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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 DECEMBER
1, 2025 SUPPLEMENTAL ICE JUVENILE
COORDINATOR REPORT AND DATA**

Judge: Hon. Dolly M. Gee

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TABLE OF EXHIBITS

Exhibit Index to Plaintiffs' Response to December 1, 2025 Supplemental ICE Juvenile Coordinator Report and Data

Exhibit No.	Exhibit Description
1	Declaration of Javier Hidalgo, December 8, 2025 ("Hidalgo Decl.")
2	Declaration of Leecia Welch, December 8, 2025 ("Welch Decl.")
3	J.R.F. Declaration (Dilley), September 9, 2025 ("J.R.F. Decl.")
4	Z.F. Declaration (Dilley), September 10, 2025 ("Z.F. Decl.")
5	I.B. Declaration (Dilley), September 11, 2025 ("I.B. Decl.")
6	N.V.S.M. Declaration (Dilley), November 17, 2025 ("N.V.S.M. Decl.")
7	C.R.G. Declaration (Dilley), November 18, 2025 ("C.R.G. Decl.")
8	A.K. Declaration (Dilley), November 19, 2025 ("A.K. Decl.")
9	M.M.S. Declaration (Dilley), November 18, 2025 ("M.M.S. Decl.")
10	M.R.P. Declaration (Dilley), September 11, 2025 ("M.R.P. Decl.")
11	N.G.C. Declaration (Dilley), October 10, 2025 ("N.G.C. Decl.")
12	L.R.L. Declaration (Dilley), October 9, 2025 ("L.R.L. Decl.")
13	J.V.D.A. Declaration (Dilley), September 10, 2025 ("J.V.D.A. Decl.")
14	K.M.L. Declaration (Dilley), October 10, 2025 ("K.M.L. Decl.")
15	N.G. Declaration (Dilley), November 21, 2025 ("N.G. Decl.")
16	K.V.L. Declaration (Dilley), October 9, 2025 ("K.V.L. Decl.")
17	V.L.G. Declaration (Dilley), October 9, 2025 ("V.L.G. Decl.")
18	N.C.G. Declaration (Dilley), September 11, 2025 ("N.C.G. Decl.")
19	D.C.R.R. Declaration (Dilley), November 21, 2025 ("D.C.R.R. Decl.")
20	S.M.G. Declaration (Dilley), October 9, 2025 ("S.M.G. Decl.")
21	N.T.G. Declaration (Dilley), September 10, 2025 ("N.T.G. Decl.")
22	Q.G. Declaration (Dilley), September 10, 2025 ("Q.G. Decl.")
23	A.T.L. Declaration (Dilley), September 11, 2025 ("A.T.L. Decl.")

Previously Filed Declarations

Docket No.	Description
1656-5	Ex. 4 to Pls.’ Resp. to Sept. 2025 Suppl. JC Reports and Data, C.H. Declaration (Dilley), July 28, 2025 [Doc. # 1656-5] (“C.H. Decl.”)
1656-15	Ex. 14 to Pls.’ Resp. to Sept. 2025 Suppl. JC Reports and Data, K.M. Declaration (Dilley), July 28, 2025 [Doc. # 1656-15] (“K.M. Decl.”)
1656-8	Ex. 7 to Pls.’ Resp. to Sept. 2025 Suppl. JC Reports and Data, A.D.C. Declaration (Dilley), September 9, 2025 [Doc. # 1656-8] (“A.D.C. Decl.”)
1656-12	Ex. 11 to Pls.’ Resp. to Sept. 2025 Suppl. JC Reports and Data, E.O.N.M. Declaration (Dilley), July 28, 2025 [Doc. # 1656-12] (“E.O.N.M. Decl.”)
1656-4	Ex. 3 to Pls.’ Resp. to Sept. 2025 Suppl. JC Reports and Data, C.G.V. Declaration (Dilley), July 28, 2025 [Doc. # 1656-4] (“C.G.V. Decl.”)
1656-17	Ex. 16 to Pls.’ Resp. to Sept. 2025 Suppl. JC Reports and Data, M.O. Declaration (Dilley), July 29, 2025 [Doc. # 1656-17] (“M.O. Decl.”)

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I. INTRODUCTION

Pursuant to the Court’s September 26, 2025 Order, Doc. # 1672, and in accordance with Paragraphs 28A and 30 of the *Flores* Settlement Agreement (“FSA”), the Juvenile Coordinator (“JC”) for U.S. Immigration and Customs Enforcement (“ICE”) filed a supplemental annual report on December 1, 2025. ICE Juvenile Coordinator Suppl. Report, Doc. # 1692-4 (“ICE JC supplemental report”).

The ICE JC supplemental report confirms Plaintiffs’ ongoing concern that ICE remains woefully out of compliance with the FSA’s requirements “to treat all minors in its custody with dignity, respect and special concern for their vulnerability as minors,” to maintain “safe and sanitary” detention conditions, and to “place each detained minor in the least restrictive setting appropriate to the minor’s age and special needs.” FSA ¶¶ 11, 12.A. The ICE JC supplemental report admits that extended length of stay is a “widespread operational challenge,” that a “comprehensive education program [is] not in place,” that recreation has not been provided in compliance with the FSA, that a new orientation video is being used in lieu of know your rights trainings, and that lights are kept on all night in children’s sleeping areas. ICE JC Suppl. Report at 2, 10, 13, 15-16, 30, and 32. Despite these admissions and the overwhelming evidence from class members documenting FSA violations, the ICE JC supplemental report assures this Court that ICE is a “model of regulatory compliance and humane care.” *Id.* at 41. Not so. Defendants’ actions continue to flagrantly violate the FSA and this Court’s orders.

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

The ICE JC supplemental report confirms that class members remain detained at the South Texas Family Residential Center in Dilley, Texas (“Dilley”) for prolonged periods of time in violation of this Court’s prior orders. *Id.* at 2-3. The ICE August 2025 20-Day Report, Doc. # 1692-6 (“Aug. census chart”) and the ICE September 2025 20-Day Report, Doc. # 1692-9 (“Sept. census chart”) (collectively “census charts”) show hundreds of children are being detained for a month or longer for reasons that do not indicate imminent removal despite the government’s assurances of their “efforts to minimize detention.” ICE JC Suppl. Report at 16; *see also* Hidalgo Decl. ¶¶ 9-12. ICE

1 detained nearly 400 children for more than 20 days in August and September 2025 alone.
2 ICE JC Suppl. Report at 2. More than 150 of these children appear detained for more than
3 30 days. Sept. census chart; Aug. census chart.¹ In September 2025, over 200 children
4 were held in ICE detention for at least 20 days, over 50 children were held for at least 30
5 days, and over 25 for at least 40 days, not counting time in hotels or transit. Sept. census
6 chart. Children on the September census report may have even longer lengths of stay,
7 because the chart does not show later book out dates. *Id.*

8 Defendants' claims of "substantial compliance" with the FSA fall flat. ICE JC
9 Suppl. Report at 16. Defendants have not addressed the vast majority of the violations at
10 Dilley that *Flores* counsel have been communicating in meet and confer letters since May
11 2025. Welch Decl. ¶¶ 2-3, 5, 11; Hidalgo Decl. ¶¶ 7-8. Ongoing FSA violations include:
12 inadequate medical care, lack of access to know your rights trainings, lack of access to
13 legal counsel, lack of access to varied child-friendly foods and snacks, the inability of
14 class members to sleep due to lights on in their living areas all night, lack of access to
15 appropriate hygiene products, lack of free calls to family members, and lack of adequate
16 education and recreation. Welch Decl. ¶ 3; *see also* Hidalgo Decl. ¶¶ 23-25, 28-29. In
17 addition, in recent weeks, conditions and treatment appear to have worsened with
18 families reporting horrific concerns, such as denial of critical medical care, worms and
19 mold in their food resulting in children becoming ill, and threats of family separation by
20 officers and staff. Welch Decl. ¶ 4; Hidalgo Decl. ¶¶ 23, 27, 29. Families report that their
21 children are weak, faint, pale, and often crying because they are so hungry. Welch Decl. ¶
22 4.

23 ¹ The census chart states: "Facility Length of Stay was determined by calculating the time
24 (in days) between Apprehension Date and either Book-out Date or 8/31/2025 for those
25 who remain in custody." Aug. census chart at 1. The same language appears in the
26 September census chart with 9/30/2025 as the cutoff date. Sept. census chart at 1.
27 Accordingly, the full length of stay in the "FLOS" column may be much longer for
28 families that remained in custody past September 30, 2025. Families without a listed
book out date have longer stays than the number listed in their "20 Day Case Review"
column, *e.g.*, one child remained detained 69 days with FLOS listed as 47 in Sept. census
chart at 8.

1 Plaintiffs' counsel have conducted six site visits at Dilley since Defendants began
2 detaining families there in April 2025. *Id.* ¶ 2. After each site visit, Plaintiffs' counsel
3 have provided Defendants with a detailed, comprehensive list of *Flores* violations. *Id.* ¶
4 5. As directed by Defendants, Plaintiffs have also raised emergency time-sensitive
5 concerns about particular children via email on multiple occasions, which have largely
6 gone unanswered. *Id.* ¶ 5. Plaintiffs and Defendants have met and conferred five times
7 about the *Flores* violations at Dilley identified in Plaintiffs' correspondence. *Id.* ¶ 5. On
8 October 6, 2025, Defendants stated they would be following up with a comprehensive
9 written response to Plaintiffs' letters. To date, Defendants have not done so. *Id.* ¶ 5. The
10 vast majority of information in the ICE JC supplemental report has not been previously
11 shared with Plaintiffs despite many attempts to resolve FSA violations through the meet
12 and confer process. *Id.* ¶ 5.

13 **A. Children Are Subjected to Prolonged ICE Detention.**

14 **1. Unlawful Prolonged Detention at Dilley FRC**

15 The Court ordered the ICE JC to file a supplemental report including “a census of
16 minors who were held in ICE facilities or ICE-contracted facilities for over 72 hours
17 during the months of August and September 2025” and “a detailed explanation as to the
18 reason(s) for the prolonged detention of minors in excess of 20 days and for housing in a
19 hotel.” Order re September 22, 2025 Status Conference, Doc. # 1672 at 2.

20 The supplemental ICE census data reveals hundreds of children with prolonged
21 lengths of detention in excess of twenty days with little to no justification since Dilley
22 opened. ICE detained nearly 400 children for more than 20 days in the August and
23 September census data alone. ICE JC Suppl. Report at 2. The minimal explanations listed
24 in the census charts again demonstrate that Defendants are failing to comply with their
25 obligations to release children without unnecessary delay and make and record prompt
26 and continuous efforts toward family reunification and release. FSA ¶¶ 14, 18; *see also*
27 Hidalgo Decl. ¶¶ 9-11, 14-15 (noting that RAICES attorneys have “notified Defendants
28 of at least one hundred forty-seven (147) unique instances of what appear to be
unnecessary delay of class member's release” since April).

Flores counsel monitoring visits confirm that children and families are being detained for alarming amounts of time. Welch Decl. ¶ 24-25; *See also* Hidalgo Decl. ¶¶ 9-11. In July, Plaintiffs' counsel met with several children who had been detained for two or more months. Welch Decl. ¶ 24. In September, counsel learned there were families detained at Dilley for approximately 98 days (five children), 74 days (one child), 63 days (one child), and 55 days (three children). Welch Decl. ¶ 24; *see also* J.R.F. Decl. ¶ 4 (30 days at Dilley); Z.F. Decl. ¶¶ 17, 26, 31, 34, 38 (16 days in CBP followed by 60 days at Dilley); I.B. Decl. ¶ 5 (36 days at Dilley). In November, Plaintiffs' counsel met with 13 children who had been in custody for 40 to 70 days and identified families who had been at Dilley for 168 days (five children), 64 days (two children) and 56 days (three children). Welch Decl. ¶ 25. At the time of the November monitoring visit, 81 families, including approximately 115 children, had already been detained at Dilley for 21 days. Welch Decl. ¶ 25; *see also* N.V.S.M. Decl. ¶ 4 (41 days at Dilley); C.R.G. Decl. ¶ 4 (56 days at Dilley); A.K. Decl. ¶ 2 (52 days at Dilley); M.M.S. Decl. ¶ 4 (46 days at Dilley).

2. Lack of sufficient explanations to lawfully justify prolonged detention

ICE admits that "extended custody" of children is a "widespread operational challenge." ICE JC Suppl. Report at 2. The ICE JC supplemental report identifies the main reasons for extended stays as: "transportation delays," "medical needs,"² and "legal processing." *Id.* at 2. But the accompanying census charts provide no explanation as to why individual children stay in detention for over 20 days when removal is not imminent. Sept. census chart; Aug. census chart; Order re Plaintiffs' Motion to Enforce and Appoint a Special Monitor, June 27, 2017, Doc. # 363 ("June 2017 Order") at 31 ("[U]se of the expedited removal procedure does not automatically render the Agreement's preference-for-release provision inapplicable"); Welch Decl. ¶ 26 (Defendants have no response about why children are held when removal is not imminent); Hidalgo Decl. ¶ 12-15 (ICE

² Multiple class members' accounts of being denied needed medical care while at Dilley undercut the ICE JC supplemental report's claim that detaining children longer than 20 days is necessary for medical treatment. *See infra* II.B.2.

1 does not provide reason for prolonged detention, just says some families will be detained
2 indefinitely, and does not factor in *Flores* mandates when assessing release).³

3 ICE admits to holding children for months based on “administrative stay reviews,”
4 “judicial stay reviews,” and “documentation verification,” with no release option even
5 though these children are not imminently removable based on the plain posture of their
6 immigration cases. ICE JC Suppl. Report at 3; Aug. census chart (Many families
7 remained detained over 20 days at Dilley including after “USCIS issued positive finding
8 decision and subsequently issued a Notice to Appear [because] [d]etention was continued
9 for the scheduled administrative hearing.”); Sept. census chart (same). In fact, the reason
10 given for the length of stay for all 399 children is simply “Immigration and Nationality
11 Act (8 U.S.C. 1101 et seq.).” Aug. census chart; Sept. census chart.

12 Furthermore, in the “20 Day Case Review” column, there is no indication of
13 individualized determinations of flight risk or child-specific concerns other than vague
14 descriptions like “detention was continued for their scheduled administrative
15 proceedings” or “pending USCIS finding.” Aug. census chart; Sept. census chart; *see*
16 *also* Hidalgo Decl. ¶ 16 (stating the family’s current immigration case status is not a
17 lawful justification as to why detention has passed 20 days under *Flores*). This Court has
18 previously found such vague explanations insufficient to show Defendants are meeting
19 their obligations under the Settlement. *See* Order re Plaintiffs’ Motion to Enforce, April
20 24, 2020, Doc. # 784 (“April 2020 Order”) at 15-16 (noting that ICE’s “spreadsheet does
21 not contain information about flight risk or other factors leading to a denial of release”
22

23 ³ Families similarly report that they are being detained for prolonged periods without
24 explanation. N.V.S.M. Decl. ¶ 19 (family followed judge's orders to apply for asylum in
25 November but told must remain detained until a January court date); C.R.G. Decl. ¶ 5
26 (After 56 days at Dilley, mother has not been told how long she and her family will
27 remain detained nor received any information about release); Hidalgo Decl. ¶ 12
28 (“[S]ince the beginning of April 2025, which is when ICE began detaining families in
Dilley anew, we have notified Defendants of at least one hundred fifty (150) unique
instances of what appear to be *unnecessary* delay of a class member’s release.”)
(emphasis added).

1 and merely states reasons such as “pending IJ hearing/decision” or “pending USCIS
2 response”).

3 The census charts suggest that Defendants are not exercising due diligence to
4 promptly screen families for relief to determine whether removal is imminent or
5 individually evaluating non-imminently removable class members for release. *Compare*
6 ICE JC Suppl. Report at 16 with Aug. census chart and Sept. census chart; *see* Ex. 4 to
7 Pls.’ Resp. to Sept. 2025 Suppl. JC Reports and Data, [Doc.# 1656-5] C.H. Decl. ¶ 47
8 (CFI occurred a month prior); Ex. 14 to Pls.’ Resp. to Sept. 2025 Suppl. JC Reports and
9 Data, [Doc.# 1656-15] K.M. Decl. ¶¶ 5-6. 29, 42-44 (Family expressed fear upon
10 apprehension, but spent 18 days in CBP followed by 14 days at Dilley, as well as a day
11 when ICE attempted to put them on a plane, before receiving a CFI screening); N.G.C.
12 Decl. ¶ 20; Hidalgo Decl. ¶¶ 15-19. Defendants continue to rely on delayed screening
13 and ongoing proceedings to justify children’s prolonged detention. For example, one
14 family spent 51 days in custody before release because “[d]etention was continued
15 pending the immigration judge hearing. Detentin [sic] was further continued during the
16 appeal period while the FAMU filed an appeal with the BIA.” Sept. census chart at 9.
17 Another child remained detained by ICE for over two months, from June 17, 2025 to
18 August 28, 2025, and the only stated reason for this prolonged detention is “[d]etention
19 was continued pending a scheduled administrative hearing. Due to the credibility with
20 head of household’s testimony, the immigration judge delayed the issuance of a written
21 decision.” Aug. census chart at 2. A third young child was similarly held at Dilley for 56
22 days, from June 16, 2025 to August 13, 2025, and the only explanation provided is
23 “Detention was continued pending the immigration judge review.” *Id.* at 4. Legal services
24 providers working with class members at Dilley also report that ICE is increasingly
25 refusing to release children at Dilley simply because they have a pending immigration
26 case. Hidalgo Decl. ¶¶ 14-19 (“It has become more common, and recently has become
27 the norm, that ICE-ERO indicates an intent to not consider *Flores* protections when
28 making release decisions.”) In fact, there has been a “marked decrease” in Defendants’
efforts to release class members. Hidalgo Decl. ¶ 19. Class members cannot be detained

1 for these long periods simply because they have a pending immigration proceedings. June
2 2017 Order at 24-26, 30-31; Hidalgo Decl. ¶ 16.

3 As this Court has already held, prolonged detention when removal is not imminent
4 or “ready to take place” is a violation of paragraphs 14 and 18 of the FSA. *See* April 2020
5 Order at 13-14. Additionally, continued detention of class members, even where the child
6 has a final removal order, is a violation of FSA paragraph 14 *unless* ICE has provided an
7 individualized assessment that determines continued detention is necessary for safety or
8 because of a flight risk. *Id.* at 17-18. Despite the ICE JC supplemental report’s assertion
9 that flight risk assessments are occurring, nothing in the census charts indicates that they
10 occur. *See, e.g.*, Aug. census chart (no mention of flight risk); Sept. census chart (same);
11 L.R.L. Decl. ¶ 39 (“We have not heard of an individual release hearing or had a chance to
12 explain why we shouldn’t be here anymore.”); N.V.S.M. Decl. ¶ 47 (same).

13 **3. Prolonged detention of children in hotels**

14 This court has issued orders limiting the use of hotels to “*brief* hotel stays (not
15 more than 72 hours) as necessary and in good faith to alleviate bottlenecks in the intake
16 processes at licensed facilities.” Order re Defendants’ *Ex Parte* Application to Stay,
17 September 21, 2020, Doc. # 990 at 5; *see also* Order re Plaintiffs’ Motion to Enforce
18 Settlement as to “Title 42” Class Members, September 4, 2020, Doc. # 976 at 17
19 (permitting exceptions “for one to two-night stays while in transit or prior to flights”).
20 The ICE August 2025 72-Hour Report, Doc. # 1692-5 (“Aug. 72-hour report”) and the
21 ICE September 2025 72-Hour Report, Doc. 1692-8 (“Sept. 72-hour report”) again reveal
22 unexplained prolonged detention of children in hotels that appear to violate those orders.
23 Plaintiffs’ counsel have raised concerns regarding prolonged detention in hotels with
24 Defendants regarding the August 2025 data and received no response. Welch Decl. ¶ 5
25 n.1. Several entries ICE identified as spending over 72 hours also lack a clear explanation
26 for why class members were held in hotels. 72+ hours in a hotel in August 2025, Doc. #
27 1692-7; 72+ hours in a hotel in September 2025, Doc. # 1692-10.

28 Additionally, Plaintiffs again question the reliability of Defendants’ data. The ICE
JC supplemental report only lists 4 children who spent over 72 hours in a hotel in August

1 and 3 children in September, erroneously excluding several children who spent more than
2 72 *cumulative* hours held in hotels. *E.g.*, Aug. 72-hour report at 13 (15 days in 5 hotels),
3 *id.* at 9-10 (10 days in 4 hotels); *id.* at 2 (4 nights in 2 hotels); *id.* at 3 (4 nights in 2
4 hotels); *id.* at 3 (4 nights in 4 hotels); *id.* at 3 (89 hours in hotel). The Aug. 72-hour report
5 provides no explanations for why these children remained in hotels. *Id.* ICE cannot evade
6 the Court's prior order by moving children to different hotels every few days. The
7 exclusion of these children from ICE's 72-hour list raises questions as to ICE's
8 methodology and suggests ICE is grossly undercounting the number of children detained
9 in hotels for more than 72 hours.

10 Plaintiffs' counsel are concerned by the alarming trend toward longer, unjustified
11 detention of children – both at Dilley and in irregular placements like hotels – in violation
12 of prior, clear orders from this Court.

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

14 Children's prolonged detention at Dilley is particularly concerning given the
15 ongoing, widespread FSA violations reported by countless families. Plaintiffs' counsel
16 have met with approximately 100 families at Dilley since it was re-opened in April 2025.
17 Welch Decl. ¶¶ 2, 11. Class members and their families consistently report serious
18 concerns with Dilley's secure, prison-like environment, including inadequate medical
19 care, lack of access to know-your-rights trainings, lack of access to legal counsel, lack of
20 access to varied, child-friendly foods and snacks, the inability of class members to sleep
21 due to lights kept on in their living areas all night, lack of access to adequate or sufficient
22 hygiene products, lack of free calls to family members, and lack of adequate education
23 and recreation. Welch Decl. ¶¶ 3, 12.

24 ***1. Children are detained for prolonged periods in an unlicensed, secure prison-
25 like environment.***

26 Dilley is a 56-acre unlicensed, secure ICE facility located in Dilley, Texas. Welch
27 Decl. ¶ 7. The facility continues to operate under a contract with CoreCivic, one of the
28 largest for-profit prison contractors in the United States. *Id.* ¶ 7. The perimeter of the

1 facility is surrounded by a high metal fence. Ex. 7 to Pls.’ Resp. to Sept. 2025 Suppl. JC
2 Reports and Data, [Doc.# 1656-8] A.D.C. Decl. ¶ 18; Welch Decl. ¶ 7. To enter the
3 facility, visitors must proceed through a locked trailer-style building, be subjected to an
4 extensive search for “contraband” items, and pass through a metal detector. *Id.* ¶ 7.

5 Children at Dilley continue to report feeling like prisoners locked up in isolated,
6 cell-like trailers. *See, e.g.*, I.B. Decl. ¶ 59 (“We are hoping that lawyers can . . . make sure
7 that children can be released from these prisons.”); M.M.S. Decl. ¶ 29 (“This place
8 definitely feels like a jail. There is no other way to describe it; it’s a jail for children.”);
9 A.D.C. Decl. ¶ 18 (“We know we are like prisoners here”); N.G.C. Decl. ¶ 5 (“It’s a
10 prison here – it is truly a living hell.”); I.B. Decl. ¶ 32 (“My older son is now becoming
11 so depressed because this is a horrible place for a child.”). In some cases, families report
12 sharing their living quarters with up to five other families. N.V.S.M. Decl. ¶ 22 (“Our
13 room now has 12 people in it. It’s totally packed.”); C.R.G. Decl. ¶ 10 (living with five
14 other moms and their kids); M.M.S. Decl. ¶ 22 (living with four other moms and their
15 daughters).

16 In addition, families continue to report having difficulty sleeping because lights are
17 kept on in living areas throughout the night. J.R.F. Decl. ¶ 15 (“The lights are on all the
18 time.”); J.V.D.A. Decl. ¶ 28 (“The lights are on all the time and the guards’ radios are so
19 loud.”); Z.F. Decl. ¶ 67 (“Two of the lights must be on in our room at all times, including
20 nights.”); K.M.L. Decl. ¶ 20 (“Some of the lights are on all the time.”); A.K. Decl. ¶ 27
21 (“If I could change one thing here, it would be . . . turning the lights off at night”);
22 N.G. Decl. ¶ 7 (“[We] have asked why adults and children have to sleep with the lights
23 on.”); Ex. 11 to Pls.’ Resp. to Sept. 2025 Suppl. JC Reports and Data, [Doc.# 1656-12]
24 E.O.N.M. Decl. ¶ 13 (“If you put a blanket over your face in bed to not see the light, the
25 staff will come in the night and pull it off.”).

26 Class members continue to report distress at being separated from one of their
27 parents in the evenings and during other periods throughout the day. E.O.N.M. Decl. ¶ 4
28 (“The thing we wish the most is that we could all stay together the four of us.”). ICE holds
dual household families in separate zones – with mothers and children generally in one

1 zone and fathers living separately in another zone. J.V.D.A. Decl. ¶ 27 (“My husband is in
2 a different part of the facility with other dads. We don’t understand why he can’t stay with
3 us since we have our own room.”); K.V.L. Decl. ¶ 28 (“My husband stays separately from
4 us, with all the other fathers.”). Although families are allowed to be together during periods
5 of the day, fathers are separated from their children after 8 pm, which is upsetting to many
6 children. E.O.N.M. Decl. ¶ 8 (sister cried every night because she was separated from her
7 other sibling staying with their father); A.D.C. Decl. ¶ 22 (“My wife has shared that
8 children are really suffering who are separated from their fathers. Last night, she heard a
9 child crying around 1 a.m. When she went to check, the mom said that it was really hard
10 on her because she was used to sleeping with both her parents but, here, she is only able to
11 sleep with her mom.”). There are also limited places to be together as a family during the
12 day, as fathers are not permitted in their wives’ and children’s living quarters and vice
13 versa. J.V.D.A. Decl. ¶ 32 (“I am not allowed to leave my daughter ever. Also, the guards
14 won’t let my husband watch her if I’m not there. If I want to take a small break, lie down,
15 or take a shower, I have to be with my daughter at all times.”).

16 ***2. Dilley still provides dangerously inadequate medical care to children.***

17 Contrary to the ICE supplemental report, families continue to report serious
18 concerns with medical care at Dilley. Welch Decl. ¶ 13; Hidalgo Decl. ¶ 30 (Dilley
19 families have raised concerns over inadequate medical care to RAICES attorneys on at
20 least 360 occasions). Most recently, families reported children becoming sick from eating
21 contaminated food and receiving inadequate medical care. *See infra* Part II.B.4. Medical
22 staff told one family whose child got food poisoning to only return if the child vomited
23 eight times. Welch Decl. ¶ 13. A staff member hit another child in the eye with a mop,
24 resulting in bleeding, severe irritation, and vision impairment – yet Dilley’s medical staff
25 did not see her for two days and provided no treatment. K.V.L. Decl. ¶¶ 22-27 (“We are
26 worried she will have long-term eye issues.”). A staff member broke another child’s foot
27 by dropping a volleyball net pole on him, and ICE had not yet approved a referral to an
28 orthopedic specialist. V.L.G. Decl. ¶¶ 5-8. An 11-year-old girl’s severe ear infection

1 caused hearing loss, but Dilley's medical staff did not provide a thorough medical exam.
2 N.G. Decl. ¶¶ 12-14. Children report distress from medical unit staff denying treatment or
3 making them wait days for diagnoses when they felt sick and feverish. Welch Decl. ¶ 13;
4 *see, e.g.*, D.C.R.R. Decl. ¶¶ 4-6 (ten-year-old with Hirschsprung's denied medical
5 attention until eighth day at Dilley and denied accommodations thereafter); S.M.G. Decl.
6 ¶ 5 (two-year-old with fever and diarrhea was denied treatment for one week before she
7 was diagnosed with flu and provided rehydration fluids); A.K. Decl. ¶ 16 (two-year-old
8 with fever and ear infection had to wait three days for diagnosis and was denied further
9 testing when infection spread); N.V.S.M. Decl. ¶¶ 34-35 (14-year-old with congestion
10 and sore throat denied consultation with doctor); C.H. Decl. ¶¶ 31-32 (six-year-old
11 denied cavity treatment). In one instance, class members watched in terror as a pregnant
12 woman fainted and seized for an extended time before medical support arrived. J.R.F.
13 Decl. ¶ 41; M.R.P Decl. ¶ 61; N.C.G. Decl. ¶ 11.

14 Additionally, obtaining needed medications, and even non-prescription and basic
15 health items like diaper cream, remains extremely challenging due to early pill window
16 times and long lines. J.V.D.A. Decl. ¶ 33 (had to go to medical unit twice a day to get a
17 "little lick of cream" for child's allergic reaction); Z.F. Decl. ¶ 71 (family had to wait in
18 pill line for medicine three times per day and it would take them several hours a day
19 because wait times were so long); V.L.G. Decl. ¶ 10 (family had to wait in pill line for 30
20 minutes twice a day for son's medication); A.D.C. Decl. ¶ 12 (father had to wait in line at
21 7 a.m., 1 p.m., and 7 p.m. to get a tablespoon of diaper cream for his son); *see also* N.G.
22 Decl. ¶ 11.

23 For children with disabilities and other previously-diagnosed medical conditions,
24 detention in secure and restrictive facilities, prolonged separation from their medical
25 providers, and interruption of their medical care plans cause dangerous deterioration of
26 their health. Welch Decl. ¶ 14. For example, over the past three months, a child on the
27 autism spectrum regressed developmentally from missing needed therapies and the harsh
28 conditions at Dilley. A.D.C. Decl. ¶¶ 6, 9-12 (nine-year-old child on autism spectrum not
receiving needed therapies, vomiting from harsh chemical smell in bathrooms, and

1 regressing to the point of soiling himself and needing diapers). Another child with
2 Hirschsprung's disease suffered horribly due to a change in medication and diet that
3 caused her to go 10 days without a bowel movement. D.C.R.R. Decl. ¶ 4 (child "cried in
4 pain the entire time" once she finally had a bowel movement and had "blood in her
5 stool"). One child's pain-management plan for serious injuries to his back and arms was
6 so disrupted at Dilley that he could barely walk. N.C.G. Decl. ¶ 8 ("[T]hey haven't given
7 us anything that will help his pain here."); *see also* V.L.G. Decl. ¶ 9 (epileptic class
8 member's medication type and dosage, that he had been taking since he was three, was
9 changed without explanation).

10 Parents also consistently report concerns regarding their children's mental health.
11 Regression in their children's development is particularly upsetting, including children
12 hitting themselves in the face, becoming aggressive, and frequently wetting themselves
13 after years of being potty trained. *See* A.K. Decl. ¶ 20 (one-year-old has "start[ed] hitting
14 himself in the face"); K.V.L. Decl. ¶ 16 (six-year-old "has started to wet her pants again
15 since coming [here]"); A.D.C. Decl. ¶ 23 (nine-year-old has started needing "to wear
16 diapers . . . [and] we have also seen an increase in tantrums, yelling and having episodes.
17 . . ."). Numerous families report kids being constantly on-edge, anxious, stressed, and
18 depressed. I.B. Decl. ¶ 34 (seven-year-old son "cries constantly, he is volatile and
19 emotional"); N.V.S.M. Decl. ¶ 33 ("I feel very sad and stressed to be here. Sometimes I
20 have anxiety attacks here. My nerves are so high. I don't know what is happening. My
21 muscles will twitch because I'm so nervous and on edge."); Ex. 3 to Pls.' Resp. to Sept.
22 2025 Suppl. JC Reports and Data, [Doc.# 1656-4] C.G.V. Decl. ¶ 13 ("My daughter is
23 suffering here. She wakes up in the middle of the night from nightmares, and she cries at
24 night."). S.M.G. Decl. ¶ 9 ("[My] two year old is always anxious and cannot be still or
25 stay in one place."); K.M.L. Decl. ¶ 26 ("We are locked in here and that it [sic] is
26 difficult. My baby is frustrated and stressed."). Worsening the already difficult physical
27 detention for many families, mental health care at Dilley is sorely lacking. *See, e.g.,*
28 J.R.F. Decl. ¶ 22 ("We've seen the psychologist here, and I told her my daughter is
anxious and biting her nails. She just said, 'don't do that' and then they draw."); N.G.

Decl. ¶ 16 (“Some people asked for a psychologist and were told that they could be given pills to sedate their children which would make them like vegetables.”).

The ICE JC supplemental report notes that “[i]nspection checklists from the CSO highlighted the importance of 24-hour medical care availability and emphasized ongoing staff training in handling medical emergencies,” but provides no information about the providers’ specific certifications or how medical services for children are monitored. ICE JC Suppl. Report at 9.⁴ ICE’s brief discussion of medical services provided at Dilley similarly lacks sufficient detail to support an inference of FSA compliance, particularly in the face of Plaintiffs’ frequent communications with class members about their urgent medical issues. *Id.*; Welch Decl. ¶¶ 3, 5.

3. Children are still not being provided know-your-rights trainings and lack sufficient access to legal counsel.

Contrary to the assertions in the ICE JC supplemental report, children and families at Dilley continue to report that they are not apprised of their rights under *Flores*, including their right to access legal counsel. Welch Decl. ¶ 15. The ICE JC supplemental report claims “ICE facilities are required to provide free phone calls to legal counsel” and that “[l]egal orientation programs (LOPs) are made available to educate minors about immigration proceedings, their rights, and available legal options.” ICE JC Suppl. Report at 33. However, at the November 18-19, 2025 site visit and long before then, class members reported never receiving a legal orientation program, having challenges accessing their immigration lawyers, and not being able to call their immigration lawyers for free. Welch Decl. ¶¶ 15-16; Hidalgo Decl. ¶¶ 24-25 (RAICES not permitted to conduct know-your-rights trainings for class member at Dilley despite requests and LOPs have been discontinued).

Plaintiffs have repeatedly voiced concern that there is still no legal orientation program or know-your-rights program for families at Dilley despite the availability of

⁴ Plaintiffs’ counsel have asked for information regarding medical services and protocols utilized at Dilley repeatedly, but such information has never been provided. Welch Decl. ¶ 10.

1 willing legal services providers to conduct such trainings on a weekly basis. J.R.F. Decl.
2 ¶ 34 (“When we arrived at Dilley, there was an orientation that was about four minutes
3 long and a handout in English. Someone translated it. It didn’t say anything about *Flores*.
4 I only heard of *Flores* through RAICES.”); J.V.D.A. Decl. ¶ 43 (“We did not receive any
5 Know Your Rights training.”); N.T.G. Decl. ¶ 14 (“We have never received any ‘know
6 your rights’ trainings or handouts about my rights under *Flores*.”); Z.F. Decl. ¶¶ 51-52
7 (no one other than RAICES talked to them about their rights); I.B. Decl. ¶ 57 (“We were
8 never told about the *Flores* Agreement.”); M.R.P. Decl. ¶ 56 (“I never received a ‘know-
9 your rights training.’”); N.C.G. Decl. ¶ 14 (“[N]o one here has explained the *Flores* rights
10 to me for my child.”); C.H. Decl. ¶ 38 (“I have not been told about my rights or about a
11 case called *Flores*.”); Q.G. Decl. ¶ 8 (“[ICE officers at Dilley] told me I had no rights.”).
12 Several class members report that while they never received a know-your-rights training,
13 ICE officials did explain how to seek voluntary departure and self-deport. *See* K.M.L.
14 Decl. ¶¶ 33-35; C.R.G. Decl. ¶ 18; M.M.S. Decl. ¶ 19.

15 The ICE JC supplemental report acknowledges there is no live legal orientation
16 program at Dilley but asserts that families are apprised of their legal rights through a
17 “new” video at intake. ICE JC Suppl. Report at 32. The video is generally presented in a
18 time and manner that prevent class members and their families from meaningfully
19 understanding their rights. Welch Decl. ¶ 15. Most families are exhausted, disoriented,
20 and frightened when they arrive at Dilley and are not able to retain complicated legal
21 information, to the extent they can even hear or understand the video. *Id.* ¶ 15. As far as
22 Plaintiffs’ counsel are aware, the video does not inform class members of their basic
23 rights under *Flores* nor does it provide an opportunity for class members to ask questions
24 about their legal rights. *Id.* ¶ 15.

25 Class members and their parents repeatedly express distress at their limited access
26 to information about their rights or the status of their cases. *See, e.g.*, A.T.L. Decl. ¶ 16
27 (“I wish that there was the opportunity for independent lawyers to tell us about our rights
28 and help us know what our options were.”); M.R.P. Decl. ¶¶ 59-60 (did not receive any
information about separated husband or immigration case, only voluntary departure);

1 N.V.S.M. Decl. ¶ 49 (“If I could change one thing, it would be to give people here real
2 information.”); N.G. Decl. ¶ 17 (expressing frustration at either the nonexistence or lack
3 of knowledge of any grievance policy or how to make reports at Dilley). No families
4 reported being told they could watch a know your rights video “on demand.” *Contra* ICE
5 JC Suppl. Report at 32. *See* N.G. Decl. ¶ 18 (family asked for a manual regarding their
6 rights and the rules of Dilley and were told no); Welch Decl. ¶ 15.⁵ Most recently, class
7 members were not only denied know-your-rights trainings, but also were affirmatively
8 told that *Flores* protections no longer exist. N.G. Decl. ¶¶ 4-5 (ICE officers and
9 supervisors told a group of detained families that the *Flores* rule was revoked).

10 Class members also continue to face barriers to making free phone calls to legal
11 counsel, including *Flores* attorneys or other private lawyers. K.V.L. Decl. ¶ 40 (“When I
12 called you, Katie Johnson from *Flores*, it was not free. I had to pay.”); Q.G. Decl. ¶ 13
13 (“Until this moment providing this declaration, I did not know that I had the right to
14 make a free call to my son’s lawyer.”); J.R.F. Decl. ¶ 31 (“I never touch the phone here
15 without having money. I called RAICES and I’m not sure if I was charged. I know
16 they’re pro bono, but I don’t think the calls to them are free.”); E.O.N.M. Decl. ¶ 45
17 (even calling RAICES costs money); Ex. 16 to Pls.’ Resp. to Sept. 2025 Suppl. JC
18 Reports and Data, [Doc.# 1656-17] M.O. Decl. ¶ 31 (have to pay for legal calls with your
19 own money); A.T.L. Decl. ¶ 11 (“[W]e haven’t been able to communicate with [our
20 lawyers] while we have been detained.”). Notwithstanding the many occasions Plaintiffs
21 have raised this violation to Defendants, families still receive insufficient instructions on
22 how to make free legal phone calls. Welch Decl. ¶ 16. On our site visits to Dilley, *Flores*
23 counsel saw the instructions ICE provides regarding free legal calls, which state that they

24 ⁵ Language access continues to be a serious problem at Dilley exacerbating families’
25 ability to understand their rights or access legal counsel. Assertions in the report that
26 “ICE is committed to ensuring minors can communicate in a language they understand”
27 and that “inspection checklists verify the availability of interpreters and other language
28 access services throughout the facility” conflict with the experiences of all of the non-
Spanish and English speakers we have met with over the past seven months. *Compare*
ICE JC Suppl. Report at 14 with Z.F. Decl. ¶ 66 (“There is very little translation
available, except for medical staff.”); A.K. Decl. ¶ 25; C.H. Decl. ¶ 27.

1 can be made only to a small number of pro bono contacts on an ICE-provided list. Welch
2 Decl. ¶ 16. Lastly, many class members report not being told they could access free
3 lawyers and never receiving a list of free lawyers. N.T.G. Decl. ¶ 13 (“We were never
4 given a list of available free lawyers. My mom ended up finding out about RAICES from
5 other families living here.”); M.R.P. Decl. ¶ 55 (“I didn’t receive a list of free legal
6 counsel, I just talked to other people and they told me about RAICES.”).

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

8
9 The ICE JC’s supplemental report ignores Plaintiffs’ concerns regarding the lack
10 of child-friendly foods and instead simply asserts that “meals continue to meet dietary
11 standards [and] . . . [l]ower-sugar options are available upon request” and shows photos
12 of baby food. ICE JC Suppl. Report at 17, 21. However, for months, families have
13 complained that the food is not nutritious, that it is always the same, and that there are no
14 toddler-friendly options, leading many children to lose weight or stop eating entirely. *See*,
15 e.g., C.G.V. Decl. ¶ 16 (“The menu has not changed and we’ve been here for 40 days.”);
16 J.R.F. Decl. ¶¶ 19, 40 (child losing weight from not eating food because it is too spicy
17 and heavy); M.R.P. Decl. ¶ 46 (“The kids don’t like the food . . . they need plain food.”);
18 N.C.G. Decl. ¶ 20 (“[M]any children do not eat the food here.”); N.G. Decl. ¶ 22 (too
19 spicy and not nutritious); M.O. Decl. ¶ 25 (“There is no special food for toddlers”; the
20 food is too hard for toddlers to chew). Families continue to report that due to the lack of
21 child-friendly, varied, and sufficient amounts of food, their children are constantly
22 hungry, especially babies and toddlers. *See* I.B. Decl. ¶ 39 (two-year-old “does not eat the
23 food here, he is hungry all the time”); K.V.L. Decl. ¶ 37 (six-year-old girl is losing
24 weight); C.R.G. Decl. ¶ 8 (son barely eats); A.K. Decl. ¶ 11 (“Every day I am crying
25 because there is not food for our son to eat . . . I am so sad all the time that there is not
26 baby food here.”); Welch Decl. ¶ 17; Hidalgo Decl. ¶ 29 (“[F]ood provided at Dilley is
27 not adequate nor appropriate for children, leading to tender-age class members’ physical
28 deterioration and loss of weight”).

Recent interviews with class members reveal that food quality and variety continue to deteriorate. Class members report that food served to them recently was contaminated with worms and mold, causing many children to become ill and vomit repeatedly. A.K. Decl. ¶¶ 11-12 (“[L]ast week, I was given broccoli and cauliflower that were moldy and had worms.”); N.V.S.M. Decl. ¶ 39; N.G. Decl. ¶ 15 (“We were given wormy food and when someone spoke out about it . . . he was taken in the middle of the night and threatened that he and his family would be separated.”); Welch Decl. ¶ 13.

The ICE JC supplemental report states that “kitchens in the FRC were subject to regular inspections focused on cleanliness, proper food storage, and adherence to preparation standards” and “daily inspections.” ICE JC Suppl. Report at 8-9. But clearly, the inspections are not sufficient if they fail to prevent contaminated food from being served to children. Welch Decl. ¶ 17.

Many families have also reported that their children are being denied the special diets they need to stay healthy. M.M.S. Decl. ¶¶ 10-11 (cafeteria will not accommodate food allergies or vegetarianism for nine-year-old); E.O.N.M. Decl. ¶ 17; A.K. Decl. ¶¶ 13-15; D.C.R.R. Decl. ¶¶ 4-6 (child with Hirschsprung’s disease was denied a special diet, leading to vomiting, fever, and severe constipation). Additionally, despite Plaintiffs’ repeated detailed suggestions of alternative healthy food and snacks requested by class members, parents report there have been no changes to the availability of snacks for children between meals. *See* K.M. Decl. ¶ 39 (only apples for snacks; never any other type of fruits, like bananas); S.M.G. Decl. ¶ 7; Welch Decl. ¶¶ 17-18. To the extent “low-sugar” snacks are available “upon request,” families we have met with are not aware of these additional options. *Compare* ICE JC Suppl. Report at 17 *with* Welch Decl. ¶ 18.

Six months after Plaintiffs’ counsel began alerting Defendants to the lack of potable water for class members in many areas of the facility, class members reported in November that water filters have been installed on sinks in the living quarters. Welch Decl. ¶ 19. However, parents continue to report having limited access to bottled water for mixing with baby formula and have voiced concerns that the tap water has caused digestive issues for babies. A.K. Decl. ¶ 12, 17. In October, parents reported needing a

1 doctor's note to get bottled water for their babies' formula. S.M.G. Decl. ¶ 8 (had to ask
2 doctor for bottled water for baby, because guard would not provide full bottle of water);
3 K.M.L. Decl. ¶ 17 ("Every time I want a bottle of water for my baby's formula, the
4 guards tell me I have to go to medical."). In November, parents reported being rationed
5 one bottle of water per day for baby formula. A.K. Decl. ¶ 17. Otherwise, bottled water
6 can be purchased for \$1.21 per bottle at the commissary, which most families cannot
7 afford. Welch Decl. ¶ 19. Being provided with potable drinking water is not only a basic
8 human right, it is also covered by FSA ¶ 12.A. If Defendants choose to detain infants and
9 toddlers, they must take into account their particular vulnerability and ensure that ample
10 bottled water is available to them for formula. *Id.*

11 **5. *Children still lack access to sufficient hygiene products.***

12 Although the ICE JC's supplemental report claims children are "continuously
13 provided with personal hygiene products," as recently as two weeks ago, class members
14 reported that these products continue to be deficient and/or inadequate. ICE JC Suppl.
15 Report at 18. The products that children do receive include toothbrushes that fall apart,
16 ineffective deodorant, insufficient toothpaste, and only harsh hand soap for all washing
17 purposes (including hair, face, and body). N.T.G. Decl. ¶ 15 ("The deodorant they gave
18 us does not work at all and the toothbrushes fall apart."); V.L.G. Decl. ¶ 13 (toothbrushes
19 break immediately); Z.F. Decl. ¶ 68 ("[T]he soap they give us for hair and shower gel is
20 very bad, like hand soap."). Families report that the hand soap is too harsh on their
21 children's skin, leading to rashes and skin peeling. *See* S.M.G. Decl. ¶ 10 ("We did not
22 like using the hand soap they have in the showers on our babies' skin."); C.G.V. Decl. ¶
23 19 ("I have to buy shampoo and body soap for my daughter because the soap in the
24 showers is just hand soap and it irritates her skin."); C.R.G. Decl. ¶ 17 ("The products
25 they gave us . . . were very hard on our skin . . ."); N.C.G. Decl. ¶ 13 ("The soap is harsh
26 and makes people get rashes.") Requests for baby wash have been denied. Welch Decl. ¶
27 20. Some families report that they spend their limited resources on basic items for their
28 children at the commissary to keep them safe and healthy. J.R.F. Decl. ¶¶ 24-25; M.R.P.

Decl. ¶ 48 (hygiene products provided “to last one day” – family has to buy toothbrushes, shampoo and body soap); K.V.L. Decl. ¶ 39; A.D.C. Decl. ¶ 15; N.V.S.M. Decl. ¶ 40 (“The only thing we don’t pay for [here] is toilet paper.”). To make matters worse, basic hygiene products, such as shampoo, are often unavailable at the commissary. M.M.S. Decl. ¶ 23 (commissary was out of shampoo for five days). Examples of basic needs products sold in the commissary include: \$5.73 for deodorant, \$1.44 for soap, \$2.39 for toothpaste and \$1.30 for a single dose of Tylenol. Welch Decl. ¶ 20. Class members report that prices are also rising. C.G.V. Decl. ¶ 19.

6. 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 their non-detained family members beyond their initial call upon entering the facility. *See, e.g.*, M.M.S. Decl. ¶ 25 (“My daughter is not permitted to make free phone calls to family members. There are signs that say that calls cost seven cents per minute, but you have to look at the fine print that there is a 23% surcharge.”); N.T.G. Decl. ¶ 16 (“We have to pay for phone calls to talk to our family here.”); L.R.L. Decl. ¶ 38 (same); K.M.L. Decl. ¶ 31 (same); C.R.G. Decl. ¶ 19 (same); A.D.C. Decl. ¶ 21. Many class members are distressed that, for weeks at a time, they do not have the funds to communicate with parents or siblings who are not detained with them. N.C.G. Decl. ¶ 15 (“... I have not been able to put any money on my phone account because of a problem with my CoreCivic ID number.”). Others report they are unable to contact their family members to ask them to put money in their accounts. Welch Decl. ¶ 10; *see* K.M.L. ¶ 31; N.V.S.M. Decl. ¶ 23.⁶ Class members have the right to speak to family members for free under the *Flores* Settlement Agreement Notice of Rights Pursuant to September 18, 2020

⁶ In November 2025, Plaintiffs’ counsel learned that in-person visitation has now started at Dilley for family members and spouses. This is a welcome improvement for families with U.S. citizen relatives, but the vast majority of class members rely on phone calls to keep in touch with their family members. Welch Decl. ¶ 21.

1 Court Order Doc. # 1056-1 at *2,⁷ and it is unacceptable to deny children communication
2 with family for months at a time. FSA ¶ 11, 12.A, and Ex. 1.A ¶ 11.

3 **7. Defendants do not provide Flores compliant education or recreation at Dilley.**

4
5 The ICE JC supplemental report admits that a “comprehensive education program
6 was not in place” for the past seven months but states that “[f]amilies were provided with
7 age-appropriate educational packets and materials” and that a new education program
8 will be starting in January. ICE JC Suppl. Report at 13. Defendants also concede that ICE
9 does not yet provide a “recreation program that complies with all Flores requirements.”
10 *Id.* 10. It appears that now Defendants intend to change the FRS and programming to
11 bring it into compliance. *Id.* at 9-10, 13, 15-16. But Defendants do not explain the delay
12 in providing these vital services or deny that they are not currently providing them to
13 children who are languishing for months with little or nothing to do. *See, e.g.,* J.R.F.
14 Decl. ¶ 18 (school is “just drawing”); N.V.S.M. Decl. ¶ 29 (“I feel like I am losing my
15 education here.”); N.T.G. Decl. ¶ 11 (school is “just one hour a day”); A.K. Decl. ¶ 21
16 (no preschool here). Children and families dispute that educational packets provided are
17 “age-appropriate.” I.B. Decl. ¶ 45 (“[T]here is really no school for the children”); M.R.P.
18 Decl. ¶ 42 (“All they do at the school here is draw for one hour.”). Further, the minimal
19 education that is offered is wholly inaccessible to non-English and Spanish speakers. *See*
20 N.G. Decl. ¶ 26 (the one-hour lessons are with a Spanish-speaking teacher and the family
21 doesn’t speak Spanish).

22 To make matters worse, families now report that classrooms have a maximum
23 capacity of approximately 12 to 15 children, which results in some children being turned
24 away. N.V.S.M. Decl. ¶ 27 (“There is just one professor at the school, only a few kids
25 can go in every day. It’s just 12-15 kids is the capacity of the room. If you don’t get there
26 early, sometimes you won’t be able to get into the classroom because it fills up.”); N.G.C.
27 Dec. ¶ 16 (“[W]hen I took my daughter [to the school room] yesterday, they already had

28 ⁷ Order re January 29, 2021 Status Conference, Doc. # 1077, at 2 (“[T]he Court approved the final language of the Notice of Rights”)

1 15 kids so she was not able to go. They said that was the limit.”). Children who arrive
2 after capacity is reached are denied access to any education for the day.

3 Classroom instructors now appear to be asking class members about sensitive
4 immigration issues during their school hour, including asking them to write essays on
5 why they are afraid to return to their home countries. M.M.S. Decl. ¶ 16 (“The questions
6 about immigration they ask the kids during class are not proper. What does ICE have to
7 do with math?”); C.R.G. Decl. ¶ 7 (child asked about immigration case in school);
8 J.V.D.A. Decl. ¶ 37 (child given assignment in class about his asylum case). In addition
9 to being wholly inappropriate and demonstrating a complete lack of awareness of trauma-
10 informed treatment of children, this kind of assignment and activity can prejudice
11 children’s legal rights and relief and interfere with their attorney-client relationships if
12 they are represented, under FSA ¶ 11.

13 Countless declarations from class members and families stand in stark contrast to
14 the report’s assertion that “ICE seeks to create a supportive environment where minors
15 can develop essential life skills, maintain healthy routines, and enjoy meaningful leisure
16 experiences.” ICE JC Suppl. Report at 10. Children are actively suffering while detained
17 at Dilley with little to no meaningful education, recreation, activities, or toys, in violation
18 of FSA Ex. 1 ¶¶ 4-7. *See, e.g.*, Welch Decl. ¶ 22; K.M. Decl. ¶ 37 (“There just isn’t a lot
19 to do for a six-year-old girl, especially since we have been in detention for more than 100
20 days.”); N.T.G. Decl. ¶ 20 (“It’s just the same thing here day after day after day.”); C.H.
21 Decl. ¶ 27.

22 **C. ICE’s FSA monitoring system and protocols are woefully deficient to
23 ensure FSA compliance.**

24 The ICE JC supplemental report purports to describe a variety of “standards and
25 tools utilized by ICE to ensure compliance with the FSA.” ICE JC Suppl. Report at 3-14.
26 However, the various protocols and checklists attached to the report are generally too
27 vague, unrelated to actual FSA provisions, or inaccurate to meaningfully achieve this
28 objective. For example, the “Family Residential Standards JFMD Weekly Compliance
Tool Center: Dilley FRC” document has only one check box for FRS 4.3 Medical Care

1 compliance: “Did new admission examinations occur in compliance with the
2 requirements?” Doc. # 1692-12 at 2. While admission examinations are an important
3 component of ensuring safe medical care for class members, they should not be the only
4 medical care metric evaluated to ensure compliance with the FSA. As another example,
5 the FRS 4.1 Food Service requirement purports to measure “safety/sanitary measures,”
6 “food quality,” and food temperatures, but there is no metric to evaluate whether food is
7 actually child friendly. *Id.* at 2. Moreover, it is notable that the FRS 5.2 Education, FRS
8 5.5 Recreation, and FRS 5.8 Visitation metrics were all marked “Compliant” in August
9 even though ICE’s own report admits visitation did not start until November and *Flores*-
10 compliant education and recreation is not slated to begin until January 5, 2026. *Compare*
11 *Id.* at 2-3 with ICE JC Suppl. Report at 10, 16. Given the voluminous evidence of FSA
12 violations, it is clear to Plaintiffs that the current monitoring protocols at Dilley are
13 wholly inadequate to ensure FSA compliance.⁸

14 **III. CONCLUSION**

15 The ICE JC supplemental report acknowledges that ICE has been out of
16 compliance with many FSA requirements for seven months, yet somehow still asserts
17 ICE is in “substantial compliance with FSA requirements” and goes “beyond to meet its
18 intent.” ICE JC Suppl. Report at 16, 17. ICE’s own data and Plaintiffs’ declarations from
19 site visits in September, October, and November categorically refute ICE’s assertions.
20
21

22 ⁸ The ICE JC supplemental report continues to assert that the 2020 FRS standards “were
23 modified to reflect the abbreviated duration of stay” despite the prolonged detention of
24 hundreds of children. ICE JC Suppl. Report at 14. The report also fails to explain
25 coherently what the actual modifications to the FRS standards were and which FRS
26 standards are currently in place. For example, FRS 4.1 Food Service is a 31-page policy,
27 and the 3 paragraphs describing the modifications to it do not describe what was changed.
28 Family Residential Standards 2020, Doc. # 1567-13; ICE JC Suppl. Report at 8-9.
Similarly, 2020 FRS 4.3 Medical Care is a 36-page policy, and the 5 paragraphs
describing the modification also do not articulate what changed. Family Residential
Standards 2020; ICE JC Suppl. Report at 9.

1 Given the ongoing FSA violations occurring in family detention and Defendants'
2 recalcitrant or non-existent responses, Plaintiffs may have no choice but to seek court
3 intervention to enforce this Court's previous orders in the near future.

4
5 Dated: December 8, 2025

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13 CHILDREN'S RIGHTS

14 Leecia Welch

15 Eleanor Roberts

16 /s/ Leecia Welch

17 Leecia Welch

18 *One of the attorneys for Plaintiffs*

CERTIFICATE OF SERVICE

I hereby certify that on December 8, 2025, I caused a copy of Plaintiffs' Response to Supplemental Juvenile Coordinator Reports and Data to be served to all counsel through the Court's CM/ECF system.

Dated: December 8, 2025

/s/ Leecia Welch

Leecia Welch

One of the attorneys for Plaintiffs

**Exhibit Index to Plaintiffs' Response to
December 1, 2025 Supplemental ICE Juvenile Coordinator Report and Data**

Exhibit No.	Exhibit Description
1	Declaration of Javier Hidalgo, December 8, 2025 ("Hidalgo Decl.")
2	Declaration of Leecia Welch, December 8, 2025 ("Welch Decl.")
3	J.R.F. Declaration (Dilley), September 9, 2025 ("J.R.F. Decl.")
4	Z.F. Declaration (Dilley), September 10, 2025 ("Z.F. Decl.")
5	I.B. Declaration (Dilley), September 11, 2025 ("I.B. Decl.")
6	N.V.S.M. Declaration (Dilley), November 17, 2025 ("N.V.S.M. Decl.")
7	C.R.G. Declaration (Dilley), November 18, 2025 ("C.R.G. Decl.")
8	A.K. Declaration (Dilley), November 19, 2025 ("A.K. Decl.")
9	M.M.S. Declaration (Dilley), November 18, 2025 ("M.M.S. Decl.")
10	M.R.P. Declaration (Dilley), September 11, 2025 ("M.R.P. Decl.")
11	N.G.C. Declaration (Dilley), October 10, 2025 ("N.G.C. Decl.")
12	L.R.L. Declaration (Dilley), October 9, 2025 ("L.R.L. Decl.")
13	J.V.D.A. Declaration (Dilley), September 10, 2025 ("J.V.D.A. Decl.")
14	K.M.L. Declaration (Dilley), October 10, 2025 ("K.M.L. Decl.")
15	N.G. Declaration (Dilley), November 21, 2025 ("N.G. Decl.")
16	K.V.L. Declaration (Dilley), October 9, 2025 ("K.V.L. Decl.")
17	V.L.G. Declaration (Dilley), October 9, 2025 ("V.L.G. Decl.")
18	N.C.G. Declaration (Dilley), September 11, 2025 ("N.C.G. Decl.")
19	D.C.R.R. Declaration (Dilley), November 21, 2025 ("D.C.R.R. Decl.")
20	S.M.G. Declaration (Dilley), October 9, 2025 ("S.M.G. Decl.")
21	N.T.G. Declaration (Dilley), September 10, 2025 ("N.T.G. Decl.")
22	Q.G. Declaration (Dilley), September 10, 2025 ("Q.G. Decl.")
23	A.T.L. Declaration (Dilley), September 11, 2025 ("A.T.L. Decl.")

Previously Filed Declarations

Docket No.	Description
1656-5	Ex. 4 to Pls.' Resp. to Sept. 2025 Suppl. JC Reports and Data, C.H. Declaration (Dilley), July 28, 2025 [Doc. # 1656-5] ("C.H. Decl.")
1656-15	Ex. 14 to Pls.' Resp. to Sept. 2025 Suppl. JC Reports and Data, K.M. Declaration (Dilley), July 28, 2025 [Doc. # 1656-15] ("K.M. Decl.")
1656-8	Ex. 7 to Pls.' Resp. to Sept. 2025 Suppl. JC Reports and Data, A.D.C. Declaration (Dilley), September 9, 2025 [Doc. # 1656-8] ("A.D.C. Decl.")
1656-12	Ex. 11 to Pls.' Resp. to Sept. 2025 Suppl. JC Reports and Data, E.O.N.M. Declaration (Dilley), July 28, 2025 [Doc. # 1656-12] ("E.O.N.M. Decl.")
1656-4	Ex. 3 to Pls.' Resp. to Sept. 2025 Suppl. JC Reports and Data, C.G.V. Declaration (Dilley), July 28, 2025 [Doc. # 1656-4] ("C.G.V. Decl.")
1656-17	Ex. 16 to Pls.' Resp. to Sept. 2025 Suppl. JC Reports and Data, M.O. Declaration (Dilley), July 29, 2025 [Doc. # 1656-17] ("M.O. Decl.")

EXHIBIT 1

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. RAICES’s mission is to defend the rights of immigrants and refugees; empower individuals, families, and communities of immigrants and refugees; and advocate for liberty and justice. This mission encompasses striving to ensure access to asylum and protection for noncitizens, including those arriving at the border and subject to expedited removal. RAICES provides free and low-cost immigration legal services to underserved immigrant children, families, and individuals.

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 helped over 250 families in ICE custody.
5. I have read the ICE Juvenile Coordinator's supplemental report dated December 1, 2025 [Doc. # 1692-4] and the attachments to the Juvenile Coordinator's report.
6. 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.

RAICES Attorneys Notify Defendants of Potential Flores Violations

7. I have previously submitted declarations to this Court detailing my team's experience with ICE's lack of compliance with *Flores* protections, and am familiar with this court's prior Orders instructing ICE with regard to its compliance. The following facts set forth by me may appear similar to those in my prior declarations, particularly my April 21, 2020, declaration [Doc. #774-63], because unfortunately the facts have largely remained the same and ICE's noncompliance persists.
8. Because ICE-ERO at Dilley consistently disregard *Flores* protections, we have made it part of our normal course of business to notify Defendants of potential *Flores* violations.
9. As a matter of practice, our team monitors the length of time our minor clients, each of whom is a *Flores* class member, are in DHS custody.
10. As a matter of practice, our team notifies ICE-ERO at Dilley when it appears class members' prolonged detention may be in violation of *Flores* and we inquire as to ICE-ERO's efforts toward release of the family and the Government's justification for prolonged detention. We are unable to notify ICE-ERO of every violation of *Flores*, and

therefore our effort to notify Defendants of potential *Flores* violations under-represents the true number of cases where a class member's prolonged detention at Dilley may be in violation of *Flores*.

11. I have reviewed our records and since the beginning of April 2025, which is when ICE began detaining families in Dilley anew, we have notified Defendants of at least one hundred forty-seven (147) unique instances of what appear to be unnecessary delay of a class member's release. RAICES has sent ICE-ERO over seventy-seven (77) of these notifications since August 2025. In each of the notices we have sent, we ask ICE-ERO the status of the class member's release or their case status otherwise.
12. Attached hereto as **Exhibit A** are true and correct examples of ICE-ERO's responses to RAICES' notices of potential *Flores* violations our records indicate were sent to ICE-ERO since the beginning of August 2025. Our clients' personal identifying information has been redacted.
13. ICE-ERO does not always answer our inquiries, and the action ICE-ERO takes in response to our notices have been inconsistent. While ICE-ERO has released some class members, they increasingly respond by stating their intent to detain class members in Dilley indefinitely pending further immigration processes and proceedings.
14. The Juvenile Coordinator's report and relevant attachments [Doc. #s 1692-4, 1692-6, 1692-9] indeed show many families released after the 20-day threshold, but with many exceeding that threshold by only a handful of days during the months of August and September. Consistent with this data, during that time frame ICE-ERO's responses to RAICES' notices of potential *Flores* violations did indicate the Government made some efforts to release class members within 20 days. For example, in an August 12, 2025 response to one of our

inquiries, the Government responded “Your clients are scheduled for release due to 20 day limitation.” See **Exhibit A** at pg 1. However, recently, ICE-ERO’s approach towards compliance has evolved. It has become more common, and recently has become the norm, that ICE-ERO indicates an intent to not consider *Flores* protections when making release decisions.

15. A response from Defendants often indicates no efforts to release the class member. For example, in a November 26, 2025 response to an inquiry with regard to a class member in DHS custody for over twenty-one (21) days, an ICE-ERO deportation officer responded “Currently no plans for release.” See **Exhibit A** at pg 60.
16. Often, ICE-ERO’s only stated reason for prolonged detention is the class member’s immigration case posture. For example, in a September 26, 2025 response to an inquiry with regard to a class member in DHS custody for over twenty-three (23) days, an ICE-ERO deportation officer responded “At this time, the family’s case remains pending a decision from USCIS...To determine the next appropriate steps, we must receive USCIS’s decision...once a decision from USCIS is issued, we will re-evaluate the family’s situation and take appropriate actions”. See **Exhibit A** at pg 3. In a November 15, 2025 response with regard to class members in ICE custody over twenty-eight (28) days, an ICE-ERO deportation officer responded “Your clients have an upcoming Master Hearing scheduled for 11/18/2025, they will remain in custody until the completion of their hearing.” See **Exhibit A** at pg 37.
17. On several occasions, ICE-ERO has indicated a class member is a flight risk but provided no individualized explanation or analysis as to the class member. Indeed, ICE-ERO’s response indicates no imminent removal. For example, in an October 15, 2025 response

with regard to a class member in ICE custody over twenty-nine (29) days, an ICE-ERO deportation officer responded “your client remains a proven flight risk. Your client continues to unwillingly cooperate with the Colombian consulate to obtain travel documents...A third country removal request has been made; however, your client will remain in custody until their removal is completed.” *See Exhibit A* at pg 7. In another instance, in an October 15, 2025 response with regard to a class member detained at Dilley for at least forty-eight (48) days, an ICE-ERO deportation officer stated “Your client failed to comply with a scheduled removal while in a detained environment. Based on the totality of the circumstances, your client is considered a flight risk and will remain in custody.” *See Exhibit A* at pg 13. In yet another instance, with regard to a class member who had been detained in Dilley from April 25, 2025 through June 27, 2025 - approximately sixty (60) days - released and then **re-detained** in Dilley for another twenty-nine (29) days, an ICE-ERO deportation officer responded “Your clients failed to comply with their removal order. Their cases are being reviewed for prosecution for Failure to Comply. There is no release date at this time.” *See Exhibit A* at pg 21.

18. Alarming, ICE-ERO has begun to indicate that for some class members, they intend to wait for a hearing in the child’s BIA Appeal. This is despite our explaining to ICE-ERO that such a hearing could take months to years and perhaps never come. *See e.g. Exhibit A* at pp 32 and 57. Hearings before the BIA are exceedingly rare. Usually, the BIA issues a written decision based on the parties’ briefs alone without a specific timeline. It can sometimes take years for the BIA to issue a decision on a fully briefed matter.
19. Based on our records, there has been no observable increase in Defendants’ efforts to release class members from Dilley, but rather a marked decrease.

Defendants' Unnecessary Delay in Class Members' Release Includes Minors Who are not in Expedited Removal

20. It has generally been the practice of ICE-ERO to release class members with their parents when the family is issued a Notice to Appear to initiate removal proceedings under INA § 240, or a referral to an immigration judge for withholding only proceedings. It is my understanding this practice was in part to comply with *Flores* requirements prohibiting detention of class members in unlicensed facilities when removal is not imminent.
21. Among the class members detained in Dilley are children who, with their family members, were apprehended in the interior rather than upon crossing the southern border. Many of these families are in ongoing immigration proceedings, including but not limited to removal proceedings. ICE-ERO now cite the ongoing removal proceedings as justification for detaining class members who do not face imminent removal. *See e.g. Exhibit A* at pp 27 (“In client’s Master Hearing... the immigration Judge gave your client a task to be complete by a certain time frame. Due to the IJ decision your client will remain in custody...”), 43 (“The family’s individual hearing is scheduled for January 7, 2026, at 8:30 AM”), 52 (“Your clients are scheduled their individual hearing on January 14, 2025. A review of their custody status will be completed following the decision from an immigration judge.”)
22. RAICES’ Asylum Access Services is very limited in its ability to provide direct representation in full removal proceedings under INA § 240, or withholding-only proceedings. There are multiple ways class members are prejudiced from meaningfully being able to pursue their legal cases due to being detained in Dilley indefinitely. Class members and their families are often denied access to their property and to information that would provide the material support for their claims for legal relief. Moreover, while the

Juvenile Coordinator's report [Doc. # 1692-4, at 14] suggests language access at Dilley is in compliance with *Flores*, RAICES records indicate otherwise. Class members and their families are often not able to access copies of forms they are required to submit in the languages they speak, nor do they have access to interpretation services to be able to submit this information to the immigration court in English. For example, while RAICES is aware that the Form I-589 Application for Asylum and for Withholding of Removal is made available by the Government for reading in twelve languages including: Arabic, Simplified Chinese, Dari, French, Haitian Creole, Pashto, Portuguese, Russian, Somali, Spanish, Turkish, and Vietnamese, USCIS and EOIR only accept completed forms in English. Class members are at constant risk of being prejudiced in their immigration proceedings while detained as they often have no way to submit completed I-589 to the court by the short deadlines set by immigration judges in detained proceedings.

23. It is often reported to us by class members and their families that they are very limited in their ability to access the library and computers at Dilley and the limitations in access, as well as technical failures often impact their ability to timely file required forms in their cases. Moreover, ICE-ERO maintains a campaign of constantly urging families to give up their pursuit of protection and return home for some promised amount of money and implying that if they do not "voluntarily" return they risk family separation.

Lack of Legal Orientation Program and Group KYR Presentations

24. In prior years, RAICES services included group legal presentations that would provide know-your-rights ("KYR") information to class members. Such presentations were essential in countering misinformation and lack of information detained class members commonly experience when navigating their immigration cases while detained. These

presentations were also an important opportunity for detained class members to ask questions about their rights and legal options. While RAICES has previously requested they be allowed to provide that same presentation to currently detained class members, ICE-ERO has denied that request and has yet to respond to RAICES request to clarify the reason for the denial and how to cure any issue ICE-ERO identified with the request. RAICES submitted a FOIA request to seek this information on June 12, 2025, which remains pending.

25. Separate from the KYR presentations RAICES was able to provide, historically, detained class members previously had access to a Legal Orientation Program that was provided by legal service providers pursuant to contracts and subcontracts with the Department of Justice. It is my understanding that in April 2025, the Department of Justice terminated its contracts with Legal Orientation Program providers. To my knowledge, there remains no meaningful replacement for the Legal Orientation Program. This is further evidenced by the lack of information class members and their families have received by the time we meet with them.

Lessened Oversight and Accountability

26. Historically, the Office for Civil Rights and Civil Liberties (CRCL) and the Office of the Immigration Detention Ombudsman (OIDO), through their oversight functions, served as an additional check against misconduct and rights violations suffered by *Flores* class members while in ICE custody.
27. Following a drastic reduction in workforce at those agencies, which functionally eliminated these oversight agencies, we have observed an increase in the misconduct and rights

violations class members and their families report experiencing while detained in Dilley. This includes coercive and prejudicial efforts to convince detained families to abandon their pursuit of legal protections and relief and instead to agree to return to their home country for a small sum of money. Such coercive tactics include threats of family separation. Indeed, we have observed several families separated while detained at Dilley.

Class Members Report Harmful Conditions

28. In the normal course of our work, we inquire about the conditions of detention faced by our clients. RAICES tracks various issues reported to us by *Flores* class members detained at Dilley. In addition to prolonged detention, we often hear of other egregious conditions imposed upon class members by ICE. Lack of educational material, resources, and age-appropriate activities for developing children are a frequently reported issue. I understand the Government's noncompliance with *Flores* with regard to education at Dilley is reflected in the Juvenile Coordinator's report [Doc. # 1692-4 at 13].
29. Our clients often report that the food provided at Dilley is not adequate nor appropriate for children, leading to tender-age class members' physical deterioration and loss of weight. Families also report conditions that are harmful to class member children such as the lights being on in children's sleeping areas for 24 hours and inadequate clothing—as just some examples. While the Juvenile Coordinator's report [Doc. # 1692-4 at 9] acknowledged inappropriate diet for certain populations outside of South America, it also suggests that the same diet is appropriate for minors from South America. RAICES questions the conclusion that ethnic background or country of origin is a determining factor in a human child's nutritional needs. Notwithstanding, RAICES can confirm that families from South America also report the harmful effects of the inadequate food at Dilley on their class

member children. For the months of August through October 2025, families detained at Dilley have reported to RAICES issues with such physical and environmental conditions on at least fifty-seven (57) occasions.

30. Clients also frequently report not receiving adequate medical care when they report issues to ICE-ERO. RAICES records indicated families at Dilley have raised concerns over inadequate medical care on at least three hundred sixty (360) occasions.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: December 8, 2025

San Antonio, Texas

A handwritten signature in dark ink, appearing to read "Javier Hidalgo", is written over a horizontal line.

Javier C. Hidalgo

EXHIBIT A

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**



Javier Hidalgo <javier.hidalgo@raicestexas.org>

Fwd: Release Status and Potential Violation of Flores Settlement Agreement, #Axxx-xxx-913

Javier Hidalgo <javier.hidalgo@raicestexas.org>
To: Javier Hidalgo <javier.hidalgo@raicestexas.org>

Wed, Dec 3, 2025 at 3:37 PM

----- Forwarded message -----

From: SNALegalAccess-Dilley, <SNALegalAccess-Dilley@ice.dhs.gov>
Date: Tuesday, August 12, 2025 at 6:23:27 AM UTC-5
Subject: RE: Release Status and Potential Violation of Flores Settlement Agreement, #Axxx-xxx-913
To: RAICES Karnes <raiceskarnes@raicestexas.org>, SNALegalAccess-Dilley, <SNALegalAccess-Dilley@ice.dhs.gov>

Good morning,

Your clients are scheduled for release due to 20 day limitation.

From: RAICES Karnes <raiceskarnes@raicestexas.org>
Sent: Monday, August 11, 2025 4:45 PM
To: SNALegalAccess-Dilley, <SNALegalAccess-Dilley@ice.dhs.gov>
Cc: RAICES Karnes <raiceskarnes@raicestexas.org>
Subject: Re: Release Status and Potential Violation of Flores Settlement Agreement, #Axxx-xxx-913

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Good afternoon,

I write to follow up on this Flores release request for our clients. Please advise as to when the family can expect to be released. Thank you!

Respectfully,

Sam Doiron (she/her/hers)

Staff Attorney | Asylum Access Services | RAICES

+1 (210) 591-0534 | sam.doiron@raicestexas.org | raicestexas.org

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On Fri, Aug 8, 2025 at 3:05 PM 'SNALegalAccess-Dilley,' via RAICES Karnes <raiceskarnes@raicestexas.org> wrote:

Good afternoon,

We are currently reviewing these cases and will provide updates soon.

Thank you,

Deportation Officer

Dilley Immigration Processing Center

San Antonio Field Office

Enforcement and Removal Operations

300 El Rancho Way Dilley, TX 78017

Good afternoon,



Javier Hidalgo <javier.hidalgo@raicestexas.org>

Fwd: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-168 and 484

1 message

Javier Hidalgo <javier.hidalgo@raicestexas.org>
To: Javier Hidalgo <javier.hidalgo@raicestexas.org>

Thu, Dec 4, 2025 at 11:57 AM

----- Forwarded message -----

From: SNALegalAccess-Dilley, <SNALegalAccess-Dilley@ice.dhs.gov>
Date: Friday, September 26, 2025 at 1:05:36 PM UTC-5
Subject: RE: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-168 and 484
To: RAICES Karnes <raiceskarnes@raicestexas.org>
Cc: SNALegalAccess-Dilley, <SNALegalAccess-Dilley@ice.dhs.gov>, Rodolfo Alttilo <rodolfo.alttilo@raicestexas.org>, Albert Macias <albert.macias@raicestexas.org>, San Antonio.Outreach <SanAntonio.Outreach@ice.dhs.gov>

Good afternoon,

At this time, the family's case remains pending a decision from USCIS regarding their fear interviews. To determine the next appropriate steps, we must receive USCIS's decision. Be assured, once a decision from USCIS is issued, we will re-evaluate the family's situation and take the appropriate actions.

Respectfully,

Deportation Officer

San Antonio Field Office, Dilley Immigration Processing Center

From: RAICES Karnes <raiceskarnes@raicestexas.org>
Sent: Friday, September 26, 2025 12:32 PM
To: RAICES Karnes <raiceskarnes@raicestexas.org>
Cc: RAICES Karnes <raiceskarnes@raicestexas.org>; SNALegalAccess-Dilley, <snalegalaccess-dilley@ice.dhs.gov>; Rodolfo Alttilo <rodolfo.alttilo@raicestexas.org>; Albert Macias <albert.macias@raicestexas.org>; San Antonio.Outreach <sanantonio.outreach@ice.dhs.gov>
Subject: Re: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-168 and 484

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Good morning Officer,

Thank you for your previous response. Flores Class member has been detained for approximately **23 DAYS**.

Please be advised that **A FINAL ORDER OF REMOVAL OR PENDING ADJUDICATION ARE NOT VALID REASONS TO DETAIN A CHILD OVER 20 DAYS**. In her April 24, 2020 Order in the Flores settlement agreement, Judge Gee reiterated that **ICE must release minors in its custody within 20 days** absent a specific, individualized determination that detention is necessary to avoid a flight risk or danger to a detained child or others. Judge Gee found that **the procedural posture of a minor's immigration case, including a final removal order or pending adjudication, is not a sufficient reason to detain a child past 20 days.**

Respectfully,

Albert Macias

RAICES

On Tuesday, September 23, 2025 at 9:08:53 AM UTC-5 RAICES Karnes wrote:

Good morning officers,

I write to follow up on this request for our clients. This Flores classmember has been detained for **20 days**. Please advise as to when this family can expect to be released. Thank you for your time

Respectfully,

Sam Doiron (she/her/hers)

Staff Attorney | Asylum Access Services | RAICES

+1 (210) 591-0534 | sam.doiron@raicetexas.org | raicetexas.org

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On Mon, Sep 22, 2025 at 9:13 AM RAICES Karnes <raiceskarnes@raicetexas.org> wrote:

Good morning Officer,

Thank you for your previous response. Flores Class member has been detained for approximately **19 days**.

Please be advised that **A FINAL ORDER OF REMOVAL OR PENDING ADJUDICATION ARE NOT VALID REASONS TO DETAIN A CHILD OVER 20 DAYS.** In her April 24, 2020 Order in the Flores settlement agreement, Judge Gee reiterated that **ICE must release minors in its custody within 20 days** absent a specific, individualized determination that detention is necessary to avoid a flight risk or danger to a detained child or others. Judge Gee found that **the procedural posture of a minor's immigration case, including a final removal order or pending adjudication, is not a sufficient reason to detain a child past 20 days.**

Respectfully,

Albert Macias

RAICES

On Friday, September 19, 2025 at 9:24:10 AM UTC-5 SNALegalAccess-Dilley, wrote:

Good morning,

The family's case is currently pending a determination from USCIS. Once a decision has been issued, copies of the determination will be provided to the family.

If you have any questions regarding the status of the interview or related matters, please reach out to USCIS directly.

Respectfully,

Deportation Officer

From: Albert Macias <albert.macias@raicestexas.org>

Sent: Friday, September 19, 2025 8:54 AM

To: San Antonio.Outreach <sanantonio.outreach@ice.dhs.gov>; Consuegra, Ernesto <ernesto.consuegra@ice.dhs.gov>; SNALegalAccess-Dilley, <SNALegalAccess-Dilley@ice.dhs.gov>; De Leon, Maria V <Maria.V.DeLeon@ice.dhs.gov>

Cc: Rodolfo Alttilo <rodolfo.alttilo@raicestexas.org>; Sam Doiron <sam.doiron@raicestexas.org>; RAICES Karnes <raiceskarnes@raicestexas.org>

Subject: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-168 and 484

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Dear Officers:

We write with regard to our clients, Flores Class Members [REDACTED], and their parent(s), [REDACTED]. Our fully executed G28s are attached.

Please provide information regarding the status of this Family Unit's release. To comply with the Flores settlement agreement, ICE must effectuate the release of Class Members detained in unlicensed congregate settings such as ICE's "Family Residential Centers", "with all deliberate speed" and these children along with their mother have been in DHS custody since approximately 09/03/2025. See Flores v. Barr, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3, 4 (C.D. Cal. June 26, 2020). ICE must release [REDACTED], "without unnecessary delay in a manner consistent with the Flores Settlement Agreement and the Court's prior Orders, and consistent with concern for the particular vulnerability of minors." Flores v. Barr, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3 (C.D. Cal. Aug. 7, 2020).

Moreover, Judge Gee ordered ICE to undertake "renewed and more vigorous efforts" to release minors, and specifically stated ICE can achieve compliance by releasing children together with their parents. See Flores v. Barr, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3, 4 (C.D. Cal. June 26, 2020). ICE is also required by regulation to conduct an individualized custody determination for the detained parents of a minor in its custody for the purpose of releasing the child and parent together, given that the parent is the preferential sponsor. 8 C.F.R. § 1236.3.

Further, the Ms. L Settlement prohibits the separation of families unless there is evidence a parent is a danger to the child or has a criminal history. No such evidence has been presented in this case. Accordingly, simultaneous release of [REDACTED], and their parent(s), [REDACTED] is required in order to comply with the Flores Settlement Agreement ("FSA"), Ms. L, and the orders in O.M.G. v. Wolf. See O.M.G. v. Wolf, 1:20-cv-00786-JEB, March 30, 2020 Minute Order (D.D.C. Mar. 30, 2020); Ms. L. v. U.S. Immigration & Customs Enforcement, 310 F. Supp. 3d 1133 (S.D. Cal. Jun. 26, 2018).

If ICE has chosen to detain these Flores Class Members and their parent despite Judge Gee's orders, please provide recorded evidence of ICE's ongoing efforts to release the Flores class members, including but not limited to a written custody determination, pursuant to ICE's duty under Paragraph 18 of the FSA to "make and record the prompt and continuous efforts on its part toward family reunification and the release of the minor." Please note that any response to this request that is based on the status of the children's immigration case would be insufficient per Judge Gee's Flores orders. Flores, 2:85-cv-4544-DMG-AGR (C.D. Cal. May 22, 2020) ("[T]he information submitted by ICE continues to show cursory explanations for denying minors release under the FSA, including vague categories such as 'USCIS/IJ Review,' which the Court previously criticized."). Efforts toward release must be ongoing as long as the children are in custody, pursuant to Paragraph 14 of the FSA.

Again, please provide us with the proper documentation that ICE has made prompt and continuous efforts to release these Flores Class Members and their parent(s). If there are any sponsorship needs for this family, please know that RAICES is ready and equipped to assist with promptly finding sponsorship and obtaining tickets for travel.

Please do not hesitate to contact us with any questions.

Respectfully,
Albert Macias
RAICES

RAICES

Javier Hidalgo <javier.hidalgo@raicestexas.org>

Fwd: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-678

1 message

Javier Hidalgo <javier.hidalgo@raicestexas.org>
To: Javier Hidalgo <javier.hidalgo@raicestexas.org>

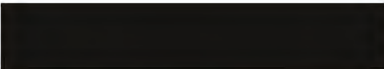
Thu, Dec 4, 2025 at 12:06 PM

----- Forwarded message -----

From: SNALegalAccess-Dilley, <SNALegalAccess-Dilley@ice.dhs.gov>
Date: Wednesday, October 15, 2025 at 9:37:29 AM UTC-5
Subject: RE: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-678
To: RAICES Kames <raiceskarnes@raicestexas.org>
Cc: SNALegalAccess-Dilley, <SNALegalAccess-Dilley@ice.dhs.gov>, Rodolfo Altillo <rodolfo.altillo@raicestexas.org>, Janeth De Jesus <janeth.dejesus@raicestexas.org>, San Antonio.Outreach <SanAntonio.Outreach@ice.dhs.gov>

Good morning,

As a reminder, your client remains a proven flight risk. Your client continues to unwillingly cooperate with the Colombian consulate to obtain travel documents. Your client is already violating one of the conditions of the I-220B Order of Supervision release paperwork. A third country removal request has been made; however your client will remain in custody until their removal is completed.


Deportation Officer

San Antonio Field Office, Dilley Immigration Processing Center

Enforcement and Removal Operations (ERO)

U.S. Immigration and Customs Enforcement (ICE)

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From: RAICES Kames <raiceskarnes@raicestexas.org>
Sent: Wednesday, October 15, 2025 9:23 AM
To: RAICES Kames <raiceskarnes@raicestexas.org>
Cc: RAICES Kames <raiceskarnes@raicestexas.org>; SNALegalAccess-Dilley, <snalegalaccess-dilley@ice.dhs.gov>

.gov>; Rodolfo Altillo <rodolfo.altillo@raicestexas.org>; Janeth De Jesus <janeth.dejesus@raicestexas.org>; San Antonio.Outreach <sanantonio.outreach@ice.dhs.gov>; De Leon, Maria V <maria.v.deleon@ice.dhs.gov>
Subject: Re: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-678

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Good morning Officer,

As a reminder, Flores Class members have now been detained for approximately **29 DAYS**.

A FINAL ORDER OF REMOVAL IS NOT A VALID REASON TO DETAIN A CHILD OVER 20 DAYS. In her April 24, 2020 Order in the Flores settlement agreement, Judge Gee reiterated that **ICE must release minors in its custody within 20 days** absent a specific, individualized determination that detention is necessary to avoid a flight risk or danger to a detained child or others. Judge Gee found that the procedural posture of a minor's immigration case, including a final removal order or pending adjudication, is not a sufficient reason to detain a child past 20 days.

Respectfully,

Albert Macias

RAICES

On Wednesday, October 8, 2025 at 11:52:49 AM UTC-5 RAICES Kames wrote:

Good morning Officer,

Thank you for response. As a reminder, Flores Class members have now been detained for approximately **22 DAYS**.

Please be advised that **A FINAL ORDER OF REMOVAL IS NOT A VALID REASON TO DETAIN A CHILD OVER 20 DAYS.** In her April 24, 2020 Order in the Flores settlement agreement, Judge Gee reiterated that **ICE must release minors in its custody within 20 days** absent a specific, individualized determination that detention is necessary to avoid a flight risk or danger to a detained child or others. Judge Gee found that the procedural posture of a minor's immigration case, including a final removal order or pending adjudication, is not a sufficient reason to detain a child past 20 days.

Respectfully,

Albert Macias

RAICES

On Tuesday, October 7, 2025 at 9:53:14 AM UTC-5 SNALegalAccess-Dilley, wrote:

Good Morning,

Your clients came into custody with a Final Order of Removal already signed by an Immigration Judge. The only reason that your client remains in custody is due to their unwillingness to cooperate with the Colombian consulate to obtain a Colombian travel document. Due to the facts, your client is deemed a flight risk and will remain in custody until their programmed removal to their country of origin.

In her April 24, 2020 Order in the Flores settlement agreement, Judge Gee reiterated that **ICE must release minors in its custody within 20 days absent a specific, individualized determination that detention is necessary to avoid a flight risk or danger to a detained child or others.** See Flores v. Barr, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3, 4 (C.D. Cal. June 26, 2020). Judge Gee found that the procedural posture of a minor's immigration case, including a final removal order or **pending adjudication**, is not a sufficient reason to detain a child past 20 days. See Flores v. Barr, 2:85-cv-4544-DMG-AGR (C.D. Cal. May 22, 2020).



Deportation Officer

San Antonio Field Office, Dilley Immigration Processing Center

Enforcement and Removal Operations (ERO)

U.S. Immigration and Customs Enforcement (ICE)

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From: RAICES Karnes <raiceskarnes@raicestexas.org>

Sent: Tuesday, October 7, 2025 9:24 AM

To: RAICES Karnes <raiceskarnes@raicestexas.org>

Cc: RAICES Karnes <raiceskarnes@raicestexas.org>; Rodolfo Altillo <rodolfo.altillo@raicestexas.org>; Janeth De Jesus <janeih.dejesus@raicestexas.org>; SNA Legal Access-Dilley, <snalegalaccess-dilley@ice.dhs.gov>; San Antonio Outreach <sanantonio.outreach@ice.dhs.gov>; De Leon, Maria V <maria.v.deleon@ice.dhs.gov>

Subject: Re: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-678

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Good morning Officers,

In her April 24, 2020 Order in the Flores settlement agreement, Judge Gee reiterated that **ICE must release minors in its custody within 20 days absent a specific, individualized determination that detention is necessary to avoid a flight risk or danger to a detained child or others.** See *Flores v. Barr*, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3, 4 (C.D. Cal. June 26, 2020). Judge Gee found that the procedural posture of a minor's immigration case, including a final removal order or **pending adjudication**, is not a sufficient reason to detain a child past 20 days. See *Flores v. Barr*, 2:85-cv-4544-DMG-AGR (C.D. Cal. May 22, 2020).

These Flores Class Members have now been detained a total of 21 days.

Because ICE has not submitted evidence of individualized release assessments for Class Members awaiting asylum decisions, much less evidence that ICE makes and records individual assessments in a prompt and continuous manner, the Court finds ICE in violation of the FSA's Paragraph 18 (as well as the Court's prior June 27, 2017 Order) with regard to Class Members in expedited removal proceedings who are "pending IJ hearing/decision" or "pending USCIS response." Because unnecessary delay has resulted from this apparent failure to make individualized parole assessments, ICE is also in violation of Paragraph 14. *Flores v. Barr*, No. CV854544DMGAGRX, 2020 WL 2758792, at *11 (C.D. Cal. Apr. 24, 2020).

Please advise.

Respectfully,
Betsaida Lopez
RAICES

On Monday, October 6, 2025 at 9:36:24 AM UTC-5 RAICES Karnes wrote:

Dear Officers:

We write with regard to our clients, Flores Class Member [REDACTED] [REDACTED] and her parents, [REDACTED] and [REDACTED]). Our fully executed G28s are attached.

Please provide information regarding the status of this Family Unit's release. To comply with the Flores settlement agreement, ICE must effectuate the release of Class Members detained in unlicensed congregate settings such as ICE's "Family Residential Centers", "with all deliberate speed" and this child along with his father have been in DHS custody since approximately **09/16/2025**. See *Flores v. Barr*, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3, 4 (C.D. Cal. June 26, 2020). ICE must release [REDACTED] "without unnecessary delay in a manner consistent with

the Flores Settlement Agreement and the Court's prior Orders, and consistent with concern for the particular vulnerability of minors." *Flores v. Barr*, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3 (C.D. Cal. Aug. 7, 2020).

Moreover, Judge Gee ordered ICE to undertake "renewed and more vigorous efforts" to release minors, and specifically stated ICE can achieve compliance by releasing children together with their parents. See *Flores v. Barr*, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3, 4 (C.D. Cal. June 26, 2020). ICE is also required by regulation to conduct an individualized custody determination for the detained parents of a minor in its custody for the purpose of releasing the child and parent together, given that the parent is the preferential sponsor. 8 C.F.R. § 1236.3.

Further, the Ms. L Settlement prohibits the separation of families unless there is evidence a parent is a danger to the child or has a criminal history. No such evidence has been presented in this case. Accordingly, simultaneous release of [REDACTED] and her parents is required in order to comply with the Flores Settlement Agreement ("FSA"), Ms. L, and the orders in *O.M.G. v. Wolf*. See *O.M.G. v. Wolf*, 1:20-cv-00786-JEB, March 30, 2020 Minute Order (D.D.C. Mar. 30, 2020); *Ms. L. v. U.S. Immigration & Customs Enforcement*, 310 F. Supp. 3d 1133 (S.D. Cal. Jun. 26, 2018).

If ICE has chosen to detain this Flores Class Member and her parents despite Judge Gee's orders, please provide recorded evidence of ICE's ongoing efforts to release the Flores class member, including but not limited to a written custody determination, pursuant to ICE's duty under Paragraph 18 of the FSA to "make and record the prompt and continuous efforts on its part toward family reunification and the release of the minor." Please note that any response to this request that is based on the status of [REDACTED] immigration case would be insufficient per Judge Gee's Flores orders. *Flores*, 2:85-cv-4544-DMG-AGR (C.D. Cal. May 22, 2020) ("[T]he information submitted by ICE continues to show cursory explanations for denying minors release under the FSA, including vague categories such as 'USCIS/IJ Review,' which the Court previously criticized."). Efforts toward release must be ongoing as long as the child is in custody, pursuant to Paragraph 14 of the FSA.

Again, please provide us with the proper documentation that ICE has made prompt and continuous efforts to release this Flores Class Member and her parents. If there are any sponsorship needs for this family, please know that RAICES is ready and equipped to assist with promptly finding sponsorship and obtaining tickets for travel.

Please do not hesitate to contact us with any questions.

Respectfully,

Sam Doiron (she/her/hers)

Staff Attorney | Asylum Access Services | RAICES

+1 (210) 591-0534 | sam.doiron@raicetexas.org | raicetexas.org

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Javier Hidalgo <javier.hidalgo@raicestexas.org>

Fwd: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-598

1 message

Javier Hidalgo <javier.hidalgo@raicestexas.org>
To: Javier Hidalgo <javier.hidalgo@raicestexas.org>

Thu, Dec 4, 2025 at 12:07 PM

----- Forwarded message -----

From: SNA Legal Access-Dilley, <SNA Legal Access-Dilley@ice.dhs.gov>
Date: Wednesday, October 15, 2025 at 1:17:34 PM UTC-5
Subject: RE: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-598
To: RAICES Kames <raiceskarnes@raicestexas.org>

Good afternoon,

Your client failed to comply with a scheduled removal while in a detained environment. Based on the totality of the circumstances, your client is considered a flight risk and will remain in custody. Thank you.

Deportation Officer

DIPC

From: RAICES Kames <raiceskarnes@raicestexas.org>
Sent: Tuesday, October 14, 2025 3:33 PM
To: San Antonio.Outreach <sanantonio.outreach@ice.dhs.gov>; Consuegra, Ernesto <ernesto.consuegra@ice.dhs.gov>; SNA Legal Access-Dilley, <SNA Legal Access-Dilley@ice.dhs.gov>; De Leon, Maria V <Maria.V.DeLeon@ice.dhs.gov>
Cc: Rodolfo Altillo <rodolfo.altillo@raicestexas.org>
Subject: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-598

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Dear Officers:

We write with regard to our clients, Flores Class Members [REDACTED], and their parent(s), [REDACTED]. Our fully executed G28s are attached.

Please provide information regarding the status of this Family Unit's release. To comply with the Flores settlement agreement, ICE must effectuate the release of Class Members detained in unlicensed congregate settings such as ICE's "Family Residential Centers", "with all deliberate speed" and these children along with their parent(s) have been in DHS custody since approximately **08/28/2025**. See Flores v. Barr, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3, 4 (C.D. Cal. June 26, 2020). ICE must release [REDACTED], "without unnecessary delay in a manner consistent with the Flores Settlement Agreement and the Court's prior Orders, and consistent with concern for the particular vulnerability of minors." Flores v. Barr, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3 (C.D. Cal. Aug. 7, 2020).

Moreover, Judge Gee ordered ICE to undertake "renewed and more vigorous efforts" to release minors, and specifically stated ICE can achieve compliance by releasing children together with their parents. See Flores v. Barr, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3, 4 (C.D. Cal. June 26, 2020). ICE is also required by regulation to conduct an individualized custody determination for the detained parents of a minor in its custody for the purpose of releasing the child and parent(s) together, given that the parent(s) is the preferential sponsor. 8 C.F.R. § 1236.3.

Further, the Ms. L Settlement prohibits the separation of families unless there is evidence a parent is a danger to the child or has a criminal history. No such evidence has been presented in this case. Accordingly, simultaneous release of [REDACTED] and their parent(s), [REDACTED] is required in order to comply with the Flores Settlement Agreement ("FSA"), Ms. L, and the orders in O.M.G. v. Wolf. See O.M.G. v. Wolf, 1:20-cv-00786-JEB, March 30, 2020 Minute Order (D.D.C. Mar. 30, 2020); Ms. L. v. U.S. Immigration & Customs Enforcement, 310 F. Supp. 3d 1133 (S.D. Cal. Jun. 26, 2018).

If ICE has chosen to detain these Flores Class Members and their parent(s) despite Judge Gee's orders, please provide recorded evidence of ICE's ongoing efforts to release the Flores class members, including but not limited to a written custody determination, pursuant to ICE's duty under Paragraph 18 of the FSA to "make and record the prompt and continuous efforts on its part toward family reunification and the release of the minor." Please note that any response to this request that is based on the status of the children's immigration case would be insufficient per Judge Gee's Flores orders. Flores, 2:85-cv-4544-DMG-AGR (C.D. Cal. May 22, 2020) ("[T]he information submitted by ICE continues to show cursory explanations for denying minors release under the FSA, including vague categories such as 'USCIS/IJ Review,' which the Court previously criticized."). Efforts toward release must be ongoing as long as the children are in custody, pursuant to Paragraph 14 of the FSA.

Again, please provide us with the proper documentation that ICE has made prompt and continuous efforts to release these Flores Class Members and their parent(s). If there are any sponsorship needs for this family, please know that RAICES is ready and equipped to assist with promptly finding sponsorship and obtaining tickets for travel.

Please do not hesitate to contact us with any questions.

Respectfully,
Maria Maldonado
RAICES

RAICES

Javier Hidalgo <javier.hidalgo@raicestexas.org>

Fwd: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-532

1 message

Javier Hidalgo <javier.hidalgo@raicestexas.org>
To: Javier Hidalgo <javier.hidalgo@raicestexas.org>

Thu, Dec 4, 2025 at 12:17 PM

----- Forwarded message -----

From: SNALegalAccess-Dilley, <SNALegalAccess-Dilley@ice.dhs.gov>
Date: Thursday, October 23, 2025 at 11:33:12 AM UTC-5
Subject: RE: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-532
To: RAICES Karnes <raiceskarnes@raicestexas.org>
Cc: SNALegalAccess-Dilley, <SNALegalAccess-Dilley@ice.dhs.gov>, San Antonio.Outreach <SanAntonio.Outreach@ice.dhs.gov>, De Leon, Maria V <Maria.V.DeLeon@ice.dhs.gov>, Rodolfo Alttilo <rodolfo.alttilo@raicestexas.org>

Good morning,

We are once again denying that request for release, your client has proven to be a flight risk due to their inability to comply with his scheduled removal. Your client has been given the due process of a Credible Fear interview with USCIS, that decision was then reviewed and affirmed by an Immigration Judge. Your client's will remain in custody until the execution of their removal has effectively taken place.

Deportation Officer

San Antonio Field Office, Dilley Immigration Processing Center

Enforcement and Removal Operations (ERO)

U.S. Immigration and Customs Enforcement (ICE)

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From: RAICES Karnes <raiceskarnes@raicestexas.org>
Sent: Thursday, October 23, 2025 11:17 AM
To: RAICES Karnes <raiceskarnes@raicestexas.org>
Cc: SNALegalAccess-Dilley, <snalegalaccess-dilley@ice.dhs.gov>; San Antonio.Outreach <sanantonio.outreach@ice.dhs.gov>; De Leon, Maria V <maria.v.deleon@ice.dhs.gov>; Rodolfo Alttilo

<rodolfo.altillo@raicestexas.org>

Subject: Re: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-532

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Good morning Officers,

We are once again following up on our release request for Flores Class Member [REDACTED] and his father, [REDACTED].

The Flores Class members have been detained for approximately **59 days**.

Please advise,

Thank you

Maria Maldonado

RAICES

On Tue, Oct 21, 2025 at 3:50 PM RAICES Karnes <raiceskarnes@raicestexas.org> wrote:

Good afternoon Officers,

Because ICE has not submitted evidence of individualized release assessments for Class Members awaiting asylum decisions, much less evidence that ICE makes and records individual assessments in a prompt and continuous manner, the Court finds ICE in violation of the FSA's Paragraph 18 (as well as the Court's prior June 27, 2017 Order) with regard to Class Members in expedited removal proceedings who are "pending U hearing/decision" or "pending USCIS response." Because unnecessary delay has resulted from this apparent failure to make individualized parole assessments, ICE is also in violation of Paragraph 14. See Flores v. Barr, No. CV854544DMGAGRX, 2020 WL 2758792, at *11 (C.D. Cal. Apr. 24, 2020).

The Flores Class members have been detained for approximately **57 days**.

In her April 24, 2020 Order in the Flores settlement agreement, Judge Gee reiterated that **ICE must release minors in its custody within 20 days absent a specific, individualized determination that detention is necessary to avoid a flight risk or danger to a detained child or others**. See Flores v. Barr, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3, 4 (C.D. Cal. June 26, 2020). Judge Gee found that the procedural posture of a minor's immigration case, **including a final removal order** or pending adjudication, is not a sufficient reason to detain a child past 20 days. See Flores v. Barr, 2:85-cv-4544-DMG-AGR (C.D. Cal. May 22, 2020).

Please advise.

Respectfully,

Betsaida Lopez

RAICES

On Wednesday, October 15, 2025 at 1:14:39 PM UTC-5 SNALegalAccess-Dilley, wrote:

Good afternoon,

We are diligently working on this case. A third removal attempt has not been scheduled. Your client failed to comply with a scheduled removal while in a detained environment. Based on the totality of the circumstances, your client is considered a flight risk and will remain in custody. Thank you.

Deportation Officer

DIPC

From: RAICES Karnes <raiceskarnes@raicestexas.org>

Sent: Tuesday, October 14, 2025 2:45 PM

To: RAICES Karnes <raiceskarnes@raicestexas.org>

Cc: SNALegalAccess-Dilley, <snalegalaccess-dilley@ice.dhs.gov>

Subject: Re: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-532

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Good afternoon Officers,

We are kindly following up on our aforementioned request. The Flores Class members have been detained for approximately 50 days.

Thank you

Maria Maldonado

On Thu, Oct 9, 2025 at 1:28 PM RAICES Karnes <raiceskarnes@raicestexas.org> wrote:

Good afternoon ICE officers,

Has the date of removal been set or is there an approximate time frame for removal?

Thank you,

Lucia Centurion

RAICES

On Wednesday, October 8, 2025 at 3:47:24 PM UTC-5 SNAlegalAccess-Dilley, wrote:

Good afternoon,

Your client failed to comply with a scheduled removal while in a detained environment. Based on the totality of the circumstances, your client is considered a flight risk and will remain in custody. Your client will be scheduled for another removal attempt, failure to comply with the removal will result in additional federal prosecution for your client.

Deportation Officer

DIPC

From: RAICES Karnes <raiceskarnes@raicestexas.org>

Sent: Wednesday, October 8, 2025 11:30 AM

To: RAICES Karnes <raiceskarnes@raicestexas.org>

Cc: SNAlegalAccess-Dilley, <snalegalaccess-dilley@ice.dhs.gov>; San Antonio.Outreach <sanantonio.outreach@ice.dhs.gov>; De Leon, Maria V <maria.v.deleon@ice.dhs.gov>; Rodolfo Alttilo <rodolfo.alttilo@raicestexas.org>

Subject: Re: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-532

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Good morning Officers,

In her April 24, 2020 Order in the Flores settlement agreement, Judge Gee reiterated that **ICE must release minors in its custody within 20 days absent a specific, individualized determination that detention is necessary to avoid a flight risk or danger to a detained child or others.** See Flores v. Barr, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3, 4 (C.D. Cal. June 26, 2020). Judge Gee found that the procedural posture of a minor's immigration case, **including a final removal order** or pending adjudication, is not a sufficient reason to detain a child past 20 days. See Flores v. Barr, 2:85-cv-4544-DMG-AGR (C.D. Cal. May 22, 2020).

These Flores Class Members have now been detained for approximately **44 DAYS**. Prior to this, Flores Class members were in DHS detention from approximately 04/25/2025 until about 06/27/2025, approximately **60 DAYS**.

Please advise.
Betsaida Lopez

RAICES

On Friday, October 3, 2025 at 8:31:58 AM UTC-5 SNAlegalAccess-Dilley, wrote:

Good Morning,

Your client failed to comply with a scheduled removal while in a detained environment. Based on the totality of the circumstances, your client is considered a flight risk and will remain in custody. Your client will be scheduled for a secondary removal, failure to comply with the removal will result in additional federal prosecution for your client.

Deportation Officer

San Antonio Field Office, Dilley Immigration Processing Center

Enforcement and Removal Operations (ERO)

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From: RAICES Karnes <raiceskarnes@raicestexas.org>

Sent: Friday, October 3, 2025 8:09 AM

To: RAICES Karnes <raiceskarnes@raicestexas.org>

Cc: RAICES Karnes <raiceskarnes@raicestexas.org>; SNAlegalAccess-Dilley, <snalegalaccess-dilley@ice.dhs.gov>

Subject: Re: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-532

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Good morning Officer,

Flores Class members have now been detained for approximately **39 DAYS**. Prior to this, Flores Class members were in DHS detention from approximately 04/25/2025 until about 06/27/2025, approximately **60 DAYS**.

A FINAL ORDER OF REMOVAL IS NOT A VALID REASON TO DETAIN A CHILD OVER 20 DAYS. In her April 24, 2020 Order in the Flores settlement agreement, Judge Gee reiterated that **ICE must release minors in its custody within 20 days** absent a specific, individualized determination that detention is necessary to avoid a flight risk or danger to a detained child or others. Judge Gee found that the procedural posture of a minor's immigration case, including a final removal order or pending adjudication, is not a sufficient reason to detain a child past 20 days.

Respectfully,

Albert Macias

RAICES

On Wednesday, October 1, 2025 at 1:41:24 PM UTC-5 RAICES Karnes wrote:

Good afternoon ICE officers,

I'm respectfully following up on the Flores notice.

Thank you,

Lucia Centurion

RAICES

On Monday, September 29, 2025 at 9:58:41 AM UTC-5 RAICES Karnes wrote:

Good morning Officer,

Thank you for response. As a reminder, Flores Class members have now been detained for approximately **35 DAYS**. Prior to this, Flores Class members were in DHS detention from approximately 04/25/2025 until about 06/27/2025, approximately **60 DAYS**.

Please be advised that **A FINAL ORDER OF REMOVAL IS NOT A VALID REASON TO DETAIN A CHILD OVER 20 DAYS.** In her April 24, 2020 Order in the Flores settlement agreement, Judge Gee reiterated that **ICE must release minors in its custody within 20 days** absent a specific, individualized determination that detention is necessary to avoid a flight risk or danger to a detained child or others. Judge Gee found that the procedural posture of a minor's immigration case, including a final removal order or pending adjudication, is not a sufficient reason to detain a child past 20 days.

Respectfully,

Albert Macias

RAICES

On Wednesday, September 24, 2025 at 1:12:33 PM UTC-5 SNAlegalAccess-Dilley, wrote:

Good afternoon,

Your clients failed to comply with their removal order. Their cases are being reviewed for prosecution for Failure to Comply. There is no release date at this time.

Deportation Officer

DIPC

From: RAICES Karnes <raiceskarnes@raicestexas.org>

Sent: Wednesday, September 24, 2025 10:29 AM

To: RAICES Karnes <raiceskarnes@raicestexas.org>

Cc: SNAlegalAccess-Dilley, <snalegalaccess-dilley@ice.dhs.gov>

Subject: Re: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-532

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Thank you.

Do these clients have a set date for release?

Lucia Centurion

RAICES

On Tuesday, September 23, 2025 at 11:22:34 AM UTC-5 SNAlegalAccess-Dilley, wrote:

Good morning,

IJ affirmed the negative CF determination. Your clients will be removed soon. Thank you.

Deportation Officer

DIPC

From: RAICES Karnes <raiceskarnes@raicestexas.org>

Sent: Tuesday, September 23, 2025 9:15 AM

To: RAICES Karnes <raiceskarnes@raicestexas.org>

Cc: SNAlegalAccess-Dilley, <snalegalaccess-dilley@ice.dhs.gov>; De Leon, Maria V <maria.v.deleon@ice.dhs.gov>; San Antonio.Outreach <SanAntonio.Outreach@ice.dhs.gov>

Subject: Re: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-532

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Good morning officers,

Please provide an update on our client's release status. This Flores classmember has now been detained for approximately **29 DAYS**. Prior to this, the Flores classmember was in DHS detention from approximately 04/25/2025 until about 06/27/2025, approximately **60 DAYS**.

Please note: In her April 24, 2020 Order in the Flores settlement agreement, Judge Gee reiterated that ICE **must release** minors in its custody within 20 days absent a specific, individualized determination that detention is necessary to avoid a flight risk or danger to a detained child or others. See *Flores v. Barr*, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3, 4 (C.D. Cal. June 26, 2020). Judge Gee found that the procedural posture of a minor's immigration case, including a final removal order or pending adjudication, is not a sufficient reason to detain a child past 20 days. See *Flores v. Barr*, 2:85-cv-4544-DMG-AGR (C.D. Cal. May 22, 2020).

Respectfully,

Sam Doiron (she/her/hers)

Staff Attorney | Asylum Access Services | RAICES

+1 (210) 591-0534 | sam.doiron@raicestexas.org | raicestexas.org

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On Mon, Sep 22, 2025 at 10:48 AM RAICES Karnes <raiceskarnes@raicestexas.org> wrote:

Good morning officers,

Please provide an update on our client's release status. Flores Class members have now been detained for approximately **28 DAYS**. Prior to this, Flores Class members were in DHS detention from approximately 04/25/2025 until about 06/27/2025, approximately **60 DAYS**.

Please note: In her April 24, 2020 Order in the Flores settlement agreement, Judge Gee reiterated that ICE must release minors in its custody within 20 days absent a specific, individualized determination that detention is necessary to avoid a flight risk or danger to a detained child or others. See Flores v. Barr, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3, 4 (C.D. Cal. June 26, 2020). Judge Gee found that the procedural posture of a minor's immigration case, including a final removal order or pending adjudication, is not a sufficient reason to detain a child past 20 days. See Flores v. Barr, 2:85-cv-4544-DMG-AGR (C.D. Cal. May 22, 2020).

Respectfully,

Betsaida Lopez

RAICES

On Thursday, September 18, 2025 at 7:41:27 AM UTC-5 SNALegalAccess-Dilley, wrote:

Good morning,

Your clients have been scheduled for removal and will be removed soon. Thank you.

Deportation Officer

DIPC

From: RAICES Karnes <raiceskarnes@raicestexas.org>

Sent: Wednesday, September 17, 2025 8:57 AM

To: RAICES Karnes <raiceskarnes@raicestexas.org>

Cc: RAICES Karnes <raiceskarnes@raicestexas.org>; Rodolfo Alttillo <rodolfo.alttillo@raicestexas.org>; SNALegalAccess-Dilley, <snalegalaccess-dilley@ice.dhs.gov>; San Antonio.Outreach <sanantonio.outreach@ice.dhs.gov>; De Leon, Maria V <maria.v.deleon@ice.dhs.gov>

Subject: Re: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-532

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Good morning officers,

Please provide an update on our client's release status. Flores Class members have now been detained for approximately **23 DAYS**. Prior to this, Flores Class members were in DHS detention from approximately 04/25/2025 until about 06/27/2025, approximately **60 DAYS**.

Respectfully,

Albert Macias

RAICES

On Tuesday, September 16, 2025 at 12:02:56 PM UTC-5 RAICES Kames wrote:

Good morning, Officers,

We are following up on the above Release Status and Potential Violation of Flores Settlement for our clients Flores Class Member [REDACTED] and his father, [REDACTED]. This child and his father have been in DHS custody since approximately 08/25/2025. Prior to this, our client and his father were in DHS custody in South Texas Family Detention Center from 04/25/2025 until their release on or about 06/27/2025.

Please provide us with an updated status of release and the proper documentation that ICE has made prompt and continuous efforts to release this Flores Class Member and his parent.

Thank you,

Monica Gutierrez

RAICES

On Friday, September 12, 2025 at 1:55:36 PM UTC-5 RAICES Kames wrote:

Dear Officers:

We write with regard to our clients, Flores Class Member [REDACTED] and his father, [REDACTED]. Our fully executed G28s are attached.

Please provide information regarding the status of this Family Unit's release. To comply with the Flores settlement agreement, ICE must effectuate the release of Class Members detained in unlicensed congregate settings such as ICE's "Family Residential Centers", "with all deliberate speed" and this child along with his father have been in DHS custody since approximately 08/25/2025. Prior to this, our client and his father were in DHS custody in South Texas Family Detention Center from 04/25/2025, until their release on or about 06/27/2025. See *Flores v. Barr*, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3, 4 (C.D. Cal. June 26, 2020). ICE must release [REDACTED], "without unnecessary delay in a manner consistent with the Flores Settlement Agreement and the Court's prior Orders, and consistent with concern for the

particular vulnerability of minors." *Flores v. Barr*, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3 (C.D. Cal. Aug. 7, 2020).

Moreover, Judge Gee ordered ICE to undertake "renewed and more vigorous efforts" to release minors, and specifically stated ICE can achieve compliance by releasing children together with their parents. *See Flores v. Barr*, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3, 4 (C.D. Cal. June 26, 2020). ICE is also required by regulation to conduct an individualized custody determination for the detained parents of a minor in its custody for the purpose of releasing the child and parent together, given that the parent is the preferential sponsor. 8 C.F.R. § 1236.3.

Further, the Ms. L Settlement prohibits the separation of families unless there is evidence a parent is a danger to the child or has a criminal history. No such evidence has been presented in this case. Accordingly, simultaneous release of [REDACTED], and his father, [REDACTED] is required in order to comply with the Flores Settlement Agreement ("FSA"), Ms. L, and the orders in *O.M.G. v. Wolf*. *See O.M.G. v. Wolf*, 1:20-cv-00786-JEB, March 30, 2020 Minute Order (D.D.C. Mar. 30, 2020); *Ms. L. v. U.S. Immigration & Customs Enforcement*, 310 F. Supp. 3d 1133 (S.D. Cal. Jun. 26, 2018).

If ICE has chosen to detain this Flores Class Member and his parent despite Judge Gee's orders, please provide recorded evidence of ICE's ongoing efforts to release the Flores class member, including but not limited to a written custody determination, pursuant to ICE's duty under Paragraph 18 of the FSA to "make and record the prompt and continuous efforts on its part toward family reunification and the release of the minor." Please note that any response to this request that is based on the status of the children's immigration case would be insufficient per Judge Gee's Flores orders. *Flores*, 2:85-cv-4544-DMG-AGR (C.D. Cal. May 22, 2020) ("[T]he information submitted by ICE continues to show cursory explanations for denying minors release under the FSA, including vague categories such as 'USCIS/IJ Review,' which the Court previously criticized."). Efforts toward release must be ongoing as long as the children are in custody, pursuant to Paragraph 14 of the FSA.

Again, please provide us with the proper documentation that ICE has made prompt and continuous efforts to release this Flores Class Member and his parent. If there are any sponsorship needs for this family, please know that RAICES is ready and equipped to assist with promptly finding sponsorship and obtaining tickets for travel.

Please do not hesitate to contact us with any questions.

Respectfully,

Sam Doiron (she/her/hers)

Staff Attorney | Asylum Access Services | RAICES

+1 (210) 591-0534 | sam.doiron@raicetexas.org | raicetexas.org

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RAICES

Javier Hidalgo <javier.hidalgo@raicestexas.org>

Fwd: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-437

1 message

Javier Hidalgo <javier.hidalgo@raicestexas.org>
To: Javier Hidalgo <javier.hidalgo@raicestexas.org>

Thu, Dec 4, 2025 at 12:18 PM

----- Forwarded message -----

From: SNALegalAccess-Dilley, <SNALegalAccess-Dilley@ice.dhs.gov>
Date: Wednesday, October 15, 2025 at 3:34:23 PM UTC-5
Subject: RE: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-437
To: RAICES Karnes <raiceskarnes@raicestexas.org>
Cc: SNALegalAccess-Dilley, <SNALegalAccess-Dilley@ice.dhs.gov>, Rodolfo Altillo <rodolfo.altillo@raicestexas.org>, Janeth De Jesus <janeth.dejesus@raicestexas.org>, San Antonio.Outreach <SanAntonio.Outreach@ice.dhs.gov>, De Leon, Maria V <Maria.V.DeLeon@ice.dhs.gov>

Good afternoon,

In client's Master Hearing on 10/06/2025, the Immigration Judge gave your client a task to be complete by a certain time frame. Due to the IJ decision your client will remain in custody, and a reevaluation will be done at that time set by the IJ considering the family next Master Hearing on 10/22/2025.

Respectfully,

Deportation Officer

San Antonio Field Office, Dilley Immigration Processing Center

From: RAICES Karnes <raiceskarnes@raicestexas.org>
Sent: Tuesday, October 14, 2025 3:49 PM
To: RAICES Karnes <raiceskarnes@raicestexas.org>
Cc: SNALegalAccess-Dilley, <snalegalaccess-dilley@ice.dhs.gov>; Rodolfo Altillo <rodolfo.altillo@raicestexas.org>; Janeth De Jesus <janeth.dejesus@raicestexas.org>; San Antonio.Outreach <sanantonio.outreach@ice.dhs.gov>; De Leon, Maria V <maria.v.deleon@ice.dhs.gov>
Subject: Re: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-437

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Good afternoon Officers,

We are following up on our aforementioned request for [REDACTED] and her mother, [REDACTED].

Flores Class members have been detained for **29** days.

Thank you

Maria Maldonado

On Thu, Oct 9, 2025 at 3:24 PM RAICES Karnes <raiceskarnes@raicestexas.org> wrote:

Greetings ICE officers,

Respectfully following up on the afore mentioned Flores Violation Notice.

Thank you,

Lucia Centurion

RAICES

On Wednesday, October 8, 2025 at 7:49:56 AM UTC-5 SNALegalAccess-Dilley, wrote:

Good morning,

In client's Master Hearing on 10/06/2025, the Immigration Judge gave your client a task to be complete by a certain time frame. Due to the IJ decision your client will remain in custody and a reevaluation will be done at that time set by the IJ.

Respectfully,

Deportation Officer

San Antonio Field Office, Dilley Immigration Processing Center

From: RAICES Karnes <raiceskarnes@raicestexas.org>

Sent: Tuesday, October 7, 2025 9:09 AM

To: RAICES Karnes <raiceskarnes@raicestexas.org>

Cc: RAICES Karnes <raiceskarnes@raicestexas.org>; Rodolfo Alttillo <rodolfo.alttillo@raicestexas.org>; Janeth De Jesus <janeth.dejesus@raicestexas.org>; SNALegalAccess-Dilley, <snalegalaccess-dilley@ice.dhs.gov>; San Antonio.Outreach <sanantonio.outreach@ice.dhs.gov>; De Leon, Maria V <maria.v.deleon@ice.dhs.gov>

Subject: Re: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-437

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Good morning Officers,

In her April 24, 2020 Order in the Flores settlement agreement, Judge Gee reiterated that **ICE must release minors in its custody within 20 days absent a specific, individualized determination that detention is necessary to avoid a flight risk or danger to a detained child or others.** See *Flores v. Barr*, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3, 4 (C.D. Cal. June 26, 2020). Judge Gee found that the procedural posture of a minor's immigration case, including a final removal order or **pending adjudication**, is not a sufficient reason to detain a child past 20 days. See *Flores v. Barr*, 2:85-cv-4544-DMG-AGR (C.D. Cal. May 22, 2020).

These Flores Class Members have now been detained a total of 22 days.

Because ICE has not submitted evidence of individualized release assessments for Class Members awaiting asylum decisions, much less evidence that ICE makes and records individual assessments in a prompt and continuous manner, the Court finds ICE in violation of the FSA's Paragraph 18 (as well as the Court's prior June 27, 2017 Order) with regard to Class Members in expedited removal proceedings who are "pending IJ hearing/decision" or "pending USCIS response." Because unnecessary delay has resulted from this apparent failure to make individualized parole assessments, ICE is also in violation of Paragraph 14. See *Flores v. Barr*, No. CV854544DMGAGRX, 2020 WL 2758792, at *11 (C.D. Cal. Apr. 24, 2020).

Please advise.
Betsaida Lopez
RAICES

On Thursday, October 2, 2025 at 8:40:11 AM UTC-5 RAICES Karnes wrote:

Dear Officers:

We write with regard to our clients, Flores Class Member [REDACTED]
[REDACTED] and her mother, [REDACTED]
[REDACTED]. Our fully executed G28s are attached.

Please provide information regarding the status of this Family Unit's release. To comply with the Flores settlement agreement, ICE must effectuate the release of Class Members detained in unlicensed congregate settings such as ICE's "Family Residential Centers", "with all deliberate speed" and this child along with her mother have been in DHS custody since approximately **09/15/2025**. See *Flores v. Barr*, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3, 4 (C.D. Cal. June 26, 2020). ICE must release [REDACTED] "without unnecessary delay in a manner consistent with the Flores Settlement Agreement and the Court's prior Orders, and

consistent with concern for the particular vulnerability of minors." *Flores v. Barr*, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3 (C.D. Cal. Aug. 7, 2020).

Moreover, Judge Gee ordered ICE to undertake "renewed and more vigorous efforts" to release minors, and specifically stated ICE can achieve compliance by releasing children together with their parents. See *Flores v. Barr*, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3, 4 (C.D. Cal. June 26, 2020). ICE is also required by regulation to conduct an individualized custody determination for the detained parents of a minor in its custody for the purpose of releasing the child and parent together, given that the parent is the preferential sponsor. 8 C.F.R. § 1236.3.

Further, the Ms. L Settlement prohibits the separation of families unless there is evidence a parent is a danger to the child or has a criminal history. No such evidence has been presented in this case. Accordingly, simultaneous release of [REDACTED], and her mother is required in order to comply with the Flores Settlement Agreement ("FSA"), Ms. L, and the orders in *O.M.G. v. Wolf*. See *O.M.G. v. Wolf*, 1:20-cv-00786-JEB, March 30, 2020 Minute Order (D.D.C. Mar. 30, 2020); *Ms. L. v. U.S. Immigration & Customs Enforcement*, 310 F. Supp. 3d 1133 (S.D. Cal. Jun. 26, 2018).

If ICE has chosen to detain this Flores Class Member and her parent despite Judge Gee's orders, please provide recorded evidence of ICE's ongoing efforts to release the Flores class member, including but not limited to a written custody determination, pursuant to ICE's duty under Paragraph 18 of the FSA to "make and record the prompt and continuous efforts on its part toward family reunification and the release of the minor." Please note that any response to this request that is based on the status of [REDACTED] immigration case would be insufficient per Judge Gee's Flores orders. *Flores*, 2:85-cv-4544-DMG-AGR (C.D. Cal. May 22, 2020) ("[T]he information submitted by ICE continues to show cursory explanations for denying minors release under the FSA, including vague categories such as 'USCIS/IJ Review,' which the Court previously criticized."). Efforts toward release must be ongoing as long as the children are in custody, pursuant to Paragraph 14 of the FSA.

Again, please provide us with the proper documentation that ICE has made prompt and continuous efforts to release this Flores Class Member and her parent. If there are any sponsorship needs for this family, please know that RAICES is ready and equipped to assist with promptly finding sponsorship and obtaining tickets for travel.

Please do not hesitate to contact us with any questions.

Respectfully,

Sam Doiron (she/her/hers)

Staff Attorney | Asylum Access Services | RAICES

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RAICES

Javier Hidalgo <javier.hidalgo@raicestexas.org>

Fwd: Release Status and Potential Violation of Flores Settlement Agreement, #Axxx-xxx-749

1 message

Javier Hidalgo <javier.hidalgo@raicestexas.org>
To: Javier Hidalgo <javier.hidalgo@raicestexas.org>

Thu, Dec 4, 2025 at 12:25 PM

----- Forwarded message -----

From: SNALegalAccess-Dilley, <SNALegalAccess-Dilley@ice.dhs.gov>
Date: Thursday, November 13, 2025 at 4:53:38 PM UTC-6
Subject: RE: Release Status and Potential Violation of Flores Settlement Agreement, #Axxx-xxx-749
To: RAICES Karnes <raiceskarnes@raicestexas.org>
Cc: SNALegalAccess-Dilley, <SNALegalAccess-Dilley@ice.dhs.gov>, San Antonio.Outreach <SanAntonio.Outreach@ice.dhs.gov>, De Leon, Maria V <Maria.V.DeLeon@ice.dhs.gov>, Janeth De Jesus <janeth.dejesus@raicestexas.org>

Good afternoon

As mentioned on previous emails sent 11/07, 11/10, 11/11 and today 11/13 inquiring about your client, your client primary attorney has filed the necessary forms for the family BIA appeal. As of today, waiting on a date of the next hearing and decision from the BIA.

Respectfully,

Deportation Officer

From: RAICES Karnes <raiceskarnes@raicestexas.org>
Sent: Thursday, November 13, 2025 11:23 AM
To: RAICES Karnes <raiceskarnes@raicestexas.org>
Cc: SNALegalAccess-Dilley, <snalegalaccess-dilley@ice.dhs.gov>; San Antonio.Outreach <sanantonio.outreach@ice.dhs.gov>; De Leon, Maria V <maria.v.deleon@ice.dhs.gov>; Janeth De Jesus <janeth.dejesus@raicestexas.org>
Subject: Re: Release Status and Potential Violation of Flores Settlement Agreement, #Axxx-xxx-749

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Good morning officer,

Thank you for the update on this case. As stated on 11/10 and 11/11, please be advised that a pending BIA appeal is not a valid reason to detain a child over 20 days. In her April 24, 2020 Order in the Flores settlement agreement, Judge Gee reiterated that **ICE must release minors in its custody within 20 days** absent a specific, individualized determination that detention is necessary to avoid a flight risk or danger to a detained child or others. Judge Gee found that **the procedural posture of a minor's immigration case, including a final removal order or pending adjudication, is not a sufficient reason to detain a child past 20 days**. In this case, Flores Class members have been detained for approximately **29 DAYS**.

The BIA appeal period is typically lengthy; our clients and Flores class members should not be required to await adjudication of their BIA appeal from detention, especially considering the young age of the child. We respectfully request ICE release our clients during the pendency of their appeal.

Sincerely,

Alvin B. Rodriguez Lynch (he/him)

Senior Attorney | RAICES

+1 (210) 960-4595 | alvin.rodriquez@raicestexas.org | raicestexas.org

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On Tuesday, November 11, 2025 at 10:42:04 AM UTC-6 SNALegalAccess-Dilley, wrote:

Good morning

As mentioned on previous emailed sent 11/07/2025 inquiring about your clients, your client's primary attorney has filed the necessary forms for the family BIA appeal. As of today, waiting on a date of the next hearing and decision from the BIA.

Respectfully,

Deportation Officer

From: RAICES Karnes <raiceskarnes@raicestexas.org>

Sent: Monday, November 10, 2025 1:46 PM

To: SNALegalAccess-Dilley, <SNALegalAccess-Dilley@ice.dhs.gov>

Cc: RAICES Karnes <raiceskarnes@raicestexas.org>; San Antonio.Outreach <SanAntonio.Outreach@ice.dhs.gov>; De Leon, Maria V <Maria.V.DeLeon@ice.dhs.gov>; Janeth De Jesus <janeth.dejesus@raicestexas.org>

Subject: Re: Release Status and Potential Violation of Flores Settlement Agreement, #Axxx-xxx-749

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Good afternoon,

Thank you for the update on this case. Please be advised that a pending BIA appeal is not a valid reason to detain a child over 20 days. In her April 24, 2020 Order in the Flores settlement agreement, Judge Gee reiterated that **ICE must release minors in its custody within 20 days** absent a specific, individualized determination that detention is necessary to avoid a flight risk or danger to a detained child or others. Judge Gee found that the procedural posture of a minor's immigration case, including a final removal order or pending adjudication, is not a sufficient reason to detain a child past 20 days. Flores Class members have been detained for approximately **26 DAYS.**

The BIA appeal period is typically lengthy; our clients and Flores class members should not be required to await adjudication of their BIA appeal from detention, especially considering the young age of the child. We respectfully request ICE release our clients during the pendency of their appeal.

Thank you for your time and consideration,

Sam Doiron (she/her/hers)

Supervising Attorney | Asylum Access Services | RAICES

+1 (210) 591-0534 | sam.doiron@raicestexas.org | raicestexas.org

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On Fri, Nov 7, 2025 at 9:53 AM SNALegalAccess-Dilley, <SNALegalAccess-Dilley@ice.dhs.gov> wrote:

Good morning

As mentioned on previous emailed sent inquiring about your clients, your client's primary attorney has filed the necessary forms for the family BIA appeal. As of today, waiting on a date of the next hearing and decision from the BIA.

Respectfully,

Deportation Officer

From: RAICES Karnes <raiceskarnes@raicestexas.org>
Sent: Tuesday, November 4, 2025 10:04 AM
To: RAICES Karnes <raiceskarnes@raicestexas.org>
Cc: SNA Legal Access-Dilley, <snalegalaccess-dilley@ice.dhs.gov>; San Antonio Outreach <sanantonio.outreach@ice.dhs.gov>; De Leon, Maria V <maria.v.deleon@ice.dhs.gov>; RAICES Karnes <raiceskarnes@raicestexas.org>; Sam Doiron <sam.doiron@raicestexas.org>; Janeth De Jesus <janeth.dejesus@raicestexas.org>
Subject: Release Status and Potential Violation of Flores Settlement Agreement, #Axxx-xxx-749

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Dear Officers:

We write with regard to our clients, Flores Class Member [REDACTED] and their parent, [REDACTED]. Our G28's are attached here.

Please provide information regarding the status of this Family Unit's release, given that in order to comply with Flores ICE is must effectuate the release of Class Members detained in unlicensed congregate settings such as ICE's "Family Residential Centers", "with all deliberate speed" and [REDACTED] and their parents have been in DHS custody since approximately 10/16/2025. See Flores v. Barr, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3, 4 (C.D. Cal. June 26, 2020). Thus, ICE must release [REDACTED] "without unnecessary delay in a manner consistent with the Flores Settlement Agreement and the Court's prior Orders, and consistent with concern for the particular vulnerability of minors." Flores v. Barr, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3 (C.D. Cal. Aug. 7, 2020).

Moreover, Judge Gee, ordering ICE to undertake "renewed and more vigorous efforts" to release minors, specifically stated that ICE can achieve compliance by releasing children together with their parents. See Flores v. Barr, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3, 4 (C.D. Cal. June 26, 2020). ICE is also required by regulation to conduct an individualized custody determination for the detained parents of a minor in its custody for the purpose of releasing the child and parent together, given that the parent is the preferential sponsor. 8 C.F.R. § 1236.3.

Further, the Ms. L Settlement prohibits the separation of families unless there is evidence that a parent is a danger to the child or has a criminal history. No such evidence has been presented in this case. Accordingly, simultaneous release of [REDACTED] and their parents is required in order to comply with the Flores Settlement Agreement ("FSA"), Ms. L, and the orders in O.M.G. v. Wolf. See O.M.G. v. Wolf, 1:20-cv-00786-JEB, March 30, 2020 Minute Order (D.D.C. Mar. 30, 2020); Ms. L. v. U.S. Immigration & Customs Enforcement, 310 F. Supp. 3d 1133 (S.D. Cal. Jun. 26, 2018).

If ICE has chosen to detain these Flores Class Members and their parents despite Judge Gee's orders, please provide recorded evidence of ICE's ongoing efforts to release the Flores class members, including but not limited to a written custody determination, pursuant to ICE's duty under Paragraph 18 of the FSA to "make and record the prompt and continuous efforts on its part toward family reunification and the release of the minor." Please note that any response to this request that is based on the status of [REDACTED]'s immigration case would be insufficient per Judge Gee's Flores orders. Flores, 2:85-cv-4544-DMG-AGR (C.D. Cal. May 22, 2020) ("[T]he information submitted by ICE continues to show cursory explanations for denying minors release under the FSA, including

vague categories such as 'USCIS/IJ Review,' which the Court previously criticized."). Efforts toward release must be ongoing so long as the child is in custody, pursuant to Paragraph 14 of the FSA.

Again, please provide us with the proper documentation that ICE has made prompt and continuous efforts to release these Flores Class Members and their parents. If there are any sponsorship needs for this family, please know that RAICES is ready and equipped to assist with promptly finding sponsorship and obtaining tickets for travel.

Please do not hesitate to contact us with any questions.

Respectfully,

Janeth De Jesus Arevalo, J.D. (she/her/hers)
Staff Attorney | RAICES – San Antonio

p. +1 (210) 226-7722 ext. 409 | f. +1 (210) 910-6588
janeth.dejesus@raicestexas.org | raicestexas.org

RAICES

Javier Hidalgo <javier.hidalgo@raicestexas.org>

Fwd: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-903, -905, -904

1 message

Javier Hidalgo <javier.hidalgo@raicestexas.org>
To: Javier Hidalgo <javier.hidalgo@raicestexas.org>

Thu, Dec 4, 2025 at 12:32 PM

----- Forwarded message -----

From: SNALegalAccess-Dilley, <SNALegalAccess-Dilley@ice.dhs.gov>
Date: Saturday, November 15, 2025 at 8:31:24 AM UTC-6
Subject: RE: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-903, -905, -904
To: RAICES Karnes <raiceskarnes@raicestexas.org>
Cc: SNALegalAccess-Dilley, <SNALegalAccess-Dilley@ice.dhs.gov>, Monica Gutierrez <monica.gutierrez@raicestexas.org>, San Antonio.Outreach <SanAntonio.Outreach@ice.dhs.gov>, Rodolfo Alttilo <rodolfo.alttilo@raicestexas.org>, Sam Doiron <sam.doiron@raicestexas.org>

Good morning,

Your client's case remains the same as the last update that was provided on 11/06/2025:

"Your clients have an upcoming Master Hearing scheduled for 11/18/2025, they will remain in custody until the completion of their hearing."

Deportation Officer

San Antonio Field Office, Dilley Immigration Processing Center

Enforcement and Removal Operations (ERO)

U.S. Immigration and Customs Enforcement (ICE)

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From: RAICES Karnes <raiceskarnes@raicestexas.org>

Sent: Friday, November 14, 2025 10:20 AM

To: RAICES Karnes <raiceskarnes@raicestexas.org>

Cc: RAICES Karnes <raiceskarnes@raicestexas.org>; SNALegalAccess-Dilley, <snalegalaccess-dilley@ice.dhs.gov>

.gov>; Monica Gutierrez <monica.gutierrez@raicestexas.org>; San Antonio.Outreach
<sanantonio.outreach@ice.dhs.gov>; Rodolfo Altillo <rodolfo.altillo@raicestexas.org>; Sam Doiron
<sam.doiron@raicestexas.org>

Subject: Re: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-903, -905, -904

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Greetings ICE officers,

Respectfully following up on the aforementioned Flores Violation Notice.

Thank you,

Lucia Centurion

RAICES

On Friday, November 7, 2025 at 8:50:20 AM UTC-6 RAICES Karnes wrote:

Good morning Officers,

In her April 24, 2020 Order in the Flores settlement agreement, Judge Gee reiterated that **ICE must release minors in its custody within 20 days absent a specific, individualized determination that detention is necessary to avoid a flight risk or danger to a detained child or others.** See Flores v. Barr, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3, 4 (C.D. Cal. June 26, 2020). Judge Gee found that the procedural posture of a minor's immigration case, including a final removal order or **pending adjudication**, is not a sufficient reason to detain a child past 20 days. See Flores v. Barr, 2:85-cv-4544-DMG-AGR (C.D. Cal. May 22, 2020).

Please release Flores Class members who have now been detained for approximately **28 DAYS**. Thank you.

Respectfully,

Albert Macias

RAICES

On Thursday, November 6, 2025 at 7:15:22 AM UTC-6 SNALegalAccess-Dilley, wrote:

Good morning,

Your clients have an upcoming Master Hearing scheduled for 11/18/2025, they will remain in custody until the completion of their hearing.

Deportation Officer

San Antonio Field Office, Dilley Immigration Processing Center

Enforcement and Removal Operations (ERO)

U.S. Immigration and Customs Enforcement (ICE)

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From: RAICES Karnes <raiceskarnes@raicestexas.org>

Sent: Wednesday, November 5, 2025 1:55 PM

To: RAICES Karnes <raiceskarnes@raicestexas.org>

Cc: RAICES Karnes <raiceskarnes@raicestexas.org>; Monica Gutierrez <monica.gutierrez@raicestexas.org>; Consuegra, Ernesto <ernesto.consuegra@ice.dhs.gov>; SNALegalAccess-Dilley, <snalegalaccess-dilley@ice.dhs.gov>; De Leon, Maria V <maria.v.deleon@ice.dhs.gov>; San Antonio.Outreach <sanantonio.outreach@ice.dhs.gov>; Rodolfo Altillo <rodolfo.altillo@raicestexas.org>; Sam Doiron <sam.doiron@raicestexas.org>

Subject: Re: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-903, -905, -904

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Good afternoon Officers,

We are following up on the request above. Flores Class members have now been detained for approximately **26 DAYS**. Please advise.

Thank you,

Janeth De Jesus Arevalo, J.D. (she/her/hers)
Staff Attorney | RAICES – San Antonio

p. +1 (210) 226-7722 ext. 409 | f. +1 (210) 910-6588
janeth.dejesus@raicestexas.org | raicestexas.org

On Monday, November 3, 2025 at 10:29:40 AM UTC-6 RAICES Kames wrote:

Greetings ICE officers,

Respectfully following up on this Flores Notice.

Thank you,

Lucia Centurion

RAICES

On Thursday, October 30, 2025 at 8:57:07 AM UTC-5 RAICES Kames wrote:

Good morning Officers,

We are following up on the request above. Flores Class members have now been detained for approximately **20 DAYS**. Please advise.

Thank you,

Albert Macias

RAICES

On Tuesday, October 28, 2025 at 10:43:04 AM UTC-5 Monica Gutierrez wrote:

Thank you,

Monica Gutierrez

----- Forwarded message -----

From: **Monica Gutierrez** <monica.gutierrez@raicestexas.org>
Date: Tue, Oct 28, 2025 at 10:41 AM
Subject: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-903, -905, -904
To: <sanantonio.outreach@ice.dhs.gov>, <ernesto.consuegra@ice.dhs.gov>, SNALegalAccess-Dilley@ice.dhs.gov <SNALegalAccess-Dilley@ice.dhs.gov>, Maria.V.DeLeon@ice.dhs.gov <Maria.V.DeLeon@ice.dhs.gov>
Cc: Rodolfo Alttillo <rodolfo.alttillo@raicestexas.org>, Sam Doiron <sam.doiron@raicestexas.org>

Dear Officers:

We write with regard to our clients, Flores Class Members [REDACTED] and their parent(s), [REDACTED]. Our fully executed G28s are attached.

Please provide information regarding the status of this Family Unit's release. To comply with the Flores settlement agreement, ICE must effectuate the release of Class Members detained in unlicensed congregate settings such as ICE's "Family Residential Centers", "with all deliberate speed" and these children along with their parent(s) have been in DHS custody since approximately 10/10/2025. See Flores v. Barr, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3, 4 (C.D. Cal. June 26, 2020). ICE must release

[REDACTED] "without unnecessary delay in a manner consistent with the Flores Settlement Agreement and the Court's prior Orders, and consistent with concern for the particular vulnerability of minors." Flores v. Barr, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3 (C.D. Cal. Aug. 7, 2020).

Moreover, Judge Gee ordered ICE to undertake "renewed and more vigorous efforts" to release minors, and specifically stated ICE can achieve compliance by releasing children together with their parents. See Flores v. Barr, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3, 4 (C.D. Cal. June 26, 2020). ICE is also required by regulation to conduct an individualized custody determination for the detained parents of a minor in its custody for the purpose of releasing the child and parent(s) together, given that the parent(s) is the preferential sponsor. 8 C.F.R. § 1236.3.

Further, the Ms. L Settlement prohibits the separation of families unless there is evidence a parent is a danger to the child or has a criminal history. No such evidence has been presented in this case.

Accordingly, simultaneous release of [REDACTED] and their parent(s), [REDACTED] is required in order to comply with the Flores Settlement Agreement ("FSA"), Ms. L, and the orders in O.M.G. v. Wolf. See O.M.G. v. Wolf, 1:20-cv-00786-JEB, March 30, 2020 Minute Order (D.D.C. Mar. 30, 2020); Ms. L v. U.S. Immigration & Customs Enforcement, 310 F. Supp. 3d 1133 (S.D. Cal. Jun. 26, 2018).

If ICE has chosen to detain these Flores Class Members and their parent(s) despite Judge Gee's orders, please provide recorded evidence of ICE's ongoing efforts to release the Flores class members, including but not limited to a written custody determination, pursuant to ICE's duty under Paragraph 18 of the FSA to "make and record the prompt and continuous efforts on its part toward family reunification and the release of the minor." Please note that any response to this request that is based on the status of the children's immigration case would be insufficient per Judge Gee's Flores orders. Flores, 2:85-cv-4544-DMG-AGR (C.D. Cal. May 22, 2020) ("[T]he information submitted by ICE continues to show cursory explanations for denying minors release under the FSA, including vague categories such as 'USCIS/IJ Review,' which the Court previously criticized."). Efforts toward release must be ongoing as long as the children are in custody, pursuant to Paragraph 14 of the FSA.

Again, please provide us with the proper documentation that ICE has made prompt and continuous efforts to release these Flores Class Members and their parent(s). If there are any sponsorship needs for this family, please know that RAICES is ready and equipped to assist with promptly finding sponsorship and obtaining tickets for travel.

Please do not hesitate to contact us with any questions.

Respectfully,



RAICES

Javier Hidalgo <javier.hidalgo@raicestexas.org>

Fwd: FW: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-849 & 158

1 message

Javier Hidalgo <javier.hidalgo@raicestexas.org>
To: Javier Hidalgo <javier.hidalgo@raicestexas.org>

Thu, Dec 4, 2025 at 12:33 PM

----- Forwarded message -----

From: SNALegalAccess-Dilley, <SNALegalAccess-Dilley@ice.dhs.gov>
Date: Monday, November 24, 2025 at 7:10:57 AM UTC-6
Subject: RE: FW: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-849 & 158
To: RAICES - Karnes <raiceskarnes@raicestexas.org>

Greetings,

The family's individual hearing is scheduled for January 7, 2026, at 8:30 AM.

Thank you,

Deportation Officer

Dilley Immigration Processing Center

SNALegalAccess-Dilley@ice.dhs.gov

From: RAICES Karnes <raiceskarnes@raicestexas.org>
Sent: Friday, November 21, 2025 3:04 PM
To: RAICES Karnes <raiceskarnes@raicestexas.org>
Cc: SNALegalAccess-Dilley, <snalegalaccess-dilley@ice.dhs.gov>
Subject: Re: FW: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-849 & 158

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Good afternoon, Officers,

Thank you for providing the case status update.

Please be advised that a case pending decision/adjudication does not constitute valid grounds for extended detention. In her April 24, 2020 Order in the Flores settlement agreement, Judge Gee reiterated that ICE must release minors in its custody within 20 days absent a specific, individualized determination that detention is necessary to avoid a flight risk or danger to a detained child or others. **Judge Gee found that the procedural posture of a minor's immigration case, including a final removal order or pending adjudication, is not a sufficient reason to detain a child past 20 days.** These Flores Class Members have now been detained for approximately 44 days.

If the FAMU is detained through 1/07/26, they will have been in DHS custody approximately 92 days, in clear violation of the FSA.

Please provide us with the proper documentation that ICE has made prompt and continuous efforts to release these Flores Class Members and their parent(s). If there are any sponsorship needs for this family, please know that RAICES is ready and equipped to assist with promptly finding sponsorship and obtaining tickets for travel.

Thank you,

Monica Gutierrez

RAICES

On Thursday, November 20, 2025 at 11:23:52 AM UTC-6 SNALegalAccess-Dilley, wrote:

Greetings,

The family's individual hearing is scheduled for January 7, 2026, at 8:30 AM.

Thank you,

Deportation Officer

Dilley Immigration Processing Center

SNALegalAccess-Dilley@ice.dhs.gov

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From: RAICES Karnes <raiceskarnes@raicestexas.org>

Sent: Thursday, November 20, 2025 10:40 AM

To: RAICES Karnes <raiceskarnes@raicestexas.org>

Cc: RAICES Karnes <raiceskarnes@raicestexas.org>; SNA Legal Access-Dilley, <snalegalaccess-dilley@ice.dhs.gov>; Rodolfo Altillo <rodolfo.aitillo@raicestexas.org>; San Antonio Outreach <sanantonio.outreach@ice.dhs.gov>; Janeth De Jesus <janeth.dejesus@raicestexas.org>
Subject: Re: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-849 & 158

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Good morning, Officers,

We are following up on the above Release Status and Potential Violation of Flores Settlement. Please confirm receipt of follow up from 11/19/2025 and provide an updated status.

These Flores Class Members have now been detained a total of about **43 days**.

Thank you,

Monica Gutierrez

RAICES

On Wednesday, November 19, 2025 at 9:51:13 AM UTC-6 RAICES Karnes wrote:

Good morning, Officers

We are following up on the above Release Status and Potential Violation of Flores Settlement for our client Flores Class Member [REDACTED], and their parent, [REDACTED]. Please provide an updated status of this family's release.

Please be advised that a case pending decision/adjudication does not constitute valid grounds for extended detention. In her April 24, 2020 Order in the Flores settlement agreement, Judge Gee reiterated that ICE must release minors in its custody within 20 days absent a specific, individualized determination that detention is necessary to avoid a flight risk or danger to a detained child or others. **Judge Gee found that the procedural posture of a minor's immigration case, including a final removal order or pending adjudication, is not a sufficient reason to detain a child past 20 days.** These Flores Class Members have now been detained for **42 days**.

This famu's ICH is scheduled for 1/07/26. If the famu is detained through 1/07/26, they will have been in DHS custody approximately 92 days, in clear violation of the FSA.

Please provide us with the proper documentation that ICE has made prompt and continuous efforts to release these Flores Class Members and their parent(s). If there are any sponsorship needs for this family, please know that RAICES is ready and equipped to assist with promptly finding sponsorship and obtaining tickets for travel.

Thank you,

Monica Gutierrez

RAICES

On Tuesday, November 11, 2025 at 6:28:07 AM UTC-6 SNAlegalAccess-Dilley, wrote:

Good morning,

Your clients case remains the same as the last update that was provided on 11/06/2025:

"The hearing has been rescheduled to November 18, 2025. The Immigration Judge (IJ) has granted FAMU until November 14, 2025, to submit any asylum applications."

Deportation Officer

San Antonio Field Office, Dilley Immigration Processing Center

Enforcement and Removal Operations (ERO)

U.S. Immigration and Customs Enforcement (ICE)

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From: RAICES Karnes <raiceskarnes@raicestexas.org>

Sent: Monday, November 10, 2025 4:26 PM

To: RAICES Karnes <raiceskarnes@raicestexas.org>

Cc: RAICES Karnes <raiceskarnes@raicestexas.org>; SNAlegalAccess-Dilley, <snalegalaccess-dilley@ice.dhs.gov>; Rodolfo Alttillo <rodolfo.alttillo@raicestexas.org>; San Antonio.Outreach <sanantonio.outreach@ice.dhs.gov>; Consuegra, Ernesto <ernesto.consuegra@ice.dhs.gov>; Janeth De Jesus <janeth.dejesus@raicestexas.org>; De Leon, Maria V <maria.v.deleon@ice.dhs.gov>

Subject: Re: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-849 & 158

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Good afternoon, Officers

We are following up on the above Release Status and Potential Violation of Flores Settlement. Please provide an updated status of this family's release.

These Flores Class Members have now been detained a total of about **33 days**.

Thank you,

Monica Gutierrez

RAICES

On Friday, November 7, 2025 at 1:11:48 PM UTC-6 RAICES Karnes wrote:

Hello,

In her April 24, 2020 Order in the Flores settlement agreement, Judge Gee reiterated that **ICE must release minors in its custody within 20 days absent a specific, individualized determination that detention is necessary to avoid a flight risk or danger to a detained child or others**. See Flores v. Barr, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3, 4 (C.D. Cal. June 26, 2020). Judge Gee found that the procedural posture of a minor's immigration case, including a final removal order or **pending adjudication**, is not a sufficient reason to detain a child past 20 days. See Flores v. Barr, 2:85-cv-4544-DMG-AGR (C.D. Cal. May 22, 2020).

These Flores Class Members have now been detained a total of about 30 days.

Because ICE has not submitted evidence of individualized release assessments for Class Members awaiting asylum decisions, much less evidence that ICE makes and records individual assessments in a prompt and continuous manner, the Court finds ICE in violation of the FSA's Paragraph 18 (as well as the Court's prior June 27, 2017 Order) with regard to Class Members in expedited removal proceedings who are "pending IJ hearing/decision" or "pending USCIS response." Because unnecessary delay has resulted from this apparent failure to make individualized parole assessments, ICE is also in violation of Paragraph 14. See Flores v. Barr, No. CV854544DMGAGRX, 2020 WL 2758792, at *11 (C.D. Cal. Apr. 24, 2020).

Please advise,

Betsaida Lopez

RAICES

On Thursday, November 6, 2025 at 6:38:49 AM UTC-6 SNALegalAccess-Dilley, wrote:

Greetings,

The hearing has been rescheduled to November 18, 2025. The Immigration Judge (IJ) has granted FAMU until November 14, 2025, to submit any asylum applications.

Thank you,

Deportation Officer

Dilley Immigration Processing Center

SNALegalAccess-Dilley@ice.dhs.gov

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From: RAICES Karnes <raiceskarnes@raicestexas.org>

Sent: Wednesday, November 5, 2025 3:50 PM

To: RAICES Karnes <raiceskarnes@raicestexas.org>

Cc: SNA Legal Access-Dilley, <snalegalaccess-dilley@ice.dhs.gov>; RAICES Karnes <raiceskarnes@raicestexas.org>; De Leon, Maria V <maria.v.deleon@ice.dhs.gov>; San Antonio Outreach <sanantonio.outreach@ice.dhs.gov>; Sam Doiron <sam.doiron@raicestexas.org>; Janeth De Jesus <janeth.dejesus@raicestexas.org>

Subject: Re: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-849 & 158

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Good afternoon Officers,

Kindly following up on this request. Has this family been released already? If not, when could they expect to be released?

Please be advised that a case pending decision/adjudication does not constitute valid grounds for extended detention. In her April 24, 2020 Order in the Flores settlement agreement, Judge Gee reiterated that ICE must release minors in its custody within 20 days absent a specific, individualized determination that detention is necessary to avoid a flight risk or danger to a detained child or others. **Judge Gee found that the procedural posture of a minor's immigration case, including a final removal order or pending adjudication, is not a sufficient reason to detain a child past 20 days.** These Flores Class Members have now been detained for **28 days**.

Thank you in advance for your prompt attention to this delicate and urgent matter.

Janeth De Jesus Arevalo, J.D. (she/her/hers)
Staff Attorney | RAICES – San Antonio

p. +1 (210) 226-7722 ext. 409 | f. +1 (210) 910-6588
janeth.dejesus@raicestexas.org | raicestexas.org

On Tuesday, November 4, 2025 at 8:06:59 AM UTC-6 SNALegalAccess-Dilley, wrote:

Greetings,

The hearing has been rescheduled to November 18, 2025. The Immigration Judge (IJ) has granted FAMU until November 14, 2025, to submit any asylum applications.

Thank you,

Deportation Officer

Dilley Immigration Processing Center

SNALegalAccess-Dilley@ice.dhs.gov

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From: RAICES Karnes <raiceskarnes@raicestexas.org>

Sent: Monday, November 3, 2025 2:56 PM

To: Albert Macias <albert.macias@raicestexas.org>

Cc: San Antonio.Outreach <sanantonio.outreach@ice.dhs.gov>; Consuegra, Ernesto <ernesto.consuegra@ice.dhs.gov>; SNALegalAccess-Dilley, <SNALegalAccess-Dilley@ice.dhs.gov>; De Leon, Maria V <Maria.V.DeLeon@ice.dhs.gov>; Rodolfo Alttilo <rodolfo.alttilo@raicestexas.org>; Janeth De Jesus <janeth.dejesus@raicestexas.org>; RAICES Karnes <raiceskarnes@raicestexas.org>

Subject: Re: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-849 & 158

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Good afternoon officers,

I write to follow up on this request for our clients. This family has been in DHS custody for 26 days. Please advise as to when this family can expect to be released. Thank you so much

Respectfully,

Sam Doiron (she/her/hers)

Supervising Attorney | Asylum Access Services | RAICES

+1 (210) 591-0534 | sam.doiron@raicestexas.org | raicestexas.org

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On Thu, Oct 30, 2025 at 9:16 AM Albert Macias <albert.macias@raicestexas.org> wrote:

Dear Officers:

We write with regard to our clients, Flores Class Members [REDACTED] and their parent(s), [REDACTED]. Our fully executed G28s are attached.

Please provide information regarding the status of this Family Unit's release. To comply with the Flores settlement agreement, ICE must effectuate the release of Class Members detained in unlicensed congregate settings such as ICE's "Family Residential Centers", "with all deliberate speed" and these children along with their parent(s) have been in DHS custody since approximately 10/08/2025. See Flores v. Barr, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3, 4 (C.D. Cal. June 26, 2020). ICE must release [REDACTED], "without unnecessary delay in a manner consistent with the Flores Settlement Agreement and the Court's prior Orders, and consistent with concern for the particular vulnerability of minors." Flores v. Barr, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3 (C.D. Cal. Aug. 7, 2020).

Moreover, Judge Gee ordered ICE to undertake "renewed and more vigorous efforts" to release minors, and specifically stated ICE can achieve compliance by releasing children together with their

parents. See *Flores v. Barr*, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3, 4 (C.D. Cal. June 26, 2020). ICE is also required by regulation to conduct an individualized custody determination for the detained parents of a minor in its custody for the purpose of releasing the child and parent(s) together, given that the parent(s) is the preferential sponsor. 8 C.F.R. § 1236.3.

Further, the Ms. L Settlement prohibits the separation of families unless there is evidence a parent is a danger to the child or has a criminal history. No such evidence has been presented in this case. Accordingly, simultaneous release of [REDACTED], and their parent(s), [REDACTED] is required in order to comply with the Flores Settlement Agreement ("FSA"), Ms. L, and the orders in *O.M.G. v. Wolf*. See *O.M.G. v. Wolf*, 1:20-cv-00786-JEB, March 30, 2020 Minute Order (D.D.C. Mar. 30, 2020); *Ms. L. v. U.S. Immigration & Customs Enforcement*, 310 F. Supp. 3d 1133 (S.D. Cal. Jun. 26, 2018).

If ICE has chosen to detain these Flores Class Members and their parent(s) despite Judge Gee's orders, please provide recorded evidence of ICE's ongoing efforts to release the Flores class members, including but not limited to a written custody determination, pursuant to ICE's duty under Paragraph 18 of the FSA to "make and record the prompt and continuous efforts on its part toward family reunification and the release of the minor." Please note that any response to this request that is based on the status of the children's immigration case would be insufficient per Judge Gee's Flores orders. *Flores*, 2:85-cv-4544-DMG-AGR (C.D. Cal. May 22, 2020) ("[T]he information submitted by ICE continues to show cursory explanations for denying minors release under the FSA, including vague categories such as 'USCIS/IJ Review,' which the Court previously criticized."). Efforts toward release must be ongoing as long as the children are in custody, pursuant to Paragraph 14 of the FSA.

Again, please provide us with the proper documentation that ICE has made prompt and continuous efforts to release these Flores Class Members and their parent(s). If there are any sponsorship needs for this family, please know that RAICES is ready and equipped to assist with promptly finding sponsorship and obtaining tickets for travel.

Please do not hesitate to contact us with any questions.

Respectfully,
Albert Macias
RAICES

RAICES

Javier Hidalgo <javier.hidalgo@raicestexas.org>

Fwd: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-526, 525, and 527

1 message

Javier Hidalgo <javier.hidalgo@raicestexas.org>
To: Javier Hidalgo <javier.hidalgo@raicestexas.org>

Thu, Dec 4, 2025 at 12:34 PM

----- Forwarded message -----

From: SNALegalAccess-Dilley, <SNALegalAccess-Dilley@ice.dhs.gov>
Date: Monday, November 24, 2025 at 4:03:54 PM UTC-6
Subject: RE: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-526, 525, and 527
To: RAICES Karnes <raiceskarnes@raicestexas.org>
Cc: Rodolfo Altillo <rodolfo.altillo@raicestexas.org>, Sam Doiron <sam.doiron@raicestexas.org>, Albert Macias <albert.macias@raicestexas.org>

Good afternoon,

Your clients are scheduled their individual hearing on January 14, 2025. A review of their custody status will be completed following the decision from an immigration judge.

Respectfully,

Deportation Officer

San Antonio Field Office, Dilley Immigration Processing Center

Enforcement and Removal Operations (ERO)

U.S. Immigration and Customs Enforcement (ICE)

From: RAICES Karnes <raiceskarnes@raicestexas.org>
Sent: Monday, November 24, 2025 1:27 PM
To: RAICES Karnes <raiceskarnes@raicestexas.org>
Cc: RAICES Karnes <raiceskarnes@raicestexas.org>; SNALegalAccess-Dilley, <snalegalaccess-dilley@ice.dhs.gov>; Rodolfo Altillo <rodolfo.altillo@raicestexas.org>; Sam Doiron <sam.doiron@raicestexas.org>; Albert Macias <albert.macias@raicestexas.org>
Subject: Re: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-526, 525, and 527

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Good afternoon officers,

We are following up on the above Release Status and Potential Violation of Flores Settlement. Please confirm receipt of follow up and provide an updated status of the FAMU's release. They have been detained for approximately **50 DAYS**.

Please be advised that a case pending decision/adjudication does not constitute valid grounds for extended detention. In her April 24, 2020 Order in the Flores settlement agreement, Judge Gee reiterated that ICE must release minors in its custody within 20 days absent a specific, individualized determination that detention is necessary to avoid a flight risk or danger to a detained child or others. **Judge Gee found that the procedural posture of a minor's immigration case, including a final removal order or pending adjudication, is not a sufficient reason to detain a child past 20 days.**

Thank you,

Albert Macias

RAICES

On Friday, November 21, 2025 at 1:25:39 PM UTC-6 RAICES Karnes wrote:

Good afternoon, Officers,

We are following up on the above Release Status and Potential Violation of Flores Settlement. Please confirm receipt of follow up and provide an updated status of the FAMU's release. They have been detained for approximately 47 Days.

Thank you,

Monica Gutierrez

RAICES

On Wednesday, November 19, 2025 at 9:19:15 AM UTC-6 RAICES Karnes wrote:

Good morning, Officers,

We are following up on the above Release Status and Potential Violation of Flores Settlement for our clients Flores Class Members [REDACTED]

[REDACTED], and their parent(s), [REDACTED]
[REDACTED]

In her April 24, 2020 Order in the Flores settlement agreement, Judge Gee reiterated that **ICE must release minors in its custody within 20 days absent a specific, individualized determination that detention is necessary to avoid a flight risk or danger to a detained child or others.** See Flores v. Barr, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3, 4 (C.D. Cal. June 26, 2020). Judge Gee found that the procedural posture of a minor's immigration case, including a final removal order or **pending adjudication**, is not a sufficient reason to detain a child past 20 days. See Flores v. Barr, 2:85-cv-4544-DMG-AGR (C.D. Cal. May 22, 2020).

This famu's ICH is scheduled for 1/14/26. If the famu is detained through 1/14/26, they will have been in DHS custody approximately 101 days, in clear violation of the FSA.

Please confirm receipt of this follow up and provide an updated status along with the proper documentation that ICE has made prompt and continuous efforts to release these Flores Class Members and their parent(s). If there are any sponsorship needs for this family, please know that RAICES is ready and equipped to assist with promptly finding sponsorship and obtaining tickets for travel.

Thank you,

Monica Gutierrez

RAICES

On Wednesday, November 5, 2025 at 3:37:40 PM UTC-6 RAICES Kames wrote:

Good afternoon, Officers,

Thank you for your prompt response to the above Release Status and Potential Violation of Flores Settlement request.

In her April 24, 2020 Order in the Flores settlement agreement, Judge Gee reiterated that **ICE must release minors in its custody within 20 days absent a specific, individualized determination that detention is necessary to avoid a flight risk or danger to a detained child or others.** See Flores v. Barr, No. CV 85-4544-DMG (AGR), Dkt. No. 833 at 3, 4 (C.D. Cal. June 26, 2020). Judge Gee found that the procedural posture of a minor's immigration case, including a final removal order or **pending adjudication**, is not a sufficient reason to detain a child past 20 days. See Flores v. Barr, 2:85-cv-4544-DMG-AGR (C.D. Cal. May 22, 2020).

Please confirm receipt of this follow up and provide an updated status along with the proper documentation that ICE has made prompt and continuous efforts to release these Flores Class Members and their parent(s). If there are any sponsorship needs for this family, please know that RAICES is ready and equipped to assist with promptly finding sponsorship and obtaining tickets for travel.

Thank you,

Monica Gutierrez

RAICES

On Tuesday, November 4, 2025 at 2:39:15 PM UTC-6 SNALegalAccess-Dilley, wrote:

Good afternoon,

Your clients are scheduled a Master hearing on 11/18/2025. The family will remain in custody pending the completion of their immigration process. G-28s have been uploaded into their cases.

Respectfully,

Deportation Officer

San Antonio Field Office, Dilley Immigration Processing Center

Enforcement and Removal Operations (ERO)

From: Albert Macias <albert.macias@raicestexas.org>

Sent: Tuesday, November 4, 2025 9:02 AM

To: San Antonio.Outreach <sanantonio.outreach@ice.dhs.gov>; Consuegra, Ernesto <ernesto.consuegra@ice.dhs.gov>; SNA Legal Access-Dilley, <SNALegalAccess-Dilley@ice.dhs.gov>; De Leon, Maria V <Maria.V.DeLeon@ice.dhs.gov>

Cc: Rodolfo Alttilo <rodolfo.alttilo@raicestexas.org>; RAICES Karnes <raiceskarnes@raicestexas.org>; Sam Doiron <sam.doiron@raicestexas.org>

Subject: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-526, 525, and 527

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Dear Officers:

We write with regard to our clients, Flores Class Members [REDACTED] and their parent(s), [REDACTED]. Our fully executed G28s are attached.

Please provide information regarding the status of this Family Unit's release. To comply with the Flores settlement agreement, ICE must effectuate the release of Class Members detained in unlicensed congregate settings such as ICE's "Family Residential Centers", "with all deliberate speed" and these children along with their parent(s) have been in DHS custody since approximately 10/05/2025. See Flores v. Barr, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3, 4 (C.D. Cal. June 26, 2020). ICE must release

[REDACTED], "without unnecessary delay in a manner consistent with the Flores Settlement Agreement and the Court's prior Orders, and consistent with concern for the particular vulnerability of minors." Flores v. Barr, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3 (C.D. Cal. Aug. 7, 2020).

Moreover, Judge Gee ordered ICE to undertake "renewed and more vigorous efforts" to release minors, and specifically stated ICE can achieve compliance by releasing children together with their parents. See Flores v. Barr, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3, 4 (C.D. Cal. June 26, 2020). ICE is also required by regulation to conduct an individualized custody determination for the detained parents of a minor in its custody for the purpose of releasing the child and parent(s) together, given that the parent(s) is the preferential sponsor. 8 C.F.R. § 1236.3.

Further, the Ms. L. Settlement prohibits the separation of families unless there is evidence a parent is a danger to the child or has a criminal history. No such evidence has been presented in this case. Accordingly, simultaneous release of [REDACTED]

[REDACTED] and their parent(s), [REDACTED] is required in order to comply with the Flores Settlement Agreement ("FSA"), Ms. L, and the orders in O.M.G. v. Wolf. See O.M.G. v. Wolf, 1:20-cv-00786-JEB, March 30, 2020 Minute Order (D.D.C. Mar. 30, 2020); Ms. L. v. U.S. Immigration & Customs Enforcement, 310 F. Supp. 3d 1133 (S.D. Cal. Jun. 26, 2018).

If ICE has chosen to detain these Flores Class Members and their parent(s) despite Judge Gee's orders, please provide recorded evidence of ICE's ongoing efforts to release the Flores class members, including but not limited to a written custody determination, pursuant to ICE's duty under Paragraph 18 of the FSA to "make and record the prompt and continuous efforts on its part toward family reunification and the release of the minor." Please note that any response to this request that is based on the status of the children's immigration case would be insufficient per Judge Gee's Flores orders. Flores, 2:85-cv-4544-DMG-AGR (C.D. Cal. May 22, 2020) ("[T]he information submitted by ICE continues to show cursory explanations for denying minors release under the FSA, including vague categories such as 'USCIS/IJ Review,' which the Court previously criticized."). Efforts toward release must be ongoing as long as the children are in custody, pursuant to Paragraph 14 of the FSA.

Again, please provide us with the proper documentation that ICE has made prompt and continuous efforts to release these Flores Class Members and their parent(s). If there are any sponsorship needs for this family, please know that RAICES is ready and equipped to assist with promptly finding sponsorship and obtaining tickets for travel.

Please do not hesitate to contact us with any questions.

Respectfully,
Albert Macias
RAICES



Javier Hidalgo <javier.hidalgo@raicestexas.org>

Fwd: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-354

1 message

Javier Hidalgo <javier.hidalgo@raicestexas.org>
To: Javier Hidalgo <javier.hidalgo@raicestexas.org>

Thu, Dec 4, 2025 at 12:35 PM

----- Forwarded message -----

From: SNALegalAccess-Dilley, <SNALegalAccess-Dilley@ice.dhs.gov>
Date: Tuesday, November 25, 2025 at 11:45:43 AM UTC-6
Subject: RE: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-354
To: Alvin Rodriguez Lynch <alvin.rodriguez@raicestexas.org>, SNALegalAccess-Dilley, <SNALegalAccess-Dilley@ice.dhs.gov>, De Leon, Maria V <Maria.V.DeLeon@ice.dhs.gov>, San Antonio.Outreach <SanAntonio.Outreach@ice.dhs.gov>
Cc: RAICES - Karnes <raiceskarnes@raicestexas.org>, Janeth De Jesus <janeth.dejesus@raicestexas.org>, Rodolfo Altillio <rodolfo.altillio@raicestexas.org>, Sam Doiron <sam.doiron@raicestexas.org>

Good morning,

Your client was detained and charged with INA violation 237(a)(1)(B) Nonimmigrant overstay. Prior to her 10/30/2025 hearing your client was informed multiple times that because of her lawful entry into the U.S., her case currently qualified for an immigration bond. The Immigration Judge concluded that your client did not have a prima-facie for an asylum case, they were therefor granted a Voluntary Departure under safeguard conditions. Your client submitted a BIA appeal on 11/11/2025, your client will remain in custody until a BIA decision has been allocated.

Deportation Officer

San Antonio Field Office, Dilley Immigration Processing Center

Enforcement and Removal Operations (ERO)

U.S. Immigration and Customs Enforcement (ICE)

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From: Alvin Rodriguez Lynch <alvin.rodriguez@raicestexas.org>
Sent: Tuesday, November 25, 2025 11:10 AM

To: SNAlegalAccess-Dilley, <snalegalaccess-dilley@ice.dhs.gov>; De Leon, Maria V <Maria.V.DeLeon@ice.dhs.gov>; San Antonio.Outreach <SanAntonio.Outreach@ice.dhs.gov>; Consuegra, Ernesto <ernesto.consuegra@ice.dhs.gov>
Cc: RAICES - Karnes <raiceskarnes@raicestexas.org>; Janeth De Jesus <janeth.dejesus@raicestexas.org>; Rodolfo Altillo <rodolfo.altillo@raicestexas.org>; Sam Doiron <sam.doiron@raicestexas.org>
Subject: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-354

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Dear Officers:

We write with regard to our clients, Flores Class Member [REDACTED], and his mother, [REDACTED]. Our fully executed G28s are attached.

Please provide information regarding the status of this Family Unit's release. To comply with the Flores settlement agreement, ICE must effectuate the release of Class Members detained in unlicensed congregate settings such as ICE's "Family Residential Centers", "with all deliberate speed" and these children along with their parent(s) have been in DHS custody since approximately **10/07/2025**. See Flores v. Barr, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3, 4 (C.D. Cal. June 26, 2020). ICE must release [REDACTED], "without unnecessary delay in a manner consistent with the Flores Settlement Agreement and the Court's prior Orders, and consistent with concern for the particular vulnerability of minors." Flores v. Barr, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3 (C.D. Cal. Aug. 7, 2020).

Moreover, Judge Gee ordered ICE to undertake "renewed and more vigorous efforts" to release minors, and specifically stated ICE can achieve compliance by releasing children together with their parents. See Flores v. Barr, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3, 4 (C.D. Cal. June 26, 2020). ICE is also required by regulation to conduct an individualized custody determination for the detained parents of a minor in its custody for the purpose of releasing the child and parent(s) together, given that the parent(s) is the preferential sponsor. 8 C.F.R. § 1236.3.

Further, the Ms. L Settlement prohibits the separation of families unless there is evidence that a parent is a danger to the child or has a criminal history. No such evidence has been presented in this case. Accordingly, simultaneous release of [REDACTED], and their parent(s) is required in order to comply with the Flores Settlement Agreement ("FSA"), Ms. L, and the orders in O.M.G. v. Wolf. See O.M.G. v. Wolf, 1:20-cv-00786-JEB, March 30, 2020 Minute Order (D.D.C. Mar. 30, 2020); Ms. L. v. U.S. Immigration & Customs Enforcement, 310 F. Supp. 3d 1133 (S.D. Cal. Jun. 26, 2018).

If ICE has chosen to detain these Flores Class Members and their parent(s) despite Judge Gee's orders, please provide recorded evidence of ICE's ongoing efforts to release the Flores class members, including but not limited to a written custody determination, pursuant to ICE's duty under Paragraph 18 of the FSA to "make and record the prompt and continuous efforts on its part toward family reunification and the release of the minor." Please note that any response to this request that is based on the status of the children's immigration case would be insufficient per Judge Gee's Flores orders. Flores, 2:85-cv-4544-DMG-AGR (C.D. Cal. May 22, 2020) ("[T]he information submitted by ICE continues to show cursory explanations for denying minors release under the FSA, including vague categories such as 'USCIS/IJ Review,' which the Court previously criticized."). Efforts toward release must be ongoing as long as the children are in custody, pursuant to Paragraph 14 of the FSA.

Again, please provide us with the proper documentation that ICE has made prompt and continuous efforts to release these Flores Class Members and their parent(s). If there are any sponsorship needs for this family, please know that RAICES is ready and equipped to assist with promptly finding sponsorship and obtaining tickets for travel.

Please do not hesitate to contact us with any questions.

Sincerely,

Alvin B. Rodriguez Lynch (he/him)

Senior Attorney | RAICES

+1 (210) 960-4595 | alvin.rodriquez@raicetexas.org | raicetexas.org

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RAICES

Javier Hidalgo <javier.hidalgo@raicestexas.org>

Fwd: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-479, 480, and 481

1 message

Javier Hidalgo <javier.hidalgo@raicestexas.org>
To: Javier Hidalgo <javier.hidalgo@raicestexas.org>

Thu, Dec 4, 2025 at 12:37 PM

----- Forwarded message -----

From: SNA Legal Access-Dilley, <SNA Legal Access-Dilley@ice.dhs.gov>
Date: Wednesday, November 26, 2025 at 8:38:17 AM UTC-6
Subject: RE: Release Status and Potential Violation of Flores Settlement, Axxx-xxx-479, 480, and 481
To: RAICES Kames <raiceskarnes@raicestexas.org>

Good morning,

Case Update: Family is scheduled for court on 12.12.25.

Currently no plans for release.

Thank you,

Deportation Officer

Dilley Immigration Processing Center

San Antonio Field Office

Enforcement and Removal Operations

300 El Rancho Way Dilley, TX 78017

Good morning officers,

We are following up on the Flores Violation above. The Flores Class members have now been detained for approximately 21 days. Please confirm that the request has been received and is under review. Thank you.

Respectfully,

Albert Macias

RAICES

On Monday, November 24, 2025 at 1:50:13 PM UTC-6 Albert Macias wrote:

Dear Officers:

We write with regard to our clients, Flores Class Members [REDACTED], and their parent(s), [REDACTED]. Our fully executed G28s are attached.

Please provide information regarding the status of this Family Unit's release. To comply with the Flores settlement agreement, ICE must effectuate the release of Class Members detained in unlicensed congregate settings such as ICE's "Family Residential Centers", "with all deliberate speed" and these children along with their parent(s) have been in DHS custody since approximately 11/05/2025. See Flores v. Barr, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3, 4 (C.D. Cal. June 26, 2020). ICE must release [REDACTED], "without unnecessary delay in a manner consistent with the Flores Settlement Agreement and the Court's prior Orders, and consistent with concern for the particular vulnerability of minors." Flores v. Barr, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3 (C.D. Cal. Aug. 7, 2020).

Moreover, Judge Gee ordered ICE to undertake "renewed and more vigorous efforts" to release minors, and specifically stated ICE can achieve compliance by releasing children together with their parents. See Flores v. Barr, No. CV 85-4544-DMG (AGRx), Dkt. No. 833 at 3, 4 (C.D. Cal. June 26, 2020). ICE is also required by regulation to conduct an individualized custody determination for the detained parents of a minor in its custody for the purpose of releasing the child and parent(s) together, given that the parent(s) is the preferential sponsor. 8 C.F.R. § 1236.3.

Further, the Ms. L Settlement prohibits the separation of families unless there is evidence a parent is a danger to the child or has a criminal history. No such evidence has been presented in this case. Accordingly, simultaneous release of [REDACTED] and their parent(s), [REDACTED] is required in order to comply with the Flores Settlement Agreement ("FSA"), Ms. L, and the orders in O.M.G. v. Wolf. See O.M.G. v. Wolf, 1:20-cv-00786-JEB, March 30, 2020 Minute Order (D.D.C. Mar. 30, 2020); Ms. L. v. U.S. Immigration & Customs Enforcement, 310 F. Supp. 3d 1133 (S.D. Cal. Jun. 26, 2018).

If ICE has chosen to detain these Flores Class Members and their parent(s) despite Judge Gee's orders, please provide recorded evidence of ICE's ongoing efforts to release the Flores class members, including but not limited to a written custody determination, pursuant to ICE's duty under Paragraph 18 of the FSA to "make and record the prompt and continuous efforts on its part toward family reunification and the release of the minor." Please note that any response to this request that is based on the status of the children's immigration case would be insufficient per Judge Gee's Flores orders. Flores, 2:85-cv-4544-DMG-AGR (C.D. Cal. May 22, 2020) ("[T]he information submitted by ICE continues to show cursory explanations for denying minors release under the FSA, including vague categories such as 'USCIS/IJ Review,' which the Court previously criticized."). Efforts toward release must be ongoing as long as the children are in custody, pursuant to Paragraph 14 of the FSA.

Again, please provide us with the proper documentation that ICE has made prompt and continuous efforts to release these Flores Class Members and their parent(s). If there are any sponsorship needs for this family, please know that RAICES is ready and equipped to assist with promptly finding sponsorship and obtaining tickets for travel.

Please do not hesitate to contact us with any questions.

Respectfully,
Albert Macias
RAICES

EXHIBIT 2

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

Attorneys for Plaintiffs

Additional counsel listed on following page

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 DECEMBER 1, 2025 SUPPLEMENTAL
ICE JUVENILE COORDINATOR
REPORT AND DATA**

Honorable Dolly M. Gee
Chief United States District Judge

1 NATIONAL CENTER FOR YOUTH LAW

Mishan Wroe (Cal. Bar No. 299296)

2 Diane de Gramont (Cal. Bar No. 324360)

3 1212 Broadway, Suite 600

Oakland, CA 94612

4 Telephone: (510) 835-8098

5 Email: mwroe@youthlaw.org

6 NATIONAL CENTER FOR YOUTH LAW

7 Rebecca Wolozin (admitted pro hac vice)

8 818 Connecticut Ave. NW, Suite 425

Washington, DC 20006

9 Telephone: (202) 868-4792

10 Email: bwolozin@youthlaw.org

11 CHILDREN'S RIGHTS

12 Leecia Welch (Cal. Bar No. 208741)

13 2021 Fillmore Street

San Francisco, CA 94115

14 Telephone: (415) 602-5202

15 Email: lwelch@childrensrights.org

16 CHILDREN'S RIGHTS

17 Eleanor Roberts (admitted pro hac vice)

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DECLARATION OF LEECIA WELCH

I, Leecia Welch, declare as follows:

1. I am a Deputy Litigation Director 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.

2. Since May 2025, Plaintiffs’ co-counsel and I have conducted six monitoring site visits in our role as *Flores* counsel at the South Texas Family Detention Center (“Dilley”). 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. We have spoken to approximately 100 family units, some with up to three or four class member children, and amassed extensive evidence of the ongoing *Flores* violations at Dilley.

3. Dilley remains an unlicensed, secure, prison-like facility where children’s physical and mental health deteriorate the longer they are detained. During our November 18-19, 2025 site visit, roughly 50% of all the detained families had been at Dilley for 21 days or longer. Defendants have not addressed the vast majority of the violations at Dilley that *Flores* counsel have been raising since May, including inadequate medical care, lack of access to know your rights trainings, lack of access to legal counsel, lack of access to varied, child-friendly foods and snacks, the inability of class members to sleep due to lights kept on in their living areas all night, lack of access to appropriate hygiene products, lack of free calls to family members, and lack of adequate education and recreation. All of these ongoing, unresolved violations are exacerbated by increasing prolonged lengths of detention, as detailed in Paragraphs 24 and 25 below.

4. In recent weeks, conditions of confinement and treatment of families appear to have worsened with families reporting horrific concerns, such as denial of critical medical care, worms and mold in the food that result in children becoming ill, and threats

1 of family separation by officers and staff. Families report that their children are weak,
2 faint, pale, and often crying because they are so hungry.

3 5. After each of our site visits, we have provided Defendants with a detailed,
4 comprehensive list of the *Flores* violations that our monitoring revealed. To date, we
5 have sent Defendants meet and confer letters regarding these violations on May 7, May
6 16, May 28, June 4, June 20, August 14, September 16, September 18, October 9,
7 October 23, and November 25, 2025. As directed by Defendants, we also raised
8 emergency time-sensitive concerns about particular children via email on June 6, June 17,
9 July 30, August 5, October 15, and November 21, 2025. To date, Plaintiffs and
10 Defendants have met and conferred five times (May 14, May 30, July 24, September 17,
11 and October 6, 2025) about the *Flores* violations at Dilley identified in our
12 correspondence. On October 6, Defendants stated they would be following up with a
13 comprehensive written response to our letters. To date, Defendants have not done so –
14 and their position regarding most of the concerns we have repeatedly raised is either
15 denial or remains unknown.¹ The information provided in the ICE JC supplemental
16 report far exceeds any information shared by Defendants in response to our many letters
17 and emails.

18 6. Following this Court's directives, Plaintiffs have repeatedly requested that
19 the ICE Juvenile Coordinator be included in the process of resolving *Flores* violations at
20 Dilley. Defendants have been unwilling to involve the Juvenile Coordinator and have
21 insisted that Plaintiffs not communicate with her directly, even if Defendants' attorneys
22 are copied on communications. Defendants' position appears to be that the only way to
23 involve the Juvenile Coordinator is for Plaintiffs to submit a list of questions in
24 accordance with the procedure set forth in Paragraph 29 of the *Flores* Settlement
25 Agreement (FSA).

26 **Dilley Is a Secure Facility**

27 ¹ Defendants have also failed to respond to Plaintiffs' November email about
28 concerning long hotel stays reported in the August 2025 data.

1 7. Dilley is a 56-acre unlicensed, secure ICE facility located in Dilley, Texas.
2 The facility continues to operate under a contract with CoreCivic, one of the largest for-
3 profit prison contractors in the United States. *See* <https://www.corecivic.com/about>. The
4 perimeter of the facility is surrounded by a high metal fence. To enter the facility,
5 visitors must proceed through a locked trailer-style building, be subjected to an extensive
6 search for “contraband” items, and pass through a metal detector.

7 8. Children and parents consistently refer to Dilley as a prison or jail. Some
8 children and parents have described Dilley to me as a living hell, a horrible place, or a
9 place where God no longer exists.

10 9. On each of our six site visits, either CoreCivic staff or an acting ICE
11 compliance office has led a tour of the facility. The grounds consist of five living zones
12 for detainees with rows of beige trailers. The facility has the capacity to hold 2,400
13 people, but there have been around 400-470 family members in total at Dilley during
14 each of our site visits since July. As of November 19, 2025, there were about 420 family
15 members, but the overall population at Dilley increased to 830 people with the
16 introduction of single females. Families report that the sudden increase in the population
17 at Dilley has resulted in cramped living quarters, longer wait times for getting into the
18 dining hall, less freedom of movement, more shouting from guards, and lack of adequate
19 hygiene products, like shampoo, at the commissary.

20 10. As noted previously, Defendants have taken the position that no questions
21 are permitted during the tour. Defendants have directed us to compile our questions and
22 submit them in writing to Defendants’ counsel. We have now submitted multiple sets of
23 questions to which Defendants have never responded. For example, we have repeatedly
24 asked for information regarding medical services and medical protocols utilized at Dilley,
25 but such information has never been provided. On the last two site visits, we did not
26 compile additional questions because the process seemed pointless since we have never
27 received answers.

Flores Violations at Dilley

11. Since Dilley re-opened in April, we have met with approximately 100 families in person, not including the countless phone calls and emails we have received from detained families. With the exception of the minimal improvements noted below, Dilley remains woefully out of compliance with the FSA. We have raised the same concerns to Defendants' counsel repeatedly for months. ICE's assertions of compliance with the FSA in their supplemental response are refuted by extensive evidence from our interviews with class members and their parents.

12. As noted above, Dilley class members and their parents consistently voice concerns about inadequate medical care, lack of access to know-your-rights trainings, lack of access to legal counsel, lack of access to varied, child-friendly foods and snacks, the inability of class members to sleep due to lights kept on in their living areas all night, lack of access to adequate or sufficient hygiene products, lack of free calls to family members, and lack of adequate education and recreation.

13. Families continue to report serious barriers to accessing needed medical care. Most recently, families reported children becoming sick from eating contaminated food and receiving inadequate medical care. Medical staff told one family whose child got food poisoning to only return if the child vomited eight times. Children report distress from medical unit staff denying treatment or making them wait days for diagnoses when they feel sick and feverish. One child has a severe ear infection that has not been appropriately treated such that the child is now experiencing hearing loss. Another child fell and experienced head trauma but had not been seen by a specialist for evaluation at the time of our interview. Yet another child was hit in the eye with a mop by a staff member resulting in profuse bleeding and loss of vision – and it took weeks for her to see a specialist. Another child suffered a broken foot when a staff member dropped a volleyball net pole on him. Additionally, obtaining needed medications and even non-prescription and basic health items like diaper cream remains extremely challenging due to early pill window times and long lines. On my visits, families have

1 shown me the tiny plastic containers they are given with about a tablespoon of diaper
2 cream at a time. To get more, they must wait in line each time.

3 14. For children with disabilities and other previously-diagnosed medical
4 conditions, detention in secure and restrictive facilities, prolonged separation from their
5 medical providers, and interruption of their medical care plans cause dangerous
6 deterioration of their health. Over the past seven months, we have met with children with
7 life-threatening diseases like leukemia, and children on the autism spectrum who were
8 suffering from missing needed therapies and the harsh conditions at Dilley. Parents
9 consistently report concerning behaviors and regression in their children's development,
10 including children hitting themselves in the face, becoming aggressive, and frequently
11 wetting themselves after years of being potty-trained.

12 15. Children and families consistently report they are not apprised of their rights
13 under *Flores*, including their right to free legal calls and information about free legal
14 counsel. Plaintiffs have repeatedly voiced concern that there is still no Legal Orientation
15 Program or Know Your Rights program for families at Dilley despite the availability of
16 willing legal services providers to conduct such trainings on a weekly basis. The
17 "orientation video" Defendants' assert is shown to all families is inadequate and no
18 substitute for a live training. The video is generally presented in a time and manner that
19 prevent class members and their families from meaningfully understanding their rights.
20 Most families are exhausted, disoriented, and frightened when they arrive at Dilley and
21 are not able to retain complicated legal information, to the extent they can even hear or
22 understand the video. This video, which I have viewed portions of, discusses complex
23 legal issues like types of humanitarian visas and defenses. The video plays on a loop
24 during intake, cycling through different languages, such that it would take dedicated
25 concentration for anyone to watch it until it gets to a part where it begins in one's own
26 language. It is my understanding that the video does not inform class members of the
27 basic rights that all *Flores* class members are supposed to be afforded once detained.
28 Moreover, showing a video without a live presentation prevents children from having the

1 opportunity to ask questions about their rights. Class members repeatedly express
2 distress at their limited access to information about their rights or the status of their cases.
3 None of the families I have spoken to reported being told they could watch a know your
4 rights video “on demand” as noted in the ICE JC supplemental report. ICE Juvenile
5 Coordinator Supplemental Report, Doc #1692-4 (“ICE JC Suppl. Report”) at 32.

6 16. Class members also continue to face barriers to making free legal phone
7 calls to counsel, including *Flores* attorneys or other private lawyers. Notwithstanding the
8 many occasions Plaintiffs have raised this violation to Defendants, families still receive
9 insufficient instructions on how to make free legal phone calls. On our site visits to
10 Dilley, we have seen and reviewed the instructions ICE provides regarding free legal
11 calls, which state that they can be made only to a small number of pro bono contacts on
12 an ICE-provided list.

13 17. Regarding varied, child-friendly foods and snacks at Dilley, once again, ICE
14 claims to have resolved these issues asserting that “[m]eals continue to meet dietary
15 standards . . . [l]ower-sugar options are available upon request” and showing photos of
16 baby food. ICE JC Suppl. Report at 17, 21. Interviews with class members reveal that
17 food quality and variety continue to deteriorate. Class members report that food served
18 to them recently has been contaminated with worms and mold, causing many children to
19 become ill and vomit repeatedly. Despite the pictures of baby food in the ICE JC
20 supplemental report, parents of babies have consistently raised that soft child-friendly
21 food is not available unless they purchase the soup or noodles sold in the commissary.

22 18. Families continue to report that their children are not eating and are being
23 denied the special diets they need to stay healthy. Additionally, despite our repeated
24 requests and time spent elaborating in detail how to address the lack of healthy and varied
25 snacks available to class members, parents report there have been no changes to the
26 variety of snacks for children between meals. To the extent “[l]ower-sugar” snacks are
27 available “upon request” as noted in the ICE JC supplemental report – families we have
28 met with are not being made aware of additional options. ICE JC Suppl. Report at 17.

1 Families continue to report that due to the lack of child-friendly, varied, and sufficient
2 amounts of food, their children are constantly hungry.

3 19. Six months after Plaintiffs' counsel began alerting Defendants to the lack of
4 potable water for class members in many areas of the facility, class members recently
5 reported that water filters have been installed on sinks in the living quarters. Families
6 continue to report concerns about the lack of access to bottled water for baby formula.
7 Parents have described such inconsistent practices related to getting bottled water for
8 formula that it is difficult to understand what the currently policy is. In October, parents
9 reported needing a doctor's note to get bottled water for their babies' formula. In
10 November, parents reported being rationed one bottle of water per day for baby formula,
11 which is obviously insufficient. Otherwise, bottled water can be purchased for \$1.21 per
12 bottle at the commissary, which most families cannot afford.

13 20. Although the ICE JC supplemental report further claims children are
14 "continuously provided with personal hygiene products," as recently as about two weeks
15 ago, class members reported that Defendants continue to provide deficient/inadequate
16 amounts of hygiene products. ICE JC Suppl. Report at 18. The products that children do
17 receive include toothbrushes that fall apart, ineffective deodorant, insufficient toothpaste,
18 and only harsh hand soap for all washing purposes, including hair, face, and body.
19 Families consistently report that the hand soap is too harsh on their children's skin and
20 that their requests for the baby wash provided to babies have been denied. The ICE JC
21 supplemental report shows photos with soap dispensers that are labeled "Citrus Fresh
22 Foaming Handwash," confirming families' reports to Plaintiffs' counsel. ICE JC Suppl.
23 Report at 29. Families report that they must spend their limited resources on basic items
24 for their children at the commissary. To make matters worse, basic hygiene products,
25 such as shampoo, are now selling out at the commissary for long periods of time.
26 Examples of basic needs products sold in the commissary include: \$5.73 for deodorant,
27 \$1.44 for soap, \$2.39 for toothpaste and \$1.30 for a single dose of Tylenol.

21. Plaintiffs' counsel have repeatedly told Defendants about ICE's practice of denying children free phone calls to their family members who are not at Dilley beyond their initial call upon entering the facility. Many class members are distressed that, for weeks at a time, they do not have the funds to communicate with parents or siblings who are not detained with them. Others report they are unable to contact their family members to ask them to put money in their accounts. On our most recent visit, we learned that in-person visitation has now started at Dilley for family members and spouses. This is a welcome improvement for families with U.S. citizen relatives who can make the journey, but the vast majority of class members rely on phone calls to keep in touch with their noncitizen or remote family members.

22. The ICE JC supplemental report admits there is no consistent structured education available at Dilley but claims that new education and recreation services will begin in January. To make matters worse, families now report that classrooms have a maximum capacity of around 12 to 15 children. Children who arrive after capacity is reached are denied access to *any* education for the day. During our last site visit, we were also shocked to hear that classroom instructors are asking class members about sensitive immigration issues, including asking them to write essays on why they are afraid to return to their home countries. In addition to being wholly inappropriate and demonstrating a complete lack of awareness of trauma-informed treatment of children, this kind of assignment and activity can prejudice children's legal rights and relief and interfere with their attorney-client relationships if they are represented. Recreation activities remain extremely limited, with minors reporting they are constantly bored with nothing to do. The lack of structured activities exacerbates the trauma of detention and leads to worsening mental health symptoms. Parents also consistently voice concerns about the lack of toys for younger children given the importance of play to healthy development. Some parents report their children are so desperate to play with toys that they have begun playing with rocks they find on the ground at Dilley.

23. Families also continue to complain about the living arrangements at Dilley. Dual household families must live in separate zones – with mothers and children generally in one zone and fathers living separately in another zone. Although families are allowed to be together during the day, fathers are separated from their children after 8 pm, which is upsetting to many children. There are also limited places to be together as a family during the day, as fathers are not permitted in their wives’ and children’s living quarters and vice versa. Some families report sharing their cramped living quarters with up to five other families. In addition, families continue to report having difficulty sleeping because lights are kept on in living room areas throughout the night.

Alarming Lengths of Detention at Dilley

24. During our monitoring visits, we have spoken to children and families who have been detained for extremely prolonged periods. In July, we met with several children who had been detained for two or more months. During the September 2025 site visit, we interviewed fifteen families that had been detained over 20 days. ICE census data showed that families had been detained at Dilley for approximately 98 days (five children), 74 days (one child), 63 days (one child), and 55 days (three children).

25. At our site visit on November 18-19, 2025, we met with 13 children who had been in custody for over 40 days and identified families who had been at Dilley for 168 days (five children), 64 days (two children) and 56 days (three children). According to ICE census data, 81 families, including approximately 115 children, had already been detained at Dilley for 21 days or more when we arrived on November 18, 2025.

26. We have repeatedly told Defendants that they are violating this Court’s orders that children may not be kept in unlicensed, secure facilities except for the short period during which DHS is actively executing either imminent release or removal. Defendants have not answered Plaintiffs’ previous questions about what processes are in place to individually review children’s cases to (i) avoid unlawfully holding children in family detention when removal or release is not imminent and/or (ii) release them as soon

1 as DHS identifies that removal is not imminent. In the absence of any information to the
2 contrary, Plaintiffs have informed Defendants that we understand that no such process
3 exists. The minimal information on the detention review process provided in the ICE JC
4 supplemental report is the most information shared with Plaintiffs to date, and it only
5 serves to confirm Plaintiffs' concerns.

6 27. We have also told Defendants that we remain concerned that some families
7 are being unreasonably deemed a flight risk or otherwise determined to need to be
8 detained for more than 20 days for reasons this Court has deemed illegitimate. Plaintiffs'
9 counsel have asked repeatedly who makes these determinations, but have received no
10 answer or other information.

11 28. Most recently, we told Defendants that class members reported that ICE
12 agents have told families at Dilley that *Flores* protections regarding time in custody no
13 longer apply as of November 1, 2025. We have asked Defendants' counsel to
14 immediately instruct ICE agents that *Flores* remains fully in effect as to DHS, but have
15 not received a response.

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17 I declare under penalty of perjury that the foregoing is true and correct. Executed on this
18 8th day of December, 2025 at San Francisco, California.

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Leecia Welch

EXHIBIT 3

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, J [REDACTED] R [REDACTED] -F [REDACTED], declare as follows:
2

3 1. This testimony is based on my personal knowledge and the following facts are true
4 to the best of my understanding and recollection.
5

6 **Background and Detention:**

7 2. I am 26 years old. I am from [REDACTED].

8 3. I speak Spanish.

9 4. I have been detained at Dilley for 30 days. I am here with my daughter, who is
10 five-years-old.

11 5. Before I was brought to Dilley, I was living in Texas for about two years, in San
12 Antonio.

13 6. When I was detained, an ICE officer brought me to a station. There, the ICE
14 officer told me I had the right to have my daughter come with me. The ICE officer said,
15 “it’s better if you bring your child” because it’s a “center for families.” He said, “if you
16 go alone, you’ll go to a center that is harder for you.”

17 7. I had to look for someone to bring my daughter to meet me at the ICE station. The
18 officers wouldn’t go and get her or take me to go get her. A family member brought my
19 daughter to the ICE station, and then we were taken here to Dilley.

20 8. My daughter was attending preschool previously and was going to start
21 kindergarten this fall. She was so excited.

22 9. Since entering this country, I have attended all my court hearings. I went in
23 January of this year, and the judge said all was good – that I just had to attend my next
24 court date. My next court date wasn’t until 2026.

25 10. RAICES already asked Dilley to release me and my daughter since we have been
26 here for much longer than 20 days, but yesterday I was told our request was denied.
27
28

1 **Dilley ICE Facility:**

2 11. My daughter always asks me when we are going to leave here, when she can play
3 with her tablet, go to school, and see her little dog. But I don't know what to say; she
4 isn't at the age where she can really understand our situation.

5 12. When I ask anyone here why I'm here and when I can leave, they speak to me very
6 rudely.

7 13. There are three other women and five other children in our room here.

8 14. Usually, the guards knock before entering our room. One guard doesn't knock,
9 though, she just enters. When this guard comes in, she makes us sit straight up on the
10 couches to "count us," even the kids.

11 15. The lights are on all the time. Even if we are watching a movie during the day, the
12 guards enter and turn the lights on.

13 16. There is a game room here, but the guards don't let the kids run around. There are
14 a lot of rules.

15 17. My daughter has a completely different attitude now. She doesn't want to play
16 with the other kids.

17 18. She goes to the school in the morning, and she says the class is boring. The teacher
18 always does the same thing. It's just drawing. The teacher yells at them and says to finish
19 the handouts in their house. It's not enough education for her.

20 19. She doesn't want to eat due to her emotions. She's always been a big eater. The
21 food for her is too heavy. It's spicy and heavy. She has lost weight from not eating.

22 20. My daughter got lice here. We've gone to the doctor twice now. We get the
23 shampoo each time, but it's not working. It's already been 15 days, and she still has lice.
24 The first time they left the shampoo in for 10 minutes, the second time for 30 minutes. It
25 didn't work either time.

26 21. Due to the lice, she is very uncomfortable. She's crying a lot because it hurts her,
27 and she can't sleep. She's scratching her head, and she's injuring her scalp from
28 scratching so hard.

22. She's also become very anxious since coming here. She's biting her nails a lot. We've seen the psychologist here, and I told her my daughter is anxious and biting her nails. She just said, "don't do that" and then they draw. She never offered my daughter medicine or anything to help with the anxiety.

23. When we got here, I asked for a nail file. They wouldn't give me one, so my entire nail completely fell off. That is what happens when you don't take care of fake nails. For four days, it was incredibly painful. The medics just said we don't have experience with nails.

24. You can't drink the water here. The smell is bad, and it hurts our stomachs a lot. We have to buy it at the commissary if we have money. In the dining area, there is milk and juice, but there isn't water. The guards say, "This is all that there is. If you don't like it, buy it at the store."

25. When we entered Dilley, they gave us lotion and shampoo. They also gave us a travel pack of toothpaste and a toothbrush. But we finished what they gave us after about eight days. You have to buy it after that if you want more. If you don't buy it from the commissary, there is nothing. All they have here is hand sanitizer.

26. You can only use the daycare room if you're talking to an attorney. This is my first time using it. If I have to shower or go to bathroom, I have to bring my daughter with me. If she's napping in the afternoon and I have to pee, I have to hold it or wake her. It's terrible.

27. Some of the guards here understand Spanish, but they will sometimes give me responses in English. And I can't understand that.

28. For clothes, they gave us just two shirts and two pants. They say this is all there is. The size is not right for my daughter; it's too big for her. Basically every time we shower, we have to wash our clothes too.

29. Most of the time there is no soap in the washing machine to wash the clothes; it just washes with water. Sometimes we put shampoo in there if we have any.

1 30. The commissary doesn't have good food, it's just junk food like cookies, chips,
2 and soda. We buy shampoo from the store.

3 31. I never touch the phone here without having money. I called RAICES and I'm not
4 sure if I was charged. I know they're pro bono, but I don't think the calls to them are free.

5 32. If a friend or someone else who isn't a lawyer calls me and leaves a message for
6 me here, they don't tell me.

7 33. I haven't asked for one, but I have never received a visit from a family member or
8 friend here. I have never heard of that happening.

9 34. When we arrived at Dilley, there was an orientation that was about four minutes
10 long and a handout in English. Someone translated it. It didn't say anything about Flores.
11 I only heard of Flores through RAICES.

12 35. There is another family here, and the mom is a pastor. She wanted us all to have a
13 moment with God. There were about 25 people gathered, and we all wanted that. We
14 asked her to lead us in prayer. The guards came towards us yelling and said you can't do
15 that here.

16 36. When the kids go to school for one hour, some parents and I used to go under the
17 tree to talk. It was a good way to vent and just relax for a second. I liked it. Now they say
18 we have to just eat or go to our room. We can't go under the tree anymore to talk.

19 37. I have never heard of a case manager.

20 38. I have used the tablets to contact ICE, and the ICE official will respond after a few
21 days or only after I message them many times in a row. I think it's free. They mostly just
22 say, "thanks for your patience, your case is pending."

23 39. They say if we sign the voluntary departure papers it's \$1000 for me and \$1000 for
24 my daughter. I have friends who signed the paper, though, and they didn't get the money.
25 But that money is not a lot anyway.

26 40. The food here is exactly the same every day. It never changes. It's very spicy and
27 is painful for the kids to eat.
28

41. Last week, a woman who was four months pregnant fainted in the dining hall. It took about 30 minutes for medical help to arrive. We all wanted to help and were trying to get to her, but the guards were holding us back. They wouldn't help her. That night she was just back in her room like nothing happened.

1 I declare under my duty to tell the truth and penalty of perjury that to the best of my
2 knowledge, all the information I have here given is correct and complete and I understand
3 the legal consequences of testifying falsely to the authorities. Executed on this 09 day
4 of Sept 2025, at Dilley, Tx.



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: 09/09/2025

Katherine Johnson
Katherine Johnson

EXHIBIT 4

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, Z [REDACTED] F [REDACTED], declare as follows:

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

4 2. I am 37 years old. I am from [REDACTED].

5 3. I came with my six-year-old son, [REDACTED].

6 4. I speak [REDACTED]

7 San Diego CBP Facility

8 5. In April 2025, we flew into Mexico, crossed the border on foot, and after walking
9 for about five hours, helicopters spotted us and a border patrol agent drove up to arrest us.

10 6. They took us to some sort of processing facility where they asked us biographic
11 information.

12 7. They took us from there to a CBP facility in San Diego. It felt like a prison in this
13 facility. The environment and the food were horrible.

14 8. We slept on a thin mat on the cement platform on the floor. We were in a large
15 room with about thirty people. We were split by mothers with children and fathers with
16 children separately. I was moved with my son to a tiny cell with an exposed toilet, maybe
17 because I am a father with my child.

18 9. There was no soap to wash our hands in this facility.

19 10. There were no windows in our cell. This was by far the worst place we have
20 experienced.

21 11. They never dimmed the lights, we were not allowed to dim them though we asked
22 to.

23 12. There was a vent loudly blowing cold air constantly and we had only the thin
24 mylar blankets to try to stay warm.

25 13. For food, they gave us only crackers or sandwiches.

26 14. Sometimes they would let us out of the cell into a cement sally port where at least
27 we could feel the air and see the sun. It was a tiny space and often we would be there
28 only ten minutes, other days we could not go out at all.

1 15. This was the only time we were out of our cell. There were no toys and nothing for
2 my child to do. We spent our days waiting for those ten minutes outside.

3 16. The shower was outdoors and tiny, it was frigid when we were allowed to shower,
4 and often we did not get a shower at all for days. Even when we got a shower, they did
5 not provide us clean clothes. We wore the same clothes for sixteen days, our clothes were
6 stinking and dirty. I only learned after being released that we could've asked for clothes
7 because I finally met another person who spoke [REDACTED] who had also been in CBP
8 who explained this to me.

9 17. We were in this facility for sixteen days.

10 18. It was egregious, it was so difficult for my son.

11 19. The entire sixteen days, we did not get a phone call.

12 20. We could not call family, we could not call a lawyer, no one.

13 21. I have a friend who was here in the U.S. who I wanted to call, but I could not. No
14 one knew where we were.

15 22. My wife was panicked for us. She didn't know where I was, where our child was.
16 Before I left, I tried to prepare her that we might not be able to speak, but she was
17 terrified for us, not knowing where we were or if we were alive.

18 23. I asked the guards to allow us to make a call and they told us no, that we were "not
19 allowed to do anything here."

20 24. We asked to apply for asylum and they told me "no, there is no asylum anymore, it
21 does not exist now."

22 25. It was torture to be there, it was so boring and difficult for my son. There was
23 nothing to do for weeks on end, we were alone and could not even speak to anyone
24 except each other. In those ten or twenty minutes on the days when a guard took pity and
25 let us outside, we might speak to another person who was detained, but otherwise we
26 were completely alone in the cell for more than two weeks.
27
28

Dilley

26. We were accompanied by three officers and placed on a plane to Dilley, and we arrived here on May 13, 2025.

27. Around the third day here, a female ICE officer came to us with a translator device and told all the [REDACTED] families that there is no chance of asylum and the only option we had was to go back to [REDACTED].

28. Another family agreed to sign, but I refused and repeated that we need asylum. I knew that we have a right to ask for asylum. She fought with me, saying there is no asylum, but eventually they gave me a date for our interview. Two days later we received a credible fear interview. It was very short.

29. We had not spoken to a lawyer yet and we could not have a lawyer present with us.

30. Only after the interview was I able to find a lawyer. Less than a week later, our lawyer told us we had failed the interview. I asked for any other options and the lawyer told us that unfortunately, we were out of options.

31. When we were approaching the 21st day in custody, an ICE officer came to all the [REDACTED] families and told us that we had all failed our interviews and that we had no choice but to leave the country. They gave us paperwork and began asking for our addresses and phone numbers in [REDACTED].

32. They told us if we filled out the paperwork, we would be released to the U.S. But of course we did not believe them and we refused to fill out the paperwork.

33. We do not have a passport, so they could not remove us, and we just waited.

34. They detained us for another 20 days after that, and then they released us on June 27, 2025. We had learned children could not be kept here for more than 20 days, but they kept us more like 40 days.

35. We went to New York and we were there for two months. We had an ankle monitor and we thought we would build our life, and we would pursue our immigration case. We began to plan for our future in New York.

36. They did not give us a court date. They only gave us an ICE officer or some official who we had to check in with and they placed an ankle monitor on me.

37. They told us to report to ICE on August 25, 2025, and when we arrived they arrested us and brought us back to Dilley.

38. Now we have again been here at Dilley fifteen days.

39. My son misses his brother and his mom.

40. After we were taken to Dilley the second time, on the second day, they told us they now had our documentation and that we would need to go back to [REDACTED]. They showed it to us, it was a paper document but not a passport. I do not know if it was real or what the document contained. If it is legitimate, they must have petitioned [REDACTED] for this.

41. They told us that we would be here 7 to 10 days more.

42. I asked if there were any other options, if there was anything else we could do and they said to just speak to our lawyer.

43. We are in a room with bunk beds with three families. There are six of us in the room. We are all fathers and sons.

44. The other children are young, a toddler and an eight-year-old.

45. There is nothing to do in the room, we can only watch TV.

46. One of the families speaks [REDACTED] and the other is from [REDACTED], they arrived yesterday.

47. I am trying to keep my son healthy. I try to take him to the grass, to the gym, and keep him active. There's not much you can do here.

48. There is a snack room in our trailer where our room is where we can get small items like milk, juice, cookies, and apples. We take water from the sink there because the water in our room is not drinkable.

49. We have been able to speak with RAICES lawyers but there is no other lawyer that comes here. It is extremely difficult to get a different lawyer. If we leave a message we will not get a call back. I don't know how they would be able to contact us from outside,

1 but most people cannot get in contact with their lawyer even if they have one. The only
2 free legal service is RAICES.

3 50. The RAICES lawyers work so hard, but there are only a few lawyers and we have
4 so many people here who need help.

5 51. We have never had a presentation about our rights.

6 52. Only when we are able to speak to a RAICES lawyer do we learn anything about
7 our rights. No one here would talk to us about something like that.

8 53. We have to pay to use the phones except when we call RAICES. It is very
9 expensive to call internationally, it is a dollar every two minutes.

10 54. We have called my wife, but it is so expensive we cannot talk as much as we want
11 to. My son has been away from his mom and brother for too long, he is forgetting what
12 it's like to have the family near and to be social.

13 55. If it came to this, I would want to leave my son here without me. Even if they
14 imprison me somewhere else, I would want my son to get out of this place.

15 56. I met a mother and her child here the first time we were detained. During the time
16 we were free in New York, some time in May, this mother called me from an ICE
17 detention and told me that her child was placed in some sort of foster care while the
18 mother was transferred to another ICE facility. I have thought about this often, and I
19 would be willing to send my son to a foster setting even if they continue to detain me for
20 longer. My priority is to get my child out of this facility, and to build a life here in the
21 U.S. I dream of us being together and living free in the U.S.

22 57. I cannot return to [REDACTED]. I would rather be imprisoned here than be sent back
23 because I am this afraid for my life if I were returned there. I know I would be killed.

24 58. I want my son to be braver, and more social. He wants to be close to me all the
25 time. He needs me so much. I don't know what will happen to us and I am afraid that
26 soon he will be alone.

27 59. I want my son to get school, to get an education and to be somewhere better, to
28 have a chance of a life here, even if I stay in prison.

60. They get only one hour of school here, they fill out packets in math or writing.

61. What I really want is to have more time for the kids to be in school so that they can learn. We have nothing for them to do in the room and they want to be learning. I want for them to have more hours of school per day, so they can study and keep up in school.

62. My son asked for toys and they said no, he could not have any.

63. I wish that there were another area for them to play. There is a gym, but the older kids, adults, and children are all together. When there are so many people here, we cannot access the gym, it gets too full.

64. They have added two new plastic playgrounds, but usually it is too hot to use them because they are uncovered.

65. More things for younger children, like a gym or indoor place for the younger children to play, would help to ease the pain for the younger children.

66. There is very little translation available, except for medical staff. We just try to get by with the few words I know or speak to other people who are [REDACTED] here. If there is an emergency, then we can find someone who will use a translation app on their phone, but otherwise we just do our best.

67. Two of the lights must be on in our room at all times, including nights. Sometimes the guards will knock to warn us they are coming in, but we cannot just say no, please don't enter, so there is no real privacy.

68. We can use the showers, but the soap they give us for hair and shower gel is very bad, like hand soap. We have to buy shampoo and soap from the commissary.

69. They come to check the AC, check the room, or tell us that someone needs to go somewhere.

70. The first time I was here, we were in a room with twelve people, it was far too many to be comfortable sharing a room. We didn't understand because there are so many empty rooms. Why couldn't they place us in one of the empty rooms? Now with six people, it is somewhat better.

71. We had a cough, but we were treated for it. We saw a nurse, but not a doctor. They gave us medicine, but the wait for medicine requires standing in a very long line in the sun, without shade. We wait sometimes about thirty minutes, but sometimes up to two hours in that line each time we need medicine. One of the medicines was prescribed three times a day, and we had to wait in the line three times a day to get our medicine. So we would wait several hours per day in the medicine line when we were taking medicine three times a day.

72. Last time we were detained here, the library was open all day. The kids could use the computer one hour a day. Now it is very limited. The library is open for parents with a child from 8am – 12pm. A single mother with children may go from noon to 4pm. Single fathers with a child go 4-8pm. If you go within the time frame, you can use the computer for an hour, but 4 – 6pm is dinner so there are really only two hours we are able to access the library. These new rules make it hard to get time in the library.

73. We try to use the computers to learn English, and I wish we had more time. There are no [REDACTED] books, so we cannot read. We want to learn English but without books or classes, I have no opportunity to learn. Last time we were here I recommended some books for learning English for [REDACTED] speakers and they promised they would get them for other families. But we were released and we got re-detained and are back, and still these books are not here.

74. More time for education, more space for young children and activities or toys for them, and more access to the library would make all this a little easier, especially having options for non-Spanish speaking children.

75. Here, the priority of everyone is to make us leave. There is no protection for asylum seekers. Even in credible fear interviews, they simply check off a few boxes, they do not allow us to explain. Even though I would be killed if I went back, they are just dismissive. All I want is to protect my son.

1 I declare under my duty to tell the truth and penalty of perjury that to the best of my
2 knowledge, all the information I have here given is correct and complete and I understand
3 the legal consequences of testifying falsely to the authorities. Executed on this 10th day
4 of Sept. 2025, at Dilleu.

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CERTIFICATE OF INTERPRETATION

My name is Theresa Cheng and I swear that I am fluent in both the English and [REDACTED]
languages and I interpreted the foregoing declaration from English to [REDACTED] on
September 10, 2025, to the declarant to the best of my abilities.

Dated: Sept 29, 2025

Theresa Cheng

EXHIBIT 5

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, [REDACTED] B [REDACTED], declare as follows:

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

4 2. I traveled here with my husband and my two sons, [REDACTED], who is 7, and [REDACTED] 2
5 ½. I am from [REDACTED].

6 3. I speak [REDACTED].

7 **Entry to CBP**

8 4. We came together from Mexico around August 4, 2025 across the border by car.
9 We immediately asked for asylum at the port of entry and we were detained for two days
10 at the border.

11
12 **Dilley**

13 5. We have been here over a month, since August 6. It is now September 11.

14 6. It is extremely hard for my sons here, psychologically and physically. My older
15 son, who is seven years old, is getting worse and worse.

16 7. The ICE officials told us nothing. We don't receive updates about our case, about
17 our statements, we don't know what's going on or what will happen. The only thing we
18 are constantly being told is that we will certainly be deported, that we have no chance to
19 stay.

20 8. Once an official lied to us, they told us that we would be transferred to another
21 facility. We told them we needed to contact to our lawyer. They said that they were
22 transferring us along with two other [REDACTED] families, but we knew that they were lying
23 and that they would deport us if we left with them.

24 9. We were immediately sure this was a trick and we refused to go with them.

25 10. My husband was holding our older son. The officers began to shake and grab him
26 and they pulled my son from his arms. They hurt my son when they yanked him from his
27 father's arms and he cried out.

1 11. They tackled my husband, and then he refused to stand because he did not want to
2 be deported. They grabbed him roughly and flipped him on his stomach and several of
3 them piled on top of him. They handcuffed my husband, dragged him up, and forced him
4 to a bus.

5 12. Then they took me and my other son to the same bus. The bus was a prison bus,
6 with cages and prison bars, it was not a place for children. There were about 10 other men
7 on the bus.

8 13. My husband was still handcuffed. My son was so worried for my husband because
9 of the cuffs. Everyone on the bus was handcuffed except for me and my sons. They were
10 shackled at the waist, legs, and wrists, my husband also was shackled this way.

11 14. My son was crying the whole drive. He was in pain because of the way they had
12 yanked him from my husband's arms. He was crying for his dad and because he was hurt
13 and scared.

14 15. There were also two other [REDACTED] families, whom we knew. We had become
15 friends with these families.

16 16. The father in one family had just gone on a hunger strike. The other family often
17 advocated for themselves. One of the fathers went to an officer the day before this
18 happened and told the officer he wanted his family released under *Flores*. We wondered
19 if we were all being punished for this.

20 17. It was around 10am when we boarded, and we arrived in Louisiana around
21 midnight. We watched as they dragged people off the bus towards the plane to be
22 deported.

23 18. The two other [REDACTED] families on the bus were taken off the bus and onto the
24 plane. We had been with them for three weeks, we knew these families, we knew they
25 were seeking asylum and what might happen to them when they went back, and my sons
26 and I watched them being taken onto this plane.

27 19. One of the fathers struggled, trying to stay here, and several ICE officers lifted him
28 aggressively and dragged him to the plane. He was still in shackles. All this time our

1 children were crying, watching these families, their friends, dragged from the bus
2 towards the plane.

3 20. We knew these families wanted to fight their case, like us. They wanted review by
4 a judge, but they were just taken.

5 21. We don't know what happened to them. We have not been able to speak to them
6 since. We don't know if they are ok. We are worrying about the families who were
7 deported from the bus, we worry about them all the time.

8 22. We saw people being deported, and we waited for them to come to drag us off the
9 bus, too. We were terrified we would be next. We watched the agents entering the bus,
10 picking someone, dragging them off, as my sons cried. But for some reason they never
11 took us and we stayed on the bus. At that time, they explained nothing to us. When the
12 bus began moving again we did not know why we were left on the bus or where they
13 were taking us.

14 23. We were on this bus for 36 hours in total. Along the way they would drop off
15 others on the bus at other prisons and pick people up from these prisons. While they
16 would board and remove people our children continued to wait on this bus, in this tiny
17 cage, only two by two meters of space.

18 24. There were no toilets except for an exposed toilet in the back of the bus. The bus
19 was full of men who were in full view of the toilet. We did not know who was on the bus,
20 maybe they were also immigrants, maybe they were men being transferred between
21 criminal prisons. We were only allowed to use the toilet once a day. It was agonizing.

22 25. We were given only these terrible sandwiches. They were so bad the children
23 could not eat them. They did not eat for two days, the entire trip to the airport and back to
24 Dilley.

25 26. After this 36-hour drive, we were exhausted and hungry and traumatized from this
26 experience.

27 27. Once again at intake, they took our property and inventoried our belongings. We
28 had not touched our belongings – agents grabbed them and placed them somewhere in the

1 bus when they took us, and they took us off the bus when we got back, so there was no
2 chance for anything to happen to our belongings or for any contraband to be left in them.
3 We were so exhausted we could not function. Yet we waited there for three or four hours
4 as they inspected our property, which made no sense because we had never touched our
5 property, it had been in the back of the bus and was checked the first time we came. They
6 made us go through a checkup immediately, although we hadn't slept for days or eaten.
7 They had no compassion for what we went through.

8 28. They finally took us back to our trailer.

9 29. The next day an officer came to us and told us again that we would be deported,
10 and that the only reason we were not put on the plane the night before is that there were
11 no seats left.

12 30. They told us that we had the choice to go back on a civilian plane voluntarily or to
13 be forced again onto a bus in shackles. They threatened that we would be put back on the
14 bus and endure this ordeal again if we did not agree to be deported, and that if we did
15 agreed then to be deported we could use a civilian plane and be spared this bus trip.

16 31. We returned from that bus ride on the 27th of August. Since then we have not been
17 told anything. We have had no updates. We have learned nothing about what will happen
18 now. We see other families leaving and we wonder, why not us? We see people being
19 deported, too, and my children never stop being afraid.

20 32. My older son is now becoming so depressed because this is a horrible place for a
21 child. Knowing we can be deported any second, knowing that people are being taken in
22 the middle of the night.

23 33. Sometimes we are woken in the night when they take someone. ICE will come and
24 wake up a family and tell them to pack their bag and take them to be deported in the dead
25 of night. My kids are terrified, we are all depressed, staying here just waiting for our fate.

26 34. My older son is suffering so much. He is only 7 years old. He is sensitive, but since
27 being detained he cries constantly, he is volatile and emotional, we were so worried for
28 him that we took him to the psychiatrist here who prescribed antidepressants and

1 antipsychotics. I think a kid of his age should not be taking this type of medication. But
2 since the doctor told us it could help, he has been taking it, but it hasn't helped. He is still
3 so unable to regulate his emotions that the psychiatrist increased his dosage. He keeps
4 telling us he just wants to get out of here.

5 35. Being here maybe two weeks is extremely difficult, but it's something a family
6 could survive, but now it has been more than a month, and it is impossible to endure.

7 36. The lights are always on over our beds and none of us can sleep. Officers are often
8 very loud outside our room at night, they laugh and speak loudly through the night.

9 37. When we were first here, we had other families with us in our room. They would
10 talk or watch TV at night.

11 38. During the day it is so hot that we are not allowed to walk outside. The kids are
12 cooped up inside. We can walk for half an hour early or late, when it's a little cooler, but
13 this isn't enough for children. They need to run and play.

14 39. My younger son does not eat the food here, he is hungry all the time. He will only
15 accept breastmilk and it is not enough for him. He is growing. He is two and a half, and
16 he needs to eat. I often worry that I will stop being able to produce breastmilk for him. I
17 hardly sleep and I am anxious all the time, I don't know what we would do.

18 40. My toddler is losing weight very quickly. The doctors claim that he is a healthy
19 weight but I know my child. He is tired all the time, he gets upset easily, I can see that he
20 is hungry all the time. I can see that he is losing weight and I worry he is not getting
21 vitamins or nutrients that he needs. He is becoming weaker each day.

22 41. Sometimes he will eat a small amount of dry cereal that I can buy in the
23 commissary. I try to take these to the cafeteria so that he can eat with us, but the officers
24 prevent us from even bringing these small snacks back. I will try anything to help him eat
25 but there is nothing I can do.

26 42. We want to be free so that we can make food he is familiar with that he would be
27 able to eat again. We are worried about his health, and about our older son who is
28 deteriorating mentally.

1 43. The officer told us we would be able to speak to the consulate about his situation,
2 but that has never happened.

3 44. I am myself very depressed because of what is happening to our family, but I
4 cannot take antidepressants because my son only drinks breastmilk and I am afraid
5 medication would affect him.

6 45. The kids miss school, there is really no school for the children, one hour per day
7 only. The kids go with a group around their age, but of course it is not serious school,
8 they just draw or do an activity. It is not really education. They need proper education.

9 46. I sleep with my sons in a trailer, and my husband in another. There are so few
10 places we can go to be together, especially when we are not allowed to be outside
11 because it is too hot. We can see him only in the cafeteria or the gym, but the gym always
12 has loud music and people are working out, people are often screaming, they play loud
13 games of basketball or volleyball, we cannot talk or be together.

14 47. There is the library, but there is only a short time we can use the library, a schedule
15 restricts the hours for families. It is not easy to spend time there either. The kids are not
16 allowed to play there, they can only sit quietly, and we spend our hours in the library
17 trying to research our case and learn about what will happen and how the immigration
18 system works. We try to entertain my older son with a computer, but there is nothing for
19 toddlers, he can only sit.

20 48. There are only one or two [REDACTED] books, but these are never available. There is
21 nothing for the kids to do, and it worries me that they don't get education and they cannot
22 even read.

23 49. There are almost no toys here. The boys have very little to do most of the time.

24 50. There are a few toys at the gym, but it is difficult to spend time there, usually there
25 are not enough for all the kids and there almost never are toys available for our kids.
26 They cannot leave the gym with the toys.

27 51. One of our neighbors has a nineteen-year-old daughter who was separated. They
28 told the daughter she would be taken back to her mother if she came with them, but after

1 she got on the plane they flew her to another country. The plane landed and the
2 daughter saw she was in another country and her mother was not there.

3 52. When our neighbor learned what had happened to her daughter, she became
4 hysterical. She was devastated thinking that her daughter was lied to, and that she went
5 with the agents hoping to see her mother only to find that she was alone.

6 53. Our son was given shoes two sizes too big. We asked for proper size but it takes
7 weeks to get these replaced. The same happened to me, I was given the wrong size of
8 shoes, I asked for shoes in my size but it took weeks.

9 54. The same is true even for a t shirt. We ask for a t shirt and it takes a very long time
10 to get one, although we know they have piles of them in storage, they just do not give
11 them to us.

12 55. The officers do not seem to talk with each other or to make accommodations. One
13 young girl has autism and the family got permission finally to turn off the lights for her at
14 night, but there is a different officer each shift and often they do not listen to or do not
15 even know about this agreement that the administration approved.

16 56. At one time an officer on duty in our trailer saw that the autistic girl, she is a
17 teenager, was not wearing her clothes and this officer began telling other detained people,
18 telling other ICE officers, telling everyone, and then everyone began to spread this like
19 gossip. It is not right for an officer to share something private happening in a family's
20 own room. I can only imagine what these parents feel, not just that their children are here,
21 but that their daughter is exposed in this way.

22 57. No one here tells us anything, nothing about our rights or anything else. We were
23 never told about the *Flores* Agreement.

24 58. We heard a rumor from others detained here that there is a *Flores* Agreement and
25 that it means that children cannot be here more than 20 days, but many children are here
26 more than 20 days.

27 59. We have heard rumors that it no longer exists, or that now the government no
28 longer will comply with *Flores*. We all research the *Flores* Agreement at the library and

1 we know that children are meant to be released promptly, but we see it is not happening.
2 We are hoping that lawyers can protect this agreement and make sure that children can be
3 released from these prisons.

4 60. Because of what happened to us, to all the [REDACTED] families, after the father asked
5 the ICE officer about the *Flores* Agreement, we are too afraid to say anything about
6 *Flores*.

7 61. I could never separate from my children under any circumstances, because they are
8 so close to us. Separation would be much too traumatic for them and my son is still
9 breastfeeding.

10 62. Even though I wouldn't accept this, I believe that we should have this right
11 explained to us. For some families, this may be the best choice. For example, if the kid is
12 a teenager who is missing classes, and if that child could go to a father or another relative
13 in the U.S. to wait for their parent. For those kids, the children's lives would be made
14 easier. Families should know about this right so that they can make a decision for their
15 own children.

16 63. We just keep wondering why we cannot get humanitarian parole. Our children are
17 suffering. They get worse every day. They are traumatized, my son's mental health is
18 deteriorating, my toddler is hungry every day, it is more painful each day to watch my
19 children endure being in this prison.

1 I declare under my duty to tell the truth and penalty of perjury that to the best of my
2 knowledge, all the information I have here given is correct and complete and I understand
3 the legal consequences of testifying falsely to the authorities. Executed on this 11 day
4 of Sep 2025, at Dillon.

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CERTIFICATE OF INTERPRETATION

My name is Yurii Petrashyk and I swear that I am fluent in both the English and languages and I interpreted the foregoing declaration from English to on September 11, 2025, to the declarant to the best of my abilities.

Dated: 09/24/2025



EXHIBIT 6

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, N [REDACTED] V [REDACTED] S [REDACTED] M [REDACTED], declare as follows:

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

4 2. I am 14 years old. I am from [REDACTED].

5 3. I speak Spanish.

6 4. I am here with my mom, and we have been at Dilley for 41 days.
7

8 **Entry to U.S. and McAllen CBP**

9 5. We crossed the border on the 4th of October of this year.

10 6. Immediately, we were detained around Laredo, TX.

11 7. They brought us to the McAllen CBP facility for 5 days. We called it the icebox; it
12 was freezing there.

13 8. They took us to a room and took all of our personal belongings. We were in a cell.
14 The things were in bad condition there, and we could barely sleep. We were sleeping on
15 the floor.

16 9. The food was always cold and always the same.

17 10. They do not count our 5 days there in the overall time we've been detained.

18 11. We asked to call someone while there, and they never let us do it.

19 12. Our room had 30 people in it more or less.

20 13. There was a toilet in the middle with a little wall in front of it. It was very
21 embarrassing. The cameras could see everything, and the people in our room could see us
22 from the chest up.

23 14. We told them we were here for asylum, but the guards didn't tell us anything.

24 15. They brought us with other women to Dilley one day. We drove in a van. There
25 were many of us, and they had cameras everywhere in the van. They didn't tell us where
26 we were going.

27 16. We were in border patrol for one night before arriving to McAllen, and our phones
28 are still there. They didn't bring them with us to McAllen or Dilley. They told us

1 to talk to a lawyer. They told us only someone from RAICES or a lawyer could call
2 border patrol. My dad called and that's what Border Patrol told him.

3 17. We've sent so many messages on the tablet and they never respond and the
4 messages also erase after 15 days or so. There is an ICE agent who comes on Monday.
5 We told him about our phones, and he said "I don't have anything to do with the phones."

6 18. We know we can't use our cellphones in Dilley, but we want to make sure we get
7 our personal belongings once we get released from here. If we got released today, we
8 wouldn't get our phones back because they are with Border Patrol.

9
10 **Dilley ICE Detention Center**

11 19. My mom applied for asylum in 2023, and I applied in early November of this year
12 while detained. The judge asked us to complete the I-589 form for me and we did. Now,
13 we're being told we'll be detained until January 7th when the judge will decide on our
14 case. We can't stay here until then. We won't make it.

15 20. In the room we live in here, there can be 12 people total. There is a woman in our
16 room who screams at us, says bad things about us, and puts the TV volume on high. She
17 was mad that we just wanted to stay by ourselves and not socialize that much.

18 21. It's always around 11 or 12 at night, and the people in our room start yelling this
19 song.

20 22. Our room now has 12 people in it. It's totally packed.

21 23. We talked to the therapist and guards about moving rooms, and they said we can't
22 move. It's very uncomfortable. We can't sleep. The TV is on high volume all the time.

23 24. We don't go in there all day to avoid these things and the woman who doesn't like
24 us, but whenever we enter they start to talk about us and laugh and scream loudly.

25 25. It's about 3 outfits per person, but too many people are trying to wash their clothes
26 at the same time. People accidentally steal your stuff or confuse it. The underwear burns
27 or breaks, and they won't give you more unless it's totally ripped up. You have to fill out
28 a form and then it takes a while for the clothes to actually get to you. About one week.

1 26. There is soap in the laundry room, but it's a very small amount.

2 27. There is just one professor at the school, only a few kids can go in every day. It's
3 just 12-15 kids is the capacity of the room. If you don't get there early, sometimes you
4 won't be able to get into the classroom because it fills up.

5 28. Inside the classroom, there are two women laughing in English and watching
6 YouTube. The professor speaks a bit of Spanish, but not a lot.

7 29. I go every day to school. It's just the basics: addition and subtraction. I feel like I
8 am losing my education here.

9 30. I was in 9th grade before I came here. If I had to go back to my country now, I'd
10 have to repeat the grade because of all the school I've lost.

11 31. In the park and the board games room, you can't eat, just sit and play. In the gym,
12 there are not little cups to drink water even if there's a Gatorade container there.

13 32. In the library, they don't give us headphones. You can't watch videos. You can't
14 go on social media. It's very limited. It's also completely isolating.

15 33. I feel very sad and stressed to be here. Sometimes I have anxiety attacks here. My
16 nerves are so high. I don't know what is happening. My muscles will twitch because I'm
17 so nervous and on edge.

18 34. I was sick once and they sent me to medical. The staff said they'd give me
19 ibuprofen, but when I got the pills they didn't look familiar to me. My mom and I asked
20 to consult the doctor about the pills, but we couldn't talk to one. They were also giving
21 me dirty water to take the pills.

22 35. I'm always congested here. I am trying to get medicine, but what they give me just
23 doesn't work. I'm still congested and my throat hurts all the time. They don't have what I
24 need here. The allergy medicine does not work.

25 36. I want to leave.

26 37. The therapist just asks the same questions: have you been eating, drinking, and
27 sleeping? It's always the same.
28

1 38. The water tastes like chlorine here. They recently put filters in. The filters are just
2 in the rooms. The water in the park, gym, and medical is not filtered. In the rooms, you
3 can tell a difference though now.

4 39. The food is so repetitive. We've never gotten sick from it, but another family said
5 there were worms in the food. I have a bit of anxiety about the food now.

6 40. In the bathrooms, there is hand soap and that is it. We have to buy shampoo from
7 the store. Also, we buy toothbrush and toothpaste and more. The only thing we don't pay
8 for is toilet paper.

9 41. Our skin is very dry from the soap here. Our hair also is dry.

10 42. We also buy razors from the store, but you can only use them one time.

11 43. I have never heard of a case manager.

12 44. The ICE people we talk to just look up our case on the computer, nothing else.

13 45. We have to pay for all the calls to family members.


14 46. If they make us stay in here until January 7th, we will ask to be deported. We won't
15 make it.

16 47. I have never received an individual hearing or got to explain to the judge why I
17 should leave. The judge never said if we could leave here, he just said the next court date
18 is January 7th.

19 48. We've seen women faint, have anxiety attacks, and kids that are autistic and have
20 special needs. They need to leave here.

21 49. If I could change one thing, it would be to give people here real information and let
22 people leave more quickly.

23 50. Eventually, I wanted to study English, and then I want to study aviation.
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1 I declare under my duty to tell the truth and penalty of perjury that to the best of my
2 knowledge, all the information I have here given is correct and complete and I understand
3 the legal consequences of testifying falsely to the authorities. Executed on this 18 day
4 of Nov 2025, at Dilley, TX .
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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: 11/18/25

Katherine Johnson

EXHIBIT 7

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, C [REDACTED] R [REDACTED] G [REDACTED], declare as follows:

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

4 2. I am 32 years old and my son, [REDACTED], is 14 years old. We are from [REDACTED].

5 3. I speak Spanish.

6 4. We have been detained at Dilley since September 23, 2025. My son and I walked
7 to the U.S. from [REDACTED]

8 5. They have not told us how long we have to be here. We had court on October 15,
9 2025. I requested asylum and was told to fill out the paperwork by October 31, 2025. I
10 submitted my paperwork by that date, but I have not heard a response yet. I checked the
11 website and saw that we have another court date on November 20, 2025. I ask about my
12 status, but nobody tells me anything.

13 6. It has been really hard to be stuck here for two months. It is difficult to not know
14 what will happen.

15 7. I am worried that my son is not receiving any schooling here. My son went to the
16 classroom at the beginning, but every time he would go, the teachers would ask him
17 about his case. It was just additional stress for him so he stopped going about a month
18 ago. He was not learning anything, anyway. Children should have a daily class to at
19 least be learning English. That class was basically just addition, subtraction and
20 coloring. I do not like the schooling here at all. They should be teaching children things
21 here so that they are interested in learning and not just asked questions about their cases.

22 8. I am worried because my son is barely eating. He was a good eater before, but he
23 does not like the food and has very little appetite. It's just not good for kids to be locked
24 up for this long, and he is eating less and less.

25 9. Two days ago, there was big a scandal because one of the residents found worms
26 in the broccoli. The man was trying to get signatures about the incident to try force
27 changes here.

1 10. We are living in a room with five moms and five kids. There were six families, but
2 one family left recently. It is hard to sleep in there. One neighbor snores a lot, and my
3 back is hurting from the bunk bed. My son falls asleep at about 1 am and sleeps until 11
4 am. I don't wake him up for breakfast anymore because he wasn't eating it anyway and
5 he was exhausted.

6 11. We don't drink the water here. The water in the room tasted dirty – so we now just
7 drink the juice or buy Gatorade. They put filters on the sink about 15 days ago, but it still
8 has the same bad taste.

9 12. My son will go to the gym, but it is very hard for him to be here. I will force him
10 to use the computer at least for an hour because sometimes he doesn't want to leave the
11 room.

12 13. After being here about a month, I got a horrible rash. The doctors first gave me a
13 cream, but it made it worse. A psychologist told me it was probably related to anxiety
14 and gave me medication for anxiety. The rash is finally getting better.

15 14. It is a problem that they don't have a doctor in the evening. They need someone
16 here 24 hours a day.

17 15. The other night, a resident passed out and no one found out until the next day. The
18 next morning, they tried to wake her up, but she wouldn't wake up. She was out for a
19 couple days in a hospital.

20 16. Another resident fainted – and it may be related to the fact that she was separated
21 from her baby who was a U.S. citizen. She was in a lot of pain both mentally and from
22 the sudden end to breastfeeding her baby and the impact that had on her body.

23 17. We have to buy hygiene products at the commissary. The products they gave us in
24 the beginning were very hard on our skin, but we had to wait for my sister to put money
25 in our account before we could buy other products. There is only hand soap in the
26 showers, and it is harsh with a lot of chemicals. They should be giving children different
27 soap for their skin. A lot of people here have skin allergies, and it could be the soap or it
28 could be that they are giving people used clothes to wear.

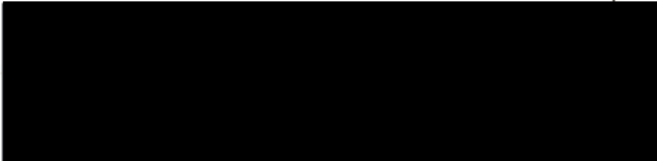
1 18. When we first arrived here, they did not give us a legal orientation or know your
2 rights training, but we did get a talk about self-deporting from ICE officials.

3 19. My son is not able to make any free phone calls to family members. They gave us
4 a card for 3 minutes when we first arrived, but that is all.

5 20. No one has mentioned the *Flores* case to me, or that my son has rights under
6 *Flores*.

7 21. I have a lot of faith that God is going to get us through this and I hope on
8 November 21, after our next court date, we can go to live with my sister.
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1 I declare under my duty to tell the truth and penalty of perjury that to the best of my
2 knowledge, all the information I have here given is correct and complete and I understand
3 the legal consequences of testifying falsely to the authorities. Executed on this 18th day
4 of November ²⁰²⁵ at Dilley, Texas.
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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: 11/18/2025

Diana Cano

EXHIBIT 8

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, A [REDACTED] K [REDACTED], declare as follows:

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

5 2. I am 22 years old, and I am from [REDACTED]. My husband, son, and I have been
6 detained at Dilley for 52 days. My son will turn two years old in December. This place is
7 not where we want to spend his second birthday.

8 3. I speak [REDACTED].
9

10 **San Ysidro Broder Station**

11 4. Prior to being detained here, we were at the San Ysidro Border Station for five
12 days. It was very awful there. There were just some iron benches in the room. We had to
13 sleep on mats on the floor for all five days. They would not even allow us to put the mats
14 on the benches to form a bed. Also, we were right under an air conditioner, and I had to
15 use our mats to create a sort of fort so that the air did not blow directly on me and my
16 son.

17 5. It was very cold. There were only cold sandwiches to eat, and there was no food
18 for children. It was very stressful for my son to be there. He is ordinarily very active and
19 running around, but he was often just silent there, just sitting and not moving. He was in
20 shock. My son and I were detained separate from my husband, who was in a different
21 area.
22

23 **Dilley ICE Detention Center**

24 6. When we were transported from CBP to Dilley, they threw out all of our things
25 into the trash, including my son's stroller. They told us we were going to a family center
26 where we would be safe.

27 7. We were given a credible fear interview, and our results were positive. We have
28 already had our master hearing where we were ordered to file Form I-589. They only

1 gave us two weeks to file that, which was stressful. But we submitted the form on time,
2 and we were assigned a trial quickly. We have very little time or ability to prepare for
3 our trial on December 18th while we are detained here. The computer time on the library
4 here is very limited, and the important legal websites are mainly blocked. All of the
5 information that we have in order to show we were persecuted in [REDACTED] is on our
6 computers and phones, but we don't have access to them.

7 8. One day, we asked for our phones and computers to get this information, and they
8 showed us a sealed see-through package with our technical devices in it. They said is this
9 enough? They wouldn't let us open the package. Obviously, both the computers and
10 phones were dead, and they wouldn't let us bring them out to charge them. It was such a
11 joke.

12 9. Also, to even use the computers here, you have to wait in line for about one hour.
13 Which we have to do to prepare for our case, but it's really hard to do so with our son.

14 10. We fear that this is all a show, and we will just be deported. We have already seen
15 this happen to other families. It is just one big show of deception. We don't think we
16 have a real chance to get asylum here, even though we passed the CFI interview.

17 11. Every day I am crying because there is not food for our son to eat. Each day there
18 is just chicken and rice. I am so sad all the time that there is not baby food here. And
19 just last week, I was given broccoli and cauliflower that were moldy and had worms.

20 12. When we first arrived here, we were told we could drink the water. My son started
21 drinking the water, and within a few days he got diarrhea. We went to the doctor on
22 October 6th, and they said it would go away on its own. They said he could eat bananas
23 and yogurt to get better, but we don't have that here. We just have apples. We asked for
24 a stool test, and they said it would take a week for the results. They told us the result of
25 the stool test was very bad and that he had an infection. I think that because so many
26 children got sick at the same time – there was probably a problem with the water. I also
27 saw some mold in the water when I poured it for myself once.
28

1 13. Later, we asked for a special diet due to his stomach problems. They gave my son
2 a special diet card only for 7 days. But the cafeteria would not give him the special diet
3 for 3 more days after that, so we had to go back to the doctor and ask again for the special
4 diet card. The special diet included fruits, but they were not fresh. They were just canned
5 fruits. From October 10th-17th they allowed this diet for him. But otherwise, they have
6 told us “no” when we ask for it, even though other families have special diets here with
7 fish, shrimp, and fresh fruit. We don’t get anything like that, and we don’t understand
8 why.

9 14. We get pasta with the sauce already pre-mixed in. My son needs at least plain
10 pasta. We have to suck the sauce off of the noodles for him before he will eat it. It’s
11 awful. It’s awful for my son, my husband, and also for me. It stresses me out so much.
12 Food is a basic necessity. The food here is also too spicy. The kids won’t eat it – it has
13 too many spices on it and too much salt and pepper. They need plain food.

14 15. In general, he doesn’t eat. Every meal, there is forcing and screaming and making
15 him eat. He is suffering, and it’s so terrible for us to watch him not eat. The only reason
16 he isn’t losing a ton of weight is because he eats the cookies and juice. That’s it.

17 16. We also went to the medical unit around October 24th because my son had a fever.
18 They didn’t really do anything, though, they only gave us Ibuprofen. We also had to stay
19 in the medical unit from the 24th until the 27th. Finally, on the 27th we were able to see a
20 pediatrician, a doctor. Before that, we kept seeing nurses only who continued repeating
21 that he was fine. The pediatrician prescribed him antibiotics because he had an ear
22 infection in both ears. We asked for tests of his chest and other follow up, but they did
23 not do anything but give him the antibiotics. He did not get better. After seven days of
24 antibiotics, his fever rose again. They did not do any other testing despite our repeated
25 requests. We went back to medical three more times to bring down his temperature, and
26 they kept saying everything was fine. The doctor said the infection had spread, though,
27 and prescribed the same antibiotics again for him. We have not had good experiences
28 here with the medical services.

1 17. One some point, we could have two bottles of water a day for my son's baby
2 formula for his bottle. But now they are telling me I can only have one bottle of water for
3 formula per day. It depends on the supervisor, and I have to ask all the time for more
4 bottled water. It's not given to me outright.

5 18. Lately, the staff has been yelling at my son because there are single women living
6 here. Anytime the single women go anywhere, they yell at us to HAULT and STOP.
7 They yelled at my son and scared him. We weren't allowed to go to the library until the
8 women had passed by, even though it was our time to go. In the same manner, no one is
9 allowed in the dining hall until they leave.

10 19. There are no potty-training toilets here to help my son with potty training. Our son
11 is almost two years old, and he needs this to be able to develop normally.

12 20. I am worried about my son and the effect of detention on him. First, he has
13 become very aggressive since he has been here. He has never done this sort of thing
14 before in his entire life. My child never used to bother anyone, and now he has started to
15 hit me and his father. We are seeing him also start hitting himself in the face. This
16 started about three weeks ago. So now we have him hitting me, himself, and his father.

17 21. Second, there is no preschool here. There is a caretaker room you can only use if
18 you have a court or attorney appointment. He also has not been saying new words since
19 he arrived here. He is not developing. We notice that it is just so hard for him to be here
20 with nothing to do and few activities or toys for him.

21 22. He is shocked by the new toys that the Flores lawyers bring here. He only has three
22 toys, and if any staff see that we have them they will take them away. He is almost two –
23 he needs toys to play with. We have to hide them all.

24 23. The lights are on all night here. My son cries all night almost every night because it
25 is so hard for him to sleep with the lights on. This has been going on for two months
26 straight. I tried to hang a towel up to hide the light from my son, but the supervisors
27 immediately tore it down and threw it away. They said I couldn't do that.

1 24. It is also very cold in the room most nights because of the air conditioning, and he
2 doesn't have enough clothes. A while ago, I asked for socks. It took them a whole week
3 to give me the socks.

4 25. Staff here mainly speaks English. They do not communicate with us in a language
5 that we can understand, [REDACTED]. They don't even use a translator app when they have it
6 in their back pocket. Just today, they asked me repeatedly in English if my son wanted to
7 go to the caretaker room. I only knew what they meant because you, Flores attorney, later
8 told me. I can't understand them, and then they just speak to us very loudly and slowly.
9 That obviously doesn't help.

10 26. This week, when the staff knew Flores was coming, they started to clean
11 everything in the facility. They washed all the washing machines for you. It was all so
12 visible and fake.

13 27. If I could change one thing here, it would be offering a child's diet, turning the
14 lights off at night, and providing at least some toys. This would help my son so much.
15 They also need education here. We have been here for so long and our son isn't receiving
16 any education.

17 28. The staff here have no education or training on how to interact with children. How
18 can they work here and take care of kids without any past education or training?
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1 I declare under my duty to tell the truth and penalty of perjury that to the best of my
2 knowledge, all the information I have here given is correct and complete and I understand
3 the legal consequences of testifying falsely to the authorities. Executed on this 19 day
4 of Nov 2025, at Dilley, TX.



CERTIFICATE OF TRANSLATION

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

Dated: 6-22-2025 Mohamed Waheed

EXHIBIT 9

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, M [REDACTED] M [REDACTED]-S [REDACTED], declare as follows:

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

4 2. I am 31 years old, and my daughter, [REDACTED], is nine years old. We are from
5 [REDACTED].

6 3. I speak Spanish.

7 4. We have been detained at Dilley for 46 days.

8 5. I have been living in New York for the past seven years. I was seeing my daughter
9 regularly, but she was living with our family in [REDACTED]. About six weeks ago, my
10 daughter came for a visit on a tourist visa. This was something she did often. I flew
11 from New York to the Miami airport to meet her. She was excited to see the beaches in
12 Florida.

13 6. When I arrived at the airport, the airlines told me that ICE wanted me to go to
14 "Door 8" to get my daughter. Once I arrived at Door 8, they let me reunite with my
15 daughter, but they would not let us leave.

16 7. They detained us in the Miami airport for about 42 hours. We were in a room that
17 only had a couch, a toilet with a wooden cover and a camera. They did not give us food,
18 but one of the officials asked if I had money and when I told him I did – he offered to buy
19 us Chick-Fil-A two times. He was the only one who offered to help us. They
20 accompanied us at all times and would not even let us make a phone call. We had to
21 share the couch to sleep. We saw other families in other rooms. We were terrified – they
22 took our phones; they weren't explaining anything to us; we would ask for help and they
23 told us they could hold us for 48 hours without giving us any information.

24 8. The officials started asking me questions and I said I did not have to respond to
25 them. The officials kept telling me I had to answer their questions. Finally, after about
26 ten hours, an official on the next shift said she knew how to make me talk. She said that
27 if I didn't answer her questions, she would take away my daughter. My daughter started
28 crying and we became very upset. At that time, I took out my daughter's birth certificate

1 to prove our relationship. They did a DNA test and took fingerprints. They didn't know
2 I could understand some English and they kept calling me "stupid" for not understanding
3 them. Those officials also said that it was too bad my daughter was not ten years old
4 because then they could separate us.

5 9. We then were transported through two different airports to come here. They sent
6 three people to accompany us. When I was on the first plane, we saw the previous flight
7 attendant from my daughter's flight from [REDACTED]. She asked us why we were on the
8 plane. I wrote on a vomit bag to please help me and call my husband to let him know
9 that we had been detained and were not allowed to make any calls. The flight attendant
10 called my husband and let him know that she had talked to us on a flight from Miami and
11 that we were headed to San Antonio.

12 **Dilley ICE Detention Center**

13 10. It is really hard for my daughter to be at a place like this. She has been going to a
14 good school; she has a loving family; she is a vegetarian and has a lot of food allergies. It
15 has been extremely hard for her to be here away from all her friends and family. She is
16 not eating enough. There isn't enough protein here for her to eat. There isn't yogurt;
17 there isn't cheese; there isn't fresh fruits. One time my daughter fainted in the shower
18 because she is not eating.

19 11. We have been to the doctor four times to request a special diet for my daughter.
20 They can see the request is in the computer, but the cafeteria is not making it for her. We
21 have asked over and over.

22 12. Before she got here, my daughter had a cast on her left foot. They took it off a bit
23 early so she could make the trip, but she was supposed to return to the doctor for follow-
24 up. The doctor was supposed to determine if the foot was healing properly. All they
25 have been able to do here is bandage the foot and give her ibuprofen.

26 13. I started talking to a psychologist here because my daughter is blaming herself for
27 our detention. Because she wanted to visit the beaches in Miami – she thinks it is her
28 fault that we were detained and ended up here. She is waking up in the night and crying.

1 14. I wrote a letter telling them that this place is not good for children's mental health.
2 My husband has also sent over my daughter's diagnosis to ICE and requested
3 humanitarian parole, but the judge has said we are under ICE's jurisdiction and there is
4 nothing she can do. We continue sending grievances but haven't heard anything.

5 15. There is nothing for my daughter to do here. There is just a PlayStation and
6 Mexican novelas on TV. I am not going to let her play on a PlayStation every day and
7 watch shows with all that violence, sex, and adult content. The only thing to do is go to
8 the gym, but since she has a problem with her foot – she can't really play too much. If
9 she does run on it, she re-injures it and is not able to do much the next day. We mainly
10 just go to the library.

11 16. There is not a school here. There is a place for the children to go for an hour
12 where the teachers seem to be trained to get information out of them about their
13 immigration cases rather than teach them. One of my daughter's friends told her that the
14 homework was to write a story about why she was scared to go back to her country. That
15 is not healthy for my daughter or any of the kids to write about. The questions about
16 immigration they ask the kids during class are not proper. What does ICE have to do
17 with math?

18 17. I have submitted grievance after grievance here. I have requested more access to
19 the computers and to legal resources online. For example, one of the computers has old
20 software on the law that is very outdated, and it is in English without any way to use
21 Google translate. We are expected to prepare our legal cases here but not given access to
22 these resources.

23 18. I have also submitted grievances about how the staff intimidate us. For example,
24 staff will say that if ICE comes and sees our room is messy, they are going to make us
25 cry. Other staff have discouraged us from submitting grievances saying those people
26 "come out last." Another staff told a resident that if she didn't stop letting other residents
27 use her email, they would take away her daughter.
28

1 19. We have never been given a legal orientation or know your rights presentation.
2 The only topic ICE has presented on is how to self deport.

3 20. No one here has informed me of my daughter's rights under *Flores*. I learned from
4 an outside lawyer that children are not supposed to be here for longer than 20 days, but
5 no one here has advised me that my child has a right to be released to family or what the
6 process would be to do that. My husband is a U.S. citizen, and we would much prefer
7 that my daughter was with him than locked up at this place.

8 21. There is not enough translation here for families. There are families from all over
9 the world, and many who do not speak Spanish or English. They are not getting help
10 with translation. When they have to turn in documentation, it is all in English and many
11 people do not know what they are filling out or signing. People tell me not to help
12 because what if something goes wrong. But how do I not help when I see people are
13 drowning? They are even charging people \$100 to submit a form for amnesty – plus \$11
14 to track to make sure it gets to the right offices. That adds up to \$133.

15 22. We live in a room with four other families – 4 mothers and 4 daughters. The
16 children often can't fall asleep before 3 am because people are crying or upset. There is
17 always something happening or people getting bad news. They only allow us to dim the
18 lights a little bit, so it is light all night long and there is constant noise and disruptions.

19 23. We have to buy hygiene products from the commissary. Sometimes they run out
20 of items. Last week we went without shampoo for five days because they had run out. In
21 the shower, there is disinfectant hand wash, but we are not going to use it on our bodies
22 or our hair.

23 24. The water here tastes like Clorox. The sign above the sink says it is okay to drink
24 the water and they have recently put filters on the faucets, but the water still does not
25 taste right.

26 25. My daughter is not permitted to make free phone calls to family members. There
27 are signs that say that calls cost seven cents per minute, but you have to look at the fine
28 print that there is a 23% surcharge.


1 26. My daughter is not allowed to be unattended even for a few minutes. Going to the
2 restroom is hard since she has to be with me at all the times.

3 27. A few weeks ago, they started sending single females here. The foot traffic is
4 much busier with the new single females. We are not allowed to be walking outside in
5 the same areas as them, and sometimes we have to wait inside for up to half an hour for
6 the women to pass by on the pathways. They yell a code word: "Blue Traffic" and then
7 we have to freeze – like freeze tag. Our freedom of movement has definitely been
8 limited since the facility was opened to single females.

9 28. My husband wanted to send basic things to us, like underwear, but we were told
10 that we are not allowed to have anything from outside. My husband thinks it is crazy that
11 there are more restrictions here than at an actual jail.

12 29. This place definitely feels like a jail. There is no other way to describe it; it's a jail
13 for children. The difference might be that there are not metal bars on the rooms, but we
14 are definitely imprisoned. We are not able to leave and told "no" to everything we ask.
15 This environment is not okay for any child.

1 I declare under my duty to tell the truth and penalty of perjury that to the best of my
2 knowledge, all the information I have here given is correct and complete and I understand
3 the legal consequences of testifying falsely to the authorities. Executed on this 18th day
4 of November 2025 at Dilley, Texas



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: 11/18/2025

Diana Cano

EXHIBIT 10

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, M [REDACTED] R [REDACTED] -P [REDACTED], declare as follows:

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

4 **Background:**

5 2. I am 26 years old. I am from [REDACTED].

6 3. I speak Spanish.

7 4. I have been detained at the Dilley facility in Texas since the 25th of August, about
8 17 days. I'm here with my daughter, [REDACTED] and she is 8 years old. I have a life partner
9 who is detained in another facility. They said they didn't detain us together because we
10 aren't officially married and he isn't my daughter's biological dad. But I wish he was
11 here with us.

12 5. Before we were brought to Dilley, we were in the refrigerator for 5 days. It could
13 have been the Rio Grande Processing Center in Laredo, but I'm not sure. We just called it
14 "Los Rios."

15 6. Before I arrived at this facility, I was living in San Antonio. I entered the U.S. in
16 December of 2024 through a CBP One appointment. My first court date was not until
17 2026.

18 7. My daughter should be in second grade. Her school started around August 17 of
19 this year, and we were detained the 19th. She has already met her teacher and everything.
20 Now she has missed almost 3 weeks of school.

21 **Detention before Dilley:**

22 8. When we were detained, my partner was driving the car with me and my daughter,
23 and a cop pulled us over. The officer said we were speeding, but we weren't. He asked
24 for my partner's license. He came back to our car after 30 minutes and just said "come
25 with me" to my partner. The officer put him in handcuffs and in the back of the police
26 car. His asylum case is currently pending.

27 9. Then the cop returned to our car and asked for my name, not my documents. He
28 left again briefly, returned, and said "come with me." The cop didn't say why I was being

1 detained. They said I had to come with my baby, who was in the backseat. They didn't
2 say I could call someone to pick her up or take care of her.

3 10. They took us to an ICE station. Once we got there, they asked for my documents,
4 and I said I have them but they're in my apartment. They just said "quiet" and "enough."

5 11. I don't know where the station was. This was on the 19th of August. We stayed
6 there for one day, my partner held separate from me and my child. It was a cell.

7 12. The following morning, they took us to "Rios." They never told us anything about
8 where we were going or why. We asked, and they said nothing. I thought my partner and
9 I would be detained together since we were picked up together, but we weren't. They
10 took him the same day we arrived to Rios to another ICE detention facility. I haven't had
11 any contact with him since then. He was like a dad to my little girl, she was so sad to be
12 separated from him.

13 13. The Rios place was horrible. I didn't think they could keep us in such a gross place
14 for so long. We basically slept on the floor. The mattresses were so thin you could feel
15 the floor beneath you.

16 14. These are places for criminals, not kids. I tried to be strong for my daughter, but it
17 was hard. Where we were there was not a window we could see out of. We never knew if
18 it was day or night or what time it was.

19 15. It was so cold, and they didn't give us more clothes. I asked for them, and they said
20 no. We each only had a big t-shirt and pants, but no sweaters or anything else. It was
21 freezing.

22 16. We couldn't have hair ties to tie our hair back in Rios either. I feel crazy if I can't
23 put my hair back. They took the hair tie from my daughter too.

24 17. There aren't words to describe the food from that place. The taste was horrible. It
25 was hot, but it made us want to throw up. My daughter wouldn't eat it. They gave her a
26 packet of little candies, and that was basically all she ate the whole time there. We were
27 there for five days. It was also the same food for every meal. There, my daughter lost
28 weight. I could tell.

1 18. Many families came in and out while we were there. We probably met 20 different
2 families, all moms with kids. At one time, there were 15 people in total in our room. It
3 was very cramped in there.

4 19. My daughter was depressed. There were no games or paper to draw or TV. There
5 was a piece of glass in our room and you could draw with a finger on it. I tried to shower
6 her how to do it, and the guards yelled at us.

7 20. She was crying all night. She was crying from the lack of food and feeling hungry.
8 It was so bad that she couldn't eat it. Even an animal wouldn't be able to eat what was
9 served to us.

10 21. All the lights were on always. That's another reason why we never knew the time.

11 22. We didn't receive a shower until the fifth day we were there. That day they gave us
12 a small dental kit and told us to shower and change our clothes.

13 23. We also didn't get toothbrushes or anything to brush our teeth for the first four
14 days.

15 24. The toilet was in the middle of the room we were kept in. There was no privacy.
16 The toilet was for everyone in the room to use. It had a tiny wall on right and left, but not
17 in front, so everyone could see you use it if you had to go. And there were cameras
18 watching us everywhere.

19 25. We never received a phone call while there.

20 26. We were never told we could call or lawyer or given a list of free lawyers to call.

21 27. We just slept during the day. Because my daughter wasn't eating, her body had no
22 energy.

23 28. I asked a guard when we could leave and what would happen, and they just said I
24 don't have a response for you.

25 29. The guard would say about the toilet in the middle of the room "That is what there
26 is. There's nothing more."

27 30. After showering on the fifth day, we drove 2 hours in a car to Dilley.
28

31. The driver told me she was in charge of mobility and didn't know anything else. I asked where we were going and why, but that's all I got.

Dilley ICE Detention Facility:

32. When we arrived at Dilley, they made us shower again and change again even though we had just done that.

33. We had a medical check-up. They said I had a UTI and my daughter had a kidney infection. This was from holding our pee because we were so embarrassed to use the toilet in front of other people. My daughter also had an ear infection we think from sleeping on the floor at Rios and it being so dirty.

34. I arrived at Dilley with cash, \$211.90. They told me it had to go into my account here. I didn't want it to. I didn't want to give them my money, but they didn't give me a choice. They said I can use it for phone calls and buying things at the store. I wanted to save it.

35. I sleep with my daughter and 3 other families who have kids. They have 2 kids, 2 kids, and 1 kid. It's a lot in one room. And they are all small children. They cry a lot during the night. One girl is 3-years-old and they don't give her a bottle for milk so she cries all night. She can have milk, but it's from a carton like the ones we drink out of at lunchtime.

36. There is no privacy in the room.

37. Sometimes I think ICE works very fast to deport us so we can't contact an attorney first.

38. The lights are on all night and day. The guards walk outside and every time they pass there is a boom sound of their shoes on the floor. This is happening all night.

39. They say the water is drinkable, but it's not. We are all without drinking water. It has a fake smell, like perfume or lotion. Maybe it's chlorine, I don't know. If you drink it, your stomach hurts so badly. More than anything, I worry for the kids. If you don't have money, you can't buy bottled water from the store. Then, you just don't drink water.

1 There is drinking water in the kitchen where we have meals but that's it. And you can't
2 bring the drinkable water out of that area with you.

3 40. My daughter just has two shirts and two pants, but one of the shirts is for sleeping.
4 I wash her clothes everyday. She has no shorts, even though it's very hot here.

5 41. The washing machine has a button for soap. You can push it, but we see it doesn't
6 come out. It's supposed to be self-dispensing, but it doesn't work. We tell the guards, and
7 they say you have to push the button. If you get to show them it doesn't come out,
8 sometimes they'll give you some soap and throw it in there but it's not a lot.

9 42. All they do at the school here is draw for one hour. My daughter has gone every
10 day except for twice.

11 43. We go to the park for a bit, but it's often too hot. The gym is chaotic too. There are
12 lots of kids and flying balls. She can't play calmly there. We like the library.

13 44. There are moments where my daughter and I are having a normal conversation and
14 she gets quiet and just says, "Mom when will we leave? When are we getting out? How
15 many more days?" I've noticed a change in her attitude and personality, mostly because
16 she is so tired all the time. She can't rest properly.

17 45. She doesn't cry, she is just quiet and thinking. She is withdrawn. She is on and off
18 with the other kids. Sometimes there is interest from her to play with them, but then she
19 just wants to sit alone for a long time.

20 46. The food here is better than where we were before, but it's still not good. The kids
21 don't like the food. It has a lot of onions and strong flavors. It's spicy too, and they need
22 plain food. Things that would be good for them are natural juices, plain rice, fruit, soup,
23 plain bread, and stuff without artificial flavors.

24 47. She is eating more now than at the Rios place, but it's unhealthy. It's a response to
25 anxiety. She is looking for anything to eat now constantly.

26 48. When we arrived here, they gave us hygienic things to last one day. If you want
27 more, you have to buy it. We buy toothbrushes, hair cream, lotion, shampoo, body soap,
28 and other food and drink products.

1 49. In the showers here there is just hand sanitizer. They want us to use this to wash
2 our clothes, the plates, and our bodies. It's "multi-use" apparently!

3 50. The guards here don't speak a lot of Spanish. Sometimes they look for a kid who
4 grew up here to translate for them.

5 51. I just have to keep going, I have to maintain myself. I am full of anxiety here. We
6 are locked up literally. These are emotions I have never encountered before. I'm always
7 tired. I want to take a nap sometimes in the afternoon but we can't. My hair is falling out.

8 52. My daughter has gone to the psychologist. They just say how was your week? Are
9 you eating? Did you go to school? Then she draws a bit and leaves. In my opinion, it
10 doesn't help. We wait longer in the waiting room than the actual appointment even lasts.
11 The whole appointment is less than 5 minutes long.

12 53. When I call RAICES, it's free. When I call my family, it's not free.

13 54. We have never received any visits in her from people besides lawyers.

14 55. I didn't receive a list of free legal counsel, I just talked to other people and they
15 told me about RAICES. It's word of mouth. Another resident gave me their number.

16 56. I never received a know-your-rights training. ICE just talked to me about my case
17 when I first arrived, and I asked if I can have a lawyer. They said if you can find one,
18 then great. If not, then no. They never told me about RAICES.

19 57. I understand the word Flores to mean we can't be detained for more than 20 days
20 here. I heard that from the people here. I also have an immigration lawyer in my family,
21 and he told me that too.

22 58. From you is the first time I'm hearing that right technically only attaches to my
23 daughter. We don't have any family here so there is no one I would pick to be a sponsor
24 for my child and she can't be separated from me. Regardless, no one ever explained to
25 me that right for my daughter to be released.

26 59. You can talk to someone about your immigration case here just on the tablets, but
27 ICE doesn't respond. They just told me my case was processed for credible fear, but I
28

1 never received any interview. I then asked about my partner, where he was and if I could
2 speak to him and they never responded.

3 60. The only thing I've heard about voluntary departure is that you get \$1,000 dollars
4 but that's it.

5 61. A while ago, there was a pregnant woman and she was eating in the kitchen. She
6 was trying to throw up and was choking. She fainted and was seizing and no one arrived
7 for 20 more minutes from medical. Then finally an ambulance came too. Her kid watched
8 the whole thing. And my kid too. It was traumatic.

9 62. There is a pastor here, another person who is detained. She talks to us about prayer,
10 and the guards told her, "You can't do this here, sorry, we can't permit this. You can't
11 talk to the people, please go to your room."

12 63. The chapel is evangelical, and she is catholic. The services offered here aren't
13 catholic. And a lot of people here are catholic.

14 64. You can make this place better, but the worst thing is just to be here for a long
15 time. Without education, without good food, without enough clothes, without rest,
16 completely enclosed, without liberty.

1 I declare under my duty to tell the truth and penalty of perjury that to the best of my
2 knowledge, all the information I have here given is correct and complete and I understand
3 the legal consequences of testifying falsely to the authorities. Executed on this 11 day
4 of Sept 2025, at Dilley, TX.



1 CERTIFICATE OF TRANSLATION

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

5
6 Dated: 09/11/2025

Katherine Johnson

EXHIBIT 11

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1
2 I, N [REDACTED] G [REDACTED] C [REDACTED], declare as follows:

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

5 2. I am 29 years old and my daughter is 5 years old. We are from [REDACTED].

6 3. I speak [REDACTED] and Spanish.

7 4. I have been detained at Dilley for 10 days.

8 5. It's a prison here – it is truly a living hell. It's not a good place for anyone. All of
9 the children here are suffering. The mothers are crying – especially for their children.
10 We are all suffering.

11 6. Before coming to Dilley, we had been living in the United States since June 2023.
12 We had been living in Chicago and my daughter was in Pre-K. Things were going well
13 for us.

14 7. A couple weeks ago, we were at the laundromat washing our clothes. We were
15 just outside waiting for our clothes when more than 20 armed, military officers in full riot
16 gear showed up in many cars and surrounded us. My daughter and I were crying. We
17 were terrified. Everywhere we looked, they were arresting people and handcuffing them.
18 I think they arrested at least 15 people. They asked me for documentation, and I gave
19 them my passport. When they saw I was from another country, they said I had to go with
20 them. I was terrified they would handcuff me or take my daughter away. I just started
21 hugging my daughter really close, and they put us both in a car together. She was crying
22 and crying and just kept asking if we could go home. It was horrible. We had just been
23 at the laundromat expecting to go home like any other day. They arrested us with just the
24 clothes on our backs. They wouldn't even let me bring the clothes we had been washing.

25 8. They drove us for a long time to a huge military camp. There were protesters and
26 journalists outside. There were many other immigrants there, and they were separating
27 the men from the women. We were then detained in a small room – about 6 X 6 feet. At
28

1 that point, it was just me and my daughter. It just had a chair and nothing else. We were
2 in that room for about 4 hours, and then they took us to an airport in Chicago.

3 9. They kept us in a room at the airport for about 2 days. It was extremely cold in
4 there and we were just wearing a thin layer of clothing. There was also a girl from
5 Venezuela with her baby. The room just had a sofa for all 4 of us to sit and sleep on. We
6 all slept on the sofa together. They let us use a restroom, but there was no shower. We
7 were not able to clean ourselves or brush our teeth. The food they gave us was not
8 edible. It was like a warm bag of food of some sort. I don't know what it was. We
9 didn't eat anything for days. They didn't even give us water to drink. The whole time
10 we would just cry and cry. We would ask what was going to happen to us, and they
11 wouldn't tell us anything. My daughter and I were not allowed to make any phone calls
12 the entire time. Finally, two ladies and a man arrived to escort us, and they flew all of us
13 to Dilley.

14 10. Since I have arrived here, they have not told me anything about my case. I went to
15 the library to try to find out about my court date online. It said on the website that my
16 court date is on October 28, 2025, so I think I have to stay here at least until then.

17 11. I learned about the lawyers at RAICES from one of the residents. I have been
18 crying and crying. They gave me the number and helped me call them.

19 12. I have a lot of pain in my uterus and it is so hard to be here. When I arrived, I told
20 the doctor that I have cysts on my uterus. I had gotten medication in Chicago to get rid of
21 the cysts and was told if I didn't take the medicine, the cysts could turn into tumors. But
22 since I arrived here, they will only give me birth control pills and pain medication. They
23 are not giving me the medication I need for the cysts. I have been to the medical unit
24 twice. The second time, I asked to speak to another doctor, but they told me that I should
25 just take the birth control pills. I feel a lot of pain and heat around the area, and I am
26 worried for my health. Every day and night, I have this pain. The doctor in Chicago has
27 told me I need to be very careful because it could lead to paralysis or heart failure. I am
28 so sad and worried.

1 13. We don't really eat the food that they offer here. I will buy my daughter the soup
2 from the commissary, and she will sometimes eat the chicken and the eggs.

3 14. I am worried about my daughter. She will hardly eat at all. She constantly asks:
4 "When we can leave?" and "When can I go back to my school?" and "When can I wear
5 my own clothes?" Sometimes my daughter doesn't want to leave our room because she
6 is so sad and just wants to leave this prison so badly. She cries and cries about all of this.
7 I am so worried that I barely eat.

8 15. When we arrived, they gave my daughter two changes of clothes. I have to wash
9 the clothes every day after we bathe. I asked for sandals for my daughter, and I am
10 waiting for an answer.

11 16. About all my daughter likes to do is color. I learned yesterday that there is a
12 school room here. But when I took my daughter yesterday, they already had 15 kids so
13 she was not able to go. They said that was the limit.


14 17. I don't understand why some people are here for a short time and some people are
15 here for more than 30 days. In the ten days that I have been here, no one has told me
16 anything about how this system works or given us a know your rights training. I have not
17 been explained anything about my daughter's rights under *Flores*.

18 18. We are able to use the phones here, but I don't have money for calls. My daughter
19 is not given free phone calls.

20 19. I have been having a lot of nightmares about when we were arrested by the military
21 outside the laundromat. I went to medical yesterday, and they prescribed medication for
22 my anxiety. My daughter constantly asks me questions about what happened to us and
23 why. She will say that the military are so bad, so bad for what they did. She asks me
24 why they wanted to separate us and still worries about that. She will tell people about
25 what happened to us all the time. When she sees what is happening in Chicago on the
26 television, she tells people that those are the bad people who arrested her. She talks about
27 it almost daily.
28

1 20. I would like to speak to someone about having a fear interview because I am
2 fearful to return to my country. At the same time, I am worried about staying here until
3 my court date at the end of October. I don't want to be here that long.
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1 I declare under my duty to tell the truth and penalty of perjury that to the best of my
2 knowledge, all the information I have here given is correct and complete and I understand
3 the legal consequences of testifying falsely to the authorities. Executed on this 10th day
4 of October, at Dilley, Texas
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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: 10/10/2025

Diana Cano

EXHIBIT 12

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, L [REDACTED] R [REDACTED], declare as follows:

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

4 2. I am 38 years old. I am from [REDACTED], and I speak Spanish.

5 3. I have been detained at Dilley for 34 days. I am here with one of my daughters
6 who is 12 years old, [REDACTED]

7
8 **Entry to Dilley**

9 4. When my family and I crossed the border into the U.S., we were separated. My
10 youngest daughter, at 8-years-old, ended up crossing the border with one of my sons,
11 who is 18. They were separated from me and my 12-year-old daughter. They crossed
12 first, and we didn't cross the border until the next day.

13 5. When I encountered immigration officials in the U.S., I immediately said, "I am
14 searching for protection for me and my kids. I have two kids who crossed the border
15 yesterday. Please help me find them."

16 6. They never helped me find the 18 year old.

17 7. I only heard once he was already back in [REDACTED] that he'd been deported.

18 8. Before arriving at Dilley, we were detained at two other facilities. Uvalde was one,
19 and the other was Eagle Pass.

20 9. We were in the Eagle Pass facility for 2 days. No one there helped me to connect
21 with or find my two kids who were separated from me. They just talked to me very
22 rudely every time I asked for help.

23 10. In Eagle Pass, they didn't let us shower or brush our teeth. It was very cold, and we
24 couldn't eat the food. They didn't let me make a phone call there either.

25 11. Also in Eagle Pass, an ICE officer told me to sign a paper. I asked if it was for
26 deportation and said I want protection for me and my kids here. He wrote on the paper
27 that I just came to the U.S. for work and yelled at me to sign it. He said "you are going
28

1 to sign this". I didn't know what I was signing, but I signed it. Later, I found out it was
2 for deportation.

3 12. Then, we went to a facility in Uvalde. We were there for 3 days. We received the
4 same treatment there. We couldn't bathe, and we were very cold. At one point, a meal
5 was passed out and then the staff came out and grabbed it away from us because it was
6 bad, but there were some kids who had already eaten it. It was expired.

7 13. Still, no one helped us connect with or find my 8-year-old daughter and 18-year-
8 old son. One of the guards told me my 8-year-old isn't here in the U.S. I said no I know
9 that she is. They said they haven't passed through here. I cried and cried and said no I
10 know they are here.

11 14. We had to call the consulate to ask where my kids are. Then, an ICE agent finally
12 said this is where they are and brought me a piece of paper with their information on it. I
13 kept asking for communication with my youngest daughter, [REDACTED], but no one would
14 help me. Finally, one person there helped me to contact my daughter who is here in the
15 U.S., but is not at Dilley with me.

16
17 **Dilley ICE Detention Center**

18 15. I did a CFI and it was negative, and I saw a judge and he said you can't appeal
19 your case anymore. We already have a deportation order.

20 16. My son has already been deported and is now hiding for his life. I will be
21 assassinated if I return to [REDACTED].

22 17. ICE agents told me my daughter is now only 40 minutes away from where we are,
23 but they cannot bring her to Dilley. The paper they originally gave me said she was in
24 Uvalde in ICE.

25 18. There is a social worker who is taking care of her.

26 19. They told me that because we are detained, we can't have any visits with each
27 other.

28 20. I have been able to talk to her on the phone.

21. I want my youngest daughter to be here with me and [REDACTED] at Dilley. We want to all be together, but they have not brought her here.

22. My oldest son is 20 and lives here in the U.S.

23. I would want to know more about if my two daughters could be released to him. Maybe I would do that, but right now all I can think about is getting [REDACTED] back with us.

24. No one ever explained to me that my daughters have a right to be released. I didn't know that.

25. No one has explained to us why we are still here. I just know that I am supposed to be patient for the decision of [REDACTED]'s lawyer. We know from her social worker that she has a court date in 2026. The social worker said she'd have to ask for voluntary departure or be deported to come back with us. [REDACTED] is in a center like this, but where there are only kids.

26. We don't want to eat here. We are very depressed. My oldest daughter won't play here. We just stay in our room, closed up.

27. I did a report against this one guard. This guard yelled at my daughter for just playing. Everyone was surprised. She was really yelling strongly. [REDACTED] now is afraid of going towards that area again and encountering this official. The reports aren't anonymous.

28. One girl in our room has lice, but the mom won't take her to medical, because she's nervous that if ICE finds out about the lice they won't let them leave here.

29. We already did a report about this, but they haven't helped us. Because we are now afraid of getting lice.

30. The food here gives me acid reflux.

31. In the bathrooms, there is just hand soap. It's the same soap for hands and to wash your body and hair.

32. We have to buy in the store things like toothpaste, shampoo, deodorant, and noodles because my daughter won't eat anything else.

33. I don't want her to lose weight.

1 34. I have already spent \$160 since we've been here in the store.

2 35. If some of the workers don't understand us, we have to look for someone else who
3 can speak Spanish.

4 36. There is an ICE agent in charge of our case. He just says your case is pending.

5 37. Someone sent my son who lives in the U.S. a letter via mail that says if your mom
6 doesn't leave in 10 days, you will owe the government \$250 dollars. This arrived for him
7 on September 26th. He said someone from immigration sent it.

8 38. The phone calls here aren't free.

9 39. We have not heard of an individual release hearing or had a chance to explain why
10 we shouldn't be here anymore.

11 40. An ICE agent told me if I don't find a lawyer, I'll be deported and lose my kid.

1 I declare under my duty to tell the truth and penalty of perjury that to the best of my
2 knowledge, all the information I have here given is correct and complete and I understand
3 the legal consequences of testifying falsely to the authorities. Executed on this 09 day
4 of Oct 2025, at Dilley, TX.

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CERTIFICATE OF TRANSLATION

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

Dated: 10/10/2025

Katherine Johnson

EXHIBIT 13

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, J [REDACTED] V [REDACTED] D [REDACTED] A [REDACTED], declare as follows:

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

4 2. I am 32 years old. I am from [REDACTED].

5 3. I speak Spanish.

6 4. I have been detained at Dilley for 14 days. I'm with my husband and three kids.
7 We have a girl who is 6, a boy who is 11, and a boy who is 16.

8
9 **Arrest and McAllen CBP**

10 5. Before Dilley, we were in McAllen for 4 days. We had been living previously in
11 Houston for three years.

12 6. We all had TPS starting in 2023, with exception of my daughter [REDACTED] who was not
13 born in [REDACTED]. We had also all applied for asylum within the correct time frame. My
14 husband and I had already received work authorization, and our asylum cases were
15 pending. We were just waiting for our asylum interview or court date.

16 7. When we were detained, we were told what you guys had was with a different
17 administration and now doesn't exist. And my husband said, "Really? I have my license
18 and work authorization, and I never received anything telling me otherwise."

19 8. We were in San Padre on vacation with our three kids and were driving back to
20 Houston when we were detained. We never crossed the border, as San Padre is in Texas.
21 We got stopped at a random checkpoint, though, where they asked if my husband was a
22 citizen.

23 9. They stopped us. They checked all of our legal "statuses." They pulled us into the
24 station.

25 10. Before being sent to McAllen, we were in a cell for 2 or 3 hours. The floor was
26 wet. The behavior from the guards or ICE agents was super disrespectful.

1 11. They only spoke English, but they didn't know I could understand English. After
2 they detained us, they said to each other "we got to find more." One official acted like he
3 had just made a basketball shot in reference to detaining all 5 of us.

4 12. We received water in the cell but not any food.

5 13. Then, we drove four hours in the middle of the night. No one said where we were
6 going.

7 14. At McAllen, they said we had to throw out all of our stuff, all our personal things.

8 15. My oldest son was held alone, I was with my 2 little kids, and my husband was
9 alone.

10 16. 1 day we received no family visit at all. I had to ask every day for the visits
11 otherwise we wouldn't get them.

12 17. Only 1 time in 4 days could we make a phone call.

13 18. When we walked to the showers or bathroom we had to put our hands behind our
14 backs.

15 19. The windows in McAllen were all covered, so you couldn't see outside the cell.
16 You didn't even know what time it was.

17 20. My husband was in a cell with 35 other men.

18 21. We all just had blankets on the floor. I was with two other families. There was a
19 TV but no games.

20 22. My oldest son was with five other kids in a cell around his age. He was really
21 scared the one day we didn't have a family visit.

22 23. No one gave us any information. We would ask and no one would say anything.

23 24. ICE just said things to us like "you can leave, but they'll find you in a year" or
24 "you won't have a job in a year."

25 25. My daughter started to cry because she was separated from her dad.

26 26. At 5 a.m. one morning they woke us up and said get your things.
27
28

1 **Dilley Detention**

2 27. Here at Dilley, I am in one room with my three kids. My husband is in a different
3 part of the facility with other dads. We don't understand why he can't stay with us since
4 we have our own room. There are bathrooms designated for men and women, and my
5 oldest son obviously uses the men's bathrooms. My husband could too.

6 28. The lights are on all the time and the guards' radios are so loud.

7 29. If they are just walking, we can hear them. It's impossible to sleep here.

8 30. They also have cameras everywhere, so why do they need to enter the rooms? And
9 why do the lights have to stay on?

10 31. There is a couple here who are both pastors. They were leading us in prayer every
11 night. Then, a guard said we couldn't be doing prayers anymore. He said "you can't pray
12 in another language that isn't English." We don't have a lot here, but we wanted to have
13 prayer and religion. The guards said we could not. They told this to the pastors
14 individually.

15 32. I am not allowed to leave my daughter ever. Also, the guards won't let my husband
16 watch her if I'm not there. If I want to take a small break, lie down, or take a shower, I
17 have to be with my daughter at all times.

18 33. Our daughter had an allergic reaction on her ankles on both feet. We went to the
19 medical unit today and they gave her a little lick of cream. They said it could be a fungus
20 or allergies, so they gave her 2 different creams. We have to go in the morning and at
21 night to get the cream now.

22 34. They are playing psychological games with us here. We had a meeting with ICE
23 recently, and there was a huge miscommunication. My husband was told he had an ICE
24 appointment, but he wanted to go with all of us. While he was searching and searching
25 for us, we were already at the appointment waiting for him. It was the guard's fault. The
26 ICE agent started the questions without my husband present.

35. An ICE agent also told us we had to sign voluntary departure paperwork so we'd be given \$1,000 dollars. He said you need to sign this because you'll never be able to enter the U.S. again otherwise.

36. There is also not e-mail on the computers in the library. We needed to get a copy of our asylum paperwork which is in our house, but we were having trouble contacting anyone to go get it.

37. Our one son who is 11 - he is in sixth grade. He went to the school here one day and the teacher made them do a writing assignment. They had to say when they arrived here, from what country, and do you understand what asylum is? My son knew enough to not write anything down.

38. This is not a core subject. This shouldn't be asked about in school.

39. I did everything right according to the immigration system here, and now who is going to pay for my bills? My apartment? Phone bills? Have I lost my job? And if we are released, can they just detain us again? I don't understand.

40. Now, we probably all want to stay together, but no one told us about our children's right to release regardless.

41. I want to sue the government. Can they really legally do this to us? Can they take me? I did everything legally. My kids are so traumatized now, we can't pay our bills. They said it'll be 20 days, but we already have 18 days (CBP + Dilley), and I don't think we'll get released on the 20th. Who is responsible for this?

42. If there had been any way to avoid the trauma in CBP or at Dilley for our kids, we would have taken that. No one told us about any other options.

43. We did not receive any Know Your Rights training.

1 I declare under my duty to tell the truth and penalty of perjury that to the best of my
2 knowledge, all the information I have here given is correct and complete and I understand
3 the legal consequences of testifying falsely to the authorities. Executed on this 10 day
4 of Sept 2025, at Dilley, TX.



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: 09/10/2025

Katherine Johnson

EXHIBIT 14

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, K [REDACTED] M [REDACTED] L [REDACTED], declare as follows:

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

4 2. I am 27 years old, and I am from [REDACTED]. I am with my daughter who is 6
5 months old.

6 3. I speak Spanish.
7

8 **San Diego CBP (2 facilities)**

9 4. I decided to cross the border near Tijuana to request asylum in this country. This
10 happened around the 26th of September.

11 5. I presented myself to immigration officials immediately in San Diego, California.
12 After that, they brought me to an ice box. I was there with my baby for about 3 days.

13 6. This first place was horrible. The guards and ICE agents spoke very rudely to us
14 there. The food was horrible. The milk they gave me for my baby was expired, it was
15 hard, and it smelled bad. There was water but it tasted and smelled like chlorine.

16 7. I didn't receive a phone call there.

17 8. When I arrived there, they told me that "Asylum is over now. You can't get it. The
18 quicker you go back to [REDACTED], the better." I thought they were probably lying based
19 on the way they were speaking to me, but I wasn't sure.

20 9. I couldn't shower the whole time I was there. There was one toilet in the middle of
21 the room that we all had to use. There was no privacy if you used it, though. There were
22 short little walls around the toilet, so everyone could still see you if you were using it.

23 10. They air conditioning was on high too, so it was freezing. They only gave us thin
24 blankets.

25 11. My baby was crying a lot, from the cold and being locked up the whole time. We
26 couldn't leave the cell. And she was so cold.

27 12. Then, we went to another facility for one more day. It was only 10 minutes away,
28 so I'm not sure why they moved us. It was still in San Diego.

1 13. After that facility, we took an airplane to San Antonio and ultimately arrived at
2 Dilley.

3
4 **Dilley ICE Detention Center**

5 14. My baby and I have been detained at Dilley for 12 days now.

6 15. "You just have to wait here until they call you." The ICE agent told this to another
7 mother who has been here around the same time as me, so that's what I assume. I
8 reviewed my case on the computer in the library, and it doesn't say anything for me like a
9 court day or any updates.

10 16. My baby can't sleep well from the stress that we've been through.

11 17. The main complaint I have here is the water. Every time I want a bottle of water
12 for my baby's formula, the guards tell me I have to go to medical. I have to get a piece of
13 paper that says my baby needs a bottle of water.

14 18. Sometimes they give it to me without the piece of paper from the doctor, but that is
15 technically the correct process to go through.

16 19. We are sharing our room with 6 other moms and their kids.

17 20. The guards wake us up every day at 5 a.m. Some of the lights are on all the time.

18 21. When I got to the bathroom or shower, I have to bring my 6 month old baby with
19 me. I have to bring her everywhere.

20 22. Every day, I have to wash my clothes, because we only have two outfits. For my
21 baby, I have four outfits.

22 23. For the diapers, we get 3 to 4 at a time.

23 24. I have just one bottle for her milk. I wash it with hand soap and a sponge in the
24 room.

25 25. The formula lasts about 4 days. They gave me a bag when I entered here with
26 formula in it.

27 26. We are locked in here and that it is difficult. My baby is frustrated and stressed.

28 27. The room we stay in has no toys.

1 28. They gave us a small amount of toiletries when we entered. When we ran out we
2 had to buy more from the commissary.

3 29. I have never heard of a case manager. No one is in charge of my case here.

4 30. I sent a message to ICE on the tablets, but they never answered me. That was four
5 days ago.

6 31. My family has to put money on my card to make phone calls to them.

7 32. I have not received any visits here from family or friends.

8 33. I have not received any information about my rights or my baby's rights here.

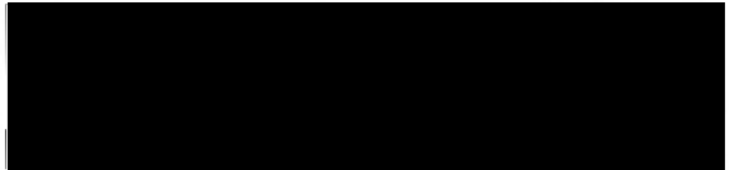
9 34. The ICE agents asked me to sign voluntary departure paperwork. They told me if I
10 leave I'd get \$1,000 dollars, but I told them I want to fight for my case.

11 35. I have never heard the word *Flores* or about that before. I only heard from other
12 detainees that we can't be here for more than 20 days,

13 36. I didn't know about my child's right to release. I would want to know more about
14 how it works in practice. If she could be released to her father who lives here in the U.S.
15 directly, then maybe I would do that.

16 37. If I could change one thing, it would be to ensure that this place doesn't exist.
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1 I declare under my duty to tell the truth and penalty of perjury that to the best of my
2 knowledge, all the information I have here given is correct and complete and I understand
3 the legal consequences of testifying falsely to the authorities. Executed on this 10 day
4 of Oct 2025, at Dilley, TX.



CERTIFICATE OF TRANSLATION

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

Dated: 10/10/2025

A handwritten signature in black ink, appearing to read "Katherine Johnson", written over a horizontal line.

EXHIBIT 15

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

DECLARATION OF N [REDACTED] G [REDACTED] [REDACTED]

Pursuant to 28 U.S.C. § 1746 and subject to penalty of perjury, I declare that the following is true and correct:

1. My name is [REDACTED]. I am a citizen of [REDACTED] and fled [REDACTED] with family. On September 22, 2025, we drove up to the US-Mexico border at Tijuana and requested political asylum in the United States. My family consists of me, my spouse and 3 three children. My oldest son is 13, my daughter is 11, and my youngest son is 4. We left [REDACTED] because the [REDACTED] government persecuted me for my political beliefs. I was in danger of taking my children of being taken away from me because of my political beliefs.

TREATMENT DURING INITIAL DETENTION

2. When we first arrived at the Mexico border at Tijuana immigration officers arrested us and they held us longer than usual. We were there for 5 days. We were sleeping on the cold floor with the AC turned on high. I told them I have a chronic condition in my kidney. ICE officers acted like nothing was happening, and I did not receive any treatment at all. During this time, I found blood in my urine.

TREATMENT AND MISINFORMATION WHILE IN DETENTION

3. Some people came and introduced themselves as human rights activists when we were brought here to Dilley. We were told that if we passed the credible fear interview that we would be released. We are completely confused about who is holding us here, and we haven't been told why we are being held here. I asked the ICE officers and they told me that it was the court that decides whether or not we will be released.
4. A group of us had a meeting with ICE and asked about the Flores rule and whether it could help us. Officers [REDACTED] and ICE supervisor [REDACTED] told us that this rule was revoked 21 days ago. They've lied to us so many times. They laugh at us and tell to call Trump when we ask about the rules. We were only given an instruction manual in Spanish about the rules for regular detention centers and not a family center. Eventually we were able to translate some of it into [REDACTED].
5. Yesterday after that meeting we met with one of the officers and asked them why they are lying about the Flores rule no longer being in place. The ICE officer told us that management was telling them to say that to us. Yesterday we asked for documents about the Flores rule, the supervisor [REDACTED] disconnected the interpreter and told us he would not say anything, he told us if we wanted to know we should call Trump.
6. It seems incredible that government officials on duty are making jokes at our expense. We are under the impression that ICE officers are not afraid of anything and can act

lawlessly since they face no consequences. They cause a lot of psychological damage to our children when they behave this way.

7. We've tried to find a manual and have asked why adults and children have to sleep with the lights on. They keep the temperature very low, and adults and children are constantly sick and are unable to get better. Every room and even in the showers the rooms are kept very cold for both adults and children.
8. We have been at the center for 45 days, and no one has cleaned the bedroom where we sleep. All the dirt stays, and very few people come clean. It is very dusty, and they don't allow us to open the windows to get fresh air. It's apparently a rule not to open the window, but we don't understand why it's not allowed.
9. We're pretty sure that there is a bias against [REDACTED] people and our children here. Whatever is allowed for the Spanish speaking children is not given to our children. The personnel seem to be very biased. If I start asking about something and they answer in Spanish, they don't clarify and say that it's my problem.
10. Sometimes the officers will turn on their walkie talkies near the children's rooms at 2 or 3 in the morning. Sometimes they'll walk into the room and talk loudly on their walkie talkies for no reason.
11. We are scared to get medical help at all. When my youngest was sick, they gave him ibuprofen and would come around 4 or 5 in the morning, waking everyone up to remind us that medication would need to be taken at 8 in the morning. They are trying to harm the psychological health of the [REDACTED] children, including my children, and are not allowing them to take certain medicines or are waking them up unnecessarily while they are sick.
12. My daughter's ears became clogged during our initial detention, and we asked if they would clear her ears. They told us they cannot perform that procedure because they do not have a medical license and offered to give her antihistamines instead. Once we were transferred to Dilley, a nurse practitioner eventually gave us some ear drops, which were very cold, and my daughter got a terrible earache. We had to give these drops to her outside, and my daughter was crying while we gave her the drops.
13. The earache became inflamed, and they eventually prescribed very strong antibiotics, even though she is just a child. She would need prebiotics to be able to take the antibiotics safely and we were not given any. The biggest problem is that she's started losing hearing in her ear, I fear that she will have partial hearing loss after being here. Low level personnel were the only ones to distribute medication to us. The nurse practitioner barely examined my daughter once.

14. We are scared to ask for anything, because the officers start threatening us that they'll put us in different detention centers and put our children in foster care.
15. We were given wormy food and when someone spoke out about it and said that the children should get better food, he was taken in the middle of the night and threatened that he and his family would be separated. Officers told him that he would go to an adult detention center and his children would go to foster care.
16. Our youngest child is very scared of the officers. When playing on the playground officers would come up to him and the other [REDACTED] children and get close to their faces and start blowing a whistle and yelling at them. The officers did this until the children cried and ran away. After doing this they'll yell, "what's wrong" and ask why they are scared. The detention center has so many little children who are intimidated and try to hide from the officers. Some people have asked for a psychologist and were told that they could be given pills to sedate their children which would make them like vegetables.
17. There is absolutely no oversight here. There's no opportunity to fix the conditions, or food or anything, and the officers do whatever they want. Yesterday an officer was walking around with handcuffs and when asked he said that he needed handcuffs in case he got attacked. He walked with the handcuffs for about two hours and then said they were not needed anymore and put them away.
18. It has been 2-3 weeks since we asked for a manual or rules for this center, and we want to know our rights and what the actual rules are. They always say no to these requests. They keep lying to our faces and when we ask why they lie, they just laugh.
19. I received a message from ICE officers that there was progress in our case, and they later said it was false information. Every day we try to find out the truth, we just aren't getting anything.
20. We are trying to contact as many different organizations as we can or reporters. But when they do come, the officers give us new things to make the conditions seem better than they are. At first, they didn't have my wife's or daughter's shoe size, and the shoes they give us break very easily. The quality of clothes is very poor and very itchy, which creates a lot of allergies. We have to wear the same clothes we wore during the whole day again at night to sleep in.
21. Only our youngest son is allowed to wear pajamas at night, the rest of us have to sleep in the same clothes that we wore outside. We're not allowed to wear the clothes we brought. We have to wear uniforms that give us allergies.
22. Our children cannot eat spicy food, and we ask if we can buy food and they do not let us. The doctor tells us that our children are not losing weight because they are eating peanut

butter. However, we know that they are not receiving any vitamins, or anything nutritious.

23. We are expecting to get in trouble after today's conversation and giving our declaration will not go over well. But we have to say something because our family and other families are suffering. We are certain that they are listening to us, and that we will face repercussions. It feels like we were in fascist Germany, and it feels like they are going to put gas into the room and just let us die.
24. I just want to know who can help and do something about this situation. Children see the officers eating normal food and drinking coke and eating McDonalds but aren't given adequate nutrition at all. Children get diarrhea, heartburn, stomach aches, and they give them food that literally has worms in it. The man who spoke out got taken and told his children will be taken into foster care. We just don't know what can be done.
25. My son is four years old and before going to bed he asks if we are bad and why they don't like us. We still don't understand because when we first crossed the border we didn't hide, we just asked for political asylum. We are trying to save our family from persecution and continue to be intimidated and treated like we did something wrong.
26. Our journey to the US was very long and this is the second year our kids haven't attended school. They have lessons for one hour a day but with a Spanish speaking teacher. We don't speak Spanish, we only speak a little bit of English, and the Spanish teacher has discretion of what kids she wants to take. The officers laugh in our faces and say they don't need school.
27. 90% of websites are blocked, and we only have one hour of computer access. We don't have anything we can use to defend our rights. We cannot follow the rules as we do not know them.

A# [REDACTED]

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

11/25/25
Date

Interpreter's Declaration

I, Alejandra Diaz, hereby declare under penalty of perjury as prescribed in 28 U.S.C. § 1746:

3. I am a law student/legal assistant with the St. Mary's Immigration and Human Rights Clinic, which has a volunteer partnership with Refugee and Immigrant Center for Education and Legal Services (RAICES).
4. On 11/21/2025, I met with NG with the assistance of a telephonic interpreter provided by LanguageLine Solutions, identified by Interpreter ID 354024, who is certified to interpret in the English and [REDACTED] languages. During our meeting, I read the entirety of the "Declaration of NG" in English, and [REDACTED] LLS # 354024 translated the entirety of the declaration into [REDACTED]. I swear under the penalty of perjury that N.G. confirmed that the information contained in the declaration is true and correct.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

[Signature]
Signature

11/21/25
Date

EXHIBIT 16

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, K [REDACTED] V [REDACTED] I [REDACTED], declare as follows:

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

4 2. I am 30 years old, and I am from [REDACTED].

5 3. I speak Spanish.

6
7 **Background and Entry to Dilley**

8 4. I have been detained at Dilley for 23 days. I am here with my husband and my
9 daughter, who is six years old.

10 5. Before I arrived at this facility I was living in Queens, New York for about 2 years
11 and 10 months. I lived with my family of three in an apartment there. My daughter was in
12 first grade, and she loved going to school. Art was her favorite subject.

13 6. Since coming to the U.S., we have always complied with the immigration rules of
14 this country. Every immigration check-up we've had, we always went to.

15 7. We went to an immigration appointment on September 15 at Federal Plaza and
16 when we got there, they told us you are under arrest by the federal government and will
17 be deported to [REDACTED] We all went together as a family. My daughter was dressed in
18 her uniform for school. We thought we'd go drop her off at school after our appointment.

19 8. We were in Federal Plaza from 7 a.m. until 6 p.m. That night, we stayed at a hotel
20 in New York City, and then the next day we got up at 3 a.m. to get on a commercial
21 airplane to come here to Texas. We didn't receive food all day at Federal Plaza, just
22 water.

23 9. We cannot go back to [REDACTED] If we do, we will be assassinated, and our
24 daughter will be kidnapped.

25
26 **Dilley ICE Detention Center**

27 10. We have had a difficult time communicating with ICE agents here about our case.
28 We cannot return to [REDACTED] I have never heard of a case manager here.

1 11. The ICE agent told us we need to talk to the [REDACTED] Consulate to prepare to be
2 deported there. The agent doesn't understand that it is dangerous for us, we cannot go
3 there.

4 12. We had a phone call with the Consulate, though. They asked for our passports, but
5 we don't have passports. Then, they asked for our cellphone number, but we don't have
6 cellphones here either. They asked for our family members' numbers instead. We didn't
7 want to give the Consulate that info, though. That is private information, and we thought
8 it was unrelated to our case. The Consulate said we need to think about our kid.

9 13. After that meeting with the Consulate, the ICE agent was very angry with us. He
10 said we are going to take your kid away from you, because you are refusing deportation.
11 There is nothing else for you to do, he said, besides be deported. He threatened to press
12 criminal charges against us. He said every day we remain here at Dilley, ICE fine us
13 \$1,000 dollars. After he said this, I started to panic. I was trembling and couldn't control
14 my crying for the rest of the day.

15 14. Since being detained here, my daughter asks about our cat and when she'll see her
16 teacher again every day.

17 15. She is normally a very extroverted girl. We are lying and telling her every day that
18 she's on vacation here. She is already bored, though, and wants to study again.

19 16. She is starting to regress behaviorally too. She has started to wet her pants again
20 since coming here. She hasn't wet her pants and used a diaper in about 4 years.

21 17. She peed her pants the other day and it leaked down into her tennis shoes. You
22 can't put those in the washer, so I told her to wear her flip flops. The guards told me she
23 couldn't walk around like that, though. They started yelling at me, and my daughter said
24 mom why are they yelling at us?

25 18. There is no flexibility here for the fact that we are all dealing with kids.

26 19. In addition to peeing her pants, she's crying a lot at night and saying she misses
27 New York. She wants to go home.
28

20. She is also asking at night to drink milk from my breasts. She hasn't had breastmilk in 4 years. This behavior is concerning to me and my husband.

21. We had to bring her to the psychologist here who agreed she is regressing. Today we are seeing a psychiatrist.

22. We also had a medical issue with her. While here, a staff member was mopping and accidentally hit her with the end of the mop in the cheek and eye. A little bit of blood left her eye. We went to medical.

23. We saw the receptionist wrote on the intake papers that she "fell while playing." I told her that isn't true, she got hit by a staff worker here who was mopping.

24. The person mopping did it on accident, it was not intentional. I didn't want him to get in trouble, but I do want staff to be more careful, especially when working around little kids.

25. The injury happened on a Sunday, but there is not a pediatrician here on Sundays. Medical said we'll call you on Monday, the next day, when the pediatrician is here. No one called us Monday. They called us Tuesday. They said her eye is fine, but my daughter still says it bothers her sometimes. We are worried she will have long-term eye issues.

26. The other day, she spilled a drink on herself and when we asked what happened, she said my eye isn't working, I couldn't see it. She sometimes she tells us that it itches, hurt, or causes her vision to be blurry.

27. We want another opinion and more medical services.

28. My husband stays separately from us, with all the other fathers.

29. The bathrooms are very dirty here; there isn't a clean space for my daughter to be when I have to use the bathroom and she comes with me. She has to come with me every time I need to shower or go to the bathroom, regardless. We clean it up before we use it, we bring paper towels and clean the bathroom stall before we use it.

30. I have to be with my daughter all the time here.

31. I can only use the caretaker room when we have court or visits from lawyers. We have never received a visit from family members or friends.

32. I can't touch my husband here. The staff say we can't hug or anything. Every time we touch each other, a guard yells at us "don't touch, don't touch!"

33. When my daughter peed her pants and it got on her tennis shoes, we had to wait about a week until she got new shoes. She just had flip flops that whole time.

34. She has 3 shirts, 2 pants, and one pair of sweatpants.

35. There is 1 hour of education here per day during the weekdays. They just draw, but she likes it.

36. She basically doesn't eat at all here. There are too many spices on the food. We are used to eating food without all the spices and artificial flavors. More than anything, she just eats bread. She eats the apples and cookies that they provide at snack time too. It's not real food though.

37. She is losing weight. Everyone here is.

38. They don't wash the big Gatorade containers that hold water. One time we went to get medicine from the pill line, and the water from there was green. My daughter had already drank the water thought before I could tell her to stop.

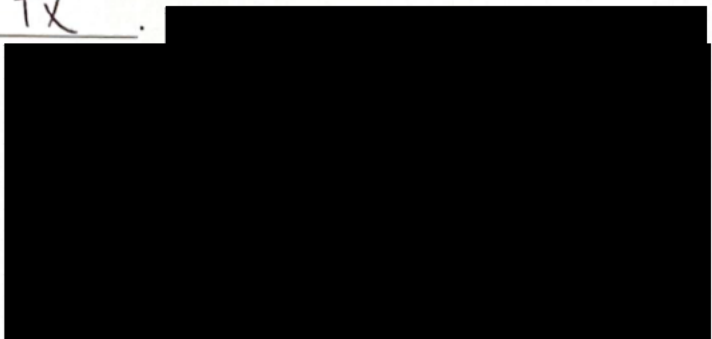
39. In the bathroom, they say there is soap for the whole body. We buy shampoo and deodorant and sunscreen at the store, though.

40. The phone calls are not free to family, but to RAICES it is free. When I called you, Katie Johnson from Flores, it was not free. I had to pay.

41. We have not heard before about our daughter's right to be released and stay in the U.S. without us. We thought we all couldn't be here past 20 days, that's what the people here say. RAICES would be the best organization to give this information out about children's rights to release, definitely not an ICE agent.

42. There is a woman here who has cognitive issues and her daughter is sick. The woman said she wanted to get poison to kill them both. She needs help.

1 43. I want to speak to someone about this facility. They are violating people's human
2 rights here.
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1 I declare under my duty to tell the truth and penalty of perjury that to the best of my
2 knowledge, all the information I have here given is correct and complete and I understand
3 the legal consequences of testifying falsely to the authorities. Executed on this 09 day
4 of Oct. 2025, at Dilley, TX. 

CERTIFICATE OF TRANSLATION

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

Dated: 10/09/2025

Katherine Johnson

EXHIBIT 17

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1
2 I, V [REDACTED] L [REDACTED]-G [REDACTED], declare as follows:

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

5 2. I am 32 years old, and my sons are 15 and 9 years old. We are from [REDACTED]

6 3. I speak Spanish.

7 4. We have been detained at Dilley for about 9 days.

8 5. We came here seeking asylum and help and instead my 15-year-old son has ended
9 up getting hurt with a broken foot because of the staff here. He was playing volleyball
10 outside and the game had wrapped up. When the workers started putting the nets away,
11 one of the workers was pushing the heavy base of the net and it was too much weight for
12 her. She dropped the metal part of the base suddenly and it landed on my son's foot. It
13 broke two of the bones. His foot started throbbing, and he felt a lot of pain right away.

14 6. We went to the medical area, and they said they needed approval to take him to the
15 hospital. We waited for about an hour before we went to the hospital. The hospital x-
16 rayed the foot and said that the big toe and the second toe were broken. The doctor said
17 surgery was not needed, and they gave my son a boot to wear. They gave us a follow up
18 appointment with an orthopedic specialist, but ICE has not approved that appointment,
19 yet.

20 7. I asked to see the video of the staff dropping the volleyball base on my son's foot,
21 but the worker in charge said they would not let me. They said that would violate the
22 privacy of others at the facility. This was different than what they told another resident
23 when her son broke his finger playing basketball in the gym. In that case, they showed
24 the video so she could understand what had happened. I think they don't want me to see
25 the video because it would show that they were at fault and that the staff shouldn't have
26 been pulling the heavy base on her own.

27 8. Yesterday I entered a complaint in the tablet about what happened to my son's
28 foot. The response from the tablet was that I should speak to a lawyer.

1 9. Another medical concern I have is with my son's medicine for his epilepsy. When
2 we were in [REDACTED], he was prescribed 600 mg of a medicine called Attemperator twice a
3 day. At this facility, they are only giving him 500 mg twice a day of a different
4 medication. I told the nurse that I was concerned about the dosage, but she said it should
5 be fine. I am scared that he has been taking this medication since he was three, and I
6 have been told that the dosage should not be lowered suddenly. I have no way of
7 knowing if this lowered dosage is safe because we are not able to see a specialist here.

8 10. To get my son's medication, we have to wait in the pill line twice a day. The wait
9 times vary. Sometimes it takes 30 minutes, but sometimes the other families will let us
10 go in front of them because my son is limping around in the boot.

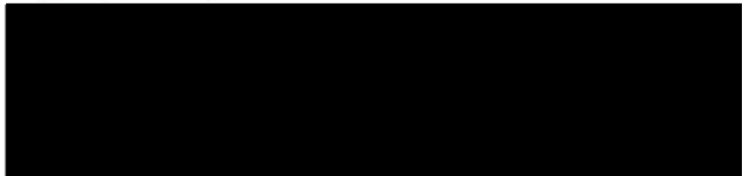
11 11. We only have two changes of clothes. This means we have to wash clothes every
12 day. The other issue is the washer soap doesn't really foam up and the clothes still smell
13 after washing. I end up washing our underwear with soap in the shower because the soap
14 for the washer doesn't really work. I've tried several washers and they don't seem to
15 work.

16 12. Our underwear areas have had skin problems, and my younger son got a fungal
17 infection. When I took him to medical, they said that infections like this were common
18 here because of the material of the clothes we are given. They gave him some cream.

19 13. When you arrive here, they give children deodorant, tooth paste/tooth brush (that
20 break immediately), lotion, and a brush. They don't give shampoo or soap. There is
21 hand soap dispensers in the shower to use on your body and hair unless you have money
22 to buy other products in the commissary. I am having to buy my children basics like
23 toothbrushes, shampoo, bar soap, and deodorant.

24 14. I also buy bottled water at the commissary because the water in the sink tastes
25 really bad.
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1 I declare under my duty to tell the truth and penalty of perjury that to the best of my
2 knowledge, all the information I have here given is correct and complete and I understand
3 the legal consequences of testifying falsely to the authorities. Executed on this 9th day
4 of October, at Dilley, TX.



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: 10/09/2025



EXHIBIT 18

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, N [REDACTED] C [REDACTED] G [REDACTED], declare as follows:

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

4 2. I am 42 years old. I am from [REDACTED].

5 3. I speak Spanish.

6 **Entry to Dilley**

7 4. I came to the United States with my son, [REDACTED], who is 14 years old. We came
8 seeking protection. We have been detained at the Dilley Family Detention Center for
9 almost three weeks.

10 5. Before we were brought to a place that was very cold in Nogales. They were
11 horrible to us there and it was so cold. The officers there were cruel to us. They told me
12 that my son would be separated from me while we were there. They were yelling at us.
13 My son had some serious injuries in his back and arm from when we lived in [REDACTED],
14 and the cold made his pain much worse. It was so bad he could hardly walk. I told them
15 we would not be separated because he was a minor, and I insisted we stay together.

16 6. We were in a room, and it was all glass. We had to use the bathroom and all the
17 guards and everyone in the room could see you. There was just a short divider like up to
18 your waist around the toilet.

19 7. We spent one night there, and then they took us to Dilley Family Detention.

20 8. When we got here to Dilley, they asked us a lot of questions. I told them about my
21 son's injury and his difficulty walking. I explained his medical history and what
22 medicines and treatments he had been receiving in [REDACTED] But they haven't given us
23 anything that will help his pain here. I was afraid to ask for an appointment with a doctor
24 after they didn't say anything or do anything when I first told them. Because it's better
25 here than at the icebox in Nogales. That place was so horrible, and I just didn't want to
26 mess anything up here.

1 9. Also, I knew another woman here who had a medical problem with her eyes,
2 which were hurting a lot, but when she went to the doctor, they just checked her eyesight
3 and they did not give her any medicine or help her at all.

4 10. There is another child who was having a problem with his face which was hurting
5 and was swollen. They gave him cream to put on, and it made his face break out in acne
6 all over.

7 11. Here there are not good medical services. There was a pregnant woman who also
8 fainted, and she also has a two-year-old. She fainted and we wanted to help her, but
9 instead all the staff came and made a circle around her and her toddler so we couldn't
10 help them. But there was no one actually helping her or doing anything medical.
11 Eventually they took her in an ambulance away from here. I think we are like two hours
12 from real medical help.

13 12. There was another mother who was having such a hard time. She went to get help
14 from the medical staff, and they gave her a pill to take in the morning and in the night. It
15 just put her to sleep. She slept day and night, and her three-year-old and six-year-old just
16 stayed in their bedroom all day and night. They couldn't go by themselves to get food in
17 the cafeteria, so they just took the snacks from the fridge with snacks and juice to eat for
18 days. The kids didn't bathe or leave the room because they had to be in the room with her
19 and she was practically drugged and sleeping from the medicine they gave her to take. I
20 was able to help her a little bit and tell her she had to keep going for her kids, and that she
21 should do everything possible to stay awake, take a cold shower, anything. I said if the
22 medicine is making things worse for you, if it makes you feel dead, you should stop
23 taking it. She started to get a little better and then finally was able to stay awake and
24 started taking care of her kids. She gave me a big hug, and she said thank you for helping
25 me. But the medical services did not help her and instead made things terrible for her and
26 her children. And none of the staff helped with her children during that time either. But
27 anyone could see what was going on.
28

1 13. It is so hard to be in good health here. So many children and parents have skin
2 reactions and allergies. The soap is harsh and makes people get rashes. My son and I both
3 had skin irritation using that soap. A lot of people have sore throats and are sick here. The
4 climate, and the constant change from hot to cold going between the different buildings,
5 giving people milk to drink who don't usually drink so much milk, all these things cause
6 children and their parents to be in poor health.

7 14. I learned about the Flores rules from a friend here. Friends say that children can't
8 stay for more than 21 days. But I know a little girl who is six years old who has been here
9 for about 33 days. Another friend told me about Flores, and I think she learned about it
10 from her lawyer. But no one here has explained the Flores rights to me for my child.

11 15. After we passed our CFI, I thought I should find a lawyer or talk to the lawyers
12 who come here from Raices, so they could help with the next step. But the ICE officer
13 told me I didn't need a lawyer, and anyway I have not been able to put any money on my
14 phone account because of a problem with my CoreCivic ID number.

15 16. Yesterday, the staff and officers suddenly started cleaning everything up. There
16 were a lot of staff and officers sitting around and we didn't know why. And then all of a
17 sudden, they got up and they started playing with kids and organizing games. It was so
18 strange. It's not usually like that. I think it may have been because you, the Flores
19 lawyers, all were here. It's usually a disaster. Things are messy, the bathrooms are not
20 very clean, there are balls, but children can only play with them in certain spaces, like in
21 the gym but not outside. Yesterday things were very different. Normally it takes a long
22 time to get something if you request it, like if you need a new shirt or something. But
23 yesterday we got many of the things we had been asking for days.

24 17. Everyone just wants to know when they can leave. They don't want to be here.
25 This place is full of the desperation of mothers to leave with their children, and the
26 children feel the desperation. Everyone just wants to know what is going to happen, and
27 when they will be able to leave.
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1 18. My son has a meeting with the psychologist once a week. I thought the meetings
2 with the psychologist would be like therapy, but they're not. They just ask a few
3 questions about what it's like here.

4 19. I worry a lot about my son. He does not have an appetite here; he is not eating a
5 lot. He suffered so much before we arrived, and now I worry about what being here is
6 doing to him.

7 20. Also, sometimes there are strange things in the food, and it seems like strange
8 parts of an animal that shouldn't be in the food. But many children do not eat the food
9 here. It worries me when there are so many small children who are just not eating.

10 21. I am holding so much here in my heart. I want to cry but I don't let the tears out. I
11 have to be strong for my son, and I have to get us through this. There is no space or
12 privacy to process what's happening. I just keep it all locked inside but sometimes I feel
13 like I will explode, holding in all that is happening to us.

1 I declare under my duty to tell the truth and penalty of perjury that to the best of my
2 knowledge, all the information I have here given is correct and complete and I understand
3 the legal consequences of testifying falsely to the authorities. Executed on this 11th day
4 of Sept. 2025, at Dilley, TX.

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CERTIFICATE OF TRANSLATION

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

Dated: Sept. 11, 2025

Rebecca Wolozin

EXHIBIT 19

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

D [REDACTED] C [REDACTED] R [REDACTED] R [REDACTED], [REDACTED]

Pursuant to 28 U.S.C. § 1746 and subject to penalty of perjury, I declare that the following is true and correct:

1. My name is [REDACTED], and I am a citizen of [REDACTED]. My daughter, [REDACTED] (10 years old) and I fled [REDACTED] on November 11, 2025. We then entered the United States on November 14, 2024. My daughter and I presented ourselves at the Yuma, Arizona, port of entry and informed the officers that we wanted to seek asylum. We were forced to flee [REDACTED] due to my work as an accountant on government contracts. The government was fearful that I would uncover or expose their corrupt practices that I uncovered through my job and began targeting me because of that fear.
2. After entering the United States, my daughter and I were released with a GPS monitor, and I fully complied with all the requirements provided to me. However, on October 21, 2025, I was suddenly called under the false pretense that our GPS monitoring was complete and would be removed, without being informed that we were going to be detained. As a result, we were unexpectedly detained on October 23, 2025, during that ISAP visit. We were both detained and transferred from Alabama to the South Texas Family Residential Center.

The Detention Center Disregarded My Daughter's Congenital Condition

3. When we arrived at the detention center and were processed, I informed the staff that my daughter had been diagnosed with Hirschsprung's disease, a condition in which her intestines do not function properly and struggle to move stool through her body. This condition requires a special diet; without it, she can go days without a bowel movement. If too much time passes without a bowel movement, her condition worsens, and she suffers severe pain, fevers, and a heightened risk of infection. I explained all of this to the detention center staff upon our arrival.
4. The detention center staff informed us that they would not provide any special care or diet until my daughter was evaluated by the medical staff. She was not able to see a doctor until our eighth day in detention. By that time, she had already gone ten days without a bowel movement. The doctor gave her laxatives, but I explained that this would not be enough; she also needed to follow a restricted diet. It took two more days for her to finally have a bowel movement, and she cried in pain the entire time. I was extremely worried because there was blood in her stool, and it was clear how much she was suffering. The entire wing became aware of her medical issue.
5. About six days after her bowel movement, she ate fried food, which is not normally part of her regular diet. I avoid giving her fried food because I know her body cannot tolerate it, but sometimes it is our only option here. That night she experienced severe vomiting,

which led to another medical visit. I pleaded with the doctor to request a special diet for her or to provide suppositories. However, he only adjusted her diet to exclude fried foods.

The Detention Center Failed to Address My Daughter's Need for Unprocessed, Healthier Food

6. During the lunch hour, they serve various options, some of which are better suited for her condition. However, when I try to get in those food lines, I am redirected to the regular line and told that the other options are sufficient for her. I sought help from the medical team once more, but this time I was seen by [REDACTED], who was extremely rude and demeaning. She told me that I needed to remember they are not there to accommodate me, that I am detained, and that their only responsibility is to ensure that detainees do not go hungry.
7. I explained that I had followed the proper immigration processes before being picked up and placed in detention. She then began asking questions about my case, and I told her that it was none of her concern and that my manner of entry was not a justification for providing inadequate medical care. I thanked her and walked out because it was clear she was unwilling to help my daughter.
8. Since we arrived at this center, my daughter has only had two bowel movements. We received two suppositories—one of which I administered immediately, and the other I plan to use in the coming days if she does not have a bowel movement soon. I know using just one at a time is not sufficient, but it took me weeks to obtain them, and I don't know when we will be able to get more. Her issues could be resolved with a healthier diet, but they refuse to provide her with one. I truly worry that one day my daughter will face a medical emergency requiring immediate intervention, and they will be unwilling to assist her.

A#

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

[REDACTED]
Signature

11/21/2025
Date

Interpreter's Declaration

I, Margaly Rojas, hereby declare under penalty of perjury as prescribed in 28 U.S.C. § 1746:

1. I am a law student/legal assistant with the St. Mary's Immigration and Human Rights Clinic, which has a volunteer partnership with Refugee and Immigrant Center for Education and Legal Services (RAICES).
2. On 11/21/2025, I met with D.C.R.R. in person. During our meeting I translated the entirety of the "Declaration of D.C.R.R." into Spanish. I am fluent in the Spanish and English language and swear under the penalty of perjury that D.C.R.R. confirmed that the information contained in the declaration is true and correct.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

[Signature]
Signature

11/21/2025
Date

EXHIBIT 20

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1
2 I, S [REDACTED] M [REDACTED] G [REDACTED], declare as follows:

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

5 2. I am 25 years old, and my daughters are one and two years old. We are from
6 [REDACTED].

7 3. I speak Spanish.

8 4. We have been detained at Dilley for 31 days. We have been told we are getting
9 deported, but we do not know when. My husband and I decided not to appeal the
10 deportation because we are worried about our two-year-old who has been very sick at
11 Dilley. We just want to get out of here.

12 5. Our two-year-old daughter has had a fever and diarrhea for eleven days. We first
13 took her to the medical area on Monday, September 29, because we were worried about
14 her fever. We took her to medical a few more times, and each time they didn't do
15 anything. The doctor just kept telling us that she was just sick and needed rest to get
16 better. They did not take our concerns about her fever seriously.

17 6. Then, this past Sunday, after she'd had a fever for six days, I requested to see a
18 different doctor than the one we had been seeing. That doctor sent us to the hospital
19 because it had been almost a week with a fever and my daughter looked very tired and
20 unwell. At the hospital, they gave her an exam and diagnosed her with the flu. They
21 gave us medication and Pedialyte. Since we returned from the hospital, we have been in
22 the medical isolation area. My one-year-old daughter and I have been staying with my
23 two-year-old in isolation for a few days.

24 7. The food here is okay for adults but not for children. My kids will pretty much just
25 eat the chicken. A lot of the time they won't eat at all. The only snacks are cookies and
26 red apples. They don't eat that, either.

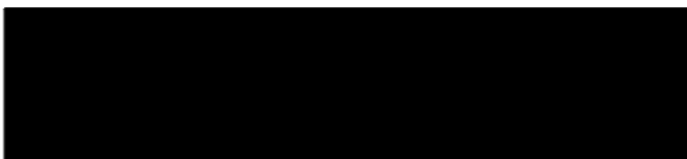
27 8. Some staff will give me bottled water for my daughter's formula and some will
28 not. My daughter drinks about 6 bottles per day. This morning, I was asking staff for

1 bottled water for the baby's formula. The guard said I should use water from the faucet.
2 The doctor was nearby, so I asked the doctor and she told the guard to give me the bottled
3 water. But instead of giving me the entire bottle of water so that I could also use it for
4 another bottle later, the guard poured the water into the baby's bottle and kept the rest of
5 the water bottle. The same thing happened with this guard later in the day, and at that
6 point the doctor ended up giving me a bottle of water. It is like that every day with
7 having to ask for these simple things, like water, that my baby needs. It is very
8 frustrating.

9 9. My kids are having a hard time being here. The two-year-old is always anxious
10 and cannot be still or stay in one place.

11 10. At the commissary, we have to buy deodorant, soap and shampoo. We did not like
12 using the hand soap they have in the showers on our babies' skin, and the deodorant does
13 not work.

1 I declare under my duty to tell the truth and penalty of perjury that to the best of my
2 knowledge, all the information I have here given is correct and complete and I understand
3 the legal consequences of testifying falsely to the authorities. Executed on this 9th day
4 of October, at Dilley, Texas
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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: 10/09/2025

Diana Cano

EXHIBIT 21

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, N [REDACTED] T [REDACTED] G [REDACTED], declare as follows:

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

4 2. I am 16 years old. I was born in [REDACTED], but I have been living in Florida and
5 Texas for ten years. I was just starting my junior year. Things were going great in
6 school. I had made new friends, and I was doing really well. I have always been a good
7 kid who never got in trouble. I was just going to school, doing my homework and then
8 hanging with my friends, working, or taking care of my 8-year-old niece on the
9 weekends.

10 3. I speak English and Spanish, and I am trying to learn Portuguese.

11 **Dilley Family Detention Center**

12 4. I have been detained at Dilley for about 22 days.

13 5. A few weeks ago, the police came to our house looking for someone different but
14 then ended up arresting us instead. I was getting ready for school at the time. It was the
15 second week of school. I was just waiting for the bus to pick me up. Then I heard the
16 police pounding on the door, slamming the wall, and yelling "Come out with your hands
17 up." It was crazy how they treated us. There were little kids in the house, but the police
18 didn't care. They busted in and put me and my older sister in handcuffs. They thought I
19 was a grown up. The cuffs were tight and hurt my hands. They had us come outside and
20 sit on the ground in the front porch of another house. The police called ICE after they
21 looked at our documents.

22 6. My 8-year-old niece, who is an American citizen, was traumatized by all of this.
23 She was crying and crying as she saw her mom (my sister), me, and my mom all getting
24 taken away by the ICE agents. It was horrible and sad how she saw us getting taken
25 away.

26 7. Then they took us to a processing center. Next they brought us to a hotel until
27 about 1 or 2 a.m. waiting for Dilley to take us. Then they transported us to Dilley in a
28 white van. It took about 2 hours and thirty minutes. We got to Dilley around 4 a.m., but

1 it took them awhile to let us inside. Then it took a long time for intake. We finally got in
2 our room around lunchtime.

3 8. When we were being processed, my mom asked if I could stay in the U.S. She
4 asked why I could not stay with my family members. My grandmother, my aunt and my
5 cousins are all U.S. citizens. I have been going to my court dates and following the rules.
6 My next court date is June 29, 2027, at 1 pm in Miami, Florida. ICE told us that I had to
7 go with my mom and that I did not have the option of staying with my American family.
8 The ICE agent said it is Trump's policy not to separate families.

9 9. Since we have been at Dilley, I have not been told anything about possible release
10 to my family members. My mom wants me to stay here in the U.S. with family even if
11 she has to be deported. My mom has signed her own voluntary departure, but she did not
12 sign for me. She wants me to stay here and continue my education with my family. The
13 ICE agent told my mom that she will lose her money and airline ticket if she does not
14 agree to have me deported with her.

15 10. I wish that we could have more water here. All that they have for drinking during
16 the day is apple juice and milk. They tell us that the water from the tap isn't good.
17 Sometimes I drink the water from the sink but it makes my throat hurt and it makes me
18 cough a lot.

19 11. I don't go to the classroom here; it's not anything like my high school or the
20 education I had before. It is just one hour a day and I don't know what they would teach
21 high school students who have been going to school in the U.S. If I was at my high
22 school, I would be learning statistics, American history, astronomy, English, AP Spanish
23 and entrepreneurship. Entrepreneurship was the best class I have ever had. She was a
24 great teacher who did all sorts of fun activities and really wanted to help us children
25 socialize and to get to know us. She had us fill out a survey with our names, nicknames,
26 favorite food, music and everything.

1 12. The only things to do here are to go to the gym or library. There is a computer at
2 the library, but you can only use it for an hour. It helps to calm me down to listen to
3 music on the computer. I also learned about my next court date from using the computer.

4 13. We were never given a list of available free lawyers. My mom ended up finding
5 out about RAICES from other families living here.

6 14. We have never received any “know your rights” trainings or handouts about my
7 rights under Flores. They have only told us about the rules of this place and what you
8 can and can’t do. We only on Monday learned about my rights under Flores from a
9 RAICES lawyer, like my right to be released from here. This is something my mom and
10 I want very much and she was upset that after three weeks here no one had ever
11 mentioned it. She’s sad that I am missing my studies and my life outside. Being locked
12 up in here is not healthy for kids and parents.

13 15. We have to buy soap, shampoo, deodorant, and toothbrushes here. The deodorant
14 they gave us does not work at all and the toothbrushes fall apart.

15 16. We have to pay for phone calls to talk to our family here.

16 17. I have three pairs of pants and two shirts. This means we have to wash clothes
17 every day. It would be better if I had at least one extra shirt.

18 18. People here will ask me to help them since I speak English and Spanish. I will ask
19 their questions to the guards and translate the answers.

20 19. I have seen people get really depressed here. They won’t go out to eat or leave
21 their rooms. It is hard to see people being deported and not being able to see their
22 families or see people they love.

23 20. I try to distract myself by spending time with new friends I have made here. I talk
24 to them so I don’t get depressed, but it starts to get boring with nothing else to do. It’s
25 just the same thing here day after day after day. A lot of kids here were living in the U.S.
26 and were caught by ICE when they went to court hearings. Their families have been
27 grabbed at court or at their homes or at work.
28

1 21. The kids here can get sad when people get deported or their friends leave. Kids are
2 tired of doing the same thing every day. We try to help kids who are sad and teach them
3 to play a new game. Sometimes kids don't eat when they are sad.

4 22. I want to stay in this country because of my studies and my family. I want to keep
5 learning, go to college, and start working. I also want to help take care of my little niece,
6 especially if she doesn't have her mother to raise her. That kid is so important to me. I
7 have helped her become the person she is and want to keep helping her grow.

8 23. Someday I would like to become a lawyer so I can help people in need who don't
9 have money, like the lawyers at RAICES or public defenders. I also am good at
10 technology and engineering, and fixing stuff - so I could also imagine becoming an
11 engineer. I just want things to go back to how they were before they arrested us.

1 I declare under my duty to tell the truth and penalty of perjury that to the best of my
2 knowledge, all the information I have here given is correct and complete and I understand
3 the legal consequences of testifying falsely to the authorities. Executed on this 10th day
4 of September 2025, at Dilley, Texas.

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A large black rectangular redaction box covers the signature area. A horizontal line extends from the right side of the box.

EXHIBIT 22

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, Q[REDACTED] G[REDACTED], declare as follows:

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

4 2. I am 49 years old. I am from [REDACTED].

5 3. I speak Spanish.

6 Entry to Dilley Family Detention Center

7 4. I have been detained at the Dilley Family Detention Center for about three weeks.

8 5. The police came to our home looking for someone else. They scared all of us just
9 barging into the house and searching for someone that didn't live there. When they saw
10 that person was not there, they still demanded that everyone in the house present their
11 identity documents. Then the police called ICE when some of us did not have
12 documentation they were looking for. They arrested my son and me, and others who lived
13 in our house also. I think they took everyone who was not a U.S. Citizen.

14 6. My son, [REDACTED], is a child. He is 16 years old. But when they arrested us in our
15 home, they handcuffed him and treated him like he was a criminal when they arrested us
16 and brought us here. It was terrible. I am his mother, and I had to watch as they treated
17 him like a criminal.

18 7. He has my mother and five of my siblings here who are all U.S. citizens and who
19 want to take care of him even if I am not there. He has his whole life here. He has been in
20 school and is a good student. He has his friends here and his family. He should be able to
21 finish high school while his case proceeds. He has a right to that. I told the officers
22 arresting him to let him stay, because he is in school and he has his immigration court
23 hearing coming. He has a lawyer who is representing him in immigration court. I told the
24 officers he was my child. They refused and left us both handcuffed while they brought us
25 a hotel in Houston. Then they brought us here. Every time there was a new ICE officer I
26 asked them to let my son go back to our family and stay with them. They all said no, they
27 were just doing their job. They had to just do their job.

1 8. When I arrived here at Dilley, the officers told me that I couldn't stay here in this
2 country. They said you can't come back for 20 years, and they told me I had no rights.
3 They said didn't want me here. I told them I am almost 50 years old and I'm not coming
4 back. I said I will accept leaving the country, but I wanted my son to stay and continue
5 his case.

6 9. They told me he didn't have any rights, and they wanted us both to just accept
7 being deported. But I wanted him to have the opportunity to stay, even if I have to go.
8 And my son agreed, he wants to stay at least until he can finish his case.

9 10. When we first arrived at Dilley, we had to sit in plastic chairs and wait in a large
10 room. Everything was so fast, and they pressured us to do everything quickly. I think
11 there was a video playing in that large room, but there was no sound. They kept shuffling
12 us here and there to do different things, like get clothing, eat, sign things, so many tasks.
13 They gave us food, but they didn't give us any time to eat it before they started rushing us
14 to the next thing.

15 11. As far as I can remember, we have never received a presentation of our rights.
16 When we arrived, they just told us we were going to have to sign a lot of papers, like if
17 we were buying a house. We would have to do a lot of autographs. And then they just
18 said, "sign here, sign here, sign here," as they flipped through the big stack of papers.

19 12. I do not remember any of the staff or officers telling me that I had a right to request
20 that my son be released from here without me. I do not remember any staff or officer
21 telling me that for the whole time I have been here. The way we learn about rights or how
22 anything works is just from other residents. My son has a lawyer who was representing
23 him in his immigration case. But now I don't know if he will keep representing my son
24 now that we are here in detention.



25 13. Until this moment providing this declaration, I did not know that I had the right to
26 make a free call to my son's lawyer. I just learned from other families detained here that I
27 could have a meeting with a lawyer from Raices. I did not know they would let me call
28

1 my son's lawyer directly. I do not remember the staff or officers every telling me I had
2 that right or explaining how to make a legal call to my son's lawyer.

3 14. Yesterday, an ICE officer tried to make me sign for both our removals. The
4 officers tried to make me accept voluntary departure for my son. But I insisted that no,
5 our cases were separate. I had my case, and my son had his case. For me, I understood
6 that I had to go. But my son has the right to stay and finish his case here, and he has the
7 right to go before the immigration judge.

8 15. I want my child to be able to leave this place, even if he leaves without me. He is a
9 child, but he is strong, and mature, and he has a big and loving family to take care of him
10 here. It will break my heart to be apart from him, but I want him to have a chance in life.
11 I want him to be able to finish high school and fight his case in immigration court. It is
12 not an easy decision for a mother to make, especially when my son and I are so close. I
13 love him so deeply. And because of that, I want to give him the chance he deserves to be
14 free.

1 I declare under my duty to tell the truth and penalty of perjury that to the best of my
2 knowledge, all the information I have here given is correct and complete and I understand
3 the legal consequences of testifying falsely to the authorities. Executed on this 10th day
4 of September 2025, at Dilley, TX.

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CERTIFICATE OF TRANSLATION

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

Dated: Sept. 10, 2025

Rebecca Wolozin

EXHIBIT 23

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, A [REDACTED] T [REDACTED] L [REDACTED], declare as follows:

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

4 2. I am 35 years old. I am from [REDACTED].

5 3. I speak Spanish.

6 4. I have been detained at the Dilley Family Detention Center with my 17-year-old
7 son, [REDACTED], for about 15 days. We were in the ice box in El Paso for five days
8 before we were brought here.

9 5. My son arrived in the United States about a year ago to live with me. He came as
10 an unaccompanied minor, and he was released to me. I was living in El Paso with my
11 partner, our daughter, and her two daughters who are my stepdaughters. I entered the
12 United States with permission on humanitarian parole, and I have applied for asylum. I
13 also have work authorization.

14 6. When [REDACTED] arrived to live with us in El Paso, I was granted custody of him in
15 the family court. He has applied for Special Immigrant Juvenile Status. We live together
16 with his siblings and stepsiblings, and we are a very tight-knit family.

17 7. We were arrested at a checkpoint about ten minutes from our house, that we have
18 passed through many times without any problem. But for some reason, this time we were
19 arrested. No one told us why.

20 8. The experience was extremely traumatic for [REDACTED] and for me. They handcuffed
21 him when they arrested us, and they left him handcuffed while they transported us to the
22 border patrol station in El Paso. As a father it broke my heart to see him handcuffed like a
23 criminal. He is such a good kid, and he is my child.

24 9. When they arrested us, both of us were so terrified to be separated. [REDACTED] was
25 begging not to be separated from me, and I was begging not to be separated from him. It
26 has been so terrible for him, and he is worried about being separated from me still, all the
27 time. It is always there.

1 10. The five days we spent in the border station in El Paso were awful. The conditions
2 there were terrible, and it killed me to see [REDACTED] suffer there.

3 11. They transferred us here to Dilley Family Detention Center after five days. We
4 have been here for about 15 days so far. We still don't know why we were detained when
5 we both have applications pending for status and [REDACTED] even had a court date
6 scheduled. He missed his court date because we were detained. We both have lawyers in
7 El Paso, but we haven't been able to communicate with them while we have been
8 detained. We only have been able to talk to my partner, who tells us information and
9 communicates with our lawyers.

10 12. While I have been in Dilley, I have seen that some families get separated. The
11 family that is sharing our bedroom with us arrived together, but her husband and one of
12 their children was sent away from here. She didn't know where they went, and she
13 couldn't find them. She thought maybe they were taken to another detention center, but
14 she doesn't know. She is so upset and cries a lot. She is still here with her 15-year-old
15 son.

16 13. No one here has told me about [REDACTED]'s rights under Flores that I can remember.
17 One officer told me that they wouldn't keep us here more than twenty days, and that they
18 would let us out to the street and then we could continue our immigration proceedings
19 from there. All we want is to be let go and go home and be with our family.

20 14. But it also makes me really frustrated that they would do this to us for absolutely
21 no reason. When we have always complied with everything, when we were seeking
22 safety here in the United States, and when we were already in our own immigration
23 proceedings. What is the purpose of locking us up and traumatizing my son like this for a
24 month, making him miss school and be apart from his family, just for us to be back where
25 we started and continuing as if nothing happened? It is inhumane to do this to people,
26 especially to children.

27 15. If we were stuck here for a lot longer, like twenty days or a month, I would want to
28 learn about the opportunity for [REDACTED] to be released without me. I would want him to

1 go live with his stepmother and our family so that he didn't have to suffer in here, even if
2 it meant I stayed here detained. I know he would not want to be separated from me
3 though, and it would be a very hard conversation to have. But as his father, if he had the
4 chance to be released even without me, to go live with our family, I would want to at
5 least know that we have that option. But if it was an immigration officer that was telling
6 me that, I think that I would find that really upsetting. I think it would feel threatening. It
7 is hard to trust the staff and ICE officers especially because they are the ones who have
8 detained us and are in charge of us here.

9 16. If we learned about it from an independent lawyer, or in a presentation where an
10 independent lawyer explained the option to me and was explaining my rights, I would
11 feel much more comfortable. I wish that there was the opportunity for independent
12 lawyers to tell us about our rights and help us know what our options were.

1 I declare under my duty to tell the truth and penalty of perjury that to the best of my
2 knowledge, all the information I have here given is correct and complete and I understand
3 the legal consequences of testifying falsely to the authorities. Executed on this 11th day
4 of September 2025, at Dilley, TX.

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CERTIFICATE OF TRANSLATION

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

Dated: Sept. 11, 2025

Rebecca Wolozin