "It has been known since 1500 at least that deprivation of sleep is the most effective torture and certain to produce any confession desired."[34] Numerous studies have corroborated that confessions obtained under these conditions are often false and thus of little utility.[33,35]

Legal cases, such as *Keenan v Hall*[36] and *LeMaire v Maass*,[1] have highlighted unconstitutional aspects of subjecting individuals to constant illumination, emphasizing the psychological harm caused by disturbing sleep patterns and exacerbating preexisting mental disorders. In *LeMaire*, Chief Judge Owen Panner noted that "[t]here is no legitimate penological justification for requiring plaintiff to suffer physical and psychological harm by living in constant illumination. This practice is unconstitutional."[1]

However, the War Crimes Act, enacted to prosecute violations of the laws of war, has not been effectively utilized for prosecuting acts of sleep deprivation as torture, despite its provisions covering international and non-international armed conflicts involving US citizens.[37]

Challenges persist in fully recognizing and prosecuting sleep deprivation as a form of torture due to varying legal interpretations within the judicial system. Notably, there have been instances in which courts, under the guise of penological purpose, have eroded the authority of cases concerning the prosecution of sleep deprivation as torture, which have laid much of the groundwork for how torture and other acts of CIDT are prosecuted.[38] Violation of the Eighth Amendment's prohibition against cruel and unusual treatment might be overlooked if a government entity deems the practice justified by emphasizing that the penological purpose must specifically align with the prisoner's situation.[38]

Additionally, the lack of a definitive sleep deprivation threshold for torture set by higher courts has contributed to ambivalence in addressing the issue. Despite medical evidence affirming sleep deprivation's cruelty and inhumanity, the absence of a clear legal boundary has left room for interpretation that potentially overlooks violations of the Eighth Amendment in instances of extreme sleep deprivation. In a petition for a *writ of certiorari*—a petition by a higher court to a lower court to review a case—to the United States Court of Appeals for the Ninth Circuit, petitioner Neil Grenning noted: "It's an easy path to ambivalence, despite undisputed medical evidence that it's 'cruel and inhumane,' because no higher court has set a threshold. No court has said, 'This is too much, this is wanton infliction violating the Eighth Amendment.'"[38] Additionally, as Hector Heurtas' case exemplifies, evidence of intentionality can be difficult to prove, making the practice insidious.[2]

While some international conventions have recognized and condemned sleep deprivation as a method of torture or abuse, prosecutions specifically targeting sleep deprivation as a stand-alone crime have been less common. In some cases, instances of sleep deprivation have been included as part of broader charges related to torture or ill treatment, but direct prosecutions solely focused on sleep deprivation are relatively rare in international courts or tribunals. Instances in which sleep deprivation was categorized as torture include reports on Indonesia, Iran, Jordan, Libya, Saudi Arabia, Turkey, and Pakistan, where it was explicitly classified as a "common torture method" or included among other recognized torture methods like loud music.[32] Despite sleep deprivation being acknowledged as a prevalent method of psychological torture, finding corroborating documentation of these practices has hindered its adequate recognition by courts and quasi-judicial bodies like UN treaty bodies. In fact, Appendix M of the Army Field Manual for Human Intelligence Collector Operations No. 2-22.3 continues to permit isolation, sensory deprivation, and sleep deprivation, which can constitute torture or CIDT as defined by UNCAT and US law.[39]

Legal Definitions and Clinical Assessment

To enable more uniform interpretation of sleep deprivation as torture, medical professionals must provide clarity regarding the extent of pain and suffering experienced by an individual who underwent intentional sleep deprivation to assist courts in assessing whether a specific instance of sleep deprivation meets the threshold of torture. The American Medical Association states that "[a]s citizens and as professionals with specialized knowledge and experience, physicians have an obligation to assist in

the administration of justice."[40] To successfully fulfill this obligation, physicians may testify as expert witnesses in cases prosecuting sleep deprivation as torture. This testimony would serve to show that prolonged sleep deprivation does in fact deserve the "special stigma" of torture due to the very real physical, mental, and emotional impacts it has on its victims.

In a court setting, a medical expert testifying to establish that sleep deprivation amounts to torture would provide a detailed overview of the case, including the circumstances surrounding the sleep deprivation experienced by the individual, such as its duration, the context in which it occurred, and the techniques used to cause sleep deprivation. The expert would additionally discuss the methods used to assess the physical and psychological effects of sleep deprivation on the individual. This discussion might include descriptions of physical examinations, medical tests, and psychological evaluations conducted to evaluate the individual's health status and well-being. The expert would present their findings, highlighting any physical or psychological symptoms observed in the individual as a result of sleep deprivation. The gold standard for conducting and documenting such forensic evaluations is the Istanbul Protocol.[41]

Based on their findings and expertise, the expert would provide their opinion on the severity of the effects of sleep deprivation on a given individual. The medical expert's opinion would allow the court to understand the severity of the specific sleep deprivation a person endured, its effect on a given person's physiology, and the sequelae that resulted, thus providing clarity to the courts as to whether or not a given individual's experience meets the threshold for torture.

Conclusion

International definitions of torture, such as that of the UNCAT, emphasize severe pain or suffering, intentionality, specific purpose, and official capacity. The justification exemption for CIDT used in the United States[17] is a false argument. There is no significant difference between torture and CIDT from a psychological or neurobiological perspective. Torturing individuals through sleep deprivation or any other means of cruel, inhumane, or degrading treatment as a means to glean confessions or important information does not yield reliable information. And since that information has no value (which, even if it did, we feel would not justify the torture), then the only purpose of the torture or CIDT is to intentionally harm someone, which, by definition, is not a justifiable exemption.

Courts internationally and in the United States have recognized sleep deprivation as cruel and unusual punishment, constituting torture. Sleep deprivation, achieved through techniques like prolonged interrogations and acoustical bombardment, causes severe mental and physical consequences, including increased anxiety, impaired cognitive function, and increased cardiovascular risk. Particularly in light of the subjective nature of mental suffering, the frequent absence of obvious physical evidence, and the purposeful lack of documentation of such evidence by the perpetrators, it is imperative that medical experts bridge the gap between science and the law, testifying to the specific negative effects of sleep deprivation on a given person and thus clarifying thresholds at which maltreatment amounts to torture.

References

1. *LeMaire v Maass*, 745 F Supp 623 (D Or 1990).
2. *Hector Huertas v Secretary Dept of Corrections*, No 12-4530 (3d Cir 2013).

3. Constitution of the World Health Organization. World Health Organization. Accessed November 28, 2023. https://apps.who.int/gb/bd/PDF/bd47/EN/constitution-en.pdf?ua=1
4. Committee on Economic, Social and Cultural Rights. Substantive issued arising in the implementation of the International Covenant on Economic, Social and Cultural Rights. General comment no. 14 (2000): the right to the highest attainable standard of health (Article 12 of the International Covenant on Economic, Social and Cultural Rights). United Nations; 2000. Accessed May 22, 2024. https://digitallibrary.un.org/nanna/record/425041/files/E_C.12_2000_4-EN.pdf?withWatermark=0&withMetadata=0&version=1&registerDownload=1
5. Liew SC, Aung T. Sleep deprivation and its association with diseases—a review. *Sleep Med*. 2021;77:192-204.
6. Baranwal N, Yu PK, Siegel NS. Sleep physiology, pathophysiology, and sleep hygiene. *Prog Cardiovasc Dis*. 2023;77:59-69.
7. Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment. United Nations. Adopted December 10, 1984. Accessed November 22, 2023. https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-against-torture-and-other-cruel-inhuman-or-degrading
8. Cakal E. Dignity fact sheet collection legal Nº 1—defining torture. Danish Institute Against Torture; 2019. Accessed October 2, 2023. https://www.dignity.dk/wp-content/uploads/defining-torture-factsheet.pdf
9. Danelius H. Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment. December 10, 1984. Accessed November 28, 2023. https://legal.un.org/avl/ha/catcidtp/catcidtp.html
10. *Geneva Convention Relative to the Treatment of Prisoners of War*. United Nations. Adopted August 12, 1949. Accessed May 14, 2024. https://www.un.org/en/genocideprevention/documents/atrocity-crimes/Doc.32_GC-III-EN.pdf
11. Pitter L. No more excuses—a roadmap to justice for CIA torture. Human Rights Watch. December 1, 2015. Accessed November 28, 2023. https://www.hrw.org/report/2015/12/01/no-more-excuses/roadmap-justice-cia-torture
12. Torture (18 USC 2340A). US Department of Justice Archives. Accessed November 28, 2023. https://www.justice.gov/archives/jm/criminal-resource-manual-20-torture-18-usc-2340a
13. Devlin J. The ticking bomb and the justification of torture. *E-International Relations*. July 5, 2012. Accessed November 28, 2023. https://www.e-ir.info/2012/07/05/the-ticking-bomb-and-the-justification-of-torture/
14. Inter-American Convention to Prevent and Punish Torture. Organization of American States. Adopted December 9, 1985. Accessed November 28, 2023. https://www.oas.org/juridico/english/treaties/a-51.html
15. Reyes H. The worst scars are in the mind: psychological torture. *Int Rev Red Cross*. 2007;89(867):591-617.
16. Burgers HJ, Danelius H. *The United Nations Convention Against Torture: A Handbook on the Convention Against Torture and Other Cruel, Inhuman, or Degrading Treatment or Punishment*. Brill; 1988.
17. De Vos CM. Mind the gap: purpose, pain, and the difference between torture and inhuman treatment. *Hum Rights Brief*. 2007;14(2):4-10.

18. European Commission of Human Rights. *Report of the European Commission of Human Rights on the "Greek Case."* European Commission of Human Rights; 1969. Accessed May 22, 2024. https://hudoc.echr.coe.int/app/conversion/pdf/?library=ECHR&id=001-167795&filename=THE%20GREEK%20CASE%20%E2%80%93%20DENMARK%20v.%20GREECE%20%3B%20NORWAY%20v.%20GREECE%20%3B%20SWEDEN%20v.%20GREECE%20%3B%20NETHERLANDS%20v.%20GREECE%20%E2%80%93%20Part%20I%20of%20V.pdf
19. Bates E. *The Evolution of the European Convention on Human Rights: From Its Inception to the Creation of a Permanent Court of Human Rights*. Oxford University Press; 2010.
20. Declaration on the Protection of All Persons from Being Subjected to Torture and Other Cruel, Inhuman, or Degrading Treatment or Punishment. United Nations. Adopted December 9, 1975. Accessed May 15, 2024. https://www.ohchr.org/en/instruments-mechanisms/instruments/declaration-protection-all-persons-being-subjected-torture-and
21. *Case of Ireland v the United Kingdom*. European Court of Human Rights. January 18, 1978. Accessed May 28, 2024. https://hudoc.echr.coe.int/eng#{%22itemid%22:[%22001-57506%22]}
22. Universal Declaration of Human Rights. United Nations. Adopted December 10, 1948. Accessed May 22, 2024. https://www.un.org/en/about-us/universal-declaration-of-human-rights
23. International Covenant on Civil and Political Rights. United Nations. Adopted December 16, 1966. Accessed May 22, 2024. https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-civil-and-political-rights
24. Council of Europe. Convention for the Protection of Human Rights and Fundamental Freedoms. Council of Europe; 1950. Amended August 1, 2021. Accessed May 22, 2024. https://rm.coe.int/1680a2353d
25. *Prosecutor v Anto Furund`ija*, Case no. IT-95-17/1-T (Int'l Crim Trib for the Former Yugoslavia December 10, 1998). Accessed May 28, 2024. https://www.icty.org/x/cases/furundzija/tjug/en/fur-tj981210e.pdf
26. Başoğlu M. A multivariate contextual analysis of torture and cruel, inhuman, and degrading treatments: implications for an evidence-based definition of torture. *Am J Orthopsychiatry*. 2009;79(2):135-145.
27. Einolf CJ. How torture fails: evidence of misinformation from torture-induced confessions in Iraq. *J Glob South Stud*. 2022;7(1):ogab019.
28. Peeler KR, Hampton K, Lucero J, Ijadi-Maghsoodi R. Sleep deprivation of detained children: another reason to end child detention. *Health Hum Rights*. 2020;22(1):317-320.
29. Leach J. Psychological factors in exceptional, extreme and torturous environments. *Extrem Physiol Med*. 2016;5(1):7.
30. Rodley NS; Commission on Human Rights. Report of the Special Rapporteur on torture and cruel, inhuman or degrading treatment or punishment. Visit by the Special Rapporteur to Pakistan. E/CN.4/1997/7/Add.2. United Nations. October 15, 1996. Accessed May 14, 2024. http://hrlibrary.umn.edu/commission/thematic53/97TORPAK.htm
31. Nowak M. What practices constitute torture?: US and UN standards. *Hum Rights Q*. 2006;28(4):809-841.

32. USA and torture: a history of hypocrisy. Human Rights Watch. December 9, 2014. Accessed October 2, 2023. https://www.hrw.org/news/2014/12/09/usa-and-torture-history-hypocrisy
33. *Ashcraft v Tennessee*, 327 US 274 (1946).
34. Camp EW, Bruce AA, Hallam O. Report of Committee on Lawless Enforcement of Law. *Am J Police Sci*. 1930;1(6):575-593.
35. "They want a confession": torture and ill-treatment in Ethiopia's Maekelawi police station. News Release. Human Rights Watch; October 18, 2013. Accessed November 28, 2023. https://www.hrw.org/report/2013/10/18/they-want-confession/torture-and-ill-treatment-ethiopias-maekelawi-police-station
36. *Keenan v Hall*, 135 F3d 1318 (9th Cir 1996).
37. Interrogation policy, Geneva Conventions, and the War Crimes Act. Human Rights Watch. Accessed November 22, 2023. https://www.hrw.org/legacy/backgrounder/usa/qna1006/5.htm
38. Petition for Writ of Certiorari, *Grenning v Miller-Stout*, No. 16-35903 (2018) (No. 18-9052).
39. US Department of the Army. *FM 2-22.3 (FM 34-52) Human Intelligence Collector Operations*. US Department of the Army; 2006. Accessed May 15, 2024. https://irp.fas.org/doddir/army/fm2-22-3.pdf
40. American Medical Association. Opinion 9.7.1 Medical testimony. *Code of Medical Ethics*. Accessed May 15, 2024. https://code-medical-ethics.ama-assn.org/ethics-opinions/medical-testimony#:~:text=As%20citizens%20and%20as%20professionals,Testify%20honestly.
41. Office of the High Commissioner for Human Rights. *Istanbul Protocol: Manual on the Effective Investigation and Documentation of Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment*. United Nations; 2022. Accessed May 15, 2024. https://irct.org/wp-content/uploads/2022/08/Istanbul-Protocol_Rev2_EN.pdf

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ATTACHMENT D

National Institutes of Health
Turning Discovery Into Health

August 30, 2022

Children's sleep linked to brain development

At a Glance

- Pre-teens who slept less than nine hours daily had differences in brain structure and more problems with mood and thinking compared to those who got sufficient sleep.
- The findings suggest that sleep interventions might be needed to help improve mental and behavioral health during pre-adolescence and beyond.

Scientists have long recognized that getting enough sleep during childhood can benefit developing brains. However, the underlying brain mechanisms are not well understood. And although experts say that children ages 6 to 12 should get at least nine hours of sleep each day, it's been unclear how less sleep might affect a child's brain.



Researchers gained insights into how insufficient sleep affects children's developing brains
vystekimages / Shutterstock

To get some answers, a research team led by Dr. Ze Wang of the University of Maryland set out to see how lack of sleep affects brain structure and other outcomes. They took advantage of data being collected in NIH's ongoing Adolescent Brain Cognitive Development (ABCD) study. ABCD has enrolled nearly 12,000 volunteers at ages 9 or 10 from research sites across the country. Participants' health, brain structure and function, and other factors will be followed for a decade as they move from adolescence into young adulthood.

The researchers identified more than 4,000 ABCD participants, ages 9 or 10, who generally got nine or more hours of sleep per day, according to their parents. This group was compared to a similar number of age-matched children who typically

got less than the recommended nine hours of sleep. The research team carefully matched the two groups based on some key factors that can confound study results. These factors included sex, household income, body mass index, and puberty status. Participants were assessed and followed over a two-year period. Results appeared in *Lancet Child & Adolescent Health* on July 29, 2022.

The researchers found that children in the insufficient sleep group at the start of the study had more mental health and behavioral challenges than those who got sufficient sleep. These included impulsivity, stress, depression, anxiety, aggressive behavior, and thinking problems. The children with insufficient sleep also had impaired cognitive functions such as decision making, conflict solving, working memory, and learning. Differences between the groups persisted at the two-year follow-up.

Brain imaging at the start of the study and two years later showed differences in brain structure and function in the insufficient sleep group compared to the sufficient sleep group. The findings suggest that sleep affects learning and behavior through specific brain changes.

"Children who had insufficient sleep€”less than nine hours per night€”at the beginning of the study had less grey matter or smaller volume in certain areas of the brain responsible for attention, memory, and inhibition control, compared to those with healthy sleep habits," Wang explains. "These differences persisted after two years, a concerning finding that suggests long-term harm for those who do not get enough sleep."

Because the ABCD study is ongoing, the researchers note that there will be opportunities to add more follow-up measurements and build on their results. "Additional studies are needed to confirm our findings and to see whether any interventions can improve sleep habits and reverse the neurological deficits," Wang adds.

€”by Vicki Contie

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References

Effects of sleep duration on neurocognitive development in early adolescents in the USA: a propensity score matched, longitudinal, observational study. Yang FN, Xie W, Wang Z. *Lancet Child Adolesc Health*. 2022 Jul 29:S2352-4642(22)00188-

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ATTACHMENT E

POLITICS

I Recognize the Look on Liam Ramos's Face

The 5-year-old was briefly held at Dilley, where families are sent after ICE roundups.

By Caitlin Dickerson

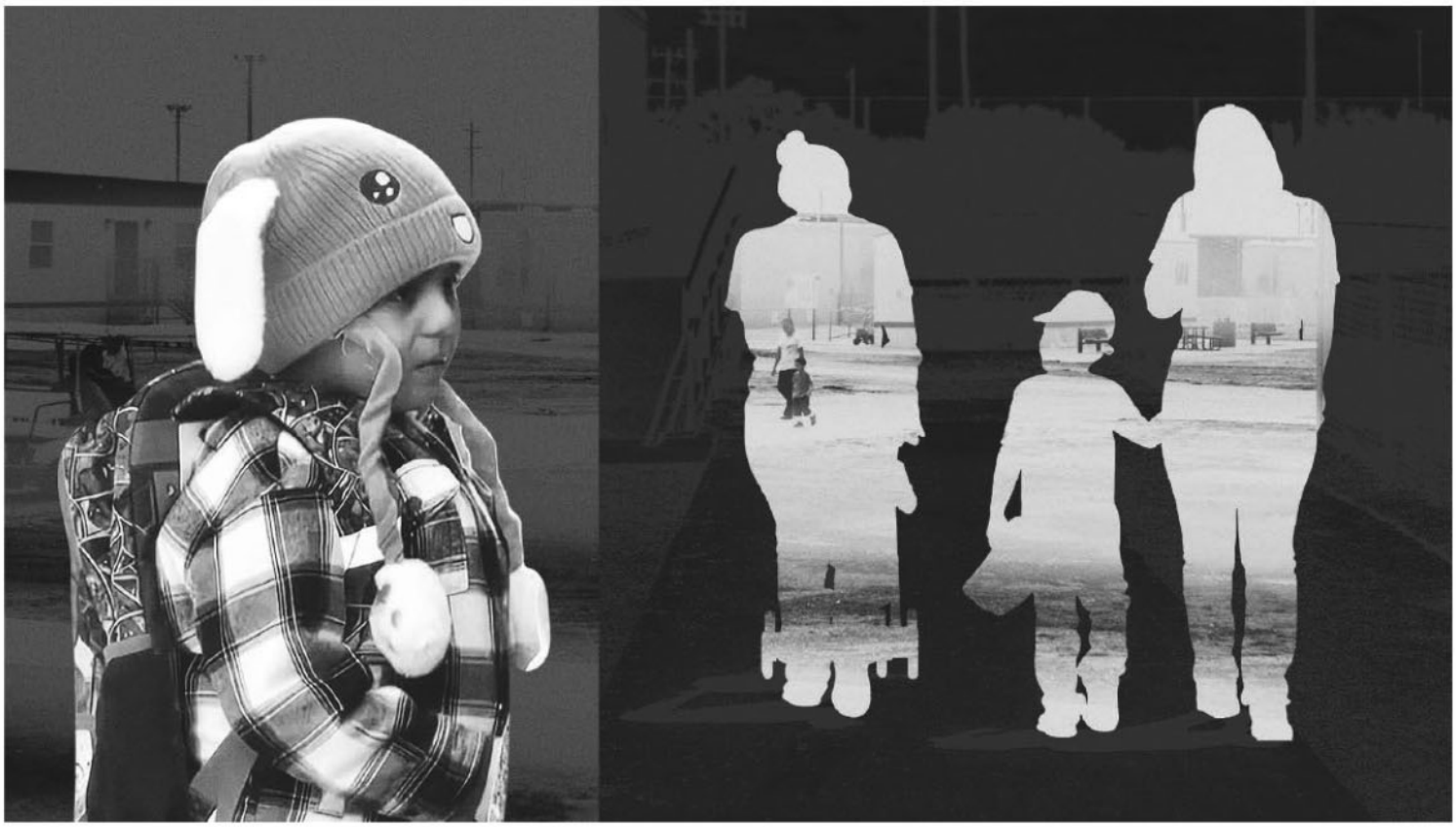


Illustration by The Atlantic. Sources: Ali Daniels; Ilana Panich-Linsman / Redux.

MARCH 10, 2026 SHARE AS GIFT DISCUSS 59 REMOVE

When the first photo of 5-year-old Liam Ramos went viral in January, it became an instant symbol of the Trump administration's mass-deportation campaign: his blue bunny hat, his Spider-Man backpack, his hunched shoulders, his scared eyes as ICE detained him and his father outside their home in a Minneapolis suburb.

The second photo of Liam, a week later, enraged people who were now invested in his story: Lying on his father's lap at the Dilley Immigration Processing Center, about 70 miles south of San Antonio, Texas, he looked pale and lethargic. His eyes were open a

to eat.

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What struck me about the second image, and his mother's update, was how familiar his transformation was. I've visited Dilley several times, and have seen many children go from bright-eyed to listless.

With his move to Dilley, Liam became part of an ongoing national experiment in detaining immigrant families. George W. Bush's administration briefly used the practice to provide respite to asylum seekers who had just crossed the border and had no plans for where to go next. But ICE officials soon argued that family detention should be used as a deterrent. In a former medium-security prison surrounded by razor wire north of Austin, young children and their parents wore jumpsuits and were confined to cells for up to 12 hours a day; it closed in 2009 after lawsuits and government inspections showed that children there were sick and malnourished.

The Obama administration eventually opened Dilley on a remote patch of Texas flatland where temperatures can hit 90 degrees even in December. Its open-air layout of trailers was supposed to be more humane. But for years now, in interviews and court filings, families have described an emotionally crushing atmosphere, with revolting food, foul water, and a dangerous lack of medical care. They say bright bedroom lights that never turn off make it almost impossible to sleep, compounding their misery.

J. Weston Phippen: Is it an immigration detention facility or a child-care center?

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In 2016, a government advisory panel recommended that ICE end the practice of family detention, and instead use monitoring programs that allow people with pending asylum cases to settle and work in the United States. But under Donald Trump, the agency has twice backtracked on plans to do that, arguing that housing children at Dilley is safe and necessary in order to discourage border crossings. Even that rationale, though, no longer adequately describes Dilley's role. Instead of detaining recent border crossers almost exclusively, Dilley is now also housing families that had established lives in the United States and were arrested in ICE sweeps.

When I toured Dilley in the fall of 2019 with a group of reporters, ICE's acting director, Matt Albence, led us across the 54-acre campus, which could detain up to 2,400 people. Albence, who now works for the private prison company GEO Group, said he was proud of how Dilley was run and pushed back against its critics. "This is clearly not a concentration camp," he said.

On the tour, I learned that when families arrived, they entered a small locked chamber called a sallyport, where they were screened for communicable diseases. Most had just finished an exhausting journey across the southern border, and were given a 15-minute "cool-down period" in an air-conditioned area that looked like a school administrator's office, with tile floors and faux-wood laminate cubicles. After a snack, they started a 12-hour intake process that involved a full physical, a shower, fingerprinting, a rules orientation, and an initial asylum screening called a "credible-fear interview." Girls older than 10 were given a pregnancy test. Then they were assigned to a dorm room in one of Dilley's five "neighborhoods," which were labeled by color and animal, and given name tags that indicated their preferred language.

A sign at reception—RECREATION JUST FOR YOU!—said that karaoke, Hula-Hoops, and air hockey were available every day from 8 a.m. to 8 p.m. "Just let a recreation staff member know what you want to do!" To minimize the risk of sexual harassment and assault, only mothers or fathers could be detained in the facility at a given time. (Posters for how to report sexual assault were everywhere.) This meant that two-parent

sometimes in another state.

Each of Dilley's 20 housing trailers had space for 120 people. The detainees slept in rooms that could accommodate up to six families in double bunk beds. In one room, I saw a teenage girl slumped forward on a couch, holding her head in one hand, staring blankly at the wall in front of her. Former ICE officials who were involved with the facility's planning later told me that the government had deemed individual bathrooms an unnecessary expense. Instead, communal ones were placed at the end of each trailer, a long walk from the farthest bedrooms.

We toured an austere courtroom that reeked of bleach, and an airless cafeteria with a rancid smell. There were amenities, such as a "salon" that offered free haircuts and a computer lab with a few children clicking away under a poster that translated *E pluribus unum* into English and Spanish. We were told that Dilley offered Zumba classes a few times a week. We visited a day care with space for 15 children, which parents could use in two-hour increments; the sole attendant was trying to soothe three crying babies.

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The few parents and children I saw outdoors looked sedated by the heat. Some huddled near skinny trees. The government had paid for landscaping, but the plants immediately died in the brutal climate, according to Claire Trickler-McNulty, a former senior adviser at ICE.

Eric Schlosser: 'We voted for retribution'

Throughout the tour, we heard coughing and saw faces covered in snot. Parents said they waited hours in the heat and rain outside the medical unit, only to be sent away with Tylenol, ibuprofen, or nothing at all.

On another trip to Dilley about a month later, I met a Mexican mother named Patricia who told me that her teenage daughter was refusing to eat and had tried to

Honduran mother named Cindy told me that her 8-year-old son, Jostin, had become unrecognizable since they arrived. "He acts like a small child," she said. "He speaks in a whisper, constantly asking for Mommy." Jostin wasn't eating either, she explained, and "everytime he goes into the cafeteria, he throws up."

Later, I interviewed a mother and son named Kenia and Michael after they were released from Dilley. Michael, who was 11, started having violent meltdowns in the facility—something that had never happened before—and they continued for months afterward. Detained children experience more stress than their bodies can handle, child-welfare experts told me, and are profoundly destabilized by seeing their parents' fear and helplessness.

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The advisory panel convened at the end of the Obama administration was supposed to recommend improvements to family detention, but instead voted unanimously to end it. "Detention is never in the best interest of children," the panel's report said.

When Trump took office in 2017, his administration disregarded the recommendation. President Biden's Department of Homeland Security finally closed Dilley in the summer of 2024. Trump reopened it a few months later, as part of a $45 billion expansion of the immigration detention system that has also involved Guantánamo Bay, tent cities on military bases, and converted warehouses.

CoreCivic, the private prison company that operates Dilley, reported that its management revenue from ICE more than doubled between the fourth quarters of 2024 and 2025—partly because of reopening Dilley. In an earnings call last year, CoreCivic's then-CEO called this "truly one of the most exciting periods" in his 32-year career with the company.

intended lifespan. ICE created a barrier between some of the trailers so that the facility can house mothers and fathers at the same time. This year, its population has fluctuated between 900 and 1,400, including pregnant women and children as young as two months old, according to Faisal Al-Juburi, a co-CEO of Raices, whose lawyers provide free counsel to families there. Like Liam Ramos, whose family came from Ecuador in 2024 and requested asylum, some detainees have pending applications for legal immigration status. And some were picked up at their court appearances or at appointments at ICE offices.

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It's become harder to learn what's happening inside Dilley in recent months, though reports suggest that conditions are worsening. ICE is no longer offering tours to journalists. After ProPublica published pictures and letters written by detained children, guards reportedly started confiscating crayons and paper. In 911 logs, ProPublica found reports of "toddlers having trouble breathing, a pregnant woman who passed out and an elementary-school-aged girl having seizures. Local authorities were also called in for three cases of alleged sexual assault between detainees."

Democratic Representative Joaquin Castro of Texas went to Dilley on February 20 and reported that families were "locked up like criminals and being treated like animals," and that some children had untreated asthma and appendicitis. Castro has long opposed family detention and criticized Trump's immigration policies. "There's a lot of little, little kids who really probably don't know how to process this experience," he said in a video posted on YouTube.

Caitlin Dickerson: An American catastrophe

Lawyers at the National Center for Youth Law are allowed to perform periodic inspections of Dilley and interview detainees, under a 1997 federal court settlement that set minimum standards for the detention of children and families. Becky Wolozin, a lawyer at NCYL, told me that since the facility reopened under Trump,

syndrome, severe autism, and other serious developmental illnesses. There was a measles outbreak earlier this year. Wolozin said that basic childhood illnesses such as ear infections can become dangerous in Dilley because children are often sleep-deprived and malnourished. "Kids have fevers for a frightening amount of time, and persistent coughs and headaches," she said. "We're seeing that only after many, many visits to the medical wing, or even to the hospital, do they actually get treated with antibiotics."

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In January, an 18-month-old detainee got sick at Dilley with COVID, RSV, pneumonia, and bronchitis and had to be hospitalized for severe respiratory distress, according to a federal lawsuit. ICE then returned her to Dilley, where her lawyers say the medical staff withheld her prescribed medication until the lawyers secured her release. In a statement, a DHS spokesperson said that the child received "proper treatment," including her prescribed medications, and that all detainees "receive timely and appropriate medical care from the moment they enter ICE custody."

Todd Brian, a spokesperson for CoreCivic, said in a statement that the company doesn't "cut corners on care, staff or training, which meets, and in many cases exceeds, our government partners' standards." He said that detainees receive three nutritious meals a day and have access to a team of "registered nurses, licensed vocational nurses, nurse practitioners, and board-certified physicians, including pediatric specialists." Brian said that any allegation that buildings were not being maintained was "patently false," adding, "Emergency medical services are activated immediately when a child's clinical presentation exceeds what can be safely managed on-site."

The Trump administration is fighting restrictions on its use of Dilley—including a 20-day limit on detaining children and families under the 1997 court settlement—by arguing that existing laws are sufficient to keep the children there safe. Al-Juburi told me that the average stay is currently about 63 days, and that one family was detained at Dilley for almost five months. Raices has gotten some clients released through

days of the Dilley photo going viral. But Al-Juburi said the petitions are time-consuming and must be made one at a time, even though the same legal logic applies to many of the children there.

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In recent court filings, ICE has called Dilley a "model of regulatory compliance and humane care." DHS said in its statement that children at Dilley "have access to teachers, classrooms, and curriculum booklets for math, reading, and spelling," as well as "3 meals a day, clean water, clothing, bedding, showers, soap, and toiletries," all of which is "generously funded by the U.S. taxpayer." The statement says that detention "is a choice" and encourages families to self-deport.

I recently spoke with a subcontractor who quit working at Dilley this year; he requested anonymity so that he wouldn't lose his security clearance. He said that since he's been out of a job, he's been stressed about money because he has a toddler at home and his partner is pregnant with a second child. But he told me that seeing Liam Ramos and so many other sick and miserable children—the constant crying and vomiting—got to be too much.

"A lot of these kids have bags under their eyes, which is something that you don't see with kids," he said. "They have worse bags than their parents."

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ABOUT THE AUTHOR



Caitlin Dickerson

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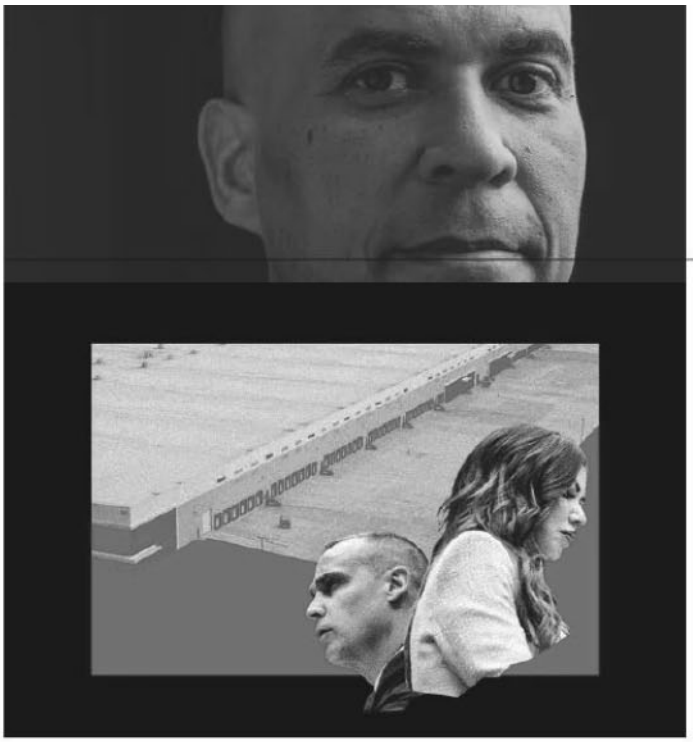


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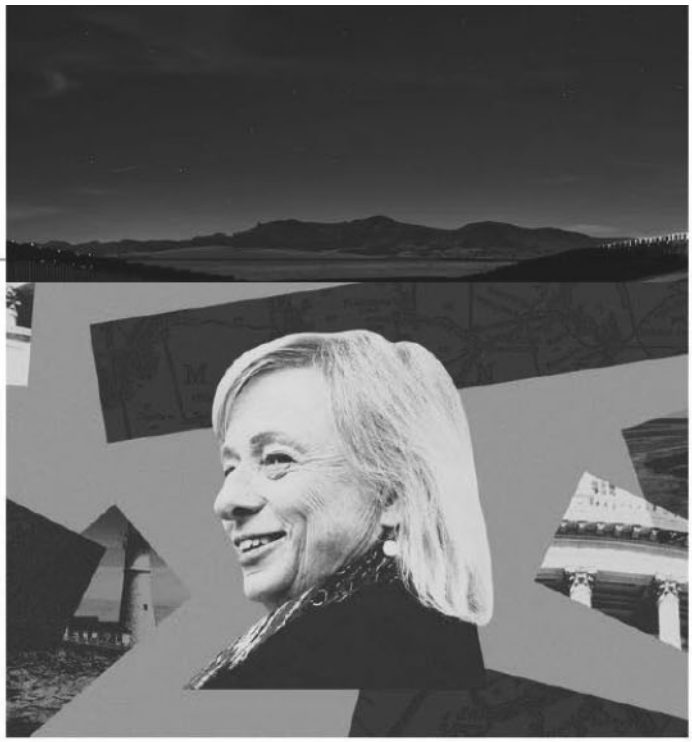


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EXHIBIT 2

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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

WESTERN DIVISION

JENNY LISETTE FLORES, *et al.*,

Plaintiffs,

v.

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

Defendants.

No. CV 85-4544-DMG-AGRx

DECLARATION OF LUCÍA Y. GONZÁLEZ IN SUPPORT OF PLAINTIFFS' RESPONSE TO MARCH 13, 2026 ICE JUVENILE STATUS REPORT AND DATA

Honorable Dolly M. Gee
Chief United States District Judge

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DECLARATION OF LUCÍA Y. GONZÁLEZ

I, Lucía Y. González, declare as follows:

1. I am a Paralegal at Children's Rights. I support Plaintiffs' counsel in the above-titled action. I graduated in 2024 from the University of Pennsylvania with a minor in Survey Research and Data Analytics. If called to testify in this case, I would testify competently about these facts.

2. Pursuant to this Court's December 15, 2025 order (Dkt. 1714), Defendants ICE and CBP were required to provide Plaintiffs' counsel with statistical reports for all class members in custody for 20 days or longer during December 2025 and January 2026.

3. Defendants publicly filed ICE Family Residential Center 20-Day Reports for December 2025 and January 2026, with personally identifying information redacted. ICE Family Residential Center 20-Day Report – December 2025 ("Dec. 20-Day Census Chart"), Dkt. 1736-2; ICE Family Residential Center 20-Day Report – January 2026 ("Jan. 20-Day Census Chart"), Dkt. 1736-3 (collectively "20-Day Census Charts"). These redacted data only show Facility Lengths of Stay ("FLOS") from the date of arrival at a federal immigration facility ("book-in" date). My calculations, explained below, show LOS ("Length of Stay") from the date of apprehension, which is a far more accurate measure of how long children have been in federal immigration custody.

4. I relied on the unredacted versions of these data filed under seal in order to determine the unique number of children with LOS over 20 days in December 2025 and January 2026. The only way to ensure that children are counted only once is to use their A Numbers as a unique identifier. Their A numbers do not appear on the publicly filed documents. Unredacted ICE Family Residential Center 20-Day Report – December 2025, Dkt. 1738-3 ("Unredacted Dec. 20-Day Census Chart"); Unredacted ICE Family Residential Center 20-Day Report – January 2026 ("Unredacted Jan. 20-Day Census Chart"), Dkt. 1738-4 (collectively "Unredacted 20-Day Census Charts").

Data Methods

5. The figures herein and reflected in Plaintiffs' Response to the March 13, 2026 ICE JC Status Report ("Pls.' Response") represent counts of unique children (*i.e.,* children who appeared in both the December and January data sets were only counted once).

6. Defendants' 20-Day Census Charts contained a total of 600 unique children who were in ICE custody for at least 20 days, but five children were in custody for exactly 20 days, so I excluded them from the calculations of the total number of children detained over 20 days – that leaves 595 children.

7. I used the LOS stated in the release narrative within the "Reason for Length of Stay" column whenever possible (this method was used for 542 children) to calculate length of stay.

8. Defendants' 20-Day Census Charts specifically state that LOS is determined by calculating the number of days between apprehension and either book-out date or the last day of the month for those who remained in custody Dec. 20-Day Census Chart, Dkt. No. 1736-2 at 1; Jan. 20-Day Census Chart, Dkt. No. 1736-3 at 1. However, Defendants do not provide this figure to Plaintiffs or the public, and instead *only* provide facility length of stay ("FLOS"), which uses the book-in date instead of the apprehension date as the start of children's time in custody. (Once again, Defendants did not provide LOS figures, even though Plaintiffs have raised discrepancies between the FLOS and the LOS in the past. *See* Pls.' Resp. to Dec. Suppl. ICE JC Report, Dkt. 1706, at 7 n.1.)

9. Using the book-in date undercounts children's actual time in custody. Therefore, the FLOS figures provided to Plaintiffs and the Court may not include time spent, for example, in a holding room, a hotel, in transit, or possibly in a CBP facility, before arriving at the South Texas Family Detention Center ("Dilley").[1] *See, e.g.*, Jan. 20-Day Census Chart, Dkt. 1736-3, at 4 (12th row with 10/10/2025 apprehension date but

[1] It is unclear whether the data include time spent in CBP custody or exclusively ICE facilities, as Defendants' 20-Day Census Charts do not define "facility."

11/3/2025 book-in date). To provide the Court with more accurate numbers, I calculated the LOS for each child present in the 20-Day Census Chart from their apprehension date.

10. For children whose narrative stated that they remained in custody and who had no book-out date (47 children), I calculated LOS between their apprehension date and January 31, 2026. Accordingly, the full LOS may be much longer for children who remained in custody past January 31, 2026. Two of these 47 children had LOSs far longer than the amount of time Dilley has been open, which suggests their apprehension dates may be from previous custody episodes. I used their book-in dates instead to determine LOS. *See* Jan. 20-Day Census Chart, Dkt. 1736-3, at 1 (10th row with 9/17/2023 apprehension date and no LOS specified in narrative), 2 (8th row with 12/4/2024 date and no LOS in narrative).

11. The entire first page of the January 20-Day Census Chart contains only children who were apprehended in 2022 – 2024. *See, e.g.*, Jan. 20-Day Census Chart, Dkt. 1736-3, at 1. If the LOS for these children were not provided in their narratives, as is the case for the two children mentioned above, Plaintiffs and the Court would not be able to calculate the accurate LOS. It is also possible that some of the LOSs calculated using apprehension dates are overstated if out-of-date apprehension dates exist in the data. If Defendants are apprehending children multiple times, apprehension dates should be updated to reflect the most recent apprehension.

12. Two children had book-out dates although their narratives stated that they remained in custody. *See* Jan. 20-Day Census Chart, Dkt. 1736-3, at 22 (5th row), 25 (10th row). For these children, LOS was determined by calculating the number of days between their apprehension and book-out dates, rather than January 31, 2026.

13. Four children were removed or transferred according to their narrative, but their LOS was not stated. *See, e.g.*, Dec. 20-Day Census Chart, Dkt. 1736-2, at 17 (11th row). For these children, LOS was determined by calculating the days between their apprehension and book-out dates.

14. Narratives were also reviewed to identify children released through habeas petitions. The 20-Day Census Charts mention habeas petitions for nine children. For six of these children, narratives clearly indicate that habeas was "granted," "ordered," or otherwise resulted in the children's release. *See, e.g.*, Jan. 20-Day Census Chart, Dkt. 1736-3, at 22 (11th row). One of these children was included in both 20-Day Census Charts, and their December narrative mentioned their release through habeas but their January narrative did not. *Compare* Dec. 20-Day Census Chart, Dkt. 1736-2, at 22 (4th row) *with* Jan. 20-Day Census Chart, Dkt. 1736-3, at 18 (14th row). This child was still included in the total of 6 children released through habeas. For the three other children, narratives mention that habeas petitions were filed and that they were released, but it is unclear whether habeas resulted in their release. *See, e.g.*, Jan. 20-Day Census Chart, Dkt. 1736-3, at 15 (5th row).

Results

15. My analysis was principally designed to calculate the LOS of each child provided for in the 20-day Census Reports because ICE did not provide that data. I also checked for discrepancies in some of the data.

16. A total of 595 unique children were in custody for more than 20 days during December 2025 and January 2026 according to the LOS. According to my analysis, 265 of these children were in custody for more than 50 days and 55 children were in custody for more than 100 days.

17. Habeas petitions led to the release of at least 6 children according to my analysis.

18. The total number of days in custody is 30,115 according to the FLOS, but 33,037 according to LOS. So, 2,922 days are unaccounted for when relying on the FLOS.

19. Using FLOS, it would appear that only 590 children were in custody for over 20 days, 200 children over 50 days, and 44 over 100 days. Using LOS, 595 children were in custody for over 20 days, 265 for over 50 days, and 55 for over 100 days. In other

words, relying on Defendants' FLOS, five children who were in custody over 20 days, 65 children over 50 days, and 11 children over 100 days would not have been counted in my totals.

20. The analysis required to calculate LOS was only possible using unredacted data. Without individual A numbers, it is impossible to de-duplicate the data, thus preventing the public from accessing accurate information about how many unique children are being held in custody for more than 20 days and how long children are actually held in federal immigration custody, including time between apprehension and book-in dates.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 20th day of March, 2026 at New York, New York.



Lucía Y. González

EXHIBIT 3

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, C[redacted] C[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 31 years old. I am from [redacted].

3. I speak Spanish.

Entry to Dilley

4. I have been detained at Dilley for 49 days with my seven-year-old son, [redacted], my nine-year-old daughter, [redacted], my 15-year-old daughter, [redacted], and my husband. My oldest daughter has autism and an intellectual disability that make it difficult for her to speak. She functions at the level of a six-year-old. But she has not received any of her regular medicine since being here. She needs to take a medicine that provides for oxygen to the brain. She also used to receive psychological and speech therapy, but she hasn't received any of that here. Her condition has gotten worse now that she's detained. There is a psychologist here, but they do not provide the right therapy for her.

Dilley ICE Detention Center

5. A couple weeks ago, when the congresspeople were here, the staff enclosed us in our room from 9 am to 4:30 pm. At 12 pm, they let us go to eat with guards flanking us on both sides to make sure we didn't talk with the congressmembers.

6. That day, they passed around a list for people to sign up and talk with the congressmembers. We all wrote our names down, but staff only allowed 2 people from our hallway to talk with the congressmembers. We think they were punishing the people who were filing the most grievances by preventing them from speaking with them.

7. On that day, they didn't even let my three children go outside to get medicine. Instead, they brought the medicine to our room. The nurse who came to our room said that medical wing was closed for the day. She said "this is the result of you guys for doing protests; this is the punishment." During this time, a five-year-old child who lives

in my room was shivering with a fever, and his mom asked the officials to allow him go to the infirmary. The staff said no. The kid began to yell and cry. Then, the staff let them go to the medical area, but the doctor sent them back and told them we can't attend to you. We didn't get any help from the officials. Eventually the kid got half a tablet of acetaminophen. We had to cut it in half because he was too small to take the full pill, but no medical staff would give him any other treatment.

8. The day before that lockdown, the staff came into our room and took drawings from my daughters where they wrote down that they are in prison.

9. For a long time, my youngest daughter had an earache here. Eventually, they prescribed her ibuprofen. But then they made me wait with her and my other two children in line for 1.5 hours to pick up the medicine. My son had a bad cold and [redacted] felt sick, but they just made them stand in line outside. We keep having to wait in these lines for medicine.

10. We have also been prohibited from sending emails in recent weeks. We have not heard anything about a new way to send emails.

11. We have family in the United States who could sponsor us and we want the opportunity to be with them.

12. The food has been bad this whole time.

13. A few days ago, the officials here found out that I have spoken with reporters, and the staff have taken reprisal steps against my children and me.

14. For the past couple of days, my children and I have been locked down in our room. They put us on lockdown after a staff member pushed my daughter and took all of her coloring materials away.

15. This week, my young daughter wrote "liberty" on a piece of paper. One of the officers found me in the laundry room and told me that I needed to come to the recreation area with that paper. When I went there, a man named Officer [redacted] took the paper and ripped it up. He said you cannot have papers that say this. Then, he threw it away. I told him I did not know that the children were not allowed to express themselves in

writing. He told me that our family could have a report made against us for this. So, I apologized.

16. Then I went to the laundry room to see if the clothes were ready. While I was there, Officer [redacted] found me and told me I had to come with him to speak to the counselor. I asked him why. He said because you had a paper that said "liberty" on it. I went with him, and the counselor asked, "Who wrote this?" I told the counselor that my daughter wrote it. I asked her whether this was a crime. The counselor said no. But then she wrote out on a paper that we were not allowed to have protest papers, and asked me to sign it. She said this was a report against me.

17. Next, the counselor asked if I had any other papers in my room that said the same thing. After she questioned me, I tried to go back to the room with my children. But, another officer who was a woman, told me I could not go into the room. When I asked why, she said they are searching all the rooms. I said ok, and went to the recreation room.

18. I knew they could search our rooms, because about a month ago, they had searched our rooms. During that search, they had taken my older daughter's deodorant and thrown it out. She has trouble expressing herself and is autistic, and found this was incredibly distressing.

19. When I tried later to go back to my room, I saw there were 12 officials in the room. I started to feel worried, and asked what happened. I also asked if they were searching anywhere else. The staff said no, we are just searching your room. When we looked inside we saw that they had grabbed all of my children's coloring papers and were ripping them all up.

20. Upon seeing them destroying the drawings, my older daughter, [redacted] started getting upset. She went to the door and started yelling at the officers, saying that they should not destroy her favorite drawing of a telephone from outside the room. The officer turned to her, held it up, ripped it up and laughed in her face. [redacted] went to open the door and said let go of my phone drawing. The official just pushed her. Then, I got in front of her and said do not push my daughter. I do not know the name of the first officer

who pushed my daughter. But then, another officer in the room, Officer [redacted] pushed me and my daughter. Then all of the male officers started pushing my daughter and me. They pushed [redacted] in the chest and grabbed her arm and she now has pain and bruises on her arm, and you can see swelling. They pushed me in my chest, too, and it still hurts. It also hurts on my arms where they grabbed me.

21. After they had already been pushed us around, one of the officers pulled out a camera and started to record us and laugh, as I yelled at them to let me go. But, there are cameras in the hallway though that should show the whole thing.

22. [redacted] started yelling and another mom came running. When the officials saw her running towards us, they let me and [redacted] go. I hugged [redacted] as she cried. Then the officers said a bunch of things in English while looking at us that we could not understand with no one translating. Then, they left.

23. After that, I went to the counselor to look for support, and the counselor told me that they would revise the cameras, but did not do anything else. Next, we went to the nurse to ask for them to look at us. The nurse looked at my arm, but would not look at my chest or my daughter's arm or chest, even though I told her that is where she was hurt. I felt upset because I wanted them to check on my daughter after the officers had used force against her.

24. Later, the staff called me to sign a report saying that I was aggressive against officers. I did not sign it.

25. Then they sent me to the psychologist, who I spoke with, and then they made me talk to the local police. I told that officer that they should talk to my daughter because she was hurt, but he said he would not look at her.

26. I told the counselor I wanted to look at the cameras to see the incident, but she would not let me see the cameras.

27. Next, the staff told me would isolate me and my three children in a medical quarantine room as a sanction. They planned to put us right next to where all the sick people are quarantined, and next to the measles quarantine area. My children were so

scared we were going to get seriously ill. They begged me to prevent the staff from making them go there, because of their fear of measles and getting sick.

28. I told the officers that I could not let them expose my children to sickness in the medical area, so they isolated us in our room instead. Now three officials watch our every move. If we go to the bathroom, they follow us. When we get snacks, they escort us. They are not even letting us go to the dining room. They are just bringing food to the room where we are isolated. This morning the staff brought the food at 6 am, which is way earlier than the kids are used to, since they are used to the 7:30 am breakfast time at Dilley. So, the kids were not hungry during their breakfast and did not eat.

29. During these days that they have kept my children locked down with me, they are not letting their father be in the same room with them.

30. Last night, [redacted] had fever, but because they have us locked down, they would not let her go to the medical area. They told me she could only get medical attention if she went with her dad, but they did not provide any way for us to let her dad know that she was sick and that he should take her because we were stuck in the room. How could I let him know? I tried to ask if I could have a friend let him know, but they prevented me from sending a message. Even if he had gotten the message, how was he going to know what was wrong without me explaining in more detail what had happened during the night?

31. I called the counselor to try to get the kids to the medical area. Officer [redacted] responded and said we could not go. He told me that it is my fault that there are so many reporters writing about Dilley. The staff then said that I will only get out of the room when I stop talking to lawyers, press, and congresspeople.

32. They have also blocked me from using the tablet during the lockdown. One the morning, one of the officers let me use the tablet and I filed a grievance, but when they realized, they took it away from me again.

33. This is all retaliation for us talking to reporters and to *Flores* counsel about what we have experienced here.

34. Yesterday, they put one of the officials that pushed [redacted] on guard in front of our window. [redacted] left the room, and said you pushed me, what are you doing here. He told her she was wrong and started laughing. They were just making fun of her and of her disability.

35. They make it clear that they see us as beneath them because we are immigrants. The staff think they are above us. We are facing really serious racism and discrimination.

36. Now every time [redacted] sees the officials, she cries. She has been waking up at dawn crying. She has a lot of head pain, too, and is not getting medical attention.

37. [redacted] says that she dreams of getting out of here and studying so she can become a doctor. She wants to see houses and cars again, and eat pizza.

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 12 day of February 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: 02/12/2026

Eleanor Roberts

EXHIBIT 4

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, M[redacted] S[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 am detained at Dilley with my 12-year-old son, [redacted], and my 14-year-old child.

4. We have been detained for 29 days in total. We lived in New York for nine years before ICE detained us. It was our home.

5. My 14-year-old was in ninth grade and loved school. This child misses going on walks and to the mall, and a best friend. My teen swam for two years until suffering shoulder injuries. Over the past year, my oldest had started to develop a strong connection with a great school social worker, and especially enjoyed AP Human Geography, Honors Earth and Space Science, and Honors Geometry classes. My oldest was always such a bright student but now is so worried about failing this year because there is no way to continue regular school while detained here. Our school from home has been trying to find ways to get educational materials to us, but even though my teen wants to keep studying here, email access is too limited to make it possible. When you try to look up information online, the links are usually blocked. The social worker has been asking if he can send school materials here, but there is no way. He asked if we could sign into google classroom, but we have not been able to do that because of the computer restrictions.

6. My youngest, [redacted], was more than half-way through seventh grade, and he liked learning new things, too. He really liked science, math, and gym. He made some new friends this year. He also liked playing soccer with his friends, though he had to be careful because of his asthma. He misses going to arcades with his family and going to the park with his friend.

7. My children went to school at Dilley once, but there was no one else there except for the teacher, and the entire school day lasted only for one hour. They found it weird because they wanted to see other young people there, so they did not go back.

8. Our school at home has written a letter attesting to my children's good character, and the value they bring as members of the school community.

Detention

9. One month ago, my ICE officer told me that my children and I had to go to an interview with an ICE officer in person. We thought we were just going to a normal check in. When we looked up the appointment confirmation online, the form said, "scheduled appointment" for "non-detained family." I went into that appointment feeling confident it was going to be a good meeting. But, when we got there, they would not let us leave the office. We were surprised, and I did not feel prepared at all. They did not show us any sort of warrant for arrest. They brought more people there to make sure we could not leave and detained us. We did not think this was going to happen, because I had been going to all my appointments, and wearing my ankle monitor.

Over One Week Detained in a Hotel

10. Then, they took us to a hotel in McAllen called McAllen Plaza Hotel, where they kept us in a room for nine days straight. At first, they told us they would deport us from there. We spent the entire time in the hotel room and we could not leave.

11. There were two officers stationed in the room with us at all times, one in front of the door and one in front of the bathroom, which made us feel so uncomfortable. The one in front of the bathroom made us feel embarrassed to use the bathroom. We felt like those days would never end. We were in such a small room.

12. We were not allowed to look out the windows of the room, and the officers said this rule was for security reasons.

13. During that time, there was one officer who said we could make one call to our family so long as it lasted less than three minutes. However, the officers told us we were not allowed to tell our family where we were, and if we did so they would take us and send us somewhere else. My teen spent the whole week crying.

14. They did not let us call our attorney to tell him where we were either. They said that he would have to provide a form proving he was our attorney to them to get access to me. But there was no way for us to let him know he needed to provide this form.

15. No one told us about our rights while we were there. There were some folders in the room on a table, but I do not know what they were and no one told me what they were.

16. After nine days, they moved us to Dilley.

Dilley ICE Detention Center

17. We have been detained at Dilley for 20 days. At first, ICE told us they brought us here to be deported, but then they said that they are detaining us while we are waiting for judges to make decisions in our case. But no one ever told us any information about how long that might be.

18. The food here has been a really big problem. I am not sure if it is because I'm not used to it, but my 12-year-old and I spent three days vomiting and with fever after eating meat here. We could not eat for three days straight. We think the food that we ate caused it, because while I was vomiting it felt like the meat I had eaten caused it, and every time I thought of the meat here, it made me feel more nauseous. Even now, [redacted] does not want to go to the cafeteria, because he worries the food will make him sick. He does not eat almost at all.

19. My other child eats very few things, and says the rice, beans, and salad are the only thing that are comfortable to eat. We often have to buy soups from the commissary because the children do not like the food in the cafeteria.

20. We really wish we could have [redacted] here. There were so many delis with Hispanic food near where we lived, and my children were used to eating that food.

21. [redacted] has had an allergy on his hands since our fourth day here. He never had an allergy like that before, but now as you can see, the back of his hands are red. It used to itch, and then they gave him a cream. It got a bit worse, but now they give him some

medicine to take and his itchiness has decreased, but his hands burn at times when they turn red. Sometimes when he puts hand sanitizer on, his hands start burning more.

22. My older child takes medication for anxiety and depression, but detention increases anxiety because there is no way to know what is going to happen to us, where we are going to go next, and if he will stay in the country. Neither of my children have any memory of [redacted]. It's scary.

23. The anxiety medications make it hard for my teen to sleep as a side effect. At times, we have to wait for a long time for the pills in a line, too.

24. Having the lights on all night makes it hard to sleep, too. We are not allowed to put towels up to block the light. They gave us eye masks, but we are not used to wearing them and the first time the children tried to, they could not sleep with them on. They still cannot use them. It helps block the light, but it makes it impossible to sleep. We also struggle to sleep, because our beds are right next to the common room, and the guards spend time in that room at night speaking loudly and opening and slamming the door. We wake up a lot at night.

25. No one has ever told us about our rights, given us a "know your rights" training, or given us a paper with information about my children's rights here. I have never seen an I-770 form either. A little over a week ago, one official told me that when we got here, we should have gotten a packet with information about free lawyers. I tried to tell him that I never got those papers and only received a receipt for my property and my ID card. He told me I was lying and that I must have received it. Later, I tried to ask other friends who were detained how I could access that list since I did not have that packet. I only found out then about a folder with that information in it by the telephones. No one who worked here had ever let us know about that folder, so we did not know about it before. The officers also did not tell us about any way to make free phone calls. We still have not been able to make calls to lawyers on that list.

26. Staff do not tell us things about our rights. For example, no one told us about *Flores* lawyers being here or talked to us about how our children have certain rights

under *Flores*. No one who works here ever mentioned the word *Flores*, explained who you were, or told us about any rights under *Flores*. I only heard about you and *Flores* because my friend explained that there were *Flores* lawyers here to me after she spoke with you.

27. I think after we had been here for three days, a supervisor came to the common room and showed our family a video about immigration law, but I do not remember what it said. I am pretty sure it did not have any information about our rights while detained. I think it was animated, but I cannot really remember it. I think I wrote down information about fear of persecution and torture, because the president of [redacted] would harm us.

28. No one has ever said anything to me about any limit on the number of days that someone can be detained.

29. We never received any information about my children's right to be released from Dilley without me.

30. We never heard from anyone that we would receive any type of individual release decision, either. We have never heard about any sort of bond hearing, either.

31. The tap water here tastes like soap, even with the filter on. So, usually we try to get ice and let it melt so we have something to drink.

32. When we take showers there is one soap that we use, and it is the same as our hand soap. We have to use for our body and hair. It leaves our hair and skin feeling really dry.

33. When we first got here, they gave us a free phone call during intake, but now we have to pay for calls. We were never allowed to make another free call to our family members. So, my children's grandmother puts money on our account. We have to balance having enough time for them to speak with her without spending all of our money.

34. No one ever told us anything about receiving in person visits.

35. The only way I can talk with my lawyer is by calling him with money on my account. I tried to use Gmail before, but it did not work. The people in the library said we would be able to use it, but we could not.

36. A few days ago, the officers told us we could not leave our room, but they did not tell anyone why. We thought something bad was happening, but then I heard in the news that some Congresspeople had come here to investigate the detained mariachi brothers. It helped us calm down to have a potential reason. I thought they had forgotten about us later in the day though, because they kept us in our rooms through lunchtime. At 1 pm, after I think the Congresspeople had left, I asked an officer about lunch, and then we got to go to the cafeteria.

37. We never learned how to use the grievance system here. I think someone told us that we could write to our ICE official in the tablet and ask about the balance of money on our account, but I do not really know about anything else we can do with them. I used the tablet once to ask the official about a court date that they told me I was going to have.

38. It is so frustrating being here without knowing anything. I am hoping we can stay in the U.S. but I have no idea how much time we will remain detained here. I worry about my ninth-grader falling behind in school. I am so grateful that my child is so dedicated to studies generally, but it makes me sad to not know what will happen next. Whenever someone leaves here, they only give them a bit of time to find out, so you do not know what is coming next.

39. My older child wants to be a veterinary surgeon as an adult, because of a love for cats. There are a lot of cats near where we live at home and my oldest would feed them. Adopting and taking so much care of one of the cats, buying a bed, and food created an attachment. Having to leave those cats behind makes my oldest feel the most sad about being here. [redacted] wants to keep getting better in school, too. He hopes to have the chance to go out with friends, and our family again, when he leaves 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 12 day of March 2026, at Dilley.

[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: 3/12/2026

Eleanor Roberts

EXHIBIT 5

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, M[redacted] M[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 speak Spanish.

3. My nine-year-old daughter, [redacted], and I have now been at Dilley for about 113 days. This declaration is an update to my statement from November.

4. Our detention at Dilley has made me stronger in some ways, but it has mainly destroyed me. I know my daughter and I will need a lot of mental health support when we get out of here. This place has weakened us physically and mentally, and it is hard to keep going.

5. I have filed around 15 or so grievances since being here at Dilley, and I have only received maybe 5 responses. I have submitted grievances about the food, the inadequate special diet available for my daughter, the medical negligence we have experienced, the lack of education and support, and the guards' bad treatment of the kids. In response to my grievances, there is a Core Civic person who meets with us. They listen to the grievance and say that they will do something, but then they don't.

6. My grievances about the food have to do with the fact that my daughter has been given the same food every day for months. There are few options, especially for a vegetarian. That is hard on children, especially when they have been here for months. It's also hard because meals for Yellow are now only served from 6-7 am, 11-12 pm, and 4-5 pm. By 8 pm, the kids in Yellow are already starving.

7. I also submitted grievances because they would not give my daughter a special diet. My daughter is a vegetarian – and they would not accept that she should be given a vegetarian meal without a religious reason. The only way we ultimately got a vegetarian diet was to get a note from our doctor in [redacted] about my child's allergies. Why are we putting children through something like all of this just for food? When you get here, you are already broken and they try to break you down even more by making it hard even to get food for your child. Even with a special diet, the only thing that is really "special"

is that she gets extra fruit and milk with the regular meal. Her only protein is from the eggs at breakfast and soy milk. My daughter has fainted twice and often feels dizzy because she is not eating well.

8. My daughter also suffers here because she has been getting very little sleep for months. She will sleep a few hours at night and then be awake for most of the night. My daughter doesn't understand why she can't sleep. She will often wake up 3 a.m. and be awake for hours. She will then fall back asleep at 11 a.m. She just has no routine here anymore. She has never had trouble sleeping before – so it is definitely related to the stress of being imprisoned. She is constantly asking when we will leave and worrying what will happen, and that her friends will forget about her.

9. The education at Dilley has been the same since we arrived here. School continues just to be for one hour for age group and the kids don't really learn much. It's worse now because they only allow 12 or so children in the classroom at a time. The children line up and after that number is filled, they tell you to come back and try again tomorrow.

10. There is still very little for my daughter to do. There are even fewer activities for her age than when we arrived. They have limited use of the computers in the library to only twenty minutes and the kids cannot play games, use Google or watch YouTube. They have arts and crafts in the gym sometimes, but it is the same thing all the time and there is one pack of colored pencils for all the children to share.

11. The holidays at Dilley were awful. On Christmas, they told us they were going to have a special Christmas event for the children. They said they would put a good movie on, and they even had flyers at the gym about it. They had all the kids come into the gym and sit in the chairs. Then they put on a video clip of the Grinch movie. After a few minutes, someone came in the gym dressed like Santa. The children were excited and started to gather around him. Staff yelled at them all to sit down, and then the Santa just gave the children who were sitting a bag of chips. Then the staff took a picture of the kids with Santa, turned the video on for another few minutes, and told the kids the activity was over. It was humiliating and frustrating to be treated this way; it was worse

than doing nothing actually. To have your child get nothing more than a bag of chips for Christmas - and to not be able to give your child even one toy because you're stuck in this prison. It was horrible. My daughter was so sad around Christmas and kept blaming herself that we have been detained here for so long even though she did nothing wrong. She brought this up repeatedly.

12. We are no longer allowed to use Gmail to send email. They started using a new system called Proton, but they limit the number of characters per email to 150 characters and they now cap the number of emails we can send. This is the only way we can write to our lawyers, for example, and it means we have to write a series of many emails in our limited twenty minutes per day. It is also nearly impossible to do any work on our cases or appeals from inside here because we don't have access to Google translator.

13. Some of the guards are awful to the children. They are always screaming at kids for doing normal things like running at the park. If you're at a park with kids, what do you expect they are going to do?

14. The medical care here is awful. For example, I was diagnosed with a urinary tract infection on October 9th. I was in pain for months. They gave me a generic treatment, and it did not work. I returned and returned to medical, and they finally gave me another treatment. They would not do more in-depth testing and just gave me another round of antibiotics. I went in for a third time, and they took a urinary sample but they lost it. They just gave me another round of antibiotics, and it still didn't work. Finally, I was in a lot of pain and a doctor saw me. He said I needed to go to the emergency room immediately because I was in pain and they had already given me so many rounds of antibiotics. I had been crying and crying and was in excruciating pain.

15. In the hospital, I had to go on intravenous antibiotics and when they finally did a culture, they learned I was resistant to the antibiotics. I was hospitalized for three days, and they would not allow my daughter to stay with me. She had to stay by herself at Dilley with a staff person watching her 24/7. She was scared and very upset for days.

When I came back from the hospital, it took about a week for them to give me the medication that I needed, which delayed my recovery.

16. I have also been extremely worried about [redacted] health. Each time she has fainted, the medical staff have downplayed it. Recently, they questioned whether she actually fainted because they couldn't see what happened on the cameras. They just gave her apple juice and a Tylenol. They did not do bloodwork. They said maybe it is hormonal and she's about to get her period. She is nine.

17. Most recently, by daughter injured her arm here. She fell in the park one evening, and they only gave her an ice pack to put on the injury for the night. She was in a lot of pain and crying all night. The next day when she went to the medical unit, the pediatrician was very upset because staff had not even wrapped her hand. The doctor gave her a cast and they left it on for about a month. She was crying and in a lot of pain during the night for weeks, and it still hurts her.

18. A lot of people don't know how to use the grievance system. In some areas, they only have tablets for grievances, but the tablets don't have an alphabet for languages like Chinese.

19. Dilley staff continue to discourage families from making grievances. Staff tell families that making complaints can impact your immigration case. Staff also tell families that they don't need to make a complaint, they can just talk directly to staff. A lot of people think that is the correct way of doing things.

20. My daughter has never been given free calls to our family. We spend about $100 weekly on phone calls.

21. We have still never been given a legal orientation or know your rights presentation during our three months here. I have heard they now play a video when you first arrive here, but ICE keeps telling families that *Flores* doesn't exist and is no longer in effect. ICE says *Flores* only applies in California.

22. No one here ever informed me of my daughter's release rights under *Flores*. In December, I requested that my daughter be released to her stepfather. I made this request

through the *Flores* lawyers. No one from ICE ever talked to me about this request. The only way I know that ICE was informed of the release request is because *Flores* attorneys have shared the updates with me. ICE denied the request supposedly because they want to "maintain family unity," but why does the government get to make that decision for families? No parent wants to see their child suffering in this prison – and as a mother, I should be able to decide if it would be better for my daughter to be released to her stepfather. It is horrible to be put in that position, but I was prepared to do that for my daughter's sake. I think it would be more selfish of me to not let her go than to keep her here continuing to suffer. I would much rather she be at school, eating normal food, and enjoying her time with friends rather than her being locked up here just because I want to have her here with me.

23. This is not a safe place for kids. In the months we have been here, I have seen many unsafe things. I worry that children are at risk from all sorts of threats – both inside and outside of the facility.

24. After three months, this place feels like a prison more than ever. Every day they have new rules that are more restrictive and make you feel even worse. No one asks you how it feels to be away from your family, your coworkers, your job, and anything that makes you feel safe. No one asks how it feels for your child not to get a single gift for Christmas. The suffering here is immense. I am very concerned about my child's health, and I don't want her to continue to suffer through all of this. Even when families are choosing to take voluntary departure, they won't tell you when you can leave or what paperwork is needed or what is happening. They won't let you even pay for your own flights. They just keep families here to make them suffer. If they want to deport us and we finally relent, why do they prolong the torture and keep us 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 January 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: 1/15/2026

Diana Cano

EXHIBIT 6

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, C[redacted] R[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 16 years old and have been living in Texas for about nine years.

3. I speak English and Spanish.

4. In September, ICE arrested my mom and me at our regular ICE check-in. I still have no idea why. We have been detained at Dilley for three months, and it's been awful. This declaration is an update to my statement from October.

5. Being at Dilley this long has been extremely hard on my mental health. It is really getting to me. I am having panic attacks. I have had a couple of medical emergencies in the past couple of months. The first medical emergency happened after one of the Core Civic officers was yelling and being aggressive with me because I was sitting around with a couple groups of teenagers, including two teens that were touching hands. He singled me out to tell me that I should know better to let that happen even though it wasn't me holding hands and I was talking to kids in a different group. He made me so upset because he took my ID and said he was reporting me to the Captain. The staff tell you that getting reports like that can affect your immigration case. I was so upset that I started crying and went to find my mom. On the way to my room, I had a panic attack. I couldn't really move and felt like I was going to pass out. Someone called medical. They brought me to medical, but all they did was check my vitals and send me back to our living area.

6. A few days ago, I had another medical emergency. I started hyperventilating. My body started to feel really heavy; my arms started tingling; and I felt like I couldn't move. My whole body felt weak. My heartbeat started racing. They took me to medical again, but they just told me to relax and took my vitals.

7. Since I have been here, I have gotten sick seven times. People are sick all the time and medical does very little to help. They will just have a nurse take your vitals. You basically have to be dying to see a doctor at this place.

8. Sleeping here continues to be really difficult. They keep the lights on all night, and it really affects us. I have also started having back pain from the thin mattress on my bunk bed. My back has been hurting for 3 or 4 days.

9. We still have to buy soap, shampoo, conditioner, toothpaste, and deodorant in the commissary. It's tough though because they now limit our access to the commissary to one day a week. Yellow can only go to the commissary on Tuesdays. I think this is because there are so many people here that the lines to get in the commissary were long and people were waiting for hours.

10. The bathrooms are still pretty nasty and will often be disgusting all day. The cleaning staff leaves around 2 pm – so the bathroom often gets very dirty in the afternoon. One time there was a curse word written on the bathroom wall with poop.

11. Education here is just as bad as ever. I don't go to the classroom because it is just an hour for all the 9th-12th graders, and they only give you worksheets that aren't even at our grade level. They also recycle the same worksheets every couple of months. I am so worried about missing three months of my junior year. I was trying to catch up, but I am concerned that I will end up having to graduate with the Class of 2028 unless we are released really soon.

12. A lot of things are even worse and more strict than when I arrived in October. For example, mealtimes are limited to one hour now when they used to be two hours. Families in Yellow are only allowed to go to the cafeteria for meals at 6-7 a.m., 11-12 p.m., and 4-5 p.m. I am never up in time for breakfast, and eating dinner at 4 pm is too early. Also, they changed the rules so that now all kids have to be with their parents most of the time – even to get a snack or go to the telephones. Kids over 12 used to have more freedom.

13. We have to pay for my calls to my sisters. It used to be that I could email my sisters, but they recently changed the system and I think you have to pay a monthly fee to be able to use the new email system. I'm not sure how to use it.

14. The food here is always the same, and I am tired of it. I mainly just eat bread and coffee. There have been times when people have found worms in the food, and yesterday there was a dead fly in the bread. It was nasty. I definitely didn't eat bread that day. Even when there is a meal I like, they don't let you have more than a single portion. I end up being hungry by 1-2 pm and again by 6-7 pm. The snacks are also always the same – milk, apple juice, red apples and cookies or sometimes a granola bar. It is rarely a granola bar. We can buy things like Maruchan ramen and macaroni and cheese at the commissary, but it gets expensive and we can only buy food on Tuesdays.

15. Since we have been here, no one has told us about our rights. In three months, there hasn't been a know your rights presentation. I have used the grievance process two times to complain about treatment by other residents, but I have not complained about these other things because staff know they are happening already. It has been the same since we got here and I don't think they will do things differently so what is the point.

16. I just hope I can get out of this prison soon. I don't want to spend my birthday here. I just want to get back to my regular life so I can see my sisters, graduate from high school, and do things I love like playing tennis.

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 January 2026, at Dilley, Texas

[redacted]

[redacted]

EXHIBIT 7

REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL

I, N[redacted] P[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 33 years old, and I have three children, [redacted], who is 14 years old, [redacted], who is 11 years old, and [redacted], who is 7 years old. We are from [redacted].

3. I speak Spanish.

4. We have been detained at Dilley for 53 days.

5. Before we arrived at this facility, we had been living in Connecticut and New York City for about two and half years. My children were going to school and things were going well.

6. On November 7, 2025, I went to Connecticut to get some papers for a job I was applying for in New York. On the way back to New York City, I was detained in Connecticut by ICE agents. They pulled over my friend's car while he was driving me to the train station. They didn't tell us why they were stopping us; they just asked for our documents. They took my documents and never gave them back. They put handcuffs around my arms and my legs and even put a chain around my waist. It was so horrible. I just kept thinking of my children and what might happen to them if I could not get released.

7. They took me to an ICE office in Connecticut. They told me I had two choices – either I could go to a detention center by myself and get someone to take care of my children or I could leave with an ankle monitor, return to New York City, and take self-deportation. I said I wanted to leave with an ankle monitor – so they let me leave to go back to New York by train. They made me sign some documents that I didn't understand, and then I made my own way to the train station. I was so scared and upset.

8. After I got back to New York, I had to attend several ICE check-ins. There was one check-in in November, two in December, and then the last one was on January 17, 2026. Due to the ankle monitor, I lost the job that I had gotten in New York City. I didn't have money for an attorney, and I was constantly worried about having enough money to

feed my children. At the meetings, they would tell me I could get an attorney or there was a voluntary departure program that would pay for our flights. The issue with voluntary departure was that my children do not have passports, so it wasn't going to be possible even if we wanted to leave. I had an asylum case that was in process, and my children also had their own special immigrant juvenile status cases that were in process. None of what they were telling me made sense.

9. On January 17, 2026, I went to our last ICE check-in. I brought my children with me because I was feeling terrified all the time that we would be separated. At that meeting, they said we had no choice but to go to a family detention center together. They did not explain why. People from DHS showed up and flew with us on a plane later that day. The people who escorted us on the flight only told us we were going to a detention center. They didn't even tell us where we were going. When we got to San Antonio, they drove us to Dilley.

Dilley ICE Detention Center

10. When we arrived at Dilley, they didn't tell us anything about what was going to happen. They gave us clothes and IDs and took us to our beds. They said if we wanted information about our cases, we should go to the chapel to talk to ICE once a week. But it's so upsetting because they don't give us the right information, and they would just tell us the same thing each time.

11. It is so hard to be here for 53 days and not have actual information about what is happening. It is just so unfair that it has taken three court dates to be able to start to figure out what is happening to us.

12. We never had an orientation about our rights here. We never saw any videos. I was told there was a list of pro bono attorneys, but I was never able to get ahold of any of the attorneys. The only thing that they would tell me here is that I could speak to an ICE agent once a week in the chapel. And then when I went to the chapel, the ICE agents would just tell me that I could go to court to request voluntary departure or get my own attorney.

13. No one ever told us about the *Flores* case or any rights my children have. The only thing I have been told is to just wait for my court date.

14. I am very upset because it has been extremely hard to get any information about my case. At court yesterday, a lawyer showed up that I had not even been able to meet. The lawyer said that no one from Dilley had given him any information about my case and he had not been able to reach out to me. The judge said that I needed to come back again today after speaking to my family and the lawyer. At court today, they told me that I needed to decide if I wanted to continue my case. I have a sponsor in New York, and I told the judge that I do want to go back there.

15. The truth is it has been the hardest on my fourteen-year-old son because he knows what is going on. He has so much anxiety and he doesn't want to eat. He is not able to fall asleep until 3 am. He doesn't understand why we are not able to leave. The younger ones don't understand as much so it's easier to keep them distracted.

16. Sleeping is very hard because the lights are on all night. We have never been given eye masks for sleeping, and I am seeing one for the first time during this interview. If someone turns off the light at night, the guards will do a disciplinary report. It is also stressful just thinking about our case and not knowing what is going to happen.

17. The water here tastes like chlorine, so we just stick to the juices. We have used the water filter, but the water still has a bad taste. We tend not to buy anything from the commissary because we don't have money.

18. My children and I were here during the protests, and it was really sad because I later heard that a lot of the people who protested were deported. It was much more crowded during that time. It is sad to think about people who decided to speak up and share their voice being deported.

19. It was difficult during the protests because we kept getting put on lockdown in our rooms. They would make us stay in our rooms, and we were unable even to go to medical. We were closely guarded. Now that there are fewer people here, we are not

seeing as much commotion. There haven't been any room searches or sweeps for about three weeks.

20. I never got to see the little boy, Liam, when he was here, but I saw him on the news. I was happy when he was released, but I couldn't help but think "what about the rest of us?"

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 11th day of March, 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: March 11, 2026

Diana Cano

EXHIBIT 8

REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL

I, E[redacted] C[redacted] M[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 13 years old. I am from [redacted].

3. I speak Spanish and English.

4. I have been detained at Dilley for 86 days. ICE detained me with my mom and separated me from my dad. I feel so sad that I had to spend Christmas and New Years without my dad. It hurt so much to not be able to get a hug or be close to him on those days. Every day that I remain here is destroying my hope for my life. I miss everything about my life in Chicago because I do not have anything here.

5. No one has ever told us why we are still here. The staff do not say anything. Even when my mom asks, they do not tell us anything.

6. Before I arrived at this facility I lived in Chicago for a little over 2 years. My mom, my dad, and I all lived together. I was in 7th grade and I liked math class best. I used to go to games on Saturday and play Roblox with my friends.

7. Before they arrested us, my mom had been doing photo ICE check-ins weekly on her phone for years. We had our first court date in November 2025, and the court scheduled our next date for 2028. In December, the ICE phone stopped working, and my mom explained to an ICE officer that the phone was not working. He told her to go to the nearest office to explain the phone problem. So, she went there without an appointment, and the staff threw her phone away, and put an ankle bracelet on her. They told her to come back tomorrow and to bring me for a welfare check. My mom told my school I needed to miss a few classes for the appointment on December 16, 2025. When we got to the welfare check, they said we were detained.

8. The officers never gave me a chance to stay with my dad. They just locked me up with my mom. I want to be free and happy, but I am not here. They did not say anything about my rights.

9. Later that afternoon, they took us to Dilley.

Dilley ICE Detention Center

10. No one told us how long they would keep us here.

11. It is depressing being here, especially on the holidays. I never imagined that they would separate me from my dad like they did, and I am so scared that they will separate me from my mom now.

12. I feel so much anxiety and nerves that I have to use the bathroom every 5 minutes here. I keep wondering what is wrong with me.

13. No one has ever told me I could be released to my dad without my mom.

14. I have only ever heard of *Flores* from my mom's friend who told us that *Flores* allows children to release after 20 days. She helped us write papers asking about our rights. My mom did not know how to because she is [redacted], and because of her lack of education, she did not know how to write a grievance. So, this other woman helped us. She took information from everyone and wrote papers to ICE asking for release, but the officers just tore them up, said *Flores* does not apply, and laughed at her.

15. One time, I was eating in the cafeteria and a guard yelled at us that we were animals. It felt terrible knowing that they do not even think we are people. Another time, a guard told us that he could make us hurry because we were inmates and he was in charge.

16. I have never been to a "know your rights" training here or seen a video about my rights.

17. Missing months of school has been so hard. I miss school so much. When we got here in December, there were so many people detained and the classes were only one hour long. We all had to go to the same classroom regardless of what age or grade we were in to do the same material, and there was not enough space. It was so unrelated to the things I was learning in my school before this. But now, I think they are trying to hide the fact that they treated us like that, because we just found out that they have started having class all day. We did not know about this change, and I do not really want to go

anymore because I do not trust them. The materials they had us doing are all too simple anyway. It feels uncomfortable, and I know I will not learn anything.

18. The food here is really bad, but whenever reporters or Congresspeople come they give us better food that they would never give us otherwise, like roast chicken, cakes, pizza, and ice cream. But that is just ICE hiding how it is the rest of the time to the outside world. Normally, they just give us the same meat with too many sauces on it every day. When they give us hamburgers, they are often raw inside. They have made me throw up before. I cannot really digest it.

19. In the fridges here, there are cookies, and the kids eat them all the time to try to survive because the rest of the food is so bad. Even adults struggle with eating the food here. We never thought that adults would also have to only eat cookies.

20. Other people eat just ramen to avoid the cafeteria foods that make them feel sick. My mom worries about it hurting me to eat too much ramen and cookies, but there is nothing else that does not feel gross.

21. They do not even give us clean water here. The only way to get clean water is to buy water bottles, and it costs $30 to buy 24 bottles.

22. I feel lucky that I have only suffered from vomiting and diarrhea from the food, because so many other kids have more intense issues. I have seen newborn babies here with bronchitis because ICE does not provide enough medical care for people who are sick. When there were a lot of people here, I would see them line up for two hours to get medicine.

23. Sleeping is so hard here. As more weeks go on, it becomes even more difficult. In my case, I cannot get myself to fall asleep until 2 am, but then I have to wake up at 6 am. I feel like I almost do not sleep. It is so hard to sleep with the lights on. I close my eyes and feel like I can still see as much light as when they are open. It feels like the light is hitting me. I also cannot sleep with the eye mask on because it makes me feel like I cannot breathe.

24. I have to pay to call my dad. There are times when we have facetimed my dad and tried to explain what is happening and ICE cut the signal, like when we tried to tell my dad that they had locked us in our rooms because the Congresspeople had come. This happened another time when we had a call with a reporter as well. I think they do not want us to share critical things about our experience here and interfere with these calls.

25. The guards also completely change how they act anytime an outside Congressperson or reporter comes. The guards start being kind to us and saying "hi," which is something they would never do when they are not being watched.

26. For example, the psychologists will pretend for the visitors that they are here to help us, but there was one girl who asked the psychologist if she would be able to leave after 20 days, and the psychologist said harshly back, "No! Who told you that? You will be here at least four months! You may never leave." That girl came back so traumatized.

27. We have also seen staff provoke kids with autism. Today, a guard told a mom to keep better control of her child when he was having an episode. But they do not understand that children like that need treatment and cannot just be controlled.

28. If I stay in the U.S., I want to be an advocate for people who are innocent to get out of jail. I want to do whatever I can to make sure that more children do not get brought to places like this, because they are going to suffer.

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 12 day of March 2026, at Dilley.

[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: 3/12/2026

Eleanor Roberts

EXHIBIT 9

REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL

I, M[redacted] T[redacted] H[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 son, [redacted], is six years old. We are from [redacted].

3. I speak Spanish.

4. We have been detained at Dilley for 23 days, and before that we were in CBP detention for about 10 days.

5. Prior to Dilley, we crossed the border at Tijuana. Border patrol first took us to a CBP station for about 30 minutes. Next, they took us to another CBP station in San Diego for about a day and a half. At that second station, my son and I were separated from my husband and we did not see one another until we were leaving. As we were leaving, my son saw his dad get handcuffed and he became extremely upset. He asked the officer if they were also going to handcuff him. The officer said no, but my son just kept crying the whole ride to the next station.

6. They took us to a third CBP station in San Diego for about eight days. My son and I were again separated from his father, which was really hard on him. He would cry and cry. The first few days, he was able to see his dad for maybe about ten minutes and toward the end he was able to see him for only about thirty minutes.

7. It was really awful to be at the CBP stations for so long. All we had was a small mattress on the ground and a metal blanket. We had to go three days without a shower and there was just an open toilet that anyone could see you use. My son had to wear the same clothes for nine days, including his underwear. The only food my son was given was a gross burrito for every meal. They'd give us burritos at 5 am, 12 pm, and 6 pm. My son went into a depression. He wouldn't eat and just kept constantly asking when we were getting out.

8. To come to the U.S. was already hard and we were hoping for a better life, but then to just be treated like criminals like that was truly awful.

9. From the third CBP station, we were driven to Los Angeles and then flown to Charlotte and then to San Antonio with three DHS escorts. We were then driven from San Antonio to Dilley.

Dilley ICE Detention Center

10. Being at this place is so hard on my son. He is not eating, and he keeps asking when we will get out of here. When we walk in the cafeteria, he covers his nose and mouth with his shirt because there is a strong odor coming from somewhere and it smells so bad to him. He is losing weight. There really needs to be more food options for children here.

11. I've been concerned about my son's health here. He got an ear infection and at first, they just gave him ibuprofen. On the second visit, they gave him an antibiotic because his ear was really red. It was hard to get him to eat food with the antibiotic because he would vomit. He vomited twice. I asked for some fruit to eat with the antibiotic, but the doctor said to let him get hungry because if he was starving he will eventually eat the food.

12. I also worry because my son has recently started talking in his sleep. I am concerned that it may be related to anxiety from being here. He always asks why the guards won't let us leave when we have done nothing wrong. He also brings up his experience in CBP and how we were crying and crying.

13. I have seen the guards being very rude with children sometimes. Some of the staff just have no business working with children.

14. When we arrived, they told us about the dos and don'ts of being here and understanding the rules. I was not shown a video about our legal rights. I was not told about *Flores* by the staff here, but we have heard about the case from some families and that kids are not supposed to be here for over 21 days.

15. We have been told by ICE that we will be sent to Ecuador. They are telling us that Ecuador is are only option. We are now just waiting for this to happen. We are really

concerned because we know no one there, and we don’t know where we will go or what will happen to us once we get there.

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 11th day of March 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: 3/11/2026

Diana Cano

EXHIBIT 10

REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL

I, J[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 17 years old. I am [redacted].

3. I speak [redacted] and English.

4. I have been detained at Dilley for almost four months. I am detained here with my mom and little sister. My big sister is also at Dilley but because she is an adult, she has to stay in a different area.

5. When we first arrived, we could only see my sister once a week but now we can see her Monday through Friday for one hour and on Saturday and Sunday for four hours. When we see my sister, we talk about how we are passing the time here. We try to be positive about things, but it is hard.

6. Before I arrived at this facility I was living in Portland, Maine for about four years. I lived with my sisters and mom. It's very hard to be here. I miss my friends and my school in Maine. I was working hard at school, and I could see how my hard work was making a difference. I was in the top 20 students of my grade, and I was learning a lot. I miss playing soccer and spending time with my friends.

Dilley ICE Detention Center

7. We don't know how long we will be here at Dilley. We are waiting to hear about our immigration case but no one has told us how long that will take or why we have to wait here to find out.

8. No one has explained to me what my rights are here. The ICE officers have told us our lawyer isn't going to be able to do anything to help us, and we are just going to be deported. I don't remember watching a video or learning about my rights. When we first arrived there were videos on in the room we were sent to, but I didn't understand what it was talking about. I don't remember receiving any paper with a notice of my rights.

9. My sister hurt her knee playing soccer last year before we got here and it's been bothering her since we've been here, but they just give her ibuprofen and Tylenol when

she goes to the doctor. It doesn't help. The doctors said if it gets worse to come back but they seem to just be waiting for it to be really, really bad and very swollen before they can take her to the hospital or do anything else. It feels like it doesn't really help to go to the doctor here.

10. My sister who is in the adult section is having a very hard time because she can't see well. Her glasses prescription is old and needs to be updated but no one will take her to the right kind of doctor to fix it. This means she has headaches and can't see.

11. We aren't used to the food here, so it hasn't been very good. We eat it because we are hungry and we need to eat but we don't like it. We buy our own food and water at the commissary because it tastes so much better. But that's very expensive. The water here, even with the filters, still gives me and my sister stomach aches.

12. It's hard to sleep here because of the loud air conditioning unit and because lights are on and people are always opening the door while we are trying to sleep. It's also hard to sleep when I have so much going on in my mind and because I know I am in detention.

13. We are able to call my uncle and we have video calls with him but they are expensive and we have to pay for them. We don't have to pay to talk to our lawyer if he makes an appointment to talk to us but if we just want to pick up the phone and call him that will cost us money.

14. No one has been able to visit us because all our friends and family are too far away in Maine.

15. Sometimes the staff here are rude to us. We try not to communicate with the staff too much because it doesn't seem to help anything. Some people are nice though. We speak enough English that it's not hard for us to communicate with the staff but for other families who are here that don't speak English or Spanish it is very hard.

16. If we have a problem we can tell the officers in our hallway about it. For example, my sister saw raccoons around the hallways and she told staff and someone said they would try and get rid of them. Or you can also write down complaints on paper, but we haven't done that, so I don't know if it works or not.

17. When we first got here, we used the tablets to watch movies and play games sometimes but you have to pay for everything so we don't do that as much anymore.

18. I haven't tried the new school yet because it's new and I am not sure it will be good and I think they are teaching in Spanish and I don't speak Spanish.

19. We have three changes of clothes but it's not very much and it's hard to get new clothes if we want something new. My mom says it is easier to not complain and avoid the stress of trying to get new things.

20. They gave us hand wash to wash our bodies and it irritated our skin so we buy our own soap in the commissary and that has helped us avoid skin issues. I think the water is also irritating our skin but there is nothing I can do about that.

21. There was a protest here but I don't remember when and I think it was because a lot of people were very sick here and the medical team wasn't doing anything to help people. At that time there were a lot of people here but now there are fewer people here and not as many people have been here for as long, so things have gotten quieter.

22. Earlier this week, a congressman visited but it was at the time when we are supposed to go to the cafeteria, so we weren't able to see them or talk to them. They only let a few people go meet with them. It felt like they were trying to hide us from the tour.

23. It is very hard to be here because you feel like you're in jail. Like you're a criminal. This place makes you see how little you are.

24. I hope I get to see my friends one day. I want to celebrate happy things like weddings and spend time with people I want to spend time with. I know I have to live my life because no one knows what tomorrow will bring.

25. When I grow up, I would like to be a soccer player or an architect, but who knows what I'll be able to do.

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 11th day of March 2026, at Dilley, Texas



EXHIBIT 11

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, T[redacted] M[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. I am from the [redacted].

3. I speak [redacted].

4. I have been detained at Dilley for four months. I am here with my husband and my two-year-old son.

5. They have not told us how long we will have to be here. No one has been able to tell us how much longer this will last.

6. We were first in CBP detention for two days and then sent to Dilley. In CBP we were only given water and spaghetti with hot water. My son was struggling there. It was a jail and he was crying a lot. It was very dirty. While we were there my son had a high fever and was vomiting but they did not take him to the doctor. On the third day we took two different flights and were sent to Dilley.

Dilley ICE Detention Center

7. Since being at Dilley, my family has had to deal with a lot of illness. My son had influenza and strep and he was having a hard time breathing and had a high fever. He was sick for almost two weeks because of the viruses. During those two weeks, I was in isolation with him while he recovered.

8. At the same time, I was not feeling well but no one knew what was causing my illness. Then, they discovered I had tuberculosis and had to be isolated because of the tuberculosis. I was in isolation for about one month and seven days with my son. This is in addition to the two weeks I was in isolation with my son for his illness.

9. During this time, my husband was only able to see us for five minutes in the morning and five minutes in the evening. It was very difficult.

10. We are no longer in isolation, but we are still struggling because we are having bad reactions to the medication. My son and I are having diarrhea and stomach problems because of the medication we are taking but the doctors will not change the medication. I

don't want to take the medication anymore because it's causing me so many problems but then they tell me I have to sign something to say I am refusing to take the medication and that scares me.

11. My son is struggling here. He looks like he is anemic and he doesn't seem healthy. But I am afraid to take him back to the medical facility because I am worried they will detain me there again. Every time we go there, they ask me to sign papers and I'm fearing they will again detain me there. I was really struggling in isolation not being able to leave or see anyone and I really don't want to have to deal with that again.

12. While I was in isolation I was pressured to sign a lot of different papers. The ICE officers were telling me I had to sign papers to return to [redacted] and if I didn't sign, I would be returned to Brazil. They kept coming in and yelling at me to sign papers.

13. It doesn't feel like we have any rights here. The people here decide everything for you and make you feel as though there are no rights here. I don't remember them showing any videos about our rights. No one has ever talked to me about my son's rights as a child here.

14. We don't like to eat the food here. We spend a lot of money to buy rice and spaghetti for our son at the commissary because that is the only thing he will eat. No one has offered my son any kind of baby or toddler food. I don't know if that's available for him. We also try and buy water at the commissary because the water here doesn't taste good.

15. They have always given me enough diapers and wipes for my son. We are given soap and shampoo but it's not baby soap or specialized for him.

16. My son doesn't sleep enough at night here. He usually sleeps about 3 hours and then gets up for several hours before going back to bed eventually. It's hard for him to sleep because there is always a lot of noise from machines around. We are all struggling to sleep here.

17. We have been able to make phone calls without issue. We've been allowed to call our attorney and our family. It costs us money to use the phones, even to call our

attorney, but if our attorney makes an appointment to talk to us then it is free for us to talk to him.

18. It is very frustrating that we are spending so much money to make phone calls and buy food at the commissary. We spend about $100 per week buying things we need.

19. My experience with the medical staff has not been good because I feel like they are trying to force me to do things. The other security guards who knew I was in isolation because of tuberculosis now mock me and say, “TB, no TB, TB, no TB” when they see me. This is embarrassing for me.

20. When we have complaints there are people we can talk to who always listen and are very nice, but it doesn’t seem like things actually change.

21. We’ve had a hard time communicating with staff because we don’t speak English or Spanish. They give us a phone or a tablet to try and translate sometimes but they don’t always have that available and then it’s nearly impossible to communicate.

22. We don’t have enough clothes especially because of how much time we’ve spent here. For example, I need more socks for my son, but when I go to ask for them, I am told we already have enough. It’s not true – we now only have one good pair of socks for him.

23. We are able to take our son to the day care and usually I do that when I have an appointment with my lawyer. He seems to like it there and he has fun with the toys there. I think it feels more like what he used to have before we came here.

24. I am very worried my son will just continue to be sick here. He used to not have all these medical problems, but he is still having shortness of breath, and I am worried about him.

25. It is really not easy to be here. It is very difficult. I want to be able to give my son a life that is not in a prison. I want him to be free.

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 11th day of March 2026, at Dilley, Texas.

[redacted]

CERTIFICATE OF TRANSLATION

My name is Alimasi Mausaka and I swear that I am fluent in both the English and [redacted] languages and I translated the foreg[redacted] to the best of my abilities.

Dated: 17 march_2026_____

_____

EXHIBIT 12

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, C[redacted] H[redacted] H[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 39 years old. I am from [redacted]

3. I speak English and Spanish.

Entry to Detention

4. I have been detained for 105 days with my 13-year-old son. I have three other children who are not detained with us.

5. My 16-year-old, 13-year-old, and I had been living in San Antonio for over two years when we were detained.

6. I was driving with my 13-year-old when they stopped us at a road checkpoint and asked for our documents. I gave my driver's license, work permit, and visa, but they still arrested us and told us that they were taking us to detention. I said that everything was valid, and the officers said that as of now they are not and that they would detain us. They did not tell me anything about my rights. No one gave me the option to have my 13-year-old go stay with another relative instead of being detained with me. I would have preferred to get processed alone, but no one gave me that option. I never wanted to expose my child to detention.

7. It's terrible because they said that this would not take a long time, but it has been over three months. My other children have been left without us this whole time. My 13-year-old son had a little dog who was only three months old when we were arrested, but now he's a big dog. We have a life in Texas they took away from us.

8. The three of us were supposed to have immigration court where I was living in August of 2026. I had a pending asylum claim. But after being detained, they quickly scheduled our court date to happen here in October, where I told the judge that I had already applied for asylum. The judge ignored my evidence and told me he would grant

me voluntary departure. I said that I was not seeking voluntary departure, but he said I would just have to appeal that decision then.

9. We have been here for so long, and the agents have lied to us. When I first got here, Agent [redacted] said that after my court date they would release me. Then the next time I saw him after the hearing, he said that after I filed my appeal he would release me. But then, after I filed it, he said "I am so sorry, but the rules changed." He no longer had the power to release me. Although he had first told us they could let us go at 21 days, he said that was not an option anymore. [redacted] said the rules and laws have changed.

10. Every time I talk to the agents now, they ask me why I would not just sign voluntary departure. I keep telling them I have a child that I have been separated from, but they do not say anything. One officer, [redacted], said that if I wait for my appeal, it will likely be denied. Then he said, so long as my case continues, he will keep seeing me here.

11. It is scary because many people who are getting positive asylum findings are still getting deported to random countries. There is one woman whose daughter has a serious medical issue that needs frequent hospitalization. She's been here for 100 days, too, but they are saying they will deport her to a random country.

12. Before I arrived at this facility, both of my children where in school, and [redacted] was in eighth grade. He really liked studying math and had great grades. He is so smart and was always on honor roll. His teachers always had compliments for him during parent-teacher conferences. Since being detained here, I miss him being able to learn and live his life. I'm crying because it is so painful.

McAllen CBP

13. First, they took us to a CBP site for two days in McAllen. It was super cold, and they gave us plastic blankets and thin pads on the ground to sleep on. The food was terrible and cold. They only gave us sandwiches and burritos.

14. They only gave us five minutes for a call there, but when I did not get an answer, they told me my time was up. They only gave me one call, but I needed to tell my boss I

could not come in. He is a quadriplegic veteran and he depends on me. So, it meant I could not call my family because I tried to call him. It is so painful, because my other son was not able to talk to his brother.

15. We could not see outside the entire time we were there.

16. My son and I were kept in a room with other families. The bathrooms were just in the middle of the room. We had no privacy, because there was a male officer who was on a platform who would look in and watch me as I used the bathroom.

17. While I was there, the officers told me that if I did not sign voluntary departure forms, they would send me to Honduras. I did not do that, but then they came and kicked the pad I was sleeping on and asked if I was going to sign anyway.

18. Right before going to Dilley, they showed us a video that said if we want anything we should ask. But then officers were drinking coffee in front of us, and we asked for coffee and they said no and were annoyed that we asked. So, it was clear we should not actually ask for anything.

Dilley ICE Detention Center

19. They brought me here to Dilley on October 7, 2025 in the morning.

20. When we first got here, they showed us a video that said we would stay there for about 21 days, and called this locked location a "shelter." They said they were here to help us, and the video said we could not apply for asylum depending on when we came to the country, but I do not remember it well.

21. At first, there were no filters on the water, and we just had to drink it. But now that they have put the filters in it helps. However, since they have not changed the filters, it is starting to taste bad again. That is so upsetting. And I cannot afford to buy the water bottles. They are little and cost over $1. Who can afford that for months on end to stay hydrated?

22. The food is really bad here, and you can hear my stomach growling. [redacted] is always sick from stomach pain and has a lot of diarrhea. He doesn't want to go to

medical for it because we have to wait hours to be seen. So, one time I bought him Pepto-Bismol from commissary to avoid medical visitation lines.

23. The first time I went to medical because [redacted] had fever, they told me he was big enough to tolerate the fever, so they would not give him any medication. They said it would probably get worse. That night I had to stay up all night putting wet towels on his face. I did not sleep at all.

24. Recently, everyone has been getting the flu, and a virus that causes vomiting. The medical annex is filled with people with the flu now, and I have heard it is out of space.

25. [redacted] has had a scaly rash all over his body from the water since week one and it never went away. I am not sure if it is the laundry soap, the soap in the showers, or the water, but it just will not get better. It might be an allergy, because they gave him allergy medicine for three days and it decreased some of the redness, but never actually got better.

26. He also now has a bacterial wart growing on his hands. The doctors said that they will not give antibiotics, and the only medication they will give is Tylenol and water.

27. When I had a gallbladder issue, they only gave me Tylenol and Pepto-Bismol. I had to wait a month for an ultrasound.

28. They gave me a special diet for 15 days that allowed me to eat less fatty foods, but then took it away. The regular food gives me stomach pain still, but the nurse said she could not allow me to go on the diet again.

29. Now, my son only eats rice and beans. The food is too sweet and sometimes looks like dog food. Even the officers say that it looks really bad.

30. There was one day that there were worms and mold in the broccoli. Sometimes there is also hair in the food.

31. Our lunch is at 11 am and dinner is at 4 pm, so [redacted] gets hungry later in the evening, and often we have to go to commissary to buy ramen or popcorn. We used to go every day, but now they have limited us to only going one day a week.

32. I have depression and anxiety, and they sometimes do not have my pills which means that I cannot sleep.

33. They also wake us up really early to call for individuals, and then it can interrupt sleep for all of us.

34. Whenever [redacted] goes to the psychologist, they ask if he eats or if he got in trouble, but do not engage on his mental health.

35. He cries a lot every night. During the day he can distract himself, but at night he is so sad. He is a big kid who has slept alone for years, but here, he always asks if he can sleep with me. He's so scared they will separate us. He did not do that before.

36. It's also hard because my son and I are in a room with other families with children who are between six and nine years old. My son feels too old to interact with them, and they only play little kid games in our area. My son doesn't have anyone to spend time with.

37. One time I was in the pill line without my son because he had a pass to be in the play area and officer [redacted] started yelling at me because my son was not with me. He walked with me back to my room to tell the officers that I should be in trouble, but they said that [redacted] had the pass. Another day, officer [redacted] started yelling at me again and telling me I was lying. Those other officers who are kinder told me I could make a grievance against [redacted] because he harasses a lot of people. But I have been scared to, because when you make a grievance other officers treat you like a trouble maker.

38. Every time we write grievances, we are afraid they are going to retaliate against us. I wrote a grievance for the computers about the change in access to email, and I also helped a roommate write a grievance about medical issues. But they never answer the grievances. One time, they moved me to a new counselor and location in the facility. There are four counselors per color in different hallways, and they are in charge of bringing clothes and ICE information. When I asked to get moved back to see my old counselor, the officer said they moved me because I would not shut up enough.

39. When I got here, there were about 400 people and now it's closer to 1,500. We used to have a lot more freedom, but now they are stopping us from doing everything. The computers used to have more internet access, but now we cannot be in the library for more than 45 minutes a day. We used to be able to print our communications with lawyers without ICE reading them, but now they read everything.

40. One of the librarians told all of us who live in the Brown and Green areas that the reason they are preventing us from using Gmail, ChatGPT, and Google, is because we are contacting organizations for help and we should not do that. The organizations I had been looking up were legal organizations, and that's how I got information about who the *Flores* lawyers were. We did try to reach out to some other organizations, but she said that ICE needed to block Gmail to stop us from doing that.

41. Gmail is the email that so many of us use to contact our attorneys and family members and many of us keep important immigration documents and correspondence in Gmail as well.

42. They have also restricted websites, which is interfering with our legal cases. Working on my case was the only way I could calm myself, so now I feel really stressed. They told us we could use Proton Mail, but then they blocked it. I made 10 different Protonmail addresses to try to send emails, but it doesn't work. I talked to a staff member, who sent an email to supervisors saying we need to get Gmail back since Proton doesn't work. She then told me that ICE responded that they would not allow it. So, the staff then said that they were going to try something called Atomic Mail, but we do not have access to that yet. This has prevented us from filing any documents. Now my son says he is concerned because that was our only outlet, and they have taken away our only benefit.

43. It is so hard because there are so many people who want to use the computer for their immigration cases and to communicate with family, and we already had to wait in line for hours to do that. But now we cannot even work on our cases.

44. I have had visits from one family member who has a green card, but I have other family members with valid visas that ICE has said cannot visit because the only visitors allowed are legal permanent residents and U.S. citizens.

45. The agents are way ruder than before, too. Especially if they decide they do not like you, they will be mean. I used to have one agent who used to explain things to me, but now I cannot see the same agent. Now, they will only let us talk to agents one day a week. They now sort us by the color of the area we live in rather than by individual agent. So now, I can only see who is there on Thursdays, and it is not the same person.

46. Yesterday, one officer was complaining about us in English to the man checking IDs at lunch, saying "this is not a cafeteria, why are people getting up to get water and juice, they should just sit their asses down." She did not know that I understood, but many of the kids heard her, too. They treat us like animals and do not even like working here. I have heard other agents say rude things while they think we do not understand, too.

47. Last Friday, on January 9, the staff forced everyone to stay in our rooms during the day until the afternoon. During that time, my son said, "Mom, now we really are prisoners." We could not leave, and when we finally could, we had to walk in a line to eat. They did not tell us why or when we would be able to leave, so we were all scared. Because we had no information, we thought they were hiding us from someone. The kids all were crying.

48. The holidays here are not more special than any other day. They brought a Santa with chips early in the morning for Christmas, but that was while the kids were still sleeping, so not all of the kids got chips. They then took photos of the kids who got chips to make it look like everyone was happy here. I went to the church later with other women and we put on a Christmas pageant to try to celebrate, but ICE started taking photos of it to try to make it look like the conditions were better than they are, and that made us uncomfortable.

49. No one has told my son he has the chance to be released from here into the U.S. He still has faith and says he will wait as long as he needs. I keep asking the ICE agents if there is anything that has changed, but the agents tell me they already talked to me three weeks ago, and nothing changed.

50. I tried to write a petition for our release, asking them to review our case and swore to not being a flight risk, but the agents said they could not sign any paper I provided them. Instead, they opened it, tore it, and then pasted what I gave them on the wall in the library with the words: "Do not print. This is not official"

51. My son feels so sad that he is separated from his family. He doesn't want to show his feelings, but I know how he feels, when I see him cry while we're praying. We pray every night, and he always prays for release.

52. When we call family members in [redacted] it costs $0.35 per minute, while Colombia is $1 per minute, and calling people at home in Texas is $0.17 per minute. I call family in [redacted] once per week because it is so expensive, but I try to call my 16-year-old once per day because I am so scared for him. All the calls to family cost money and no one has ever said there is any way to call family for free.

53. The only numbers we can call for free are the pre-programmed pro bono contacts on a specific list, but any other pro bono contacts not on that list cannot be called for free.

54. When [redacted] first got here, he still wanted to go to school, because he likes school, even though it is only for one hour a day. But then he stopped wanting to go because they gave him a questionnaire about how he got here and his immigration paperwork. He said he felt uncomfortable answering it. He told me he knew I would be upset that they were asking him these questions. He said he no longer wants to go because of this. He said it isn't a real teacher who is there anyway, it is just an officer who gives out worksheets, and they repeat the worksheets from when we got here. All of the stuff they are learning, has already been covered. He says all the stuff is only for sixth graders, too, and he already knows everything.

55. The gym has some balls, but only some work and others are damaged. There are also some games, but some items get lost or damaged. The kids request more games, but the officers say they cannot replace them.

56. The tablets here are only for grievances, video visits, and playing games. But I do not use them, because you have to pay $0.03 per minute to use the tablet. The video visits are $6 per 30 minutes.

57. No one who works here has ever mentioned *Flores* to me. They did say originally that we were only supposed to be here 21 days, but then agents said that rule changed.

58. [redacted] just wants to go back to school and finish his schooling. He says he misses school and his dog and brother. He also wants to find ways to help me so we can all spend more time at home together. He is a really good kid, and I know he could be able to be anything he wants to be in the future. He hasn't given up.

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 15 day of January, 2026, at Pillow

[redacted]

EXHIBIT 13

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, D[redacted] P[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 38 years old. I am from [redacted]. I am detained here at Dilley with my daughter, [redacted], who is 15 years old.

3. I speak Spanish.

Family Separation at Dilley

4. Currently, I have been detained at Dilley for 87 days, but this is my second time at Dilley. I am detained here with one of my daughters, but we have been separated from my other daughter [redacted], an 11-month-old baby, who is still in the United States. It has been so hard to survive here without her. There are so many moms here struggling to be strong for our children here, even though our hearts ache for the family members ICE is separating us from.

5. I have not seen my baby in six months. [redacted] she turns one year old. I am crying because I have not been able to be there for her, and the government has kept us separated so long. I feel so tired.

6. Currently, my baby is with her half-sister in the United States. For much of the time we have been here, my daughter's half-sister kept me updated about her through photos and videos. That is how I saw my daughter taking her first steps.

7. But this week they took away our Gmail access and my 15-year-old daughter and I will not be able to see photos or videos of my baby daughter anymore.

8. Now, they say we can only use Proton Mail, which I have never heard of before. I think it allows ICE to see what everyone writes and will not allow us to share videos.

9. The only option we have now is to spend money to call our family, but if we spend all of our commissary money on calls too quickly then we cannot keep in contact with our family. So, we are rationing minutes so we can keep communicating with them.

10. No one has ever given me any information about how to reunite with my baby. I am really hoping I can reunite with her. ICE never told me that [redacted] could be left with anyone outside of here, either.

CBP detention in McAllen, Texas

11. When we were first detained in August, we spent three days in the icebox in McAllen, Texas. They only gave us terrible burritos to eat there.

12. It was so cold, and we had to sleep in such a cold room with a thin, grey pad on the floor.

13. There was also no door on the bathroom there, and the one time we could shower, they gave us as a group 15 minutes to shower before being put back in the cold room.

First Time at Dilley

14. Then at the end of August, they sent me to Dilley for four days. While I was there, I told staff that I had to go to court and try to reunite with my daughter, and the staff said that they would send me to a shelter where I could pursue my case. But they tricked me. Instead, they put me and [redacted] in a car and drove us 13 hours to an airport. There, they put me on the plane even though I did not have my one-year-old daughter with me. I was so distraught and I felt impotent because I thought I was going to court to try to reunite with her, but realized I had no power.

15. I could not bear being separated from my daughter while she stayed in the United States. So, I am here detained again and trying to be reunited with her.

16. It has been so painful to be separated from [redacted] for months while here. It scares me so much that they might deport me without her and permanently separate us. How will I live without her?

Entrance to Dilley

17. When we got to Dilley, no one ever told me anything about my rights or the rules. The only rights staff told us about was our right to sign voluntary departure for $1,000. They told us to raise our hands if we wanted to sign, but they did not do anything else to explain our rights. Instead, they sent us to our rooms if we did not agree.

18. I have not seen any sort of videos since I got here that say anything about rights.

19. It is hard being here, because the rules keep changing. Since last week, they have changed so many rules. Recently, they changed our eating times, so some people can only eat lunch at 11 am or 12 pm, whereas before we could eat lunch during that whole block, and that is so hard for the children. They also decreased our time in the library and put restrictions on all websites. Similarly, they have also decreased our time in the commissary, so we can only go on certain days.

20. We used to be able to spend more time in the library, but now we are only allowed to be in the library for 45 minutes a day and, in addition to blocking Gmail, Google, and YouTube this week, they are keeping all the small kids from listening to music and playing games on the computer.

21. Now that there are so many more people here, we have to wait in hours-long lines for medicine, library access, and the commissary. People are often waiting for 2 hours. So, if you have to take medicine at 7 in the morning, you have to start waiting at 5 am. Starting recently, people also have to wait in line to enter the cafeteria for their lunchtimes.

22. I have made some complaints since being here about the rule changes, but they just take the complaints and do not give us any response. For example, complained about them taking away our access to email and decreasing our access to the library, but no one responded. Now, I have to wait in line for two hours every day so that I can be in the library for 45 minutes to see photos of my daughter. It has been so hard for so many families, because now that kids cannot play games or look at YouTube, parents do not get that opportunity for a break while in the library.

23. There are some people who work here who are really racist and will laugh at the kids' pain. I do not know what is wrong with them. There are some others who actually follow the rules and treat us in a more tolerable manner.

24. People are also scared to report anything, because they are scared they will get a report in their file against them. We worry that will prejudice our immigration cases.

25. We have seen the officers make false reports against people, too. There was another woman incarcerated here who an officer accused of hitting her, even though all of us who were there at the time saw that she did not. Since we all saw that she did not, we asked to see the video after the accusation, and they would not show us. But this accusation made us scared about the officers retaliating against us.

26. I have seen some agents come to visit our block every once in a while. They tell us if we have a complaint that we can have a meeting with a [redacted]. They do not tell us his full name. Some women do go to bring complaints.

27. We have also had issues with the food. It is so hard to eat here, because they always put so many sauces on the chicken and other foods, often give us breaded fried chicken, and do not make accommodations for medical issues. I have a gallbladder disease, where I am not supposed to eat things that are so fatty, or else I get extremely intense stomach pain. But it is so hard to take everything off the chicken, so I can't eat it. I understand that it would be so difficult to meet everyone's food preferences, but the sauces here are so strong and gross that they hurt us. Some of the sauces truly look like vomit, and their smell makes the kids gag.

28. Still, once a week, they give us plain roast chicken, and it makes everyone so happy. That is the only day the kids all eat, and often they want seconds. I wish they could give us simple food like that that everyone likes and is healthy every day.

29. The medical care here is also terrible. Four days ago, they gave me an undercooked burger that was red in the middle. I did not want it, but I was hungry and ate it, and then I started throwing up. I asked to go to the doctor, but because I only speak Spanish the guards I asked just watched and laughed at me. When I finally found a staff member who

spoke Spanish, who helped me go to the doctor, the doctor told me they would not see me until I had thrown up more than three times. The doctor would only give me acetaminophen.

30. One week ago, my daughter had a fever. There are so many fevers and coughs going around in this season. Now, there is a really strong virus spreading here and many children are getting it.

31. This morning, we went to the doctor early with my daughter to seek treatment for hives that have broken out on her face, to see if we could get more medicine, but when we got there the medical area was filled with children vomiting. Since we got here, my daughter has been breaking out in hives from the food here. The doctor gives her a cream called "medicine five," but for the past week, she has not gotten it because Dilley ran out of that cream. When we got to the medical area to ask for more, there were so many little ones vomiting. The medical people gave us masks and told us to come back later, because there was a sickness spreading. Elsewhere, I have seen people sick with vomiting, stomach pains, and coughs. I do not want my daughter to get sick with that and worry that they might isolate her.

32. [redacted] has really delicate skin, and she also breaks out from the soap we use on the clothes for the washing machine. It is so challenging because kids are not all the same, and some have more delicate skin than others, and it bothers them that there are not alternatives.

33. The bathrooms here are disgusting because they only clean the bathroom once a day. If we don't go to shower right when they are cleaned, then the showers are filled with hair and blood.

34. Many women and children have gotten infections on our behinds because of so many people sitting on the same toilet between it being cleaned. We need to use creams for relief. For some women and girls, this has caused them to suffer from UTIs.

35. The showers are not private enough because people can always see you through the sides. The bathroom stalls are not private enough either. It makes my daughter feel so

embarrassed to use the toilet because there are big holes on the side and people will sometimes look in and see her by accident.

36. I need to spend money in the commissary so that I can have shampoo, conditioner, and deodorant. They only give us hand soap which does not work to clean our hair.

37. People also buy ramen at the commissary a lot. I think that's the thing they sell the most, because so many people eat that when they are grossed out by the cafeteria.

38. Sleeping is hard here, too. It's not just the lights being on all night. There is one woman in my sleeping area who snores so much we could not sleep. Everyone got a headache. But they would not let us sleep in a different room. When we complained, they responded that staff cannot get involved in that sort of thing.

39. Recently, it has been so cold and we have to go outside to the bathroom, which upsets the children. We try to cover our faces with our t-shirts to stay warm, because we are so cold.

40. The school has not changed at all recently. It's still only for one hour and they do not do anything, so my daughter does not go anymore. No one can study here.

41. Everyone was hoping they would give us something sweet for Christmas for the children, but they only gave some children little bags of chips. The women in my room tried to decorate the room for the kids with paper decorations and make a paper Christmas tree, but the staff made us take it down. They did not do anything for New Year's Eve.

42. Although I have already been through the credible fear interview and passed, they continue to force me to stay here. I have a hearing in February for my asylum claims, but it is too expensive for me to get a lawyer.

43. I keep getting paperwork that I do not understand because it is always in English, and the staff here will not let us know what exactly it says. They gave me paperwork yesterday that I think said I have to stay detained, but they did not read it in Spanish or let me know exactly what it said. For people detained at the border, once we have been here for 60 days they give us this sort of paperwork and then again at 90 days. They have also

asked me to sign and finger print papers that I thought were about the rules of the facility, but I think now that they are not. But they have never translated these papers for us to understand them.

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 14 day of January, 2026, at Dilley.

[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: 1/14/2026

Eleanor Roberts

EXHIBIT 14

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, S[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 22 years old. I am from [redacted].

3. I speak [redacted].

4. I have been detained at Dilley for 23 days. I am here with my three daughters and my husband. Our daughters are two years old, one year old, and ten months.

San Diego CBP

5. We were at the border for two days and at another facility for five to six days after that before coming here. The facility we were at for five to six days was called San Diego.

6. At the border, we were brought to the hospital once, and then at San Diego we went to the hospital again. We went the first time because my baby not have any wet diapers, did not eat or move with fever, and was lying there limply. We were told the baby was teething at the hospital and were prescribed an ointment, but we never received it. They just gave her Tylenol.

7. After the first hospital visit, she wasn't able to eat or drink anything. She was vomiting and having diarrhea, so she couldn't keep water or milk down.

8. I told the officers I was nervous about her. I told the officers as soon as we arrived at San Diego. The room was very cold, and I was worried this would make her condition worse, but the officers said that this would help with her fever and make her better.

9. They told me not to exaggerate and stop asking for help. I was knocking a lot on the doors and asking for help. They kept ignoring me or telling me to stop bothering them. They could see me knocking and banging in their cameras.

10. We finally were able to go to the hospital again after two days of begging. They did an x-ray of the lungs and took a urine test. They said again it was most likely teething

and once again prescribed an ointment. We did not get the ointment this second time either.

11. The conditions in San Diego were awful. The bathroom was awful. Everything was dirty. We weren't able to take a shower for a while. The water was cold, and it was unbearable.

12. In San Diego, we got formula only twice even though the baby was sick and throwing it up. She was so cold.

13. All they gave us were microwavable burritos. We all developed issues with our stomach there.

14. My baby still has diarrhea to this day.

Dilley ICE Detention Center

15. It's been more than 20 days since we've arrived here, and about 30 days since we've been detained in total. There was no explanation provided to us about why we are still detained after 20 days.

16. The ICE officers are just joking with each other here saying that they should not abide by Flores. The office who is responsible for our case said that, Officer [redacted].

17. They told us that this Flores law has been something they did not need to follow for a while now.

18. We received no know-your-rights presentation upon arrival. Nobody has told us anything. We don't remember seeing a video when we got here.

19. My husband and I have been stressed the entire time since we've gotten here.

20. It's very hard for my three kids to be here. We cannot explain to them what is going on. They're bored here. They're stressed out. They want to see their dad at night, and they're not allowed to. We cannot explain these rules properly to such young kids.

21. Also, my two-year-old has been having a severe medical issue. She has a swollen gum and an infected tooth, and has a fever anytime she isn't taking ibuprofen from this infection. This has been going on since we arrived at Dilley, over 20 days ago.

22. The top of her tooth is green at the root. I think the nerve there has been hit or opened.

23. Because of all the ibuprofen, I'm nervous her stomach is messed up. Her stool is a very dark color and has a distinct smell.

24. She looks thinner, is more tired, and is always lying down. We imagine this is because she can barely eat anything due to pain. She's been on a liquid diet for more than 20 days.

25. Every day she just eats these protein yogurts. Depending on the day, she receives two or three yogurts. She always gets one in the afternoon, and then one or two for dinner. But that is it, and she gets nothing for breakfast. She needs more vitamins.

26. We have begged for this medical issue to be resolved, even talking to Congresspeople who visited the facility. All we've received so far is antibiotics, but she finished those days ago and the fever and infection are still there.

27. The dentist here told us they can't extract the tooth because of a pre-existing heart condition. That was 15 days ago. It's true that my daughter has a small hole in her heart, but that doesn't mean we can just leave her like this: not eating any solid foods, with a fever, and crying all the time. We want to see a specialist, a pediatric dentist immediately.

28. When Congressmen Castro was here this past Monday, we begged for his help. He tried to advocate for us, Dilley ended up sending us to a hospital 15 minutes away. My husband went with my sick daughter. I had to stay here with my two other daughters.

29. Unfortunately, the hospital could not help. They just checked her blood pressure. The nurse at a hospital said this is not a dental clinic. They couldn't help her.

30. The staff here think and say that I am beating my daughter, and that is why she cries so much. I tried to explain to them the toothache, but they threatened to separate us. They said if she keeps crying, we will take her away from you.

31. Also, the water is not good for us here. I'm emotionally and mentally stressed, so my breastmilk has stopped coming. I'm not able to feed the little one, so she gets formula and a bottle.

32. They give only the bottled water to the baby, so my other two girls don't get it. The poor quality of the water causes my older girls diarrhea. Today, all of a sudden, I asked for water and they gave me six bottles of water and I was shocked. That has never happened before. It's because you guys are here.

33. Initially, we were getting 3 bottles of water for the baby per day. Then, the supervisor said three bottles of water is way too much, so from then on, I have received one bottle of water in the morning and one in the evening.

34. Regarding the food here, it's horrible. My two-year-old and one-year-old cannot even eat the food here, let alone my baby.

35. All my kids here hate the food. It's too salty. It's inedible. The last three or four days they've improved the food. It's because there have been people from Congress here and now Flores counsel is here.

36. It would be great to have French fries, soup, puree, and pasta for the kids. We would also love to have bananas for the kids. They like bananas, and they're soft. I have never seen Gerber baby food or pouches for the kids here.

37. I want to give my one-year-old and two-year-old milk, but the staff make it very difficult. They don't provide formula for anyone above one.

38. There is milk though in the dining hall where we eat, which I try to give to my girls. But the staff have started to discriminate against me. I don't understand why. They tell me to throw it away and poor it in the sink – that the girls can't have it. They told me they are going to write a report if I keep trying to get milk. To clarify, this is the milk in the dining hall that everyone is allowed to drink. The staff are telling me specifically that I cannot have the milk, that my kids can't. I have no clue why they're doing that to me. That's the attitude towards the [redacted] here.

39. In our bedroom, the conditions are unbearable. It's dirty and there's puke all over the place. There is dirt everywhere. The baby keeps crawling on it. They've been cleaning this place very nicely though the past few days.

40. Also, I can't freely go to the bathroom at night. I can only go to the bathroom if the kids are with their father, and since they can't be with him at night I just hold it. We never got a choice of whether the kids could be with him or with me.

41. It's very difficult for me to be alone with my three kids. One of my daughters has to be held, because our stroller only holds two kids.

42. I asked the officers here for shampoo for the kids and they told me to use the soap in the bathroom, so I have not received any tear-free shampoo.

43. My kids have lots of trouble sleeping because of the lights. I tried to hang something up, a blanket, to cover their eyes but the officers said you can't do that.

44. I am able to communicate with some other residents using very few English words and signs, but the officers do not provide me with an interpreter.

45. We have been asked to sign documents before without an interpreter. There was an ICE officer who said she wanted to help us and said there were papers she wanted us to sign. We were able to notice ourselves with very broken English that the papers were for self-deportation. We didn't get an interpreter. Luckily, we knew enough to know she didn't actually want to help us. She was lying. We didn't sign them. She said it wasn't for deportation, that it would just help me get asylum.

46. They put a lot of pressure on us to not talk with you. Once you leave, I think they will be very rude to us. The staff started being very rude to me after I talked with Castro on Monday. They corrected every little thing I did and said they'll write a report against me.

47. The families who scheduled an appointment with him were deported overnight, so they wouldn't complain to him.

48. I said I wanted to talk with Castro, and they kept the paper from me so I wouldn't sign up. I had to sign up when no one was around. Also, when we got here they gave us very stained and dirty clothes. When Castro came, they gave us new clothes.

49. We talked to Castro on the 9th. On the 10th, we were supposed to have court but they didn't take us. We waited all day and they said come back tomorrow. We came on

the 11th, but they said we didn't have court anymore. We are terrified they are keeping us from court as a punishment for talking with Castro. We are nervous ICE potentially didn't let us enter our own courtroom and then the judge will think we were no-shows.

50. Yesterday, for example, when I was talking with you some officers said they would watch two of my kids who were asleep finally after being up all night. Then, they said they would write a report against me once they realized I was going to talk to Flores counsel. They said that is where people go to complain against them.

51. At night time yesterday, I put a blanket on the floor of our bedroom so the kids could crawl on top of it because the room was very dirty. The ICE officers told us to remove the blanket, that it's not a big deal if it's dirty. And they threw out all the baby bottles for each kid. I had one bottle per kid.

52. I am going to tell the ICE officers I was just talking to you about getting an asylum attorney for my family, because I am scared. I am so scared of retaliation here.

53. We have already had problems prior to being here. My eldest daughter was beaten in my country which was part of why we had to leave. They can't play here and there aren't enough toys. They don't trust people as much anymore. The kids are more closed off. And if we were to talk about me, my hormones because of the stress have changed. I don't have a period and produce no milk. I am having memory problems and problems with my speech. I feel like no one will help me and we are stuck here forever.

54. We feel as if we're animals at the zoo.

55. We can't put money on our account, so we can't buy anything at the store.

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 12 day of March 2026, at Dilley, TX.

[redacted]

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

I am an attorney at Children's Rights. On March 12, 2026, I met S.K. with the assistance of a telephonic interpreter provided by Jeenie, identified by Interpreter ID 084512 and named Nare, who is certified to interpret in the English and [redacted] languages. During our meeting, I read the "Declaration of S.K." in English, and Nare interpreted the entirety of the declaration into [redacted]. S.K. confirmed that all of the information contained in the declaration is correct and complete to the best of her knowledge (*see* signature page).

Katherine Johnson

Signature

03/19/2026

Date

EXHIBIT 15

DECLARATION OF JAVIER O. HIDALGO

I, Javier O. Hidalgo, swearing under penalty of perjury, make the following declaration:

1. My name is Javier O. Hidalgo, and I serve in the role of Legal Director at the Refugee and Immigrant Center for Education and Legal Services ("RAICES"). I have been the Legal Director since 2023. I have been licensed in the State of Texas since January 24, 2019, and in the State of New York since February 27, 2013.
2. I joined RAICES in 2018 and have served in my current role since 2023. Before I assumed my current position I worked as a unit director, supervisor, and previously, as a staff attorney. In my role as Legal Director, I work closely with Asylum Access Services (formerly known as the Family Detention Services Program) and oversee that program's work, which (among other things) serves detained individuals and families facing expedited removal from the United States, as well as people seeking asylum and related protection, including families detained in the Dilley Immigration Processing Center ("Dilley").
3. RAICES is a 501(c)(3) nonprofit, non-partisan organization headquartered in San Antonio, Texas. It was founded in 1986 and has offices in San Antonio, Austin, Corpus Christi, Dallas, and Houston. RAICES's mission is to defend the rights of immigrants and refugees; empower individuals, families, and communities of immigrants and refugees (including those who arrive at the border); and advocate for liberty and justice. RAICES provides free and low-cost immigration legal services to underserved immigrant children, families, and individuals, and is the largest immigration legal services provider in Texas. RAICES provides assistance in numerous areas, including, but not limited to,

asylum applications, removal defense, DACA renewals, and status changes. RAICES provides this full range of immigration-related services to individuals in detention, or who are continuing to fight their cases following release.

4. The Asylum Access Services team provides *pro bono* legal services to minors who are *Flores* class members and their families detained at Dilley. Since Defendants resumed detaining families at Dilley in April 2025, RAICES has served more than 300 families in ICE custody.

5. Through my work at RAICES, including my current role as Legal Director overseeing Asylum Access Services, I have gained extensive familiarity with the terms and requirements of the *Flores* Settlement Agreement ("FSA"), as well as subsequent agreements and/or judicial orders related to it. I am also familiar with United States Immigration and Customs Enforcement's ("ICE") Family Residential Standards ("FRS").

6. This familiarity arises from my years of providing legal services to *Flores* class members and overseeing related programming, including for detained minors and families held at Dilley and Karnes.

7. The FSA is a 1997 agreement setting national standards for the detention, treatment, and release of immigrant children in United States custody. The FRS is a set of guidelines designed to ensure humane environments for families in detention. I have previously submitted declarations in this matter detailing my team's experience with ICE's non-compliance with protections for minors, and I am familiar with prior judicial orders instructing ICE with regard to its compliance.

8. I have read the ICE Juvenile Coordinator's supplemental report filed March 13, 2026 [Doc. # 1736-14] and the attachments to the Juvenile Coordinator's report.

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

10. While some many aspects of Defendants' lack of compliance with the FSA remain consistent with what undersigned has reported in prior declarations submitted to this Court, RAICES has observed a worsening in other aspects of how Defendants have mistreated class members in the past several months.

Harsher treatment of families.

11. On January 24, 2026, a number of families detained in Dilley were recorded staging a demonstration, reportedly to protest their prolonged detention.[1] This was also shortly after the detention of Liam Ramos and his father. Following the news coverage, there was also an increase in congressional oversight visits in which families also sought to speak with members of Congress.

12. Between January and February 2026, families detained in Dilley consistently reported increasingly harsh treatment by ICE and CoreCivic staff . This increase was most apparent after the January 24, 2026, demonstration and subsequent attempts to speak with members of Congress.

13. RAICES service recipients reported harsher treatment, including increased restrictions on their movement and retaliatory statements and actions from staff. For example, families reported that in the days that followed the January 24, 2026, protest, families were restricted to their rooms while a congressional oversight visit was conducted and guards threw coloring sheets and crayons on the floors of each room to keep the minor children occupied.

[1] https://www.texastribune.org/2026/01/24/immigration-facility-protest-texas-liam-conejo-ramos/

14. Families also report their documents and belongings are frequently searched, potentially for anything signaling more organizing or protests, and that even children' s drawings have been confiscated during these searches.

Exceedingly long periods of detention.

15. From December 2025 through February 2026, many class members and their families experienced extremely long periods of detention, including over 100 days. For many families, ICE indicated families would be detained indefinitely. In my prior declaration, I highlighted examples of ICE indicating to families that they would be detained indefinitely during their ongoing immigration proceedings, [Doc. # 1706-2]. The pattern of prolonged and indefinite detention extended through February 2026, and only recently have we seen a shift to generally shorter periods of detention.

16. For example, as of February 23, 2026, there were approximately five families detained over 100 days and approximately 14 families detained over 70 days. Recently, we have seen ICE release some families within 20 days. However, a number of families detained well past 20 days remain in Dilley. As of March 19, 2026, one of the families RAICES serves has been detained 130 days.

Ongoing medical concerns.

17. Detained families continue to report lack of adequate medical care for class members. Indeed, in the period spanning December 2025 through February 2026, RAICES' records indicate at least 375 additional concerns over inadequate medical care.

18. In addition, class members face potential exposure to serious infectious diseases such as measles[2] and tuberculosis. A parent served by RAICES was diagnosed with tuberculosis

[2] https://www.texastribune.org/2026/02/02/measles-dilley-immigrant-detention-facility-liam-ramos-texas/

and kept in medical isolation for months; the family has been detained in Dilley for over 100 days.

19. Recent reporting shared various 911 recordings made by Dilley personnel when minor class members faced dire medical emergencies.[3] This is consistent with RAICES' observations and what families have reported. It is important to clarify that such calls often occur well past the time a reasonably prudent person would contact 911 for a medical emergency.

20. In one example of a family RAICES supported, a toddler who appeared to be at the brink of death before finally being rushed to the hospital. Shockingly, ICE returned this toddler to Dilley in the midst of what ICE described as a measles outbreak.[4]

Ongoing mental health concerns.

21. RAICES has long observed and identified the very clear harm detention in ICE custody inflicts upon minor class members, causing young children to withdraw and wither emotionally and physically day after day. RAICES staff including the undersigned can testify to seeing multiple children regress to behaviors typical of children several years younger than their actual age. Teenagers have been observed to grow dispondent, sometimes resentful of their parents, desperate, and even suicidal. RAICES' observations and the reports from detained families are consistent with the experiences of a teenage class member who suffered a mental health crisis while in Dilley.[5]

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[3] https://www.scrippsnews.com/investigations/ice-inc/911-calls-offer-glimpse-of-medical-emergencies-at-family-ice-detention-center

[4] https://www nbcnews.com/news/us-news/toddler-hospitalized-dilley-ice-detention-rcna257912

[5] https://apnews.com/article/children-immigration-detention-dilley-trump-administration-ice-8ab12c9357ff3b8d400cfa2b2dbe85ed

Lack of Legal Orientation Program and Legal Rights Group Presentations.

22. Class members and their family members detained in Dilley continue to be deprived of information about their legal process and rights. Families do not have access to a Legal Orientation Program, and do not receive a Legal Rights Group Presentation provided for in section 6.4 of the FRS.

23. As set forth in previous declarations, RAICES requested the requisite permission to provide detained class members and their families with Legal Rights Group Presentations. After Defendants denied the request without explanation, RAICES submitted a FOIA request to seek clarification on DHS' reason for the denial and what they would approve. The FOIA request remains pending without a response.

24. Accordingly, Class members and their families are not provided with information about their rights under the FSA. Nor are they appraised of their basic rights. Instead, families commonly report receiving incorrect legal advice from non-attorney ICE and CoreCivic staff at Dilley. The incorrect advice from ICE and CoreCivic often seem to be intended to deter families from further pursuing their case for protection from harm in their home country.

25. For example, ICE told a family from Colombia who received a negative credible fear finding that they would be able to "withdraw" their case and ask an immigration judge for voluntary departure during the Credible Fear Review hearing, which the family attempted to do in lieu of accepting RAICES' offer to represent them at that hearing. The hearing resulted in the immigration judge affirming the credible fear finding and ICE refusing to release the family due to that result. At this time the family is no longer

detained and RAICES has not been able to confirm whether they were released to their sponsor or removed pursuant to the expedited removal order.

Inadequate Food and Water.

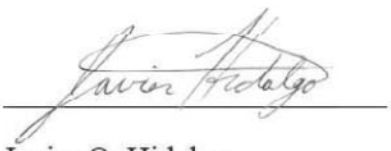
26. Families continue to report concerns about the quality and appropriateness of the food and water provided to the minor class members. There does not appear to be any improvement.

27. In sum, Defendants needlessly subject class members to many of the same harmful conditions in Dilley that have been reported since last April.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: March 20, 2026

San Antonio, Texas



Javier O. Hidalgo

EXHIBIT 16

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, N[redacted] C[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 31 years old. I am here with my husband and our children: [redacted] [redacted] (14 years old), [redacted] (13 years old) [redacted] [redacted] (10 years old). We are from [redacted].

3. I speak Spanish.

4. We have been detained at Dilley for 126 days. Before we came to Dilley, we had been living in El Paso, Texas for about three years. I have a small family, and they all were living there, too. My kids were in school and everything was going fine. My oldest daughter had started high school after doing wonderfully in middle school.

5. One morning, ICE agents showed up at our house in the morning. I had woken up to make my children breakfast. I looked out our window and there were about 25 cars filled with 3 or 4 ICE agents each in full riot gear with all of their weapons. They approached our trailer and started pounding really hard on the door. I opened the door and told them right away I have three kids in the house and asked them to please not scare them with the weapons. But in that moment, more than 100 agents forced their way past me and swarmed our house. They started searching everywhere and making a mess, breaking things. Apparently, they had been told that there were drugs, trafficking and weapons in our trailer by our horrible landlord. But when they searched, they found nothing illegal at all was happening and they realized it was not what they had been told by the landlord – it was just our family, my mom and my stepfather. They searched the house for about three hours and then finally most of the cars all left. They terrified my children for no reason.

6. When they finished the search, they asked how we had come into the country. We said that we had come during the Biden administration and were waiting to get our next court date. They told us to get dressed and they would take us to immigration court and get us an earlier court date. They were lying.

7. Instead of taking us to court, they detained us at an ICE office in El Paso for two days. We were all in an enclosed room that felt like a cell. The lights were on the whole time. They put mats on the floor for us to sleep, but none of us could sleep. We were given frozen hamburgers and burritos to eat. Everything was horrible and cold. The kids weren't eating when we were there. We were later told they would take us to another center because we couldn't be in the office cell for more than 72 hours. They did not tell us where we were going, but they said it was a better place than where we were at and not the place with the crocodiles that we had heard about on the news. We were scared we might end up at that place.

8. They eventually flew us to Dilley. We were accompanied on the plane by two men and two women. We flew to Houston, then to San Antonio, and then they drove us to Dilley.

9. It was just such an awful 360 experience to get here. It feels like God has put us through a very hard trial that we had not foreseen. All of us are having a difficult time in our own ways. It feels like our life has just stopped. We have stopped living life and we're just stuck here.

10. The food here is very bad. Back in December, the salad had worms and we were told that it's just normal. We know that some kids here have been vomiting up black from the food.

11. My kids don't go to the classroom here because it's a waste of time. They tried going but it's just like 45 minutes and they weren't learning anything.

12. The medical care here is a problem. Many children and families do not get the medical care they need. There was a one-year-old here who had a fever for about 20 days, and they finally took her to the hospital and she was there for 17 days. There is a two-year old girl who has had a cold for a really long time, and they won't give her any antibiotics. Last month, my 10-year-old daughter had a very high fever for 4 days. On the 4th day, I tried to take her to medical at 2 in the morning because I was worried. There wasn't a doctor, only a nurse. I put cold compresses on her to try to get the fever

down. They did tests and didn't find COVID or flu, and they wouldn't give her any medications. I told them something was wrong with her and I thought she needed antibiotics- but they refused and said it was just a cold. I said that after five days of fever if they didn't give us antibiotics, I would call reporters. They finally agreed to give us antibiotics, and she started to get better after about two days.

13. One of the things that is most difficult is that the light in the room is on all night. It is horrible for all of us – and especially for me because I suffer from migraines. Sometimes we try to change beds because one bed has the most light. My ten-year-old gets headaches, too, and the lights make it worse for her. There are eye masks, but they hurt our heads because they are so tight. When we tried using them, we would wake up with headaches from how tight they felt.

14. We are very worried about our oldest daughter. She doesn't want to leave the room. She doesn't want to eat. She doesn't have any motivation to do anything and is very depressed. She also has extreme anxiety and is doing things like eating the lip balm. The psychologist referred us to the psychiatrist, and she gave us sleeping pills. I am afraid to give my daughter these pills because I am not sure how they might affect her. We don't know what to do.

15. We have never gotten an orientation here about our legal rights. They haven't told us about our children's rights under *Flores* or their right to a bond hearing. It wasn't until January that some of the other families told us about the case and how it was helping people get out. We know about the grievance system, but we are scared to make a grievance because we are worried it could impact our case. The staff here have said that the more reports you make, the longer you will be here.

16. Since the families here did a protest, sometimes we are put on lockdown and forced to stay in our rooms. I wanted to see Joaquin Castro when he was here for a visit so I put my name on the list to talk to him. I was allowed to speak to him, but many people who wanted to see him were not allowed to. We told him about the awful conditions and how long we have been here, and how hard it is.

17. About two weeks ago, Core Civic did a search of our room and took everything we had in our room. They took my daughter's hair styling products, our toothbrushes, and toothpaste that we bought in the commissary and they took some stomach medicine. We were very upset when that happened. They told me to make a list of what was taken and they would replace the items, but they have not done that. They even tore up letters that I had written to the pastor here, including a letter with one of my prayers. They threw the ripped up pieces of paper in the trash. They even threw away a drawing my daughter had made of Bratz dolls.

18. We try to stay calm for our children's sake. But it is not easy. Once we are out of here, I am going to make it my mission to help my children forget about what has happened to us here. I am not sure exactly how, but someday I am going to make it up to them.

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 12th day of February 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: 2/12/2026

EXHIBIT 17

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, L[redacted] R[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 34 years old. I am from [redacted].

3. I speak Spanish.

4. I have been detained at Dilley for 84 days with my 15-year-old daughter [redacted] and my husband. We got here in November of 2025.

5. My daughter has not been wanting to get out of bed most days because she is so sad here. She spends all day crying, and does not eat much. When she gets up to eat, she puts her head on the table. Since coming here, she has had such bad anxiety that she is constantly gripping her hands and shaking her legs. I try to explain to her that we will leave, but it feels like they forgot we are here and we will be stuck here forever.

6. When we got here, we brought a machine for my husband who suffers from sleep apnea, and they put him in the medical area with that machine. While here, he started to feel severe pressure in his head and behind his eyes. He started to lose his vision. He could only see floating dots in his eyes. When we went to the doctor after a lot of insisting, the doctor said that he needed an eye exam, but that it would take three to four months to get an appointment. [redacted] started crying because she did not want her dad to go blind. It made her feel panicked.

7. Each day his eyesight got worse, and when we finally saw a nurse in January, she said that there was no record in the system saying he had a visual problem. During that visit, the nurse was just laughing and not putting our information in. I got so angry because it was an urgent medical problem, and the translator got upset too, and interrupted and said she would submit testimony about the terrible treatment we were receiving was. Only then, did the nurse say, “Oh, sorry, I now see this in the system.” I made a written complaint about the lack of medical attention after that. Only then did we get an appointment with an eye doctor. They scheduled it for three days later outside of Dilley. On January 10, 2026, they took him to get an exam and the eye doctor found out

he had developed glaucoma. The doctor prescribed my husband eye drops and scheduled another exam. The doctor also prescribed dark lens glasses to protect his eyes. At the next exam the eye doctor said the eye drops were working and to continue with them.

8. But my husband never received the dark lens glasses. After 30 days, the eye drops ran out, and they have not renewed that same medicine. They said they would give him something else, and when we tried to ask for the correct medicine prescribed by the doctor, they tried to get us to sign a paper saying we were refusing medical treatment. I refused to sign because I was not refusing his medical treatment. I just wanted the correct medicine that had been working. The medical staff called the guards into the room to force us to sign it, but we kept refusing and saying we need the correct medicine. They still will not give us the correct medicine.

9. He still is waiting to get those drops and he feels severe head pain. We are also worried about him never receiving the dark lenses. We said we would pay for the lenses if that was the hold up, but they have not provided a way to get them.

Encounter with CBP

10. We entered the United States on November 17, 2025, on visas that last until 2031. When we crossed the border, we told the border officers that we wanted to ask for asylum in the United States. But they transported us to ICE. When I told ICE that we had valid visas, they said that in their system did not show it.

11. They had already taken all of our possessions, including our passports with our visas, cell phones, our bank information, all of our documents, and moved us to a center twenty minutes away in Champlain. This made me indignant, especially because these officers had stolen our phones and all our evidence to show our visas. They said I can only get it back if we send someone to the border station to get the materials. But who am I going to be able to send to a border patrol station across the country? I have asked for these materials many times and submitted many complaints. But I never have been able to get them.

Champlain POE

12. We spent two nights in the cell in Champlain. We were the only three in a really small prison cell, smaller than this interview room. The cell did not have any beds. All three of us slept on a mat on the floor. The only other things in it were a cement seat and a toilet in the room. We felt really cold.

13. While we were in Champlain, there was nothing for [redacted] to do for the full two days. We were also not allowed to make any calls.

14. It was so hard for [redacted], and she kept asking me why she could not see the sun and why we were stuck there.

15. We only ever saw the officers through the window when they passed us food. They gave us some water and granola bars to eat and a sandwich at one point.

Dilley ICE Detention Center

16. Now that we are at Dilley, my husband sleeps alone in a room with his sleep apnea machine, but the officers do not let [redacted] and I stay there with him. It makes our daughter so sad that we are kept apart at night. We are not bad people, and we do not know why we have been here for such a long time.

17. No one has ever explained to us why we have been here for so long. ICE officers only ever say they are processing our case.

18. We have even asked ICE if we could buy tickets to go to another country. We also gave them information for a sponsor, but they will not let us leave. They say we need to be patient, but that is not easy for a 15-year-old who has been stuck here for three months.

19. We know there is one family here that had measles. They are [redacted], too. They were isolated for many days, but the facility might have let the family out while they were still sick. Even though no one else has had measles since then, they are continuing to prevent people from coming to visit us. The only precaution they are taking

is taking our temperatures quickly, but this seems like a ploy to keep us from speaking to advocates.

20. The measles outbreak has also made people scared to go to the medical area and scared that if they go to the medical area they will get stuck in quarantine and detained here for longer periods of time.

21. There are a lot of children and adults who have ongoing stomach sickness and are constantly vomiting and experiencing diarrhea. That health concern has affected everyone, but the staff has never taken any serious steps to respond. It seems like the food is what is making everyone sick. At times, the cafeteria has served undercooked chicken. They also sometimes serve food that they say is ground beef, but it tastes terrible. They also serve us rice that has grit and little rocks in it, and many people have hurt their teeth while chewing the rice. One time, they gave lettuce with worms to a family, and that made everyone scared to eat lettuce even though it was one of the few vegetables. On top of that, they let the beans sit out all day for weeks on end. Recently, they served fried shrimp, and all the kids started throwing up after eating them. Kids were vomiting on to the tables. So much of the food is dirty, left out too long, or undercooked that it is no wonder it makes kids sick.

22. We keep asking the staff why babies have no option for soft food here. They only give babies adult food, and they do not give them fruit. Consequently, all the babies are getting thin because they can only really eat pieces of bread.

23. The food makes the kids so sick that many families buy ramen from the commissary, even though they know it is unhealthy, because they know it will not make them sick. Now, we just eat bread, oatmeal, and coffee to stay safe.

24. The staff also do not vary the menu, so the children get tired of eating the same thing because they do not have enough options.

25. No one has ever given us any information about our daughter's rights in detention. They showed us an animated video about the norms that we have to follow here, but the video never said that kids under 18 years get certain kinds of treatment or talked about

rights at all. The only thing they told us about kids in particular is that they should not experience sexual abuse. There are posters about that everywhere.

26. After we got here, we had our credible fear interview, but the immigration official denied it.

27. I have filled out so many forms requesting my belongings and release, that the woman in the library stopped helping me and will not let us print things. She will not let most people make copies anymore. They also do not respect attorney-client privilege in the library. They read all our messages with our attorneys and when we ask them to send materials to lawyers, the staff say they cannot do that. But, we have no mail system or other way to have privileged communications.

28. They also took away our access to Gmail and Google two months ago, which has made it impossible to obtain our records. They now only let us use Proton Mail. But that system says the staff read everything, even though it is the only way we can send messages to our attorney. This essentially means they violate our rights client-attorney privilege because there is no way to communicate in writing confidentially. I am so worried about how often the library staff violate our attorney client privilege by reading anything our lawyers send us and not allowing private written communications.

29. I have never seen an I-770 form. It does not look familiar.

30. We have not received any information about our child's right to be released from Dilley without us.

31. We have used the tablets to make complaints. About a month ago, we were in line for the computer and we had lined up at 6 am so we could get some time on the internet. But the library staff person was only letting some people she liked use the computers. I asked her why she was not letting most of the people in line use the computer, and she told me to shut up and she would not do anything. When my husband tried to ask again, she told him to give her our ID cards over and said she would submit a report against us for causing trouble. She tried to grab the card from my husband, and he put his hands behind his back and told her not to touch him. Afterwards, I made a complaint on the

tablet. But that woman just blocked our time in the internet and retaliated against our complaint.

32. No one who works here has ever told us about *Flores* even though we have been here for three months. The only written information that I have received about *Flores* was written down by other people who were detained here. Our family try to submit a complaint to ICE that said we should be released at 20 days, but the ICE officers kept telling us our request "is not valid" and they refuse to look at it. The complaint box is filled with papers that they do not look at. The staff just tell us over and over that our complaints are not valid and that they will not look at them. The library refuses to print requests for release under *Flores*. Is it true that submitting a paper to ICE asking that our *Flores* rights be respected is not valid? Is the library allowed to refuse to print or accept them?

33. No one has given us individual hearings, allowed us to explain why we should not be here, or talked to us about voluntary departure.

34. Anytime we want to call our family members we have to pay money to place the call.

35. We have been able to meet with RAICES for free, because we met with them when they came here and an in-person visit is free.

36. The day that the congresspeople came, the staff closed us all inside and said that if we tried to go outside they would use the force against us. Many of the family members in my area were scared about those threats. The staff were so mad. They only allowed ten people who they picked to see the congresspeople. They would not let everyone who signed up on the list go.

37. Usually, staff do not let everyone have water bottles and the commissary charges $32 for 24 bottles of water. But on the day that the congresspeople came, the staff gave the people who went to speak with her bottles of water so that they would seem like they had been treated well.

38. So many people are spending all of their money on water and paying for minutes to make calls to their family.

39. There is barely school here, and it is only for one hour. If you show up even a minute late, the teacher blocks the children from entering. There was a four-year-old girl in my room who showed up three minutes late to school and the teacher told her she could not enter. Calling it a school is a joke though. When [redacted] has gone, they give her one worksheet of multiplication problems for the whole day even though she is 15-year-old and in 10th grade. She went there at first to try to learn, but there were so many rules and no teaching. The teacher just told them to sit, not talk, not laugh, and not do anything but look at her worksheet that she already knew how to do. This made her bored, and it became clear that the teacher had no patience for adolescents. Our daughter used to love studying French in school, but now she does not go to this "school" because it is not helping her learn anything. She says she is so embarrassed about going back to 10th grade after missing so much when she gets out. She is worried that she will never catch up. As we spend more days here, we lose all hope, too.

40. The guards here treat many of the kids in ways that parents would never let other people treat their kids if they had a choice. Two days ago, an autistic girl wrote "liberty" on her papers and the guard took the paper and ripped it up and pushed her. Any mom would react by defending her daughter in that situation. The mother got in front of the girl and said that the officer should not attack the girl. But the officer then said the mom was aggressive. So, they charged the mom and have put her and the children in isolation with constant security. She told them to look at the video from the camera to see the officer pushed the daughter. The staff ignored her. They treat us like our voice does not matter and like they are the only ones anyone should listen to. This makes us all know that we have no rights here. We all are so scared because we now know we would get in trouble and get charged with things if we ever tried to stop officers from abusing our children. People have no way to protect their children here. It's terrifying.

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 12 day of February 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: 02/12/2026

Eleanor Roberts

EXHIBIT 18

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, M[redacted] B[redacted] O[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 41 years old. I am from [redacted]

3. I speak Spanish. I came to the border with my 17-year-old son, [redacted] my 14-year-old daughter, [redacted], and my 21-year-old daughter, [redacted].

Entry to Dilley

4. I have been detained at Dilley for 74 days. When we were arrested, they separated my older daughter from us, and took her to another facility. My 21-year-old daughter is 8 months pregnant and is detained in El Paso where she sleeping on the floor with an aluminum blanket. Yet, they will only let us speak to her by phone for one 15-minute call every 20 days. It has been so scary, because she is detained alone during this medically vulnerable time, and we cannot check in on her. She is also a key witness to our asylum claim. We have requested over and over that they reunite her with us and allow more contact so we can monitor her health, but our requests get denied. I have filed petitions, but ICE does not respond to my petitions. She has experienced back pain to the point that she cries all the time. ICE told her if she doesn't sign for voluntary departure they would take her baby away when it was born. This facility has unjustly split up my family. I don't understand why they can't keep my oldest daughter here with me, when this facility holds other pregnant women. The only response I have gotten from filing grievances about this is that I should speak with my lawyers.

5. Now, they say they are going to deport her this week on a plane all alone, even though women who are so close to their due date should not fly. She might have complications, but no one here will listen to our concerns.

6. Even though my son came to Dilley with us when we were arrested, they also separated him from us on his 18th birthday and sent him to an immigration jail. They lied

to us about where he was going, and said he would go to a shelter, but he's locked up with adults now. They are only letting us speak with him once every 20 days, too.

El Paso CBP

7. When we were first detained in El Paso, they showed us a Know-Your-Rights video during that orientation. But they subsequently violated all the rights described in it.

Dilley ICE Detention Center

8. ICE sent us here directly from El Paso. They have not shown us a Know-Your-Rights video at Dilley. Instead, when we got here, ICE told us asylum does not exist and that they do not understand why we came for help when there is no help available. They wanted us to sign a voluntary departure forms, but I did not sign them.

9. My son suffered from inadequate medical care when he was here. He had tooth pain and they took a molar out of his mouth, but they did not do the procedure well and eight days later they had to follow up with him to take the rest of the tooth out. He also had a skin allergy and rashes, and we had to request medication for it. He then developed a persistent stomach pain on his right side, but the staff here would not take him to a doctor.

10. On [redacted]'s eighteenth birthday, the staff came to our dorm at 5 a.m. and said that he had to go to a center for adolescents where I could talk to him every day. Later on, they told me that I could only call him once every 15 days and that he was being placed in a jail. When I asked why, they said these were the rules. But I have not even been able to talk to him every 15 days. I have only been able to make two 15-minute calls in the past 40 days.

11. On December 22nd, my youngest daughter fainted. They did a finger prick test and said everything was fine. But then then next day, she fainted again coming out of the cafeteria. Previously, there was only one doctor but he is currently on vacation, so there is

no doctor currently. I've submitted a grievance for my daughter's medical issues to do more testing. But they just said she was depressed from being detained.

12. Currently, there is a COVID-19 epidemic here but they only give out acetaminophen for it. When I had to go get medicine earlier this week for my daughter's fever they gave us a mask, but everyone is still sick.

13. The food here is terrible. We ask for food that is less spicy and with fewer condiments on it, but the staff say we cannot get a different diet because we don't have a religious reason. Because they will not provide plain food, my youngest daughter only eats bread and coffee with milk. She has experienced persistent gastritis.

14. In December, there were worms in the broccoli and chicken. A woman showed worms in the chicken to an official and made a grievance.

15. The only items we can have for snacks are apple juice, apples, cookies, and milk. If the dorm runs out of snacks in the morning, which often happens, we have to wait until the night to get more snacks.

16. There are many areas where the water does not have a filter and looks dirty, including the lawyer visitation area, where the kids play, and in the medical area. I have seen sand come out of the tap in the water and I have gotten sick from the water.

17. The soap they have here hurts our skin and hair and make us break out in hives. It is making my and my daughter's hair fall out in big clumps.

18. The rooms where we live smell terrible because kids sometimes wet themselves on the carpet. The lights are always on and cannot be turned off. This is really hard because it means my daughter cannot get relief even when she has a headache.

19. It has been so cold here recently and our clothes are not warm enough. They give us gloves but they're not made for the cold. My fingers get purple.

20. There is no real schooling here. They only have space for 10 or fewer students. When kids go to the school, the teacher asks the kids if they want a page in English or Spanish. They fill it out but they don't get any feedback. The teacher also asked my daughter about her immigration case in December, and that scared her.

21. Since being here, I have written out grievances and gotten them notarized, but despite making so many grievances they all disappear. One mom told me she saw staff rip them up. I believe it, because nothing ever comes of them. A lot of us have submitted notarized grievances but still don't get responses. Even when I've submitted grievances to ICE officers, they have rarely responded.

22. One ICE official [redacted] yelled at my daughter one day and I told her to stop yelling at my child. That official later falsely accused me of hitting her. I asked for the video footage to show that I had done no such thing, but was denied. So, then I submitted a grievance about the false accusation because I am not a violent person and did not hit her. I got a response to that grievance in my favor.

23. RAICES has told ICE that they are violating my daughter's *Flores* rights by keeping her detained so long. Even after RAICES said that, one of our court dates was canceled without justification, prolonging our detention. I went to one of the meetings this facility holds, and I asked why they're violating our *Flores* rights. But they just said that we needed to talk to attorneys and would not answer. That is not a response.

24. No one has told us how long we will be detained.

25. On Christmas they treated us so cruelly. They brought an ICE official in a Santa Claus outfit here, but he brought no toys or sweets, and the kids all did not understand why Santa did not bring them anything. Young children went up to hug Santa, but he would push them away. It was so cruel. They clearly did it as a photo opportunity to use us to pretend they were treating us humanely. It left the kids all upset.

26. On January 9, 2026, staff started yelling at us in the morning to go to our rooms and then locked us all in our rooms without any explanation. They did not tell us when we would be allowed to leave. We did not know what to do or how long this would last, and we were not allowed to the library to tell our attorneys what was happening. People started panicking and the children all started crying. It was terrifying to be locked in our rooms for over four hours without any information.

27. Since then, they've taken away our access to YouTube, Google, and Gmail. For emails, we were told to use Proton Mail instead under the supervision of ICE. EOIR has been blocked, too, which is where we check our immigration case information. We can't print any documents anymore. I have asked them to print *Flores*-related documents for me to send to *Flores* lawyers, and the librarian just said no. I also think they have been blocking emails to the *Flores* attorneys because the ones that I sent do not deliver from my email address but they deliver if my sister sends them. They have not explained why they have made this change, though one staff member said these are orders from the head of ICE.

28. They got rid of the evening pill line this week as well. Now, we have to wait for them to knock on our doors at around 11 pm or midnight to get medicine.

29. They have a list of lawyers we can call for free but those phone lines are often busy or not available. If we want to call *Flores* lawyers, other lawyers who not on that list, or our family members, we have to pay. I have asked and the staff have said that there's no other way to make calls.

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 14 day of January, 2026, at Dilley Detention.

[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: 1/14/2026

Eleanor Roberts

EXHIBIT 19

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, J[redacted] V[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 33 years old. I am from [redacted].

3. I speak Spanish.

Entry to Dilley

4. I have been detained at Dilley for 49 days with my wife and my four-year-daughter, [redacted]. [redacted] turned four on the same day they first detained us here. They processed us in the afternoon and there was a really long line. It was hard for her to adjust to this reality on her fourth birthday, and she has not slept well since then.

5. It's also challenging because Dilley does not let my daughter stay with me here, since they separate all the dads at night. [redacted] cries each night saying she wants to go with me to sleep, and I have to try to calm her down, so that we do not get in trouble.

6. No one has ever explained to us why we have been here for so long. We have asked the ICE officials many times, but they are stringing us along. They just do not give us responses.

Prior to Dilley

7. Before I arrived at this facility I was living in Tennessee for about four years. I lived with my daughter and wife. [redacted] was in kindergarten. She really liked school a lot. Since being detained here, [redacted] is always talking about how much she misses her friends and the teacher.

8. I had an immigration court hearing in December 2025, and the immigration judge told us that the United States is no longer giving people asylum, and that they could send me to Honduras. We were feeling so scared because we were seeing all the news about ICE grabbing people on the street. My wife had a separate immigration case, and she was going to all her ICE appointments, but her last four appointments before we were

detained were so scary. They kept changing the people assigned as her ICE officers, and each new officer would give her information that conflicted with the officer before. One time she had a monthly phone check-in, and during the call her phone signal went out, so she went to the office to explain that she was complying. When she got to the ICE office, they detained her for two hours and then started questioning her about where we lived, where my daughter went to school, and where I worked. Then, they let her leave and assigned her four virtual appointments. But that day, an ICE officer followed her home.

9. We were detained for two days in Champlain, where at first they separated my wife from my daughter and me and kept my wife in a cell. It was very traumatic, and my wife was asking for contact with her daughter, but the officers said we would not be together.

10. But then they put us together and we all had to sleep on the floor in a big garage in our jackets because it was so cold. We spent two days there. There were no other people there. There were also no bathrooms in that building, so we had to ask the officers to take us to the bathroom in another building where there was one bathroom in a cell. This was really hard for [redacted]. It was also hard for her to eat there, because they just gave us granola bars, which were too sweet for her. Then, they made us walk to another building through a snow storm to wait for five hours for a car to drive us to Boston, where they put us in a hotel. We got there at midnight, and they let us sleep for only an hour, before they woke us up and flew us to Detroit. Then they put us on a plane to San Antonio. That was a really tough experience for [redacted]. She kept asking where her cousin and uncle were. Every time she woke up, she called out for her cousin, and whenever I heard it, it broke my heart.

11. The first thing the official told us was that we should sign voluntary departure and we would receive $3,000 per family member.

Dilley ICE Detention Center

12. No one has told us why we are here. They only told us this is a family place, and they are going to process us as a family. Since getting here they kept telling us that we need to sign voluntary departure, and that they would not give us bond, and we had no more appeals left. Because we faced so much pressure, we believed them at first that voluntary departure was our only option.

13. When we first got here, we got one free call to tell our family we were here. After that, it took two days for the money our family sent to show up in our account. Only then could we call our lawyer. And when we did, we found out our lawyer had filed an appeal, and the officials were lying about us not having appeals. We have never been allowed to call our lawyer for free.

14. The officials have also told us that they would separate me from my wife and daughter and move me to a prison, which scared me.

15. No one who works here ever mentioned *Flores* to us. Other people detained here told us about *Flores*, and one person detained here drafted a request for release under *Flores*. We have a copy of that type of request where we wrote the number of days we have been here, and asked respectfully for release, and said we will comply with all conditions to be seen and asked for release. We started printing out these forms to submit requests to the court for our release under *Flores*, but when ICE realized they stopped letting us have access to printing and photocopies.

16. Then another official told us we would get out in two weeks with GPS supervision, but then on the 36th day here, my wife asked about why we were still here despite *Flores's* 20-day rule. One officer said they would let us out, so we gave them information for our sponsor. But that was a lie. Every week, ICE sends different officers to answer questions about what is happening. But after that week, the officers who have come have just been telling us to wait, and when we asked about *Flores*, one of those ICE officers said that the *Flores* agreement does not apply to every family. Whenever we ask other officers about *Flores*, they refuse to speak about it.

17. We have never heard about bond hearings. When we asked about it, they said there were no bond hearings.

18. We have never received any sort of know your rights training. The ICE officers who come every week are supposed to answer questions, but they just say we have to wait and do not give us information about our rights. No one has ever given us a know your rights paper either.

19. I do not recognize the I-770 paper that you are showing me or the *Flores* Settlement Agreement Notice of Rights paper that you are showing me either. I have never seen one of those papers here.

20. We never saw a video when we got here with any information about our rights. No one has ever told us about a video that we can watch either.

21. They gave us a paper with a couple of phone numbers for RAICES, and there is a recording that says if you want to do a pro bono call to lawyers on the list here that you can mark 6, but we have never been able to make it work. It also does not allow us to call *Flores* attorneys or our own immigration attorney for free. I use the minutes I pay for each time I call *Flores* attorneys or my attorney.

22. No one ever told us about our daughter's right to be released from Dilley to a sponsor in the United States without us or shown us paperwork about that.

23. There is a tablet here, where you can make video calls, but we do not make them, because to do so requires the family members first complete an application that is difficult to use. There is also a way to send grievances on the tablet. We have never seen a video about our rights on the tablet though.

24. We have not had a court date since getting here.

25. When we took part in a peaceful protest here, one guard here told us that they were going to charge all of us with crimes for obstructing the law and then separate all the fathers and send them to a prison if we ever did another protest. They also said they were going to use the cameras to identify who was participating in the protests. After hearing these threats, we felt overwhelmed with fear.

26. When the officials noticed the protest was happening, they directed everyone to their rooms and did not allow people to leave. Only when we got back to our rooms did we learn that the government was threatening us with separation. They kept us in our room for three hours.

27. Then, when we heard reports about protests outside the facility, they forced us to stay in our rooms for four hours. We had to wait until the officials took us outside to eat. They kept me separated from my daughter for the whole day except for when we went to eat.

28. They kept us in our rooms the day the congresspeople came as well, and they surrounded us by officials. My wife was not allowed to take our child outside to play.

29. I felt anxious, and my wife says [redacted] felt so stressed she cried. There were not enough games for the kids to distract themselves. All the children who were stuck inside wanted to leave, but we felt like we were literally imprisoned in our rooms.

30. There have been four separate days when they locked us down in our rooms.

31. When we got here, we were all healthy. But we have gotten so sick since getting here. All the kids and adults caught a cough and diarrhea in my daughter's room. When we went to the doctor, they just gave us allergy medicine and acetaminophen, though we tried to say that my daughter did not have allergies. Then we got way worse. Anytime we tried to get medicine because [redacted] felt sick, they made us wait outside for two hours, even though it was so cold outside and [redacted] felt sick, just to get the acetaminophen. After that, we started buying Advil in the commissary to protect our daughter from the cold.

32. My daughter has been getting white spots on her face since she got here. She is constantly scratching her face, but when we went to the medical area about this, they did not do anything.

33. Another time, my wife went to the doctor crying with tooth pain, but the doctor would not see her, and when I went to find her, I saw that they would not treat her or the people after her. My wife filed a grievance once to the doctor after that, asking to be seen

for the molar pain. They made her wait four days before they talked to her, and when they called her she thought she would go to a dentist. But then the nurse just said the dentist will not see adults for any reason other than to pull teeth. So, since then, the nurse here gave her acetaminophen three times a day and she has just been taking medicine for over two weeks.

34. There are two people here with measles who have been kept in the medical area, and the doctors here have been checking our temperatures. They have been offering the measles vaccine. This makes us scared, too, because the same place where they quarantine people with measles in the infirmary is where all the other medical appointments are. So, for the past few weeks, we have avoided going to the medical area unless we are in incredible pain.

35. There were also a couple days when my wife had a migraine and could not get up, but they would not let my daughter spend time with me. When my wife asked if I could look after my daughter while she rested, they told her that if she did not watch her daughter, then they would write up a report.

36. There is no kindergarten here. There is a program that they call "school" where they put together kids from 4-6 years for one hour from 9 am-10 am in the morning. They only show videos. My wife is an early childhood educator, so she has bought a notebook from the commissary and is trying to teach our daughter, since she is not getting education here.

37. There is not enough room in the place they call a "school" for all the kids either. It is a small place with a few desks and a TV. When there were a lot of people here, there were so many children, and not enough space for all of them.

38. We have made some verbal complaints about our daughter's medical needs and about our inability to get information on our case from ICE, and the officer told us they would investigate and would let us know. They even wrote down our numbers, but then we never heard back. We also tried to ask about why no [redacted] families were leaving for weeks on end but did not hear anything back.

39. We have never heard about people from ICE who are trying to understand the conditions better here.

40. When we first got here, we had access to Gmail and we used it to communicate with our family, but around the time of the protest, they blocked it. We cannot use Proton Mail either, even though that's supposed to be the new option, because you have to pay after the first 5 messages which all have limited characters to use it. Making a phone call with our money is a better use of funds to communicate with family.

41. My daughter cannot sleep well here. The lights are on all night, and even though they turn off a couple of lights on the beds, they leave the rest of the lights on. Then the officers do a count with radios on at midnight and dawn, and the children always wake up and feel scared.

42. My daughter and wife sleep in a room with six families all from different countries. There is also a lot of dust that falls from the ceiling onto the top bunk of the bunkbed, so my wife and daughter sleep together on bottom bunk. My wife wakes up with back pain daily. They also are in a room with only older teen kids, and that makes [redacted] sad because she has no one to play with.

43. [redacted] does not like the food here. They have at times given us food that is a weird color that makes it look like it went bad. Now she does not eat anything, and we are always trying to get her to eat more. We go to the psychologist for help, but she just told us that we will be here for a long time and said not eating is normal. The psychologist said we have to try to force her to eat. There are so many breakfasts where she will not eat, and she is losing weight, and the staff here just say it is normal. Now she is eating just rice, because everything else looks so bad. Every day they give us boiled eggs and bread in the morning, and she just will not eat in anymore. We asked for a special menu for her, like the one they give people for religious reasons, because she was not eating, but the staff said she would not be allowed such a menu.

44. [redacted] got a tiny bottle of shampoo for children when we first got here but they will no longer refill it. After the protest they said that they no longer had tear-free shampoo. The shampoo we buy in the commissary is $6.

45. The toothbrushes they give out are such bad quality too. So, we started having to buy in the commissary to clean my daughter's teeth and wash hair.

46. The soap in the bathrooms does not really work either, and the toilets are not clean, since they only clean them once per day. There are so many people using them that there are days the bathrooms run out of soap and toilet paper. So, we have to buy soap to even use the bathroom.

47. Even though there were filters in some rooms, my daughter and wife stay in a room where the filter is broken, and the water comes out cloudy and tastes bad. Last time I had tap water, I got diarrhea and started vomiting and went to the medical area and they did not give me anything all night. After hours gave me acetaminophen. I could not eat anything, and then I went back to my room and kept vomiting and having diarrhea. We bought medicine at the commissary and I just kept taking it all week. I was sick for a whole week. Since then, we have had to buy water here to stay safe. You can buy 24 bottles for $30.

48. There have also been some officers who have treated our daughter awfully and said they will use force against 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 11 day of February 2025, 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: 02/11/2026

Eleanor Roberts

EXHIBIT 20

REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL

I, Z[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 17 years old. I am from [redacted].

3. I speak English, [redacted], and [redacted].

4. I have been detained at Dilley for 44 days with my mom and dad. I was originally detained with my mom and dad and brother, but they separated my brother, so I am at Dilley with my mom and dad. However, they are keeping my dad separate from me at nighttime, and I am not allowed to go to his hallway and be alone with him. I want to see him more.

5. When we ask about why we have been here for so long, they say our case is under review. On January 27, 2026, an officer told us we would be released on January 28, 2026. But that day, the congressperson came here and there was a protest outside, so the bus could not come here to get us. They did not release anyone that day. We asked the same officer the next day, and he said I would leave on January 30, but we are still here.

6. Originally, when my family applied for bond, an immigration judge approved all three of us for bond. We were ready to pay for it, but there was an administrative error in the system where the judge entered the bond to include cents on the end. But there is no way to pay an amount in the system with cents on the end, and that made the government not accept our payment.

7. When our attorney reached out to the court to get them to fix the error and allow our payment to be processed, an immigration judge reviewed the decision and decided that my parents are eligible for bond, but said I am not eligible. They said this is because I was 14 years old when I entered, and children who entered are not eligible for bond. But I have released from government custody before. I turned myself into CBP in December 2022, where I was detained for three days, then sent to a kids shelter in West Palm Beach, Florida, where I spent two weeks, before I released to my parents. Now, the judge is

saying the only way for my parents to exit detention on their bond is if they separate from me and leave me in detention alone.

8. We are stressed about how long this will take. My mom needs a heart surgery, and I have been prevented from going to school, which is awful because I was in the middle of applying for college when ICE detained me. My mom's heart issue is called SVT. We had already scheduled the surgery for December 30, 2025, but we got detained on our way to take my mom to the hospital for scans two days before that surgery.

Prior to Dilley

9. Before I arrived at this facility I was living in Florida for about three years, and my parents and brother had lived here for thirteen years. We had a dog. I was in 12th grade. I had been on the track team for four years, and I was planning to submit my college applications before the new year, but I could not because ICE detained me in December. I miss the ocean, my friends, and my dog. I miss everything.

10. CBP pulled me over while I was driving to my mom's hospital appointment with my mom, dad, brother, and dog as passengers. They did not tell us any reason they stopped us. They just said they wanted to check our documents and immigration status. We gave them our IDs and explained we had pending cases, but they detained us anyway.

11. They separated my brother that day, because he is 21, and sent him to Alligator Alcatraz. He has cerebral palsy, so we were all so scared for him. I do not know if he received any treatment while in detention.

12. They did not give us any information about what would happen when they detained us and said we would see a judge the next day, but we did not.

13. They never gave us any information about whether I could release to a family member without my parents. We have a potential sponsor for me, but they never gave us that option.

14. The day they detained us, we spent all day in detention center in Florida, and then around 3 am they transferred us to a hotel for a day, and then they flew us here.

Dilley ICE Detention Center

15. We first got here after midnight, and after spending two days in transit. They kept us in an intake room until sunrise with all the other detainees before they put us in our bedrooms. At intake they took our clothes, and provided some snacks, but that was it. There was a video playing in the background about voluntary departure and deportation, but it did not let us know any of our rights in detention. I also think it might have been muted, because I do not remember any sound, but I remember seeing the information on the screen about self-deportation.

16. I have not received any training about my rights either. I have never seen the I-770 form that you are showing me. The only thing the officer ever talked to us about is voluntary departure. They took us to a room with other people and told us that we would get $3,000 per person to sign voluntary departure. A few weeks later, they told us we would get $5,000 for the whole family if we took voluntary departure. We kept saying no. Then they said we would be released on January 28, but we are still here.

17. At the detention center in Florida, we saw a video, but it was not about our rights, either. It was about where we would be transferred next and it said there was zero tolerance for sexual abuse. But we have never seen a video about our rights since being at Dilley.

18. We have used the tablets to ask ICE agents questions. There is no information on the tablet about my rights that I know of. I guess it's possible there might be information in some applications, but if so, we do not know about it.

19. No one who works at ICE has ever told me about Flores. I have heard about it from the friends I made here. They told me that we should not be held for more than 20 days.

20. The officers have used false fire alarms to make us leave our rooms so they can search them. During these sweeps, we spend about an hour outside while they search our beds and closets randomly. Last time they did it, they threw away my basic coloring papers. They also took my hand cream and shampoo that I had bought at the commissary. This made me upset because I can only go once a week to commissary to buy shampoo.

21. There are also some days that they have made us stay in our rooms for many hours. On those days, they have prevented us from leaving even to take our pills. They keep us separate from our fathers during those times. Then, when they take us to lunch, we have to walk in line to the dining hall and in a line back to our rooms. These lockdowns have happened four times and the staff never explained why. I think it was because people were visiting.

22. We have to pay for phone calls here and the phones do not always work. It is too hard for me to make the phone work in my area. For some reason, it works from my dad's side, but not mine. We do not know what the problem is, but because of this our dad has to make any calls. Early on, we tried to request calls to my brother while he was in Alligator Alcatraz, but they did not grant us access. He has gotten out, but because of the phone issues I have been having, my dad is able to talk to my brother, but my mom and I cannot. It costs about $0.10 per minute to make a call with taxes.

23. There is no way to make free phone calls to family members, except for the original 5-minute call when we were first detained.

24. 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.

25. For families without any money, the kids cannot call any family members.

26. Since the measles outbreak started, they have been taking our temperature, but they are not doing much else different. There is one family with a small kid who staff kept in a separate room in the medical area, but they are not that isolated, and they are walking around without masks. I would not call that isolation.

27. We are always sick here. I am sorry we keep coughing during this interview. But they only ever give us Tylenol. They never give us antibiotics for our illnesses. My mom has a fever now, and they have been telling her it is just allergies and giving her allergy medicine. But it's clear they are in denial about the sicknesses, because she does not have allergies. We have been sick five times since being here. That's more times than I have

been sick in the past ten years. A few weeks ago, a virus went around and many kids kept throwing up a few times a day, but medical area only ever gave them Tylenol.

28. Because my mom missed her scheduled heart surgery, she has not had treatment here. The times that we have asked for support, staff here have said that the most they could do would be to call an ambulance.

29. The medical staff here are mostly not doctors. They are nurse practitioners. They are just doing their job, but I do not know why they have such limited ability to provide medications.

30. I am not going to school here because there is no real option for school. They have one hourlong class for ninth through twelfth grade and it is the same program each month. So, I am doing Khan Academy at the library when I can to try to learn instead.

31. The psychologist here asked me about my immigration status, and whether I knew why I was detained. For the most part, my dad answers these questions, because anytime we tell them our problems they just say, it's all ok, and there is nothing they are going to do about it. So, we try to be careful, because it's likely they pass anything we say along to ICE agents.

32. We have asked the doctors many times for clear water here. In each room, there is a little filter on top of the tap, but the filters do not really work, and I think it is because they have not been changed frequently enough. So, we have been going to the dining area for filtered water. It still tastes bad, but there is no other option for water that does not taste bad, except for buying the pack of water for $32.

33. It is hard to sleep here because the lights are on 24/7. Even if you want to try to cover your eyes with a towel, they come and take it off. They say that it's because they need to see you. But I don't think a towel over my eyes stops them from seeing me. We have forgotten how to sleep through the night, without waking up every 2-3 hours. This is bad for our brains, because we cannot produce melatonin we need from uninterrupted sleep.

34. There were 12 people in my room until yesterday, and now there are 10 people. All the other families watch TV in Spanish, but since I do not understand Spanish, I do not watch TV.

35. The guards come into our room two or three times each night, once around early night, once at midnight, and then again in the early morning to make sure people do not run away. It wakes me up each night.

36. When it got cold here, I needed a beanie and gloves, but it took two to three weeks for them to provide those items, so by the time I got them, it was not as cold anymore. I also need new shoes, because after about 20 days they break. They did not give shoes to my mom when it was raining, even though her shoes were cracked and her socks were wet. They said that the shoes were not cracked enough to change. That made me really angry.

37. I usually go to the gym and play volleyball each day.

38. I live in Brown and even though I have a pass that is supposed to allow me to leave my living area alone, officers often tell me to go back to my living area when I do. I've tried to meet up with friends that I made who live in Yellow and Red, but the officers always told us we had to go to our rooms.

39. The food here is usually fried chicken and fried fish. It is not good for us. At home we try to eat healthy food that we cook. We usually cook soups and salads, but here there is only a lettuce salad and 99% of the other food is high fat and fried. We eat it because we have no other option. We sometimes buy snacks from the commissary, but that is also junk food, so we try not to eat too much of it.

40. The soap in the bathroom smells weird and sour, and it is not foamy. I do not use the soap here for my hair, and I buy shampoo, conditioner, and a toothbrush. If the security guards are kind they will give us toothpaste, but often they say they do not have any toothpaste, so we have to buy it.

41. There has also been an issue with the laundry not having detergent for months. When we ask for detergent, they say we can use the hand soap from the bathroom, even

though we have no way to take the hand soap out of the containers. All of the washing machines smell like mold, so when we try to wash our clothes, we just rinse them in moldy smelling water.

42. The officers are sometimes rude to [redacted] families because they do not understand them as well as they might understand families that speak Spanish.

43. There was a family from [redacted] here, where the wife was pregnant, and they separated the dad and sent him to another facility from his wife and daughter.

44. I wish everyone could get out from here as soon as possible. I worry that I cannot remember everything that I should be telling you. There is so much wrong, and I think there may be some problems that I am forgetting to mention.

45. I feel mad and sad, because my parents have been working as taxpayers here for 13 years, and they own a business, but we are all still here. My dad is worried we will lose his business because he cannot update his insurance since he has been detained, and he will suffer debt if we can go home. We are also scared we will lose our home, because we have not been able to make our payments here. That is a huge concern for our family.

46. I love hanging out with my friends, and I miss them. I want to be a dentist when I am older. It would be great to work in the medical field.

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 11 day of February 2025, at Dilley, Texas.

[redacted]

EXHIBIT 21

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, 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 43 years old. I am from [redacted].

3. I speak [redacted].

4. I am detained at Dilley with my husband and my two daughters, who are 14 and 9 years old.

5. We have been here for 113 days.

Dilley ICE Detention

6. My daughters and I live separately from my husband. Our contact with him is only possible outside the rooms from 7 a.m. to 8 p.m.

7. Nothing good comes out of that. When we were living together, we had quality time together. Now, he can't put our kids to bed, tuck them in, and tell them a story. This isn't possible and it's very difficult for them. They are not used to this. They used to sleep with us at night when they got scared, but now they can't do that. We felt like more of a family unit before coming here.

8. You'll also notice my husband is limping. He has problems with his legs, muscle atrophy. He needs special treatment for it, like massages and physical therapy but they don't provide that here.

9. The lack of medical care even just for him has negatively impacted my daughters. He can't play with them like he used to. He used to play ball with them and run around. Now, he can't spend time with them like before. It's not the same.

10. The girls are sick – everyone here is sick this week. There is something going around. They can't eat lunch or they'll throw up.

11. In December, people started to get sick. It felt like the flu. I got very sick; I had an infection in my lungs. I have asthma, so I'm still recovering and getting treatment. They just stopped the antibiotics for me recently.

12. Currently, almost all the children here at Dilley are sick with nausea and diarrhea. It already spread to the adults as well. People are vomiting all over the place, in the bedrooms, eating areas, and more.

13. There is not a single room here where the kids are not sick.

14. Last night, one of our friends was vomiting and feeling very ill. He asked for a doctor, and the doctor was only provided after he fainted.

15. There are lines everywhere because the facility is so full. We waited in a long line to get into the medical unit for the girls. Like usual, they suggested we drink more water and eat bananas, which they don't have here.

16. That actually made us laugh, because we haven't seen a banana in months. We would eat one if we could!

17. During our time at Dilley, my children have been constantly stressed and subjected to psychological pressure.

18. [redacted] stopped wearing diapers at 1.5 years old, and now we've already had 4 episodes where she has wet herself. She turned 9 on [redacted] of this year; she should not be wetting herself.

19. [redacted], my older daughter, is constantly crying, and she gets hysterical easily. She cries in the shower. I can hear her crying from the shower. She's constantly sobbing.

20. She is also constantly scratching herself. She does this when she is nervous. She has been doing it all over her body.

21. We haven't seen the psychologist here for a while. He is avoiding us, because every time we talk to the psychologist it ends up with him asking how [redacted] is eating, sleeping, etc., and the psychologist is increasingly not interested in discussing anything. He doesn't want to talk about the problems the girls are having and just says, "I'm sorry." That's it.

22. Every time we talk to the psychologist, it feels like some kind of mockery. He seems shocked that we are still here. We said we're eventually headed to Sacramento because that's where our sponsor is, and he said we can look at pictures of the city on

YouTube. What a joke. So, after that we stopped seeing him. And now we can’t even look at pictures of Sacramento on YouTube or Google, because both sites are blocked by the facility.

23. There are four or five families to one room here, with only large families with children of different genders having their own rooms.

24. The lights are constantly on in the rooms, causing disorientation and preventing proper sleep. The children have difficulty falling asleep and wake up several times during the night.

25. Also, because the lights are constantly on, biological processes are disrupted, such as the production of the hormone melatonin, produced during sleep in complete darkness, which is necessary for growth hormones.

26. The rooms are very cold. The children sleep in as many clothes as possible, but there are no warm blankets.

27. The air conditioner is very loud, which also wakes the children up.

28. We have to go outside to go to the bathroom or shower. The temperature has dropped, though, and it's very cold to walk to the rooms after a shower, and it's also cold in the bathroom and shower itself. Because of this, the children get sick, everyone has runny noses and coughs.

29. The children have no personal space, no personal toys, and very few toys in the shared space. The children share them and constantly argue and fight. In our playroom, there's only one doll, which children can take by leaving their ID as collateral. My youngest daughter really suffers from the lack of personal toys. She makes her own toys out of scraps. She collects pebbles from the street and paints them into the shapes of minions. The other day, she found a medical glove and made Patrick from SpongeBob SquarePants. She also makes dolls and clothes for them out of paper. Since she doesn't have scissors, she carefully tears off what she draws with her hands. She constantly hides these toys, so that the security guards and cleaning staff don't throw them out, mistaking them for trash.

30. There's no comprehensive education. The children go to school five times a week for one hour a day. The program only lasts one month, and after that it repeats. My children learn the same thing several times.

31. Access to internet resources is also limited. The rules used to be that you could borrow a computer for one hour a day. The library has only 23 computers, 4 of which are out of order, but there are a lot of people who want them. Adults need computers for court preparation, filling out forms, and email correspondence, and children also want to surf the internet.

32. Now, though, we can't use anything at all on the computers. Nothing works. Everything is blocked. I can't even look at the website where you can see the judicial system and see the date of our trial.

33. Proton Mail is also not successful. We signed up for the Proton email account and we were able to login there twice, but on the third occasion it was already blocked.

34. The staff just said that due to internal regulations, there are new rules we all have to follow regarding the computers. They told us that starting this past Monday, January 12th, there would be no Gmail, but the facility-wide notices said Proton Mail will still work. But Proton doesn't even work. YouTube and some websites with games for the children now also don't work.

35. Google doesn't even work. If we type "New York" in the search bar, the computer says there is no New York.

36. Staff said these new regulations are so that we can all work on our immigration cases. Of course, it's only harmful to our cases.

37. I haven't used the grievance policy previously, but recently I wrote one regarding a medical issue. On December 31st of 2025, I submitted it, but no one has responded yet. Now, it's January 14th, so it has been over 2 weeks.

38. I asked for dietary nutrition because my youngest daughter has allergy-related issues. After eating certain foods, her skin itches so badly that she scratches it until it bleeds. This happens after eating spicy or fried foods. We used to see a dermatologist and

allergy specialist regarding this issue. The doctors recommended that she adjust her diet to avoid fatty, salty, sweet, and spicy foods. Not eating those is best for her.

39. Also, when she eats these kinds of foods sometimes her face starts to turn red around her mouth and she scratches it until there are blisters there.

40. Unfortunately, the food here is very fatty and spicy all the time, causing [redacted] to constantly be scratching her skin, leaving red marks.

41. When we originally went to the doctor here, she said we can't provide you with the dietary nutrition we want because they don't have such foods here – so I asked her to make a note that they can't provide the foods [redacted] needs in her medical records. She refused to make the note. She called security. She switched off all the interpreters and kicked me out of her office.

42. I also spoke to a pediatrician at Dilley about this later, a different doctor, and it all ended up the same way. She said she doesn't see any obvious reason for the special diet, but at that point in time [redacted] wasn't scratching. So, the pediatrician thought we were making it up. She didn't have the red marks then because she was just eating largely milk, bread, and cookies.

43. The pediatrician said she hasn't lost any weight. But of course she hasn't, because she is just eating milk and bread and cookies. I asked what the pediatrician's name was, and security was called again and I was kicked out again. She got very angry with me.

44. Because of this issue with my daughter's dietary needs, I made the grievance.

45. There's no proper nutrition here. Almost all the food is spicy or fried in oil, like burgers and hot dogs.

46. The only fresh vegetables are a mix of cabbage and lettuce, which aren't always fresh. Sometimes they're served moldy. If we show the staff the visible mold, they just take it out. Sometimes, people would bring the moldy cabbage to the staff, and they'd take it and eat it and say this is normal food. They'd just destroy the evidence so it wasn't brought anywhere else.

47. In November, there was an incident where boiled vegetables were served with live worms. We received no specific explanations regarding the worms. Some families got sick from it though. One family was vomiting, and they were told if their daughter vomits more than 8 times, then they can go to medical. If she vomits less than that, then don't.

48. There's also a lot of sugary food here, and the only drinks are two lemonades and coffee, but no tea. Tea is sold at the store for $4.60 for 18 tea bags. My children aren't getting proper nutrition, and because of this, they're gaining weight, as they mostly eat bread and jam or cookies and milk.

49. There's no proper clean water, even though there are filters in the rooms and kitchen. The water smells foul, and there's a white residue on the sink. All Dilley employees drink the bottled water they're given, but we have to buy it from the store; a half-liter bottle costs $1.20.

50. There's no proper medical treatment here. All that's prescribed is Tylenol, ibuprofen, antibiotics, and antihistamines. For any illness, the only advice is to drink more water, which is undrinkable.

51. The pill line lately has been at 11 p.m. or midnight. Starting from 10-11:30 p.m., the staff pick people up to go to the line. It's not just adults, it's also children. They were telling people at 8 p.m. to go to their rooms and wait for someone to pick them up for the pill line. You could wait for hours in your room before you were picked up.

52. The rooms are unsanitary, the cleaning is superficial, and there's a lot of dust and dirt in the corners under the beds, which causes allergic reactions in the children. Fleas are found in the rooms, and many children have lice. The laundry room has dirty washing machines that stink, poor-quality laundry detergent, and the clothes don't wash properly. After washing them, they still stink and the children are itchy.

53. The clothes and shoes they give out are of very poor quality. The sneakers are so bad that they last only a week. The soles crack, allowing water and dirt to pass through; replacement requests take weeks.

54. The poor-quality soap in the showers, combined with the poor-quality water, causes itching and damages hair. Shampoo, hair conditioner, soap, and antiperspirants of any reasonable quality are only available at the store. Prices range from $2.60 to $15.

55. My eldest daughter celebrated her birthday in November of 2025 at Dilley. The library refused to print a card for her.

56. My daughters are extremely distressed. Not a day goes by without them crying, and as a mother, it's incredibly painful for me to watch their tears and suffering.

57. When we speak with ICE officers, we ask them why they're holding us for so long, despite the *Flores* Agreement, to which the ICE officers reply that the Agreement is no longer in effect.

58. Once in November, they got us all together in a sports hall. There were ICE officers and medical personnel. We asked why we're being held for so long, and they said that there is no *Flores* Agreement.

59. We used to get together every day in church and there were ICE officers who received people from 9-10 a.m. We went once to speak to them and to ask about the *Flores* Agreement, but the ICE officers who were there said the *Flores* Agreement was null. This was also in November but several days later.

60. About a month and a half ago, they brought in and housed single women here. When they move around the facility, the children and I are locked in. They can lock you in the cafeteria, in the outdoor restroom, or even completely close off the playground. At times like these, you realize you're in prison.

61. We received no Know Your Rights training.

62. We have a great attorney and she is trying everything, but they will not let us out of here.

63. The children suffer so much here, not only physically but mentally too. This place is killing their souls.

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 14 day of Jan 2026, at Dilley, TX

[redacted]

CERTIFICATE OF INTERPRETATION

My name is IRINA MESTERGAZI and I swear that I am fluent in both the English and [redacted] languages, and I interpreted the foregoing declaration of a family detained in ICE from [redacted] to English to the best of my abilities.

Dated: 21/01/2026

Irina Mestergazi

EXHIBIT 22

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, Y[redacted] H[redacted] H[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 [redacted] and Spanish.

3. I have now been here at Dilley with my eleven-year-old daughter for more than three months. This is my second time talking to *Flores* counsel. I was fighting my case, but I have let ICE know that I want to take deportation.

4. I see my daughter depressed and crying all the time. She doesn't want to eat, and she is just eating apples and milk. She does not like the food. It is always the same thing over and over. She is sleeping all the time and doesn't want to do anything. I am worried because many times she doesn't eat anything.

5. My daughter has been sick for two weeks. I was upset with the medical department because even though her throat hurt and she has chills, they didn't do anything for her. They just tell me she is fine even though she has a fever. The first time, they didn't even give us any medication. We went a second time and they just gave her Tylenol.

6. It is still so hard to sleep here. My daughter doesn't sleep well and is sad all the time.

7. I am hearing that everyone here is being told they are going to be deported. It seems like no one is getting good news. That is another reason why I just want to leave.

8. No one here has told me how to use the grievance system. I do not know how to use it.

9. There are many problems with the medical system here that I would want them to improve. People are constantly complaining about the poor medical treatment their children receive.

10. The kids also don't get enough clothes here. I have asked many times for new shoes for my daughter because the soles are broken, but the lady has told me that they don't have any in her size. They keep asking me to fill out a form. I have filled out the

form and given it to them two times and still haven't gotten any shoes. I have also asked for a second sweater because my daughter was only given a white one, and it is hard to keep it clean after three months. Each time, the lady says they don't have any more without even checking. I finally got a sweatshirt from a family who was leaving. I haven't done a grievance on this because I don't know how to use the system.

11. Families are upset because they took away access on computers, like to Google. That makes it harder for people to work on their cases. They also shortened the amount of time we can use the Internet to twenty minutes.

12. I just want out of here. I can't continue to see my daughter struggle through all of this and deteriorate. I have lost faith and just want to leave for my daughter's sake.

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 January 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: 1/14/2026

Diana Cano

EXHIBIT 23

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, S[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 45 years old. I am from [redacted]

3. I speak [redacted].

4. I have been here for 80 days.

5. I am detained here with my 11-year-old twins, one boy ([redacted]) and one girl ([redacted]), and my wife.

Entry to U.S.

6. My family and I wanted to enter the U.S. legally.

7. We contracted an attorney and applied for humanitarian parole before entering the U.S. We thought that application would show up in the system as soon as we presented ourselves at the border.

8. We tried to make an appointment on the CBP One App, but it stopped working in January of 2025.

9. By October of 2025, we were not able to return to [redacted], so we drove to the border and presented ourselves immediately, asking if the immigration officer could look up our humanitarian parole application. We did not sneak into this country.

10. He said there was no sign of it in the system, so I handed him a physical copy of our application.

11. We don't understand what happened with that request.

12. We also told him that we were seeking asylum.

13. We were then sent to the San Ysidro facility for three days before being brought to Dilley around October 28th.

14. We are here because we are requesting political asylum from [redacted] I fear for not only my life but the lives of my wife and children if we were forced to return. We cannot return there.

15. We have not been able to find a free attorney that can help us with our case and our individual asylum hearing is coming up. We are desperate for help.

Dilley ICE Detention

16. My son, [redacted] has autism. We have very clear medical documentation of his diagnosis. The conditions in this detention center have severely negatively affected him. Prior to being placed in the detention center, we never observed such significant health concerns with him.

17. Let's start with the stimming. Stimming behaviors can include things for him like closing his eyes, turning his head right and left, and waving or clapping his arms. He may do this constantly while breathing loudly or making odd noises. His stimming, which is a way for him to release pressure and stress, has gotten more frequent since coming here and he's even developed two new ones.

18. Throwing his hat back or off of his head is one new stim, and making movements with his mouth like a twitching motion is the second. He used to spend a lot of time in the sand box here playing with the sand. The texture and being able to do something with his hands is helpful for him. It's cold now, though, so we can't go in the sand. This would help him relieve tension. The shower sometimes also calms him down, but he's been sick lately and it's cold out so the shower isn't working to calm him down anymore.

19. He has also been having repetitive behaviors. He can get stuck in a loop. For example, he'll repeat "where are we going?" multiple times even though we said the answer already and we already left to that place or have even arrived there. We are seeing acute manifestation of repetitive behaviors now that we didn't before.

20. He has also become more aggressive. He is struggling to restrain himself. If I don't respond to him in time, he'll pinch me. Even during this interview, he has tried to hit your coworker.

21. He has also become less talkative since coming here. He is regressing and is less verbal.

22. He is putting up a fight to everything. Even if we are going to go eat and he's hungry, he cries. When he gets dressed with his mom in the morning, he cries. If we have to go to medical to get him help, he cries. Everything is with tears. This never happened before coming here.

23. It's important to note the tears, because people with autism actually really struggle to express emotions, but he is pushing through to do that because he's in so much pain. This is him saying he can't stay here anymore.

24. Today, we saw him liven up for the first time when he got to play with the fidget spinner that you brought. He became cheerful and smiled. Lately, you cannot expect any smiles on his face.

25. He is also about to enter puberty, and in kids with his diagnosis and his age, this is a really critical period. We've been in touch with an organization in the U.S. called Autism Speaks, and they have confirmed with us that this period can be dangerous. This is around the time when children with autism are at risk of developing epilepsy. We want to do everything we can to decrease this possibility.

26. There is no educational system here, not even for kids who are normally developed. There are no specialists obviously at all, so [redacted] is not continuing with his development or education. The staff members are not trained to work with kids with autism.

27. The physical and psychological toll on our son is mounting, and we are deeply concerned for his health.

28. We do see the psychologist sometimes, but it's super brief. They ask how they kids are doing and if we're getting what we need. We respond, and that's it. That is the 5-minute conversation and then we meet in a week, and we get a sticker. And that's the whole visit.

29. The only situation when a psychologist helped us is when we had just arrived at Dilley, and we mentioned that our child stops eating when it's loud. The psychologist offered us headphones. That was the only helpful thing.

30. We still have the headphones, but he hasn't been wearing them for the past two weeks. He doesn't want to wear them anymore. We don't know why. It's still very hard for him to eat when it's loud. I think the headphones just irritate him now. He will pick at his food sometimes, but it's always noisy in the gym where we eat with all the other families.

31. In addition to his autism, [redacted] has severe dietary restrictions. We also have medical documentation of this. He has an intolerance and cannot eat anything with gluten, sugar, or lactose. Obviously, this is very limiting. Eating sugar makes him anxious, nervous, and hyperactive. Dairy and gluten cause really bad intestinal problems for his stomach.

32. We have not been approved for a special diet here. [redacted] basically eats this small, dry, hard piece of chicken every day. We have requested dietary help multiple times. The psychologist sent us to the cafeteria to request this change and then the cafeteria sent us back to medical. It's one big loop.

33. What would be great for him is fish. We have friends who are approved for the halal food which is a special diet where there is always fish. Sometimes, they share with [redacted] which is cute. They will give him little scraps of fish from their table, and he loves that.

34. Other than that, a lot of the regular food served here he cannot eat. It's really just the chicken breast he's eaten for the past 70ish days, sometimes rice and beans. He has been losing weight.

35. We did speak to the pediatrician about the issue of [redacted] eating, but she said she couldn't help us in anyway. She smiled and said that if it was possible she would feed the kids here with whatever they wanted. She said she understands that our child has autism and that he has some preferences in terms of diet, but we just have to eat what's here. But it's not just preferences for him, it's a medically documented intolerance. Sometimes for breakfast he can't eat anything because it all contains gluten. Now, after a lot of our complaining, at least they've started giving eggs for breakfast.

36. It was very painful for him to go to the bathroom for a while, but the medical unit just offered some pain medication. Unfortunately, that's all they could offer.

37. The medical staff seem to think the little chicken breast he eats every day is enough, but it's not. We are talking about making sure he has actual nutrients that don't contain gluten, lactose, or sugar. A chicken breast isn't providing him with all the nutrients he needs. The U.S. has so many available products that are gluten-free, lactose-free and such so we don't know why there isn't a menu for folks like [redacted] who need a special diet.

38. Today, it's been nine days since [redacted] has been sick and having what we think are fevers. Initially, they offered some fever-reducing medication, Ibuprofen. [redacted] took it. But now, we are telling them that it's either a virus or a bacterial infection. We need antibiotics because Ibuprofen has not been helping for at least 7 days. We need something that can treat him, and the Ibuprofen isn't working. They replied we have nothing to treat him with. That was their official response in the medical unit.

39. After so many days, when we go to medical now, we ask if they can just take [redacted] temperature. That's all we are asking for, but they don't. Ibuprofen is a serious strain on the liver, and we need to understand if he needs to keep taking that or not. We only want him to take Ibuprofen if there's an actual fever, and we can't be 100% sure if there's a fever without a temperature read.

40. When we go to medical, the staff see that [redacted] is crying and nervous. They see that our child is fairly alone here, that there aren't a lot of other autistic children here. Is it really so difficult to pay some more attention to him and not make the child suffer? It seems like they do everything possible to make him suffer. As a result, we have had to leave the medical appointments early sometimes because [redacted] is so upset.

41. It also looks to me like they are creating the conditions that are making all of our kids sick in the first place. There is a real pandemic going around this facility.

42. A lot of people are sick and people are continuing to get sick because we all stay in the same room, eat in the same cafeterias, and so on and so forth. Also, a lot of the hand sanitizer boxes are empty.

43. They don't isolate people. They just send everyone back to the same room where other people are staying when they are sick, so then obviously the whole room gets sick. Then it spreads to everyone else. We have seen kids throw up in the kitchen on the tables. It's really scary to see that and to look around and see everyone be so sick.

44. Another thing is that the medical center does not have enough capacity to see the number of children and adults they have here.

45. At the medical center, the intake room is a small room. Everyone is sick in that room, coughing and sneezing. They take the kids one at a time, and the appointments never run on-time.

46. Further, the overheads lights are on 24/7 in this facility and the indoor temperature is always freezing. This is really intolerable for [redacted] sensory needs. His sleep patterns have been disrupted. He struggles to fall asleep and frequently wakes up throughout the night.

47. Our daughter, too, struggles from the lights being on all the time and the air conditioner. These conditions have led to persistent colds, requiring frequent medical attention. However, the medical center at the facility lacks adequate care, and it is impossible to receive the necessary medical treatment there.

48. Recently, a lot of the rules here have changed. For some reason now, the dining room is only open to a small number of people. Most of the families, including our family, have to eat in the gym. This is not a place intended to give out food.

49. Our eating time has also been reduced. We're only given 1 hour for meals now.

50. The staff are unable to handle all the people that are currently here, it's beyond their capacity. It feels unreal. No one cleans the places here thoroughly. No one is cleaning the water coolers and no one cleans the gym that is used for mealtimes. They are not particularly good at cleaning anything here. The conditions are unsanitary. The reason

for all of this is that this place is a complete mess; it's totally disorganized, because they're so many people here.

51. I live in the green complex with other husbands, but my two kids and wife live in the brown complex.

52. For me**,** every day it's like being in a prison here or a concentration camp. There is a warden or someone who comes into the room and blows a whistle at 8 p.m., and we (the dads) have to say goodbye to our wives and children. This is the most painful moment. Even after months, our kids don't understand what is happening. They don't understand why I have to leave them. It's incredibly hard to go through. My children cry very often, because 8 p.m. sometimes comes during an unfinished activity or unfinished conversation.

53. Also, sometimes my wife might need my help, like if one of our children is sick. If it's after 8 p.m., they don't allow her to contact me and tell me what's going on or ask for help.

54. My wife feels like the only support she gets is from our daughter, who is only 11 years old, which is crazy. I feel terrible for our daughter because she is still so young and wants to play and draw, but my wife often needs her support with [redacted]

55. [redacted] has been so nervous lately, especially because he's been so sick. This is the third time that he's been sick for a long time in the past 2 and a half months that we've spent here. Everything is provoking tears. If we have to go somewhere or there is a transition, it all comes with tears. He's apathetic. He doesn't want to do anything. He's very sick and upset.

56. It should be also noted that single women who have committed an administrative offense live in the butterfly block. They are considered sort of like criminals here. But when they take the single women to the library or cafeteria, everything here is blocked, and the staff say we can't even look at the women or where they are. It's very interesting and weird. It's totally unclear why we have to be so separate and why single women are here. We feel like this is some sort of experiment we are living in.

57. I wrote a grievance on behalf of our family about the email ban. On Monday, Jan 12th the ban started. I don't know who introduced this rule, probably management. They have restricted everyone's use of the internet. We can't use email now anymore, like Gmail and Yahoo and Google is also restricted. As of this past Monday, they say you can only open emails if you have a Proton account, but this is a blatant lie. No one can sign up for Proton Mail here.

58. Even if you have a Proton account somehow, you can only send messages but you can't send PDFs and other files. It's really limited. They've completely restricted our ability to prepare for our legal case. The accounts also get shut down in 2 to 3 days anyway.

59. I haven't gotten a response yet from my grievance. Other people submitted grievances about the same issue, and the ones I know haven't gotten responses yet either.

60. No explanations have been given by CoreCivic or ICE on why email has been cut off. A lot of the [redacted] families here, ours included, know how to use AI, Google, and such. Because of that, we've been able to find a way to turn to organizations like Children's Rights, Human Rights, and more. And I think the facility is mad about this. We started preparing letters in real terms, like real complaints and sending them to you and others. When the facility found out that we were getting information and sending it out, they decided to ban it.

61. In [redacted] writing grievances and all of that doesn't work. We were only able to get through to the world through the media. We are from [redacted] We understand the way bureaucracy works and what it's like when laws are broken. We understand how to do advocacy. We do not wait until we get a response, we just send email after email.

62. Before the email and google ban happened on January 12th, human rights organizations' websites were already blocked. If you searched RAICES or Children's Rights, when you tried to click the page a window would pop up that says this is an incorrect site address.

63. Now, there's no Google services at all.

64. We received a list of free potential attorneys when we arrived, but none of the phone numbers worked. We weren't able to get through to any.

65. You have to pay for every phone call here, whether it's to an attorney or not. Even to RAICES, we have to pay.

66. No one has ever given us a reason for why we and our children have been held here for more than 20 days.

67. Interpretation services are sometimes provided to us, but not eagerly; only when it's useful for staff. If we approach the staff with questions, then it's not provided.

68. I've never heard of a case manager.

69. We received no Know-Your-Rights training. I also remember very clearly the day we entered Dilley and no video at all was playing.

70. All 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.

71. At one point, they called a lot of us into the gym. There were people from Latin America and [redacted], and they were talking about some rules there but in Spanish. It wasn't clear to me what they were saying. There was an ICE officer there as well and he was asked why we are being held here. The questioner referenced *Flores*, and he said there is no *Flores*. To be precise, he said, "It does not work. Forget about it. There are only the orders from Donald Trump."

72. This incident happened once around November 15th and again two weeks ago. It's happened twice.

73. The ICE officers never introduce themselves. If you approach one and are conversing with them, they will refuse to introduce themselves. We can only identify them by their ID numbers.

74. No one has explained that our children have the right to be released without us.

75. Continuing to detain our children in these conditions will cause irreparable harm to their health, and we fear for their future well-being if they are not released soon.

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 15 day of Jan 2026, at Dilley, Tx.

[redacted]

CERTIFICATE OF INTERPRETATION

My name is Yurii Petrashyk and I swear that I am fluent in both the English and [redacted] languages, and I interpreted the foregoing declaration of a family detained in ICE from [redacted] to English to the best of my abilities.

Dated: 1/15/2026

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EXHIBIT 24

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, A[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 have now been detained at Dilley with my husband and two-year-old son for 108 days.

3. We are from [redacted] and speak [redacted].

4. I spoke to *Flores* counsel in November and will provide further information today too.

Dilley ICE Detention Center

5. There is an epidemic going on here right now. Everyone is throwing up. Last night, I was throwing up the whole night. In the men's building, my husband tells me it's the same. Someone lost consciousness in the night because they fell down and fainted from being so sick.

6. The facility hasn't explained anything to us about the sickness going around. They are just bringing a lot of people here. Because of all the people, we think there are more germs.

7. Because there are more people, getting medical help is also harder. They just give out electrolytes, that's it.

8. My roommate's kid threw up in the cafeteria, and they had to wait for three hours to get medical help after that. There is always a long wait and line. After waiting, the doctor said, "you don't have a fever everything is fine."

9. Our son, [redacted], got sick on January 3rd or 4th. He had fever of almost 40 degrees Celsius (104 degrees Fahrenheit), and we waited for two hours to get medical help.

10. He slept for 17 hours straight, and when we told medical that they just said to keep waiting.

11. Finally, we were able to see a nurse, not even a doctor. The nurse didn't even look at his ears or listen to his heart or look at his throat. She just said she'd bring Ibuprofen. I

asked if she would look at him and she said she couldn't see anything. She decided to call a doctor.

12. A doctor came, Dr. [redacted]. She looked at his ears and said one of them had a complication and it was red. She said she'd prescribe him an antibiotic. We agreed to the antibiotic, but I also asked for a probiotic because otherwise my kid's stomach would get really upset. She said she couldn't do that, so we didn't get anything.

13. When I started asking for the probiotic, she started yelling at us and said "finish!" "back!" and threw us out of her office. Then, the visit was over.

14. Also, there were 5 or 6 days recently where we had to stand in the pill line at 11:30 p.m. at night. It was really cold. All the kids were asleep and they made us get them up to wait in the line.

15. No explanation was given for this odd timing of the pill line, but yesterday they switched it back to the normal time. When we asked why the pill line was briefly changed to 11:30 p.m., the staff just said line up now or we'll file a report or complaint against you.

16. Another rule changed and we are now getting our meals in the gym. We don't know why. They are not telling us anything. This has been going on for four days now.

17. They've also decreased the mealtimes. Lunch used to be 11 a.m. to 1 p.m., but now it's just 1 hour. And, we have to stand in line 30 to 40 minutes out of that time just to get the food.

18. Keep in mind that we have to hold our child in our arms the whole time. He's 2 years old. Staff don't allow kids to walk around that area during mealtime. They start raising their voices and yelling if kids are walking around, which doesn't help at all. We really struggle to hold [redacted] for 30 minutes while we wait in line.

19. When we go the gym, we see 200 women leaving from their meal. Then, we get in and sit down right away after waiting in the line to eat. We eat there, and it's not clean at all.

20. We are crying here every day.

21. The staff didn't even clean up after my roommate's child threw up in the gym while everyone was eating around it.

22. On November 19th, the last day we talked to *Flores* attorneys, we went to the kitchen for dinner. They served rice with meat, large chunks of onions and peppers, and a spicy Mexican roll with cheese and salsa. Our child refused to eat it again, and my husband, in tears, went to ask for other food for him.

23. We saw that the halal menu included fish, oranges, and normal meatballs. We stood there asking for it for a long time and started arguing with the kitchen staff again. We had become so frustrated with the lack of proper baby food and were desperate for our son to eat. There was no translation nor interpretation provided to us during this conversation, and we don't speak English.

24. Then one of the supervisors yelled at us, snatched my husband's ID, and took a photo. We went and sat down to eat, and my child only ate the canned peaches they gave him.

25. That night at 11 p.m., the reception staff called my husband, and they spoke with him through an interpreter. They said that if we behaved like that again and asked for normal food for our child, we would be separated into single detention centers, and our child would be taken to a foster family.

26. At that time, our child had barely eaten anything in 53 days, and they started putting psychological pressure on us and threatening to separate our family. She also told us not to talk much about Muslims and their Halal menu, since "everyone is equal here and there is no discrimination."

27. We were shocked and sacred. They also told my husband, "tell your wife not to open her mouth about Muslims and their menu again."

28. My husband said "you're threatening me" and they said "no, we're warning you." When it comes to *Flores*, they said *Flores* doesn't exist.

29. Now we have to keep quiet, so they don't separate us.

30. We want to say that we won't be able to send *Flores* counsel emails anymore, because they blocked all websites here. We can't even see when our next scheduled court date will be. There is no Google, no YouTube; you can't even search the daily weather.

31. We've tried Proton Mail which they said would work, but it only works for 2 days. If I create a Proton account in 2 to 3 days my email would be blocked and I'd no longer be able to log in and access it anymore. The facility blocks them or something in the system does.

32. If we were not detained, obviously our emails would not be blocked. Here, something blocks them.

33. We usually get up at 6 a.m. to get in line for the library to get to the computers by 8 a.m., but starting today no one is going because no websites work.

34. There is simply no way to prepare for our upcoming asylum hearing in these conditions.

35. They stopped giving our son bottled water. Even with filters, the tap water here still causes diarrhea.

36. The facility also stopped giving us formula a while ago. We had to wean him off the remaining formula through tears. It was awful.

37. They said go to medical if you want formula. [redacted] is only two. We went, and at medical the nurse said, "Your baby is already big. We can't give you anymore."

38. We asked why and she said "that is the end of your visit," she dropped the interpreter, and another nurse ran in and kicked us out.

39. At some point, someone brought a cooler into medic and opened it. And someone said, "What's that black thing in there?" The doctor said, "You're talking over it so you're getting it dirty." Really, we all know it was mold and they don't clean them.

40. The lack of baby food is still a really big issue for [redacted]. There is almost nothing here he eats and now he doesn't even have the formula. My husband and I are baptized, but we realized we never baptized [redacted] so he is technically Muslim. We asked for him to get the Halal menu, and it was denied.

41. No one ever told me there was Gerber baby food that was available here. One time, I noticed in the playroom that there was a box of that food. I asked the staff if they have this. They said yes, and that was after we had already been detained for 2 to 2.5 months. I was so infuriated.

42. But they said they only had vegetable and meat flavors, and [redacted] only likes the fruit Gerber food. They don't have that, so he doesn't eat it.

43. Thus, [redacted]'s eating is still the same. He almost doesn't eat anything at all. He might pick at something, but usually it's nothing. He's really fed up with everything they serve.

44. [redacted] is still hitting himself. About a month ago we saw the psychologist, and she said, "My children do that too." That was the final straw for us. Her children who are not detained are not going through anything like [redacted] is.

45. We haven't seen a psychologist for a month and a half now. We said we didn't want to anymore because the psychologist is useless and not helping us. We requested our medical records here, and the notes the psychologist writes are complete lies. It says our child is eating normally and playing normally and everything is fine. In reality, we are having so many problems. But she ignores it or doesn't see it.

46. We sometimes have gotten the tear-free baby shampoo but sometimes not. At one point we got it, but at another point they said there is no shampoo like that here and that we had to go buy it at the store. They have also said that to us before about formula.

47. A lot of the kids have fleas in their hair here, our son included.

48. I also can't remain silent about the terrible treatment of children at the Dilley Immigration Processing Center over the holidays. What happened on Christmas Day can only be described as an atrocity. A man dressed as Santa Claus entered the playroom, followed by a cart full of chips and sweets. The children, already in a difficult situation at the center, were overjoyed. They dropped everything, ran up to him, begged for candy, and wanted to take pictures. Some children even cried and begged him to give them freedom.

49. Santa himself acted very indifferent: he lifted his beard, drank water, and simply sat there. The center's director spent the entire time actively photographing the children next to Santa and the cart of food—apparently for some kind of "holiday" report. When the photo shoot was over, management simply said, "These chips aren't for you." The cart and the food were simply turned around and carted out of the room right in front of the children. They gave them absolutely nothing—not a single piece of candy. The children simply sat down to watch cartoons, as if nothing had happened. The children were left in complete shock and in tears. They were simply used as decorations for pretty photos, and then their hope for a holiday was taken away. It's cruel and cynical.

50. When we've had an attorney request that we get access to our phones, they still do not let us charge them or have access to the internet to be able to get information from our devices. Twice an attorney has requested this for us, and twice the same thing has happened.

51. Starting a month ago, we started writing regular grievances. We wrote them and put them in the boxes. We submitted 10 so far and have only received 1 response.

52. ICE officers regularly talk about the fact that *Flores* doesn't apply. They say, "We'll keep you here as long as necessary." They literally say this is the Trump administration's decision.

53. Our child isn't developing properly at all. There are no plastic potties here. We can't potty train him. There are no developmental programs for his age group. There are no programs to develop his fine motor skills and no teachers. We also haven't gone to the gym for over a month now because there are so many people there due to the weather. We just walk around outside and there is nothing for him to do and not enough toys.

54. The cruelest thing is that everywhere we go we have to stand in the longest line – library, kitchen, medicine store. Because there are so many people here, there are lines everywhere.

55. My son is probably one of the youngest to be detained for this long.

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 14 day of Jan 2026, at Dilley, TX.

[redacted]

CERTIFICATE OF INTERPRETATION

My name is Yurii Petrashyk and I swear that I am fluent in both the English and [redacted] languages, and I interpreted the foregoing declaration of a family detained in ICE from [redacted] to English to the best of my abilities.

Dated: 1/14/2026

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EXHIBIT 25

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, A[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 34 years old. I am here with my husband and our children, [redacted] [redacted] (9 years old) and [redacted] (2 years old). My younger child is from [redacted] and the rest of us are from [redacted].

3. I speak Spanish.

4. We have been detained at Dilley for more than 125 days.

5. Prior to Dilley, we sought amnesty and were sent to two CBP border patrol stations; the first one for a day and the second one for three days. They didn't let my children bathe at the first place even though we had just crossed through a river and they were very dirty. My older daughter got a very bad rash. We told them we hadn't eaten when we got to the first facility and that my children were hungry, and they just gave us two frozen burritos for the four of us. It is hard to remember how much time passed at the second facility because we never saw the sun. It was awful. They separated my husband from our children and me. They were crying. He was put with other fathers.

6. My daughter asked the CBP agents how long we would be there, and they said not long. Then I overhead them in English saying we would be there for six days, and they were laughing at my daughter.

7. After three days, they never told us where we were going next. They just drove us about four hours to Dilley. They told us the people at the next place would give us information.

8. It has been really horrible to be here. My two-year-old cries a lot for her Dad. He has to live in a separate area from us. My older daughter asks for her Dad all the time, too. She keeps asking what have we done wrong to be arrested and locked up here? My daughters also cry because they want to be with their grandmother in Denver.

9. The staff here are always threatening children with reports. For example, they say if my older daughter goes in the playground area with her little sister, they will make a

report. They say the reports will hurt our immigration case. They are just children who want to play together. Why is that wrong? I am right there with them.

10. We are having to drink the water from the faucet because we can't afford to buy the bottled water from the commissary. Both of my daughters have gotten diarrhea from it. My children won't eat the food because it has too many condiments and sauces; it hurts their stomachs. Even for us it is too harsh on our stomachs. My girls are used to having soups and more simple foods.

11. It is very hard to sleep with the lights on all night. Sometimes we try to cover the lights with a handkerchief, but they take them away. The girls will try to sleep in my bed because they are sad. My older daughter cries every night for her Dad and because she wants to leave. My two-year older cries out for her Dad every night when he leaves. They blow a whistle at 8 pm for the Dads to leave for their area, and my daughter starts yelling "Papito, Papito – please don't go! Please stay with us!"

12. My two-year-old has been sick since October. She has had a cold, vomiting, diarrhea, and respiratory issues for months. We have been to medical at least nine times. All they give her is Tylenol and allergy medicine. They have not done any testing to see what might actually be wrong with her. They keep telling me there is nothing they can do for her and that it is good for her to be sick so she can build immunity. I have been trying to help her breath easier with VapoRub and hot towels. They keep telling me there are no pediatricians.

13. Last night, my two-year-old had a fever. I am really worried because she's been sick for four months and what if it becomes something worse because they are not paying attention to her? I am also worried because her belly button started to protrude just before we arrived in the U.S. Medical staff at Dilley looked at it and said it was fine. They said it will either go back to normal or stay protruded. They say either way is fine, but we worry that there could be a problem.

14. They will usually give me 4-5 diapers a day for my daughter – but there have been issues with access with some staff. One staff would only give me one diaper for the day.

I said to her, "So do you just need one pad per day when you're on your period?" The staff said I was being rude. Another time I asked for diapers and they said they didn't have any that day and I should just "figure it out."

15. My nine-year-old went to the classroom one time, but she said they didn't learn anything. They just color. And it is just for an hour. There is just one teacher for all the grades – pre-K through high school.

16. We have never been given a know your rights orientation or told about our rights here. They never told us anything about *Flores*. They have only told us what we cannot do – for example, they told my husband and I that we cannot hold hands or kiss or go to one another's rooms.

17. One time there was a flyer about writing grievances so that the judge in *Flores* would know about family's concerns. Every time a staff would see that flyer, they would throw it away. We were told that we could do grievances, but we think they throw them all away. We saw the grievance boxes being filled with papers in January because this place was so crowded, but nothing ever changed or got better.

18. Some families did a protest a few weeks ago. After the protest, the staff started searching our rooms. My two-year-old had some crayons that another family had given her. Core Civic staff confiscated her crayons and threw them away. She was crying. They said they were throwing away the crayons for our security and so the children would not write more letters about the conditions at Dilley. They also threw away our Tylenol, Advil, and VapoRub. They probably would have taken my daughter's letters, too, but I keep them in a folder with all of our legal documents. I keep these documents with me at all times. A picture of two of my daughter's letters are attached to this statement. They speak for themselves.

mi-nombre-es-[redacted]-me-siento
mal-ya-quiero-salir-de-aqui-Por
favor-ayudemen-a-salir-de-aqui
quiero-estudiar-quiero-ser-libre
con-mi-hermana-[redacted]-ya-que
no-podemos-volver-Porque-nos
pueden-separar-de-mis-papitos
ayuda-por-favor-yo-no-soy
feliz-ni-mi-hermana-



Hola mi nombre es [redacted] tengo 9 a
estoy en Dilley texas tenemos 4 meses
Pero para mi y mi Hermana [redacted]
parese como 7 año me siento tris
ya quiero salir para ir donde mis
abuelos en denver colorado Por Favor
ayudenos no somos malos queremos sa
y ser libres necesito de sus ayudas.
Porque no podemos volver Porque la
vidas de mis PaPitos corren peligro
y las de nosotras tambien
ayuda

ayudenos



[redacted] y [redacted]

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 12th day of February 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: 2/12/2026

Diana Cano

EXHIBIT 26

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, N[redacted] M[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 29 years old. I am from [redacted].

3. I speak [redacted] and English.

4. I came here with my husband and 3-year-old daughter [redacted]. I am 32 weeks pregnant.

5. We arrived at Dilley 97 days ago.

Entry to Dilley

6. The first time we came here was from Tijuana into San Diego in February 2025. We spent eighteen difficult days in CBP detention. During those eighteen days, we did not see the sun.

7. From there, we were sent to Costa Rica during the time when the administration was sending people to the prisons in Panama and Costa Rica.

8. For almost four months we were detained in a prison in Costa Rica. The officials finally released us and told us only that we could not stay in Costa Rica. They gave us nothing, no paperwork, just released us and said we need to leave.

9. Around September 30, 2025, we made it back to the United States. They kept us ten days in CBP detention in Texas. We were held in deplorable conditions for these days in CBP custody, in a tiny cell without windows. The food was inedible, our three-year-old daughter was always hungry.

10. After ten days, they sent us here to Dilley. Now it's been almost 100 days.

11. At Dilley, we spoke with an asylum officer and received a positive determination of credible fear after our interview. We submitted our I-589 and we are scheduled for court on January 21.

12. I am so pregnant and so sick that I don't know how I can make it to the 21st.

13. Yesterday they took me to the doctor for an ultrasound. We drove about two hours to a hospital for this appointment, they told me I was about 32 weeks and 1 day pregnant

and that I have a virus in my blood that needs treatment. They wanted to send me to another hospital that could treat me, but ICE took me back to Dilley instead. Because I am a high-risk pregnancy, they said they also cannot treat me here at Dilley, they have nothing for me.

14. I have hepatitis B. The viral load is very high. The doctors told me I could pass it to my baby. They are not treating it, even the doctors know I should not be here.

15. They are giving me only Tylenol, calcium, and vitamins. I asked for ointment for the pain because I cannot take too much Tylenol.

16. I am in agony. I am exhausted, it is difficult to stand or walk. They said the viral load is so high it could cause liver cancer. They also told me without treatment, I could pass it to my unborn daughter.

17. The doctor here at Dilley told me they were sending an email to an ICE supervisor asking them to release me so I can be treated. The doctor told me that they wrote repeatedly, but that ICE still has not responded.

18. My lawyer asked for humanitarian parole and ICE never responded. She explained that it is not safe for me and the baby here, but they don't care. I am suffering.

19. My husband can be with me only during the day in the at the gym and during meal times or medical visits. My three-year-old stays with my husband at night because I am so pregnant I cannot hold or care for her.

20. I am treated just as everyone else. I am not given any accommodations, and I have to navigate without help. I must wait in lines when we eat or when I need medicine, I can hardly stand but am still forced to wait in the line.

21. The medical care and the food here is unacceptable for our daughter.

22. There is a virus going around here. All the children and the staff have gotten it. When a child gets it, they begin throwing up and become very weak. The kids are carried to the Dilley hospital when they are too sick. The adults, though, cannot be carried, and many times, an ambulance must come to the dorm area and drive them to the hospital. They prescribe only allergy medicine.

23. I am terrified my daughter will get this. My husband will not let her play with the other children because he is so worried that she will get sick, too, which makes all this even harder for her.

24. If we try to advocate for our family, or if we want to file a grievance, they tell us they will put this in a report that will affect our immigration case.

25. Most of the kids have stayed here three or more months. They scream and chew their nails, many have regressed to wetting the bed again, they are all deteriorating psychologically.

26. It is impossible for us to go back to [redacted], we would not survive it.

27. We have a friend here who will sponsor us. I have lost hope we will ever be released, but if we are we will be able to live with him.

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 14 day of January 2026, at Dillon.

[redacted]

[Name: [redacted]]

CERTIFICATE OF TRANSLATION

My name is _____ and I swear that I am fluent in both the English and [redacted] languages and I translated the foregoing declaration of [redacted] from English to [redacted] on January 14, 2026, to the best of my abilities.

Dated: _____ _____

Name:

EXHIBIT 27

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, J[redacted] B[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 35 years old and my son, [redacted], is eight years old. We are from [redacted].

3. I speak Spanish.

4. We have been detained at Dilley for 18 days.

5. Before coming to Dilley, we had been living in Michigan for about two years. A few weeks ago, the police stopped me and my wife when we were driving to work. Our son was with a babysitter at the time. They asked if we had immigration status. I responded that we did have an immigration case, but the police called border patrol and then drove us to the border patrol station in Detroit. We had to leave our car and all of our belongings behind. We don't know what happened to our car.

6. When we got to the border patrol station in Detroit, we called the babysitter and she was able to find someone to bring our son to us at the station. We were there for about a day in a small cell. We had to sleep huddled together on a mat on the ground. They did not tell us what was going to happen.

7. The next day, three people showed up to escort us to the airport. They flew with us from Detroit to Chicago, and then to San Antonio.

Dilley ICE Detention Center

8. We arrived at Dilley around 10pm and were taken to the intake area. We were given clothes and a shower, and then I was separated from my family. I went to the area at Dilley for the fathers and my son went with his mom to the area for children and mothers.

9. Since we have been here, we have never received a training about our child's rights or learned about *Flores*. I have only gotten an orientation about what we are supposed to do and not do at this facility.

10. In Michigan, my son was diagnosed with ADHD and we were in the process of getting treatment when we were arrested. He was doing fine in school and there would just occasionally be an issue. But when we got here, he quickly deteriorated and started having a really hard time. He became much more aggressive. On the third day we were here, the psychologist told us that there was nothing they could do for him, and we should basically keep him inside of his room at all times. We take him out for short periods of time, but as soon as he has more aggressive behavior or starts running, we need to bring him back. The officials will complain the minute he starts running around.

11. Because our son had to be in his room so much, the psychologist said he could have some toys in his room. Usually, children can only have toys in the common room and are not allowed to bring them to their rooms, but the psychologist made an exception given our son's isolation. But when my son switched rooms, a new officer saw the toys in his room and took them. He said he could not have them in his room. When my wife explained the psychologist gave permission for the toys, the officer said he didn't care what the psychologist said about the toys, he gives the orders. My son became very upset and went into a crisis mode. He started crying really loudly and hitting the walls. As he was leaving the room, another child opened the door and it slammed into his nose. The door hit his nose extremely hard and there was a lot of blood. We took him to medical and they gave him ice. His nose bled for about three days. We reported the incident to ICE on the tablet and made a request to get released because of how poorly our son was doing.

12. The times we brought our son to the classroom, they would just put him in a corner by himself, and other kids would tease him. For this reason, we stopped taking him to the school. At home, he was getting support in school but that has not been possible here.

13. Our son will sometimes eat the food but sometimes he will not. For him, the food is too spicy, and he rarely eats the meat because of the flavor or texture.

14. We drink the water from the faucet, but we think the water has given our son diarrhea. The bottled water is $30 for 24 bottles and we cannot afford that.

15. Sleeping has been hard for my son. He has trouble going to sleep at night and he will often wake up in the middle of the night. He has to sleep with his mom every night, which he didn't do at home. He wants the lights to be turned off at night, but they will not allow it even though he and his mom are by themselves in the room.

16. No one explained to us the grievance system or how to use it.

17. We want to be released back to Michigan or leave the country, but we cannot stay here with our son. We asked ICE what would be the fastest way to get out of here, and they said the fastest option was to take voluntary departure. We decided to do that for the sake of our son.

18. Now we feel like we are getting the runaround and don't know when we will be able to leave. We just want to get out of here so our son doesn't have to suffer and get even more traumatized. He feels like a prisoner here. He just keeps asking what happened to his toys and why he can't call his grandma when he wants to and why we cannot 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 12th day of March 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: 3/12/2026

Diana Cano

EXHIBIT 28

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, D[redacted] R[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 from [redacted] and I am detained at Dilley with my 10-year-old daughter, and have been here for about 90 days.

3. I speak Spanish.

Dilley ICE Detention Center

4. My daughter, [redacted] is 10 years old, and since she was a little girl she has suffered from Hirschsprung's disease. That is a chronic intestinal condition that can put the affected person's life at risk if it is not treated. It has been so hard being detained here because she has such a serious medical condition. The pediatrician, [redacted] said that she needs to get out of here, because this is a dangerous medical condition in a detention center. After that, they sent us to the Frio Hospital one time, and there they did a lot of enemas and X-rays, but they sent us back here afterwards.

5. Now, the only thing we can do is keep going to the medical center here a lot. But they do not understand how serious this disease is. The people here think this is something someone can handle with a laxative, but they cannot.

6. The food is the opposite diet of what she needs. She is forced to eat food that is processed, sugary, and with lots of condiments. They will not give her a special diet, and instead just tell her she should just take laxatives every day. But this actually conflicts with the medical forms I have from December where it said that she should not use laxatives so frequently.

7. Now she has been unable to use the bathroom for over a month and her access to the bathroom is impeded if she had an emergency because you have to leave the room and walk down the hall to go there. It has been 34 days since she had a bowel movement, and during that time she has had a consistent fever.

8. I am so scared because the people who work here do not recognize the risk she is facing to her health every day. They are not treating her here, and in any moment her stomach could explode and her fever could go up.

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 15 day of January 2026, at Dilley.

[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: 1/15/2026

Celia

EXHIBIT 29

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, O[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 15 years old. I am from [redacted].

3. I speak [redacted] and English.

Entry to Dilley

4. I have been detained at the Dilley Family Detention Center for 56 days. I am here with my mom, my older sister [redacted] who is 18 years old, my younger sister [redacted] who is 9 years old, and my twin siblings [redacted] and [redacted], who are four.

5. When we first came to Dilley, we asked for halal food, we are Muslim and we can only eat halal food.

6. They sent my mom to the chaplain to ask for the diet. He said they have no halal diet, but they have kosher. But he told us not to ask for the kosher diet, that the kosher food is a tin can of meat, it is basically dog food. He said that if we want to get these cans we are not allowed any sides, no salad and no rice. The salad and rice are halal, only the meat needs to be prepared separately, but they said that if we get the cans we cannot have the salad.

7. We had to beg for two weeks before they even let us eat the salad and rice, and then they said we could live on just salad if we could not eat the tin cans of kosher meat.

8. We are here for 56 days, my siblings are four years old, and they want us to live on only salad.

9. One night, after a month, we begged at least to have chicken instead of the canned meat. Chicken is not as bad as beef in our religion, but they often made beef, like hot dogs. They gave us finally a chicken breast, boiled, no seasoning, not even salt, my little siblings were so hungry but they couldn't eat it. Before dinner they were holding their stomachs they were so hungry, they had been eating very little, salads and sides, but

then they couldn't eat this chicken. We tried everything but when they tried to eat it they were only able to take a few bites.

10. They never turn the lights off. There are ten lights in the room, some are above our bed. We are not allowed to use the light switch. They don't shut the lights off, they always leave at least half on, it gives us a headache and we cannot sleep. The officers will barge in and turn on the lights, not even warn us they are doing this.

11. I woke one morning and I had extreme pain near my stomach. I never cry, but the pain was so bad I was crying the whole day.

12. It started around 9:30am. We knew that the nurse would send us away and so we hesitated to go to the doctor. The nurses here always tell us it is nothing, to just wait a few more days or drink water. So we stayed in the room.

13. That morning, an officer came to tell my mom it was time for her mental health appointment in the morning. She said she couldn't go because I was so sick and she was taking care of me.

14. He did not ask about me, he did not even check to see if I was ok.

15. They came again at 12pm, I was still unable to sit up.

16. It gets to 12:30pm, 1pm, 2pm, I could not eat, the pain stayed. It was like being stabbed in the stomach.

17. The officer came back around 2:30pm with a supervisor to come to force my mom to go to the mental health area for her counseling appointment. She had already explained she wasn't worried about counseling right now because I was really sick.

18. I was so sick that they finally went and got a wheelchair to take me to the hospital. At this point I was throwing up.

19. The wait outside the medical room was so long.

20. The line to be seen is always busy in the middle of the day, hours long.

21. We were waiting in the waiting room and the mental health officer happened to come by. I was doubled over waiting for our turn and he stopped and yelled at us that

my mother should have gone to the mental health appointment. He said, “Oh, you can come to a medical appointment but you can’t come to a mental health appointment?”

22. I was crying in pain, but he wanted to yell at us to go to counseling.

23. I was taken in to see the nurse. You can only see a doctor once you see a nurse. Only if you come back for a second appointment can you see a doctor.

24. The nurse palpated my stomach and said she found nothing.

25. The nurse said to come back in three days if there is still pain. She thought I was faking.

26. A nurse passed us in the hallway and said, “You should send him to the hospital.”

27. They called for a van to come take me to the hospital, but the van did not arrive. It was at least twenty minutes that we were waiting and I was in agony. After twenty minutes I vomited from the pain. Then finally the van came.

28. They took me to the emergency room. They took only my mom with me. My sister stayed to care for the four-year-old twins and our nine-year-old sister.

29. They took me to a tiny emergency room. It was not very good.

30. Immediately they realized I had appendicitis and that I needed emergency surgery. They said they had to take me to another hospital because they didn’t have a surgeon.

31. We got moved to San Antonio and I had surgery there immediately.

32. I wanted to tell my sister that I was ok and what was happening. My mom begged to call my sister because we knew she was scared. She didn’t know whether I was ok and we had been away now for many hours. She was trying to care for our little siblings and keep them calm all while not knowing where we were or if we were ok.

33. My mom even asked if she could at least call her lawyer and they refused. They said that they didn’t want anyone to know our location.

34. Until that night they didn’t tell my sister anything, they wouldn’t let us call so she would know what happened.

35. At 9:30, after five hours, they gave us one minute to talk to her. My mom could barely say anything because she was rushed off the phone immediately.

36. We stayed in San Antonio for the surgery and returned the next day.

37. The doctor said to try to walk, a little bit, inside, in air conditioning while I was healing. There is nowhere like that here. I would try to walk in the hallway because I could not stand in the heat outside.

38. For the first day after we came back I stayed in medical to recover, we had to remind the nurse to give antibiotics. The nurse forgot my antibiotics and when my mom reminded her, she said "It doesn't matter when you take antibiotics."

39. The day after my surgery, they wanted me to walk to the cafeteria to get food, to go to the pill line for medicine. I was taking antibiotics twice a day, they wanted me to walk all the way there and then wait in that line. It can take two hours standing in the sun to get the medicine in this line.

40. I could not walk. I was on antibiotics for four days, my mom begged for them to let me get my food and medicine in the room.

41. They told me to get my meal I had to walk, a ten-minute walk in the blinding sun, it is over 100 degrees and I had had surgery the day before. They said I had to walk, through the sun, all the way.

42. The officers don't understand how long the walk is and how hot it is because they don't have to do this walk, there are other areas where the officers can walk where we are not allowed. It was over 100 degrees and humid, I was in so much pain still that I could not do it.

43. It's not just the walk. Each of these places requires us to wait in line, sometimes for hours, in the sun. When you are recovering from surgery you need to regulate your temperature, you need shade and hydration, it is very exhausting to be healing and to be in pain.

44. It used to be that everyone can eat between 11 and 1pm. Then they split us in two groups, 11 to 12, the other from 12 to 1pm. Because so many more come between

12pm and 1pm, we had to wait in line outside. If you didn't come very early you will miss your meal or you will not have time to eat. Sometimes we would wait for an hour. It was like this when I was recovering from surgery, so that if I wanted food I had to wait in the heat.

45. Last week they changed this process to allow the cafeteria lines to be a little shorter, they split us by housing unit so fewer people would wait for the same hour.

46. The pill line is the same. Some people won't get their medicine because the line is so bad.

47. My mom begged for a wheelchair. They finally said they would give me a wheelchair but my mom should push me. She is a very small person. She could not get the wheelchair up and down the chairs or ramp or push the wheelchair over the turf and rocks.

48. Finally they said that an officer would push me to the medicine line. They would push me over the rocks and uneven ground and every bang was searing pain from my surgical wound.

49. My mom had to fight with six officers before anyone allowed them to bring food to me from the cafeteria and to bring my medicine to me.

50. Before this I was in school. A boarding school in Michigan. When I came here, I lost my spot. My mom tried to write them a letter pleading with them to understand, but it's too late. I'm already missing school.

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 12 day of August 2025, at Dilley, TX.

[redacted]

[Name: [redacted]

EXHIBIT 30

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, L[redacted] T[redacted] P[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 53 years old. I am from [redacted]. I am detained here with my 14- and 15-year-old sons, [redacted] and [redacted]

3. I speak Spanish.

Initial detention

4. We have been living in the United States for four years. We were detained on a bus from California to Houston at a security checkpoint. Then, they took us to El Paso for three days. That holding cell was so terrible, I do not want to even think about it. They kept us in a place that was so cold that everyone calls it an icebox. To eat, they only gave us sandwiches twice a day. They kept us inside a room where we did not know whether it was day or night. There was a toilet in the middle of that room with no door. We slept on the floor, only got a shower one time, and they only let us make one call. After three days, they sent us to Dilley.

Entry to Dilley

5. I have been detained at Dilley for 90 days. My younger son had to spend his birthday locked up and they both had to spend Christmas in this prison. We do not know whether we have any rights and we have been terrified the entire time we have been here.

6. Although I have been here 90 days, the judge told me I would be detained for three more months, and maybe up to 19 months, with my children during the immigration process.

7. I know the children shouldn't have to be here so long under their *Flores* rights.

Dilley ICE Detention Center

8. Although they have treated us monstrously here, I have been afraid to make reports about the conditions. One time another woman who stays in my room made a written report about the bathrooms being unsanitary. The bathrooms here are disgusting and need more cleaning. However, a staff member came into the room and yelled at us, saying that we should not make written reports. We all felt very threatened by her. She said that we should only talk to staff if there is an issue so they can resolve it.

9. But they do not resolve the issues we bring up. Now, I am scared to make any kind of report, because I do not want to get in trouble and have my stay here be harder than it already is.

10. The way staff have treated my sons here have made us very uncomfortable, too. One time, the psychologist questioned my younger son. It felt like he had to answer anything the psychologist asked because they are watching us here. Since then he has not wanted to go to the psychologist. I have been asking them to not make him see the psychologist, and made six requests for that, but they still try to make him speak with them.

11. I am autistic and so is my youngest child, and they are not giving us our prescribed medications, even though we have to take them every morning and evening. I gave the doctor here our doctor's information and the names of our prescriptions, but the doctor here refused to look at it. Instead, they are giving us the same anti-anxiety medication that they give to children who cannot sleep. But it does not address my condition. Now I feel like my whole side of my head is on fire with pain a lot of the time and I cannot sleep here. This lapse upset a system of care that we were not supposed to interrupt for three years. I do not think they are providing even basic accommodations for our conditions.

12. They haven't provided us other medical care either. My youngest son has broken out in hives over his whole body for three weeks, but the medical workers said it was just because of the water and that they cannot do anything.

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 14 day of January, 2025, at Dilley.

[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: 1/14/2026

Eleanor Roberts

EXHIBIT 31

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, M[redacted] S[redacted] M[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 37 years old. I am from [redacted]

3. I speak Spanish.

Entry to Dilley

4. I have been detained at Dilley for 89 days. I am here with my two children who are 5 and 10 years old. My mom and dad are also detained in another facility. I have not been able to talk to them at all since being here. I heard that you could request a call every fifteen days to another facility where family members are held, but I am scared to do it because they record everything and have people listen in to your conversations.

5. When we were first arrested, they confiscated my cell phone at the border, but now I have no way to communicate with family if I am sent somewhere. I asked ICE for it, and they said I will not get it back.

6. No one has told us anything about why we have been here for so long. When I got here, they gave me a credible fear interview, and after they approved that, they gave me another court date and sent me to Dilley. They told me they were going to release me with an ankle monitor, but then that same day the officer who said that told me unfortunately the laws had changed and my children and I have to stay detained here at Dilley.

Casa Grande and Nogales CBP

7. I was first detained in Nogales in October 2025, I spent three days in three different iceboxes and then they transferred me here.

8. In those iceboxes we slept on the floor with aluminum blankets and the only thing they said to us was that we should sign our deportation papers.

9. The toilets were in the same rooms we slept in with no doors and with a camera right in front of the door watching us go. My children had no privacy. We spent two days without showering there, too.

10. My children felt so depressed and hungry there. They wanted milk but the facility only gave us cold burritos.

11. We were never allowed to make any calls there.

12. The officers who worked in those locations did not really say much to us besides when they woke us up to ask questions throughout the night. They woke up my youngest three times in the middle of the night to take fingerprints. They also told us we should sign our deportation papers, and when I refused, they said I would be deported anyway. Then, they put us in a bus, and after 18 hours we arrived at Dilley.

Dilley ICE Detention Center

13. The food here is so bad. My kids do not eat almost anything. I am trying to get them to eat, but they are not able to.

14. There is also an epidemic that has broken out here, where so many children have stuffy noses, coughs, and high fevers, while the medical staff do not do anything but tell them they should drink water and should put cold presses on their heads. But so many more are falling sick. Still, the medical staff will only give one acetaminophen and kids can only get that meager medicine at certain times during a day, and need to wait in line for a long time to get that one pill. It is so hard for children to wait for three hours while sick. Also, they will not let any kids take the medicine without them watching. So, when kids get sick in the middle night they cannot get medicine. And then if people line up early with the hopes of getting medicine, staff tell them they are breaking the rules.

15. The school is also a joke here. There is just one teacher for all ages and it is only for one hour, and each child has to line up at least 15 minutes in advance, but there still might not have enough space for them. A lot of time children are told there is not space for them. It makes my daughter so sad when she is not allowed in. They also cannot wear

their nighttime clothes there even though sometimes though sometimes those are their only clean clothes. All these kids are losing out on their education. My five-year-old wants to learn to write, and they are not helping her do that. Then, there are some kids who have been in school for years, but the school does not help them. The truth is the school is terrible, but so is being here. Kids should not be locked up in a place like this.

16. Our skin has been hurting from the soap in the bathrooms. The is only one soap that we have for our hands, hair, and body, but when we complain the staff just say to buy it in the commissary. But we do not have money for that and when people have money they try to use it to call their family. I also cannot get relief from the medical providers here, because when we bring up peeling skin, they tell us to drink water.

17. The facility has also decreased our access to email here this week, and now we cannot contact people on Gmail, which was how I contacted people. I think they took it away from us because too many people were emailing *Flores* and other lawyers. They say we can only use Proton but Proton does not allow you to email just anyone; if the recipient does not have a Proton email, the email is blocked. So, we cannot get our emails out. They also limit the emails to 150 characters, and I think they read them, too.

18. There are also a lot of women who are pregnant here. They have to get in line when they need medicine, too, and there are no accommodations to be safer for their pregnancies. They have to watch their children the same way we do, and it can be really hard for them because they do not get to take breaks.

19. Whenever I ask how long we will be here, the agents just say for however long our process is. I have been here for three months but imagine I will be here at least 5 months. No one has told me about any way to get out. There are some people who have been here for seven months, including one family with five children.

20. The children here are really struggling. They're getting so sick, and they are all having such a hard time.

21. I have not made any complaints since being here, because I know so many people who have made them and gotten no response. I know that making a complaint will hurt

my process. The staff will create problems for me and make my children stay here longer if I file grievances. I think everyone who is not making grievances is scared about retaliation from officers making fake accusations to get them in trouble.

22. Last week there was a really traumatic day because they kept us all in our rooms. We were in line for the commissary and the staff came and hurried us all to our rooms. Then we could not leave our rooms at all for any reason. It was scary.

23. The mattresses are really thin and directly on top of iron slats, which means our backs hurt a lot. We have to sleep with the lights on, and the kids cannot wear eye-masks so they just do their best to cover their eyes with their arms while they sleep.

24. Anytime the officers want to come into our room, they knock as they entering, so you cannot really tell them to wait.

25. There have been lots of problems with agents who yell at children all day not to run, but they are kids, and of course they will run. The staff also have whistles that they whistle at the children, but the children are so little, they do not understand. It is stressful having other adults constantly scolding my children and making them feel bad. We are all worried people will make reports against us that will affect our cases negatively every time our children struggle to follow the rules.

26. The children get scared at times because sometimes the staff say you cannot go somewhere and they do not understand why.

27. The shoes here break within one week even when we just walk around in them. Right now, there are not enough shoes to give children new shoes when they break. If the kids' clothes rip, we do not get new ones right away either. The three pairs of clothes and one shoe pair they give us is not enough, because on top of the items getting worn down, the children often get dirty. So, we have to do laundry every day. And when it rains, since we only have one shoe pair, we just have to walk around with wet shoes.

28. Right now, there are so many people at this location. I think that is a big reason that everyone is sick right now. They have also limited our eating times and the locations we can go in the facility in response to the increase.

29. I have been here for three months, but they have never changed the curtains in the bathroom.

30. It is hard to keep kids warm when we go to the bathroom now and also to manage going to the bathroom when they are not allowed to be alone. Sometimes, my five-year-old needs to go to pee multiple times in the night, but I am not allowed to leave my son alone in bed. So, each time, I have to wake him and take him outside, too. It can be almost freezing but we still have to go outside to go to the bathroom, which makes my children so uncomfortable. Also, the boys and girls room are on different sides, so I have to take them to both sides. The rules against leaving children alone in the room during a bathroom break are so difficult. How is that reasonable for me to bring all three of us outside every time one person needs the bathroom?

31. I have a lawyer but I do not get to make free calls to him. I have to use my money if I want to call him.

32. No one has ever mentioned *Flores* or talked to me about my children's right to be released.

33. My son loves to make things with clay and my daughter loves to play princess and dress up, but here they cannot do any of that.

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 15 day of January, 2026, at Dallas.

[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: 1/15/2025

Eleanor Roberts

EXHIBIT 32

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, Ne[redacted] S[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 36 years old and my son, [redacted], is five years old. We are from [redacted].

3. I speak Spanish.

4. We have been detained at Dilley for 10 days so far. We are extremely concerned because our son has not been able to have a bowel movement since we arrived at Dilley. We have been giving him laxatives day and night, but yesterday was the first day my son was given a treatment. Last night he got an enema but he still was not able to poop. Our son does not talk much other than basic words and has some developmental delays. We think the stress of being here and the lack of food options are causing him extreme distress and that may be why he is having such bad constipation.

5. Before we arrived at this facility, we were living in El Paso, Texas for about two years. We had been to about seven or eight ICE check-ins and had ankle monitors for close to a year. When we went to our ICE check-in ten days ago, they told us we would all be sent to a family detention center. They told us our court date in September was too far off, and we needed to go to family detention because we were here illegally and needed an earlier court date. We did not understand this because we had an asylum claim and were following the rules. My husband was then handcuffed in front of my son and we were separated from him. It was very upsetting for my son to see his father be treated that way. I was taken into an area with other women and their children. They then put us in a bus to come to Dilley.

6. When we first arrived here, they showed us a video about immigration rights, but it did not say anything about the rights of children in detention or mention *Flores*. I saw something about *Flores* on TV, but no one has talked to me about it here.

7. During a general meeting when we got here, ICE told us that children were not supposed to be here for more than 21 days. Then they called up the families and showed us a document that mentioned the 21 days. We think the document said we were

consenting to have our child stay here more than 21 days, but it was written in English and they would not translate it for us. We refused to sign it because we were not sure what it said and whether we were waiving any rights. We were worried it could say that we were agreeing to voluntary departure.

8. Before we arrived here, our son had been going to pre-kindergarten in El Paso. The school had been doing some testing to understand his special needs, but we were apprehended before we could find out the full results. They were not sure if he had autism, speech delays, or other developmental delays.

9. Ever since the day we were arrested at the ICE check-in, my son hasn't really been eating. He doesn't like the food here and he just won't eat it. The food has too many condiments and sauces for him, and it is not fresh. He will sometimes eat cereal. Because of his constipation, he gets a special diet, which just means he gets some fruit. But he is refusing to eat most of it. Most kids here do not get fresh fruit other than red apples.

10. I am drinking the water here because bottled water is so expensive at the commissary and we want to save all of our money to buy bottled water for our son. The water does not taste right to me, and because my son has serious problems with his stomach, we do not want him to drink it.

11. My son is fighting more since we got here and is constantly taking off his glasses and throwing them on the ground. I worry that he is getting more anxious being here. He can't really play with other kids or go to the school here because he needs specialized attention. I worry that he will not get along with the other kids. It has been extremely hard to be here with a child with special needs.

12. We buy soap, shampoo, and conditioner at the commissary because the hand soap they have in the shower is too harsh for my son's skin. I have never been told that we could get soap for our children's sensitive skin. We also buy soup and cream at the commissary; it's like a business in here. They sell everything in here and everything is expensive.

13. No children should be here. It's especially hard for children with special needs like my son, but no child should have to live this way.

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 12th day of March 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: 3/12/2026

Diana Cano

EXHIBIT 33

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, C[redacted] R[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 16 years old. I have been living in Texas for about eight years.

3. I speak English and Spanish.

4. I have been detained at Dilley for 10 days.

5. I was living with my middle sister and my mom in San Antonio. I was a junior in high school. I love tennis and really miss it. I have missed a tennis tournament since being detained here. It's also hard to be away from my friends. I called them yesterday and they were crying. I got a little emotional, too.

6. About a week and a half ago, my mom, my older sisters, my baby niece and I went in for an ICE check-in. The ICE officer asked some questions, and then asked if my middle sister was pregnant. When she said "yes" – he took her outside and I did not see her again. I was not able even to say goodbye. We then went into a different office for about an hour, and the ICE officer said that they were also going to let my older sister and her 3-month-old baby leave. Her baby is an American citizen. He let her go with an ankle monitor and said she needed to bring back proof that her baby is a U.S. citizen on October 24th.

7. We were in that office for about twelve hours. We left the office around 10 pm and we arrived at Dilley at 6 am. I had been awake for about 24 hours. We then had to go through processing at Dilley.

8. When we arrived, they gave me two shirts, two shorts, one pair of sweatpants and a pair of shoes. We have to wash our clothes almost every day. Often there is not detergent, and we have to ask again and again. Some of the kids in my living area have asked for more clothes or shoes and it takes a long time to get them.

9. We are living in a room with five other families. All six bunk beds are filled. It is difficult to be in an area with so many people. The lights are on all night. In the

mornings, some staff will knock and it's okay, but other staff will come in yelling really loudly and scare everyone.

10. We buy soap, shampoo and conditioner in the commissary. The only thing in the showers is handwash.

11. The bathrooms are often nasty and will often be disgusting all day. The cleaning staff only comes in the morning. Sometimes I will just wait until we have an appointment in the medical area to be able to use the bathroom there.

12. One time I went to the classroom, but I didn't like it. It didn't feel like I was in school. They gave me a packet about the American flag. It talked about the meaning of the stripes and stars, and the history of the flag. They also gave me a worksheet about the 50 states. At my high school, I was studying about the Spanish-American War. We had already learned about the Progressive era, the Gilded Age, and World War I. These are periods in U.S. history I didn't know much about – unlike learning about the flag, which we were taught in elementary school. I won't go back to that classroom because it doesn't seem like I would learn anything.

13. When we first got here, we didn't understand how to communicate with the outside world. They gave us some information, but it was really confusing. We were exhausted and it was hard to process.

14. Since we have been here, no one has told us about our rights. There hasn't been a know your rights presentation. The only time I heard about *Flores* was when we spoke to an attorney from RAICES a few days ago.

15. I have met people here and I go to the gym to talk to them. We will hang out and sometimes play Uno. Then I go back to our room – like a cycle. I hope it ends soon because it's pretty boring and I've already missed a lot of days of school. I want to go back to my normal life. I don't even know if it will be here in this country, but I just want to get out of here.

16. They are making me go to mental health appointments here. I have been to two and they aren't helpful. They last not even ten minutes. They just ask how you're doing

and if you've had suicidal thoughts or have tried to harm yourself. I say things like "I could be better." They just say I should not worry about things I can't control and that my mom is the adult and she can handle things. But all of this is happening to me, too, and I can't help but worry about it.

17. I had my future planned here in the U.S. I wanted to graduate from high school and go to college to study psychology. I wanted to keep playing tennis. I was focused on studying, learning to drive, and getting a job. And now I don't even know which country I will be in or where I will live.

18. I don't remember much about [redacted] because I haven't been there since I was seven years old. I just remember the bad things and the trauma that I have from back there.

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 10th day of October, at Dilley, Texas

[redacted]

EXHIBIT 34

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, K[redacted] P[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 24 years old, and my daughter is 6. We are from [redacted] and we are still at Dilley after 64 days. We have spoken to Flores Lawyers before.

3. On November 13, ICE told us that the judge in our case said we'll be released soon to finish my immigration case outside of here but within the U.S. still.

4. It's now November 18, though, and we are still here.

5. My daughter is still getting bug bites, but now the pharmacy gives us the cream for free.

6. I see there are family visits now, but we don't have family nearby who could visit.

7. They did put Brita filters in the faucets in the bedrooms, but that just show they didn't have them before. This is a recent thing. The ice still tastes better to me, but they did put the filter in.

8. My family finally figured out how to put money on my phone, so I can now make phone calls, but they are not free.

9. Everything we are asked to sign here is in English. The staff or ICE will "explain it" but they don't read it to us word for word. They don't read the whole page.

10. There was a worm in the broccoli the other day. After that, I have not eaten any vegetables here. I am too afraid. The lettuce is bad too, it's in a bad state.

11. There was a family from [redacted] that is organizing a complaint against the facility, because their kids got sick from it. They had to go to medical.

12. The staff said the worms are normal 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 18 day of Nov 2025, 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: 11/18/2025

Katherine Johnson

EXHIBIT 35

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, M[redacted] S[redacted] L[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 24 years old. I am from [redacted].

3. I speak Spanish.

4. I have been detained with my two-month-old baby [redacted] and my 15-month-old baby [redacted] for 24 days. We have been at Dilley for 21 days, after spending 3 days in CBP custody. It is really hard to be detained with my babies. I have to hold both babies alone, because they separated my husband to another living area. I do not have an easy way to go to the bathroom or shower, because I am not allowed to let anyone else hold the babies or leave them alone. Every time I put the two babies down to use the bathroom, the guards get mad and tell me that I cannot put the babies down. I beg them to allow my husband to watch the babies, but they do not permit it.

5. Our two-month-old has been here since he was one-month-old. He has had a cough for a week. It has been making me very scared, because he has a lot of phlegm. You can see he is coughing right now.

6. No one has told us why we have been detained for 24 days.

Eagle Pass and Del Rio Texas CBP

7. We were detained at the border and kept in an ice box in Eagle Pass for one day and in Del Rio for two days before they brought us to Dilley. In Eagle Pass they took our phones away, and I do not know if we will ever see them again.

8. We were the only family in those areas. Even though we were in the same room, they said my husband and I could not be together, so he kept [redacted], our older baby, in one corner of the room, and I kept [redacted] on the other side of the room. While we were there, we slept on really thin mats on the floor. It was freezing cold and they only gave us metal blankets, t-shirts, and one pair of pants, so we could not swaddle the babies. The two babies cried the whole time, and we could not sleep.

9. There were bathrooms in the middle of the room without doors and there was no privacy.

10. There were some guards who told me that they were going to separate my husband from us and I would need to take the babies alone.

Dilley ICE Detention Center

11. We have heard about a measles outbreak from people who work here, but we have not been told who here has it or any other details. They haven't given us any more information. They told us they would give vaccines to unvaccinated children, but I have not seen them do that yet. Our older daughter has her vaccines, but our youngest is two months old and does not.

12. They are not providing any special treatment to our 2-month-old. He has had a cough for over a week, and when I go to the medical annex, the nurses say he is too little to give him any medicine.

13. They provide me with diapers and milk when I ask, but I have to ask each day. They only give me four diapers at a time, so I have to keep going back to ask. The staff have not given us any baby food for our 15-month-old. She just has to eat the regular food in the cafeteria, so she barely eats anything.

14. Our 2-month-old is taking formula here with the water from the sink, and it is giving him diarrhea all the time. When we got here, they gave us three bottles of water for formula, but after that they said we had to use the sink water for formula. The guards said we would have to buy water bottles from the commissary if we need it. When I went to the medical area to explain that my son had nonstop diarrhea from the water, the doctor put an order that the guards should give me four bottles of water a day for him. But many guards will not give me the water bottles when I ask. They say they have to check with the medical staff to confirm that I am not lying and there really is an order. They always seem angry about it, and it means [redacted] has to wait to eat.

15. We have to use the same soap for our children as for ourselves. There is no soft soap for babies.

16. Two weeks ago, they took me and [redacted] to a hospital in San Antonio because they thought she had contracted a serious case of COVID, because she had had a high fever for over a week and a runny nose and cough. At Dilley, they had only been giving her acetaminophen and said they could not give any other medicine. But when the doctor tested her in San Antonio, he found she had four bacterial infections, including food poisoning, a stomach infection, and a nose infection. They prescribed her amoxicillin.

17. When we got back to Dilley from the hospital, they isolated me for three days with the two babies, and during that time [redacted] developed the cough that he now has. They did not allow my husband to see me or the babies, and everyone who saw me wore a mask. During the first three days they did not provide [redacted] with any medicine, because they said they were waiting for the prescription to arrive.

18. After three days, they said that [redacted]'s temperature was down, and we could go back to our room. But it was really cold outside, and we had to wait in the pill line to get medicine for [redacted]. [redacted] had to wait in line with us outside, even though she still felt sick.

19. Sometimes we have waited for three or four hours to see a nurse for our babies, but they do not give them anything other than acetaminophen or ibuprofen, no matter how sick they are.

20. No one has told us when we will leave ICE detention. They asked for information for our sponsor but have not said anything else.

21. No one has ever given us any information about our children's rights here.

22. I have never seen something that looks like the I-770 form that you are showing me before.

23. When we first got to Dilley in January, we arrived at 11:15 pm. They gave us clothes, told us to shower, and gave us some food. Then, the staff took us to an office where they took our data, took our photos for IDs, and took the things we brought.

24. We saw a counselor who showed us something about asylum, but I do not remember any video that mentioned children's rights while in Dilley.

25. We have used the tablet a few times. You have to put money on it to be able to make calls. We have never seen a video about our children's rights in Dilley on the tablet.

26. The people who work here have never said the word *Flores*, and we have only heard it from other people here who have spoken about it a lot.

27. We had a credible fear interview, but we never had a chance to speak with an attorney.

28. 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.

29. The people who work here never offered us voluntary departure or mentioned it to us at all.

30. One time a staff member told me they were going to separate my husband and deport him without us. But it has not happened.

31. We have never heard about a bond hearing.

32. No one has said anything to us about anyone receiving an individual release hearing or decision or chance to explain why we should not be here.

33. We have no way to call our family for free. They charge us to call our family. It costs $1 per minute for the calls abroad.

34. They did not let us go outside when the congresspeople came, and they kept us in our rooms another time during the protests. During those days, they brought medicine to us. No one explained any reason we could not go outside, but we saw information in the news.

35. When the congresspeople came, they separated out a few moms with older children who they allowed to speak with them, but they did not let anyone who had small children

or who had husbands leave the cafeteria. Instead, the guards surrounded us and kept us in there.

36. When the protest happened here, they kept us inside because we had our babies. At that time, [redacted] was only one-month-old.

37. They have told us we can make grievances, but we have not made any grievances because we have heard that they rip them up.

38. I cannot really sleep because I am caring for my two babies all night. There are four other families in the same room as me. It can be troublesome trying to get sleep in a room with so many children waking up and crying throughout the night. The lights are on all night, and it is really hard to sleep even with the eye mask. I have never slept with an eye mask before and it feels uncomfortable.

39. It is hard to wash clothes here, because there are only seven washing machines for everyone, and it is not enough for us all to do laundry as much as we need.

40. We only heard about the nursery four days ago, because no one told us about it earlier. We have not used it because we did not know it existed.

41. There are some people who work here who are helpful, but others are so angry all the time. It is so hard to ask for things from them, because they make faces and do not help. They just do whatever they want.

42. We do not have a case manager here.

43. A little while ago, we saw a guard push a girl with a disability and take her drawings from her. They have forced that child to stay in her room for days and are not letting her or her siblings or her mom see their father at all.

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 12 day of February 2025, 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: 02/12/2026

Eleanor Roberts

EXHIBIT 36

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

I, M[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 34 years old and my son, [redacted], is 7 years old. We are from [redacted].

3. I speak Spanish.

4. We have been detained at Dilley for 21 days.

5. Before we arrived at Dilley, we had been living in Buffalo, New York for a year and ten months.

6. A few weeks ago, I was driving in Rochester with my co-workers on the way home from work. We noticed a car that was driving next to us that kept slowing down to look at us. We thought it might be border patrol targeting us because we're Latinos. Then another car came in front of us and the car that had been watching us came behind us and put on flashing lights for us to pull over. They pulled us over and asked everyone for our IDs. I showed them my papers that had my next immigration court date, but they told us that we all had to go to a border patrol station. When we got to border patrol, they told us to take off our jackets. I was cold without my jacket but they didn't care. They said they were going to throw our jackets away. I asked if we were getting detained, and the man just laughed at me.

7. They put me in a room by myself and put my two male co-workers in another room.

8. After about a half an hour, they brought me over to take my picture and my fingerprints. They did not tell me what was happening. I told them I should not be detained because I was waiting for my next court date, and they said that my court date didn't matter anymore. They said that if I didn't want to get arrested, I should have left this country a long time ago. They said I should have sent in the paperwork to leave the U.S. I begged them to please let me know what would happen because my son was in school. They told me I should have thought about that. They said the only option I had

was for someone to bring my son to me. I was very worried. I called a pastor that I know, and she was able to pick up my son at the neighbors' house. He had gone there after school. The pastor brought my son to the border patrol station.

9. My son and I spent the night at the border patrol station. They put us in an enclosed room that had a small bed for us to share. It was really cold and they would only give us one blanket. They didn't feed us; they just gave my son some chips. My son was very scared, upset and crying. He kept saying that he didn't want immigration to take me away.

10. Then the next day around 4 pm, three people came to pick us up. They took us to a hotel. The five of us stayed in one room together. At around 3 am, they woke us up and took us to the airport. The same three people flew us to Texas. There were two flights. The people never said who they were; they didn't have a uniform or anything. I don't know who they were. They never left our sides. My son kept asking me where we were going. When he heard we were leaving Buffalo, he was really sad. He had gotten close to our pastor and the other kids at church. He is in second grade and was also really loving his school. His teachers said he liked asking questions and helping the other kids.

11. It is so hard to be here at Dilley. It is difficult because no one is telling me how long we have to be here or what to expect. I'm scared because my son is not really eating. He's just eating rice. It's rough because I can take whatever life gives me, but my son should not be here. He should be at school with his friends and eating the foods he likes.

12. I am not sending my son to the classroom here because all they do is just color. We watch TV together and do the word search worksheets. They don't really have any activities for my son. We mainly just stay in the room.

13. We live in a living area with two other families. It's hard because the kids in the other families are fighting a lot.

14. My son is all over the place and can never be still. At night he wakes up really scared. He often wakes up worried because he thinks that he missed school. Then he

realizes he's locked up here and there isn't school. He eventually goes back to sleep and then sleeps until we have to get up to go to breakfast. It is hard to sleep with the lights on all night. He's constantly trying to find a good position with the blanket or to turn away so that the light doesn't bother him as much.

15. When we first got here, they told us at intake that we would come back the next day to watch a video about our rights. We came back the next day, but they said it would need to be another day. They haven't called us back about it. They haven't told me anything about *Flores* or my son's rights or anything about a right to a bond hearing. They also have never given me a copy of the resident handbook or told me how to use the grievance system. I have no idea about any of these things. They haven't even spoken to me about voluntary departure – and it seems everyone here has been told about that.

16. I went to the library and saw online that I have a court date tomorrow. No one has said anything to me about it. It says online that it's a preliminary hearing.

17. It is hard to be here, and I keep hearing from people that everyone is just waiting. People told me to send messages to ICE on the tablet – so I did. But when I wrote to ICE on the tablet, they told me there was nothing they could do. They said to ask someone at CoreCivic about my case. I finally stopped asking because I ended up getting a court date somehow.

18. It's so hard to live like this. Every night my son asks me why are we still here? Why are we trapped here? I just try to tell him that it's God's plan right now.

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 11th day of February 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: 2/11/2026

Diana Cano