

EXHIBIT 62

Declaration of

Y [REDACTED] A [REDACTED] M [REDACTED] A [REDACTED]. [REDACTED]

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

1. My date of birth is [REDACTED]. I am 13 years old. I am from El Salvador. I came with my older sister, G [REDACTED] M [REDACTED] M [REDACTED] A [REDACTED], [REDACTED] who is 17 years old and with my older brother, N [REDACTED] J [REDACTED] I [REDACTED] A [REDACTED], who is 25 years old.
2. The Border Patrol picked me up about 5 minutes after I got to the United States. They took me to a place with tents and gave me a number. There were about 50 males in the place they put me. It was freezing. They were all in a group from Honduras, and they were all ages, from 3 years old, to my age, to a lot older. My brother wasn't with me, and I was scared, because I didn't know what was happening to him or my sister. I was sleeping on the floor, and they called me at about 1 in the morning. The light was on all the time. I asked for water, but they told me "No," because I didn't have a bottle. After they called me, they called 2 other teenagers, and they put us in the room with my sister and the other 3 girls for about 20 minutes. They made us get in a line, and they brought us here in a van.
3. The main reason I left El Salvador because the gang MS 13 was threatening us. I lived there with my older brother and my sister. My older brother has a business, and MS 13 was telling him he had to give them \$5 every day. When he couldn't, they said they were going to come after him. There are a lot of the gang members in my school. They made fun of me about my braces. It got a lot worse, and they started following me home. There are about 20 people killed every day in my community, so I was really scared, since I tried to stay away from them, but they were following me.
4. I got here (Clint Border Patrol Station) about 4 in the morning. Around 7 they gave us food. It was the same breakfast we always have: oatmeal, juice, a cookie. They separated me from my brother and sister. When they did that, I felt desperation. I still feel desperate, because when I ask to see my sister, they don't let me. There was 1 time I asked (Saturday), and they let me see her for about 3 minutes. They said there had to be an official there with us the whole time. A guard was close to us the entire time, so we couldn't have privacy.
5. When I got here, the room I was in had about 68 males. Now it has about 38. When I first got here, there weren't enough beds to go around, so I slept on the floor. Yesterday was the first time I could sleep in a bed. I had a metallic blanket. I sleep very badly because the TV is on all night. At about 6 in the morning, one of the officials puts music on very loud to wake us up.
6. There are a lot of sick people in my room. I have a mask so I won't get sick.
7. The toilet is outside in a plastic place. There isn't water or soap to wash our hands after we use the bathroom. We have to ask for toilet paper if we want any. Some officials let us use the bathroom at night, and some don't let us.
8. I'm always hungry. If I ask for food, they don't give it to me.

9. I was allowed to talk with my mother on Saturday, but it was only for 1 minute. The guard told me to hurry up, and he made me hang up after just 1 minute. I have been here at Clint Border Patrol for 7 days.
10. There is a 17-year-old in my room who is the leader. He helps the guards get us in a line and do other things, so he is the favorite with another guy. They get twice the food as the rest of us for helping the guards.
11. We get a cookie at night. Last night a 5-year-old boy wanted to help the official give out the cookies to everyone, but the 17-year-old said he was the one who did that. The brother of the 5-year-old came over and started telling the 17-year-old to let his little brother help. The 17-year-old reported him to the official, and the official came over and said the older brother should not say anything to the 17-year-old because he was the one who helped all the time. He yelled at the brother of the little boy and said next time he would punish him.
12. I took 2 showers, but each one has to be 1 minute to shower and get dressed. We have toothbrushes but no toothpaste.

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

June 19, 2019

Y [REDACTED] A [REDACTED] M [REDACTED] A [REDACTED]

Certificate of Translation

I, Kathleen O’Gorman, certify that I am fluent in English and Spanish and that I read the above declaration to Y [REDACTED] A [REDACTED] M [REDACTED] A [REDACTED] in Spanish.



June 19, 2019

Kathleen O’Gorman
Illinois Wesleyan University
1312 Park Street
Bloomington, IL 61701

EXHIBIT 64

Declaration of
K [REDACTED] A [REDACTED] R [REDACTED] T [REDACTED]

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

1. My date of birth is [REDACTED] I am 17 years old. I am from Honduras.
2. I left Honduras because I was being constantly harassed by gangs for "rent." If I did not pay, they threatened to kill me and my family. I was afraid for my life. My father abandoned the family when I was young, and my mother could not protect me from the gangs.
3. I was apprehended by myself. I presented myself at the border near the end of May. I was immediately taken into custody.
4. After a short time, I was brought to the Clint CBP facility.
5. I have been at the Clint CBP facility for about three weeks.
6. I have not been told of any release date or any release plan. I do not know when I will be released. I informed officials that I have a cousin in Tennessee who is willing to take me in. I provided her contact information for officials. I also have other cousins and aunts in the United States.
7. The facility is locked. I am unable to leave. I have been warned not to attempt to leave without permission.
8. After arriving at Clint CBP, I contracted influenza. I had fevers, chills, trouble swallowing, sore throat. I was tired. I was kept in a room with 6 to 9 other persons who also had the flu. Everyone was very sick. I was given medicine to take. I was released from the room after about three days. I have been asked to wear a face mask. I am still using the face mask. Others have also been asked to wear the masks.
9. I have been able to call my cousin in Tennessee a few times. She also does not know what is going on, but she is willing to take me in.

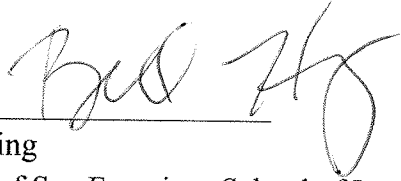
I, **K [REDACTED] A [REDACTED] R [REDACTED] T [REDACTED]** swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

K [REDACTED] A [REDACTED] R [REDACTED] T [REDACTED]

6-18-2019
Date

Certificate of Translation

I, Bill Ong Hing, certify that I am fluent in English and Spanish and that I read the above declaration to K [REDACTED] A [REDACTED] R [REDACTED] T [REDACTED] in Spanish. Executed this June 18, 2019, in Clint, Texas..



Bill Ong Hing
University of San Francisco School of Law
2199 Fulton Street
San Francisco, CA 94117

EXHIBIT 65

Declaration of
M [REDACTED] M [REDACTED] P [REDACTED], [REDACTED]

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

1. My date of birth is [REDACTED] I am from Guatemala.
2. I left Guatemala in part because my parents urged me to leave. They could not protect me from dangers in Guatemala, and they were concerned about my future. They wanted me to leave for my own well-being and safety.
3. I was apprehended by myself. For about 9 days, I was detained in an area covered by a tent that was very uncomfortable. It was crowded and cold at night. I did not feel safe there. I was given food, but not soap for cleaning. Things were very unsanitary. I got sick there.
4. After about 9 days, I was brought to the Clint CBP facility.
5. I have been at the current Clint CBP facility for about 10 days.
6. No one has discussed with me any release plan. I have no idea what is going on. I have a family friend in Florida, Pablo, who is willing to take me in. I have given his contact information and address to CBP officers.
7. At this facility, I am not free to leave. I have been told that I will get in trouble if I try to leave without permission.
8. The officers here speak to me in Spanish. Although I can speak basic Spanish, I am actually Mayan, and my first language is "Chuj." No one here can speak Chuj. I am much more comfortable speaking in Chuj.
9. When I arrived at this facility, I was very sick. My head ached, and I had a fever. I got sick where they had kept me under the tent. Here at Clint, I was seen by a doctor. I had to stay in a room with other sick people for about 3 days. I was given medicine. The others were given medicine as well. We all had to wear masks.
10. The food here is the same food every day. It is not enough. I am usually hungry.
11. I still have the same clothes on that I came with from Guatemala. When I got arrested, all my other belongings were thrown away. I have not been able to wash my clothes. I have not been given any other clothes.

12. I am currently in a room with about 45 other boys ranging in age from about 3 to 17 years old. A few of us have beds, the others sleep on the floor. The boys who are 3 and 4 years old are by themselves.
13. I have been able to speak with my family friend [REDACTED] who lives in Florida twice. He does not know what is going on. He is willing to take responsibility for me.

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

X

M [REDACTED] M [REDACTED] P [REDACTED]

6-19-2019

Date

Certificate of Translation

I, Bill Ong Hing, certify that I am fluent in English and Spanish and that I read the above declaration to M [REDACTED]
M [REDACTED] P [REDACTED] in Spanish. Executed this June 18, 2019, in Clint, Texas..



Bill Ong Hing
University of San Francisco School of Law
2199 Fulton Street
San Francisco, CA 94117

19 He also indicated
to me that he could not read
or write. Thus, he marked "X"
in the signature line.

EXHIBIT 66

Declaration of

S [REDACTED] N [REDACTED] A [REDACTED] M [REDACTED] M [REDACTED], [REDACTED]

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

1. My date of birth is [REDACTED]. I am from Guatemala.
2. I left Guatemala near the end of May 2019. I left in part because the father of my son was abusive toward me and my grandmother could not protect me. My mother and father left to live in the United States many years ago. The father of my son left me to be with another one. My son is [REDACTED] [REDACTED] [REDACTED]. I fled Guatemala with my son.
3. My son and I were apprehended with five others as we approached the border on or about June 1, 2019. We presented ourselves at the border about 8 AM. We told CBP agents that we were afraid to return to Guatemala.
4. We were taken to a facility for about a day. There, we were not able to sleep that night; no beds were provided, we could not bathe. We had to sit on the floor. The next day we were taken to another facility for an hour or so, then eventually we were brought to the Clint CBP facility.
5. I have been at the Clint CBP facility for about 17 days.
6. When arriving at the Clint facility, I informed officers that my father lives in Nebraska. I gave officers my father's name and contact information. Since I gave that information to officers, no one has discussed anything further with me. I have not heard of a release. I have no idea what is going on. I have not been told of any other optional facilities where I can live.
7. This facility is locked. I am not allowed to leave the facility. Every few days, I am allowed to go out to walk around. Most of the time I am confined to the sleeping area where at least fifty other persons are also detained. Food is provided regularly three times per day, however there is not enough. I am still nursing my child. The health care is good. A week ago my son got very sick with diarrhea and flu. He was rushed to the hospital where he was hospitalized for two days. An I.V. was placed in his arm. I was really afraid for his life. I was allowed to be with him. Finally, he got better, but he is still taking medicine that has been provided.
8. I have been allowed to call my father in Nebraska a couple times, but he does not know what is going on either.

REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL

#29613

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

[REDACTED]

[NAME]

6-17-2019
Date

Certificate of Translation

I, Bill Ong Hing, certify that I am fluent in English and Spanish and that I read the above declaration to S [REDACTED]
N [REDACTED] A [REDACTED] M [REDACTED] M [REDACTED] in Spanish. Executed this June 17, 2019, in Clint, Texas..



Bill Ong Hing
University of San Francisco School of Law
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San Francisco, CA 94117

EXHIBIT 67

Declaration of Kathleen O’Gorman, Ph.D.

Regarding Denial of Access to J [REDACTED] V [REDACTED] S [REDACTED] M [REDACTED] ([REDACTED])
and her baby, I [REDACTED] M [REDACTED] D [REDACTED] S [REDACTED] ([REDACTED])

I, Kathleen O’Gorman, declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. This Declaration is based on my personal knowledge, except in those matters based on information and belief, which I believe to be true. If called to testify in this case, I would testify competently about these facts.

2. My name is Kathleen O’Gorman. I am a Professor of English at Illinois Wesleyan University in Bloomington, IL.

3. I was part of the teams of lawyers, doctors, and interpreters who visited two Customs and Border Protection [CBP] facilities on behalf of the Center for Human Rights and Constitutional Law (“CHRCL”): the facility known as “Ursula” in McAllen, TX, from June 10, 2019, through June 12, and the CBP facility in Clint, TX, from June 17 through June 20.

4. Because I am fluent in English and Spanish, my role in both site visits was that of interpreter.

5. I had made 3 site visits over the course of 1 ½ years prior to these, all on behalf of the CHRCL, always in the role of interpreter. I visited detention centers in Harlingen, TX, Dobbs Ferry, NY, and Tornillo, TX.

6. On the afternoon of June 18, 2019, I spoke with J [REDACTED] V [REDACTED] S [REDACTED] M [REDACTED] (“[REDACTED]” ([REDACTED])) in a telephone interview as part of a team of lawyers, doctors, and interpreters at the facility on behalf of the CHRCL. I conducted the interview along with emergency-room physician Dr. Nancy E. Wang, of Stanford University Medical Center, who is also fluent in Spanish.

7. Our team was concerned by the number of children to whom we had been denied access because they were in medical isolation for influenza, and we wanted to assess as best we could their situations in isolation.

8. Because V [REDACTED] has a baby who had been isolated with influenza before she had been, we were especially anxious to hear details of their medical care and the conditions of their confinement.

9. At the time at which we concluded the initial part of our interview on June 18—the conversation/question-and-answer process with V [REDACTED]—we were told by a guard that we needed to wrap things up because the CBP facility was insisting we leave by 5:00 p.m. That meant we needed to call V [REDACTED] back the next day to read back to her in Spanish the Declaration we had prepared documenting her explanation of her situation and that of her baby.

10. As is our practice with all of our interviewees, we planned to ask her to sign the Declaration. We had been able to do that with one other child in isolation whose interview process we had concluded just before beginning our interview with V [REDACTED]

11. On the next day, when I requested permission to finish the interview with V [REDACTED] the guard with whom I spoke said she had to check with her supervisor. I explained that we had been able to interview V [REDACTED] and another child the day before by phone, given the isolation, thinking that that information would put the request in context.

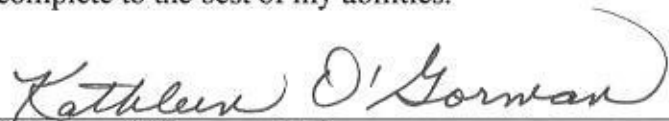
12. The guard walked down the hall and returned within a few minutes. She informed me that Watch Commander Perales said "No." When I appealed that we had been able to do this on the preceding day with no problem, she informed me that Watch Commander Perales said we should never have been allowed to do that. He was firm in his denial.

13. According to the guard, he indicated it increased risk of others getting sick if V [REDACTED] were to use the phone. When I noted that the other child had used the phone for that interview and that V [REDACTED] had also already used it, the guard indicated that they had cleaned it afterwards, but that this was now not permitted.

14. Dr. Wang and I had both reviewed the Declaration for accuracy and agree on the accuracy of what I was to read to V [REDACTED]

15. Because I was denied access to V [REDACTED] on June 19, the Declaration is unsigned.

I, Kathleen O'Gorman, swear under penalty of perjury that the above declaration is true and complete to the best of my abilities.



Kathleen O'Gorman, Ph.D.
Department of English
Illinois Wesleyan University
1312 Park Street
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June 25, 2019