

EXHIBIT 15

Declaration of Elora Mukherjee, Esq.

Regarding LRC, [REDACTED],

taking Care of X [REDACTED] E [REDACTED] L [REDACTED] V [REDACTED], [REDACTED]

1. My name is Elora Mukherjee. I graduated from Yale Law School in 2005, and am licensed to practice law in New York and New Jersey. I currently am the Jerome L. Greene Clinical Professor of Law and the Director of the Immigrants' Rights Clinic at Columbia Law School.
2. Since January 2007, I have been representing immigrant children and adults in detention facilities, including in family detention facilities and those who have been in the custody of the Office of Refugee Resettlement. I regularly observe the effects of detention on immigrant children and adults.
3. I have been interviewing children detained at the U.S. Customs and Border Patrol (CBP) facility in Clint, Texas since June 17, 2019. These interviews are conducted as part of the plaintiffs' monitoring and inspection efforts in the *Flores* litigation. I have previously participated in *Flores* interviews in Brownsville, Texas in July 2018 and Homestead, Florida in March 2019.
4. On the afternoon of June 18, 2019, I translated the attached declaration from English to Spanish for a fifteen-year old girl. She affirmed that all the information in the declaration is true and correct. She further stated and then reiterated that she was too scared to sign the declaration with her name on it. She was deeply worried that guards would learn her name and identity. She expressed fear about repercussions should her identity be revealed. She wanted to share the information in the declaration with the Judge overseeing the *Flores* case but was too scared to put her true name on the attached declaration. After I reviewed the attached declaration with this child, she cried for some time. For these reasons, the attached declaration remains unsigned.

I, Elora Mukherjee, swear under penalty of perjury that the above declaration is true and correct to the best of my abilities.



June 18, 2019

Elora Mukherjee

Date

**Declaration of LRC, [REDACTED],
taking Care of X [REDACTED] E [REDACTED] L [REDACTED] V [REDACTED], [REDACTED]**

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

1. I am 15 years old. I am not comfortable talking about what has happened to me since I came to America, but I have been taking care of a little girl and I am comfortable telling the court what has happened to her. Her name is X [REDACTED] E [REDACTED] L [REDACTED] V [REDACTED]. The roster said her birthdate is [REDACTED].
2. I started taking care of X [REDACTED] in the Ice Box after they separated her from her father. I did not know either of them before that. She was very upset. The workers did nothing to try to comfort her. I tried to comfort her and she has been with me ever since.
3. X [REDACTED] sleeps on a mat with me on the concrete floor. We spend all day every day in that room. There are no activities, only crying. We eat in the same area. We can only go outside to go to the bathroom. We don't have any opportunities to go outside to do activities or anything. There is nothing to do. None of the adults take care of us so we try to take care of each other.
4. I can't eat the food here. It is instant oatmeal and instant soup. It is not good for me. The food has too many chemicals and they cause me harm. I can't eat food with chemicals. I have anemia. I am supposed to eat soups with healthy vegetables like spinach. I am supposed to eat fresh fruit. I am supposed to eat food with nutrition in it, like iron. Here they feed us no healthy food, only food with chemicals. I am hungry all the time.
5. The officers here do not wash anyone's clothes. X [REDACTED]'s clothes are very dirty. Everyone's clothes are dirty because no one washes them.
6. They have never let X [REDACTED] brush her teeth. There is nowhere to wash her hands with soap.

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

June 18, 2019

LRC

EXHIBIT 16

Declaration of A [REDACTED] I [REDACTED] V [REDACTED] F [REDACTED]
[REDACTED]

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

1. I am from Choluteca, Honduras. My date of birth is [REDACTED]. I am 17 years old.
2. I am the mother of A [REDACTED] M [REDACTED] V [REDACTED] V [REDACTED], who was born [REDACTED].
3. I am the older sister of C [REDACTED] A [REDACTED] E [REDACTED] F [REDACTED], born on [REDACTED]. She is eight years old.
4. I am currently detained at the Ursula Processing Center together with my three-month old daughter and sister C [REDACTED].
5. I entered the United States with my daughter and sister by boat on June 3, 2019. We encountered immigration officers just after we crossed the river and were taken to a detention center. We stayed there most of the day. We were given a ham sandwich and juice. There was a jug of water, but the water tasted like dirt.
6. We were then taken to the Ursula processing center around 11 pm or midnight.
7. We have been detained at Ursula for eight days. I have not been told anything about what comes next.
8. I am a breastfeeding mom. Two days ago, I had a fever and sore throat. I didn't want to get my baby sick, so I tried giving her formula. The formula gave her diarrhea, so I have returned to breastfeeding.
9. We have been staying in different cages here in Ursula with other girls. We have thin mattresses put on the floor to sleep. I do not have a crib or separate area for my baby to sleep. We all sleep together on the mattress.
10. Yesterday, we were moved to a new area. My sister C [REDACTED] somehow lost her shoes in the move. None of the officials seemed to notice. She was walking around in her bare feet yesterday and today until I met with the Flores lawyers, who asked the officers for shoes for her. The officers said they did not have shoes, but gave C [REDACTED] socks.
11. We have only bathed once since being detained. On June 4th, we were taken to an area with about 28 showers. We bathed and brushed our teeth. Since then, however, we have not been able to bathe. I have not been able to wash and clean my baby since June 4th. We do not have toothbrushes or toothpaste or towels in the cages.
12. My daughter's onesie is very dirty. I have not been able to wash it since June 4th.

13. Officials was never told me about my rights under Flores.

I, A [REDACTED] I [REDACTED] V [REDACTED] F [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.

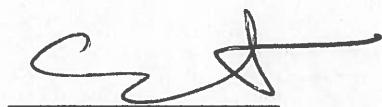
A [REDACTED] I [REDACTED] V [REDACTED] F [REDACTED]

June 11, 2019

CERTIFICATE OF TRANSLATION

I, Elissa Steglich, certify that I am fluent in English and Spanish and that I read the above declaration to A [REDACTED] I [REDACTED] V [REDACTED] F [REDACTED] in Spanish.

Executed this 11th of June 2019 in McAllen, Texas.



Elissa Steglich
University of Texas School of Law
727 E Dean Keeton St
Austin TX 78705
(512) 232-1387

EXHIBIT 17

Declaration of
B [REDACTED] P [REDACTED] M [REDACTED] M [REDACTED] [REDACTED]

I, B [REDACTED] P [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. I, B [REDACTED] P [REDACTED] M [REDACTED] M [REDACTED] [REDACTED], was born on [REDACTED]. I am sixteen.
2. My daughter, M [REDACTED] J [REDACTED] J [REDACTED] M [REDACTED] [REDACTED], was born on [REDACTED], she is eight months old. We are from Honduras.
3. I was apprehended with my infant around May 28, 2019 in the afternoon. After crossing the river and walking for about a half an hour, Border Patrol apprehended us. The agents transported us to an immigration center in a bus. The trip was about an hour. When we arrived at the center I was given a bottle of water and a churro. They had no bottles, diapers or anything for my baby. We were there for a short time and then transported to the "Dog Pound". The trip took about 45 minutes.
4. We arrived at the "Dog Pound" around 6 P.M. When we arrived they took the clothes my baby was wearing and the backpack with all of her clothing, medicine and milk. We were not given any food or water or anything to drink.
5. We were put into a three sided cage with the fourth side open to the outside filled with loads of people. Too many to count. Children, pregnant mothers and mothers with babies. There was nowhere to sit there were so many people. We had to wait for someone to stand up and quickly take their place on the ground.
6. My baby was naked outside with no blanket for all four days we were there. We were freezing. My baby couldn't sleep because the ground was cement with rocks, and in some places only rocks, and everytime she moved the sharp ground would scratch her. There were many pregnant women who had to sleep on rocks and I felt very badly for them.
7. In the morning we tried again to sleep because it as a little warmer. They gave me a rotten sandwich that I could not eat. They gave me a little bit of milk and told me to mix it with water for the baby. The water was very bad. I did not eat for over two days and the baby only had a very little bit of milk. The water came from a jug, smelled bad, and people had to share cups. It was absolutely terrible and I could not drink it.
8. The baby had a cough and a cold when we arrived and after the first day the baby was much sicker. Her cough and cold were worse and she had a very high fever. There were no doctors or medicine. The guards told me that keeping my sick baby outside would be good for her. There were many, many sick children there. A lot with fevers.

9. When I would ask for diapers I often had to wait for a very long time and I was only given 2-3 baby wipes. I had to change the baby on the ground. Diapers were not given to children who were two years or older. The guards said they should not need them.
10. During the day it was incredibly hot and at night it was very cold. There was only a small roof area with shade and people would crowd there trying to get away from the sun. It was the same every day we were there and suffered every day.
11. Around 2 or 3 A.M. on the fifth day we were brought here, to the Ursula Processing Center. When we arrived they took the baby's temperature. She had a high fever and they gave her medicine, clothes and formula.
12. We were put into a cage inside a large building. There are a lot of other mothers with children. There are not many places to sit and we have to sleep on very small, thin mats on the floor. There are thin foil blankets only. It is very crowded and there is no room. The lights are very bright and on all the time and it is very noisy and impossible to sleep.
13. My baby was sleeping on a mat in the middle of the night and the guards made me wake her up to take her to a changing area.
14. There are 7 portable toilets near the cage but not inside. We have to get in line to go to the restroom. The toilets are extremely dirty. There's no water or soap to wash your hands.
15. In the cage there is a table with a jug of water and formula. The water is very bad. I use the bottled water from my meals to mix the formula for my baby. I only have one bottle to use over and over and no way to wash it.
16. The day after we arrived here, my baby began vomiting and having diarrhea. I asked to see a doctor and they did not take us. I asked again the next day and the guard said "She doesn't have the face of a sick baby. She doesn't need to see a doctor." My baby daughter has not had any medicine since we first arrived. She has a very bad cough, fever, and continues to vomit and have diarrhea.
17. We are only given baby food sometimes. But I am afraid to ask to often because the guards are very mean. In four days, they have only given us baby food once. Before we came here, my baby was eating baby food regularly during the day as well as eating some adult food. She can not eat the food here. It makes the adults sick and would be worse for a baby.
18. Since we arrived here my baby has lost a lot of weight. Her pants are very loose now. She is not sleeping because she is sick, and it is very loud. She cries a lot and is listless.

19. The food here is terrible, the bread is bitter. The water in the jug is bad and makes me feel sick and I use my bottled water to make the baby's bottles. When I ask for more water, the guards are very mean and tell me that the baby and I don't need it. I am not able to eat or drink much. My stomach hurts and I have a headache all the time. I have lost a lot of weight here too. And I am very scared and anxious. It makes me feel very bad the way they treat us. It is hard being so young and being a mother.

20. After eight days here at Ursula we were finally able to shower and I was given clean clothes.

21. I want to go to live with my father, S [REDACTED] R [REDACTED] M [REDACTED], who lives in North Carolina. His phone number is: [REDACTED].

22. I have not been told about our rights or what is going to happen to us.

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

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

11 de Junio 2019
Date

Certificate of Translation

I, Kathie O'Gorman, certify that I am fluent in English and Spanish and that I read the above declaration to B [REDACTED] P [REDACTED] M [REDACTED] M [REDACTED] in Spanish. Executed this ___ of June in McAllen, TX.

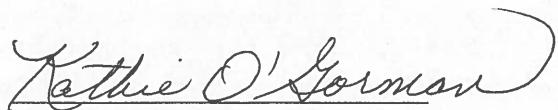

Kathie O'Gorman
Center for Human Rights and Constitutional Law

EXHIBIT 18

Declaration of
C [REDACTED] G [REDACTED] G [REDACTED] P [REDACTED], [REDACTED]

I, C [REDACTED] G [REDACTED] G [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 17 years old. I am from Honduras. I came with my daughter, A [REDACTED] G [REDACTED] M [REDACTED] G [REDACTED]. Her birthday is [REDACTED]. She is one year old. I also came with my baby's father, and we have been separated. His name is I [REDACTED] M [REDACTED] M [REDACTED]. He is 21 years old. At the moment, my daughter and I are detained together at Ursula Station.
2. We came to the United States 13 days ago on about May 29, 2019. We all crossed the river together in a raft. We came up the riverbank and were met by border patrol, and they brought me, my daughter and my baby's father to a place to be fingerprinted. We were there overnight. The next day, May 30, 2019, my daughter and I were brought to Ursula in a bus. The trip took about 15 minutes.
3. At the first facility, my daughter and I were put in a separate cell from my baby's father, where we could see, but not talk to, each other. It was so crowded that some people had to sleep sitting up. We were not given a mat to sleep on and had to sleep on a concrete floor. The next morning after we were given something to eat they brought me and my daughter to Ursula. My baby's father stayed behind.
4. At Ursula, we are fed three times each day at 7 am, noon, and the evening. We don't get anything to eat in between meals. We are sometimes given sandwiches that are cold and raw, and so we don't eat it. We get a water bottle at mealtime. If we run out of water, we are given cups to fill from a fountain, but the water tastes and smells like chlorine, and is dirty, so we don't drink it.
5. Here at Ursula, there is a table with diapers and wipes and feminine products and we have to ask permission to get them. Once, I needed clean clothes for my baby because she threw up, but when I asked for them I was told they didn't have any available. She is still in the same dirty clothes. I have not asked for anything since then.
6. The bathroom at Ursula has no paper towels to wash with or dry our hands. I have not been given a toothbrush or toothpaste to brush my teeth or my daughter's teeth. I have not been given hairbrush to brush my long hair. We were allowed to shower together once, the day after we arrived, but I have not showered since. That was 12 days ago. I would like to be able to take a shower me and my baby again, so that we could get clean.
7. At Ursula, we are in a fenced cage with other teenage moms with kids. Sometimes at night we are taken to a separate cage with only other 17 year old moms with their kids. It is very crowded. We got a mat to sleep on here. But the guards will take the mats in the early morning. Sometimes we each get a mat,

but other times we have to share a mat between four people. So then I have to sleep directly on the floor with my daughter in my arms. We have only one thin mylar blanket to share. The lights are always on.

8. I last saw my baby's father about 8 days ago. I saw him in a nearby cage, and he told me they were going to deport him. I am very sad because I want our family to be together.
9. On Mondays, they give us a phone call. I call my Dad who lives in Maryland. My daughter and I hope to live with him. I also have aunts and uncles living in the U.S.
10. I have not been given any information about our legal rights as detainees. I have not been told how long we will be here.

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

[REDACTED]
C [REDACTED] G [REDACTED] G [REDACTED] P [REDACTED]

6/12/19
Date

Certificate of Translation

I, ANAH JACOB certify that I am fluent in English and Spanish and that I read the above declaration to C [REDACTED] G [REDACTED] G [REDACTED] P [REDACTED] in Spanish. Executed this 12 of JUNE in McAllen, Texas.


ANAH JACOB

6/12/19
Date

EXHIBIT 19

Declaration of C [REDACTED] C [REDACTED] L [REDACTED] G [REDACTED]
[REDACTED] mother of
J [REDACTED] M [REDACTED] C [REDACTED] L [REDACTED]
[REDACTED]

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

I was born on [REDACTED], in El Salvador. I traveled to the US with my son J [REDACTED] M [REDACTED] C [REDACTED] L [REDACTED] who was born on [REDACTED] in El Salvador.

We crossed the river four days ago and were apprehended immediately by immigration officer. We were taken to Ursula detention. We are held in a metal cage that is very crowded. It is very very cold. We sleep on the concrete floor without a mat with only aluminum blanket. The lights are also on all the time which is very disturbing and makes my son not know when it is day or night which is confusing for his body.

The staff is abusive so I am afraid to ask for anything. Yesterday my baby was crying because he was hungry and the staff said to me, "Hey take care of your baby, it's okay to have them but you have to take care of them." They didn't bring me any food for him.

J [REDACTED] can only eat a little of the food. He took formula in a bottle when we were in El Salvador. Here, I am given one meal and share it with him. He will eat potato chips and when there is a sandwich I take out the filling and give him the bread. When he tries to eat the burritos in the morning he gets sick after a few bites and refuses to eat anymore. My son is given something white to drink once, I don't know what it is, but he refused to drink it so I didn't get it again. My son is hungry all the time.

We entered the US by crossing the Rio Grande River on a raft that started to sink. I got wet up to my waist. I was wet when I got here and was placed in the cage without being given dry clothes. I am still wearing the clothes I came in with. When I was arrested they took my sweater and my baby's hat. I don't have a coat or a sweater. I only have the shirt that I am wearing.

I, C [REDACTED] C [REDACTED] L [REDACTED] G [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.

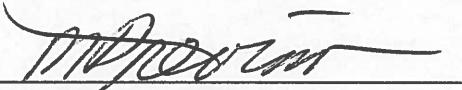
C [REDACTED] C [REDACTED] L [REDACTED] -G [REDACTED]

6-11-19

Date

Certificate of Translation

I, Merced Pérez Treviño, certify that I am fluent in English and Spanish and that I read the above declaration to C [REDACTED] C [REDACTED] L [REDACTED] G [REDACTED] in Spanish. Executed this June 11, 2019 in McAllen, Texas.



Merced Pérez Treviño
ACLU People Power
2418 Riverside Drive
Harlingen, TX 78550

EXHIBIT 23

Declaration of
E [REDACTED] T [REDACTED] P [REDACTED] E [REDACTED], [REDACTED]

I, E [REDACTED] T [REDACTED] P [REDACTED] E [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 16 years old. I am from El Salvador. I came with my niece, M [REDACTED] A [REDACTED] R [REDACTED] E [REDACTED]. Her date of birth is [REDACTED]. She is 2 years old. At the moment, we are detained together at Ursula Station.
2. We crossed the U.S. with 12 other people in a raft 16 days ago, on May 27, 2019. When we crossed we were met by border patrol. We were brought to Ursula Station and processed that day. After two days, on May 30, 2019, my niece got sick, so we were sent to a medical facility a half hour away. There, they told me she had a virus and gave her medicine. We were there for 6 days. On June 6, 2019, we were sent back to Ursula Station. We have been here since then.
3. When we first arrived at Ursula in the early morning, we got crackers and juice right away. My niece cannot drink the formula they offered. We are fed 3 times a day. We don't get any snacks between meals. Two of the meals are warm, but the evening meal is a very cold ham sandwich. It is hard to eat, and my niece does not eat much, only the apple and the chips.
4. When we arrived at the medical facility, we had to wait two hours before we got anything to eat. The water they gave us there was very cold, so I could not get rid of my cough. Being around other sick people did not help me get better, and now I feel more sick.
5. At Ursula, we are in a metal cage with more than 20 other teenagers with babies and young children. We have one mat we need to share with each other. It is very cold. We each got a mylar blanket, but it is not enough to warm us up. There are benches but we cannot sleep there. Sometimes it is so crowded we cannot find a place to sleep, so they allow a few of us to sleep outside the fenced area. The lights are on all the time.
6. We were allowed to shower when we arrived at Ursula. We showered again when they brought us back from the medical facility 5 days ago. We had only one soap, shampoo, and toothbrush to share. We have not been given a hairbrush. There is a place to wash our hands, but there is no soap. I have to ask for any diapers and wipes for my niece. Sometimes when other girls ask for things the guards yell at us and just throw them at us.
7. My niece got sick two days after we first arrived at Ursula. I told a guard she was feeling sick, and they took her to be checked out. Then they sent us to a medical facility where they told me she had a virus and gave her medicine. Since we got back to Ursula, my niece is still sick. She cries a lot. My niece spends much of the day sleeping on me, and she has very low energy. She wakes up for short periods at a time. She has a deep cough. She doesn't eat very much.

8. In the medical facility, we slept in a crowded room on the floor, with only aluminum blankets, and no mat to sleep on. It was very cold. When we arrived, it was so crowded there was no place to lay down on the floor so people had to sleep sitting up. We were fed 3 times a day. There was a bathroom inside the room. Everyone there was sick, both mothers and children. Being around so many sick people has made me sick.
9. Yesterday, we were taken to the consulate, who we were told wanted to see teens with children. At the consulate, we were told we have not been moved yet because there is not a group home open for teens and their children.
10. When I asked a guard at Ursula when we were leaving, they told me it was a process and to be patient because there are others who have been here longer than I have. We have been here a long time already and it makes me sad and worried.
11. Nobody had given me any information about our legal rights.
12. My sister, who is M██████████ mother, lives in California. We are hoping to live with her.

I, E████████T████████P████████E████████ 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.

E████████T████████P████████E████████

6/12/19
Date

Certificate of Translation

I, ANAH JACOB certify that I am fluent in English and Spanish and that I read the above declaration to NAME in Spanish. Executed this 12 of JUNE in McAllen, Texas..


ANAH JACOB

6/12/19
Date

EXHIBIT 25

Declaration of
K [REDACTED] J [REDACTED] H [REDACTED] ([REDACTED])

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

1. I, K [REDACTED] J [REDACTED] H [REDACTED] ([REDACTED]), was born on [REDACTED] I am sixteen.
2. My son, C [REDACTED] A [REDACTED] J [REDACTED] H [REDACTED] ([REDACTED]), was born on [REDACTED] he is one year old. We are from Guatemala.
3. I was apprehended with my infant around June 1, 2019 around 5 A.M. After crossing the river and walking for about an hour, Border Patrol apprehended us. The agents transported us to an immigration center by bus. The trip was about an hour. When we arrived at the center there were jugs of water but no food. They had no bottles or diapers for my baby. We were there for about three hours and then transported by bus here, to the Ursula Processing Center.
4. When we arrived we were given ham sandwiches. My baby was not able to eat his sandwich. He had juice and a cookie. Then we were put into a cage inside a large building. It is very crowded with many other mothers with children. There are only foil blankets and it is extremely cold. The lights are very bright and on all the time and it is very noisy. I am not able to sleep.
5. Before we came here my baby was eating solid food three times a day but now he is only getting breast milk and sometimes a cookie. I'm only making a little breast milk because I am not eating or drinking enough.
6. There are toilets near the cage but not inside. So we have to ask the guards to use the bathroom and they don't always let us use them. There is no water or soap to wash our hands or the baby. We have only been allowed to shower and brush our teeth one time since we arrived twelve days ago.
7. Six days after we arrived here, my baby got a cough and a cold. The guards told me that for a cough or a cold that my baby couldn't go to the doctor. I have a cough as well.
8. I am very scared and anxious. I worry about my baby because he is sick and I don't know what will happen to us.
9. I have not been told about our rights or what is going to happen to us.

I, K [REDACTED] J [REDACTED] H [REDACTED] ([REDACTED]), swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was read back to me in Spanish, a

language in which I am fluent.

K [REDACTED] J [REDACTED] J [REDACTED] H [REDACTED]

12 Junio 2079
Date

Certificate of Translation

I, Kathie O'Gorman, certify that I am fluent in English and Spanish and that I read the above declaration to K [REDACTED] J [REDACTED] J [REDACTED] H [REDACTED] in Spanish. Executed this ___ of June in McAllen, TX.



Kathie O'Gorman

Center for Human Rights and Constitutional Law

EXHIBIT 26

Declaration of
K [REDACTED] L [REDACTED] R [REDACTED]-L [REDACTED] ([REDACTED])

I, K [REDACTED] L [REDACTED] R [REDACTED]-L [REDACTED] ([REDACTED]), declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. I, K [REDACTED] L [REDACTED] R [REDACTED]-L [REDACTED] ([REDACTED]), was born on [REDACTED]. I am sixteen.
2. My daughter, N [REDACTED] V [REDACTED] T [REDACTED] R [REDACTED] ([REDACTED]), was born on [REDACTED], she is one year old. We are from Honduras.
3. I was apprehended with my infant around June 4, 2019 in the afternoon. After crossing the river and walking for about an hour, Border Patrol apprehended us. The agents transported us to an immigration center in a car. The trip was about thirty minutes. When we arrived at the center I was given a cup of water. They had no bottles, diapers or anything for my baby. We were there awhile and then transported bus here, to the Ursula Processing Center.
4. When we arrived we were put into a cage inside a large building. There are a lot of other mothers with children and pregnant women. There are not many places to sit so I had to stand and hold my baby. At night we have to sleep on very small, thin mats on the floor but they take away in the morning. There are thin, foil blankets only. It is very crowded and it is extremely cold. The lights are very bright and it is very noisy and the baby cries all the time because she is sick so we are not able to sleep.
5. We were not given food when we arrived. It was not until the next morning when I was given a burrito, chips, and an apple. There was formula and cookies for the baby, but no solid food.
6. Before we came here my baby was eating regular food but now she is only getting formula. The sandwiches they give to us for lunch are frozen so I can't even give my baby food. The guards only let me give my baby 3 bottles of formula a day. Before we came here she had at least five. We are given one cookie in the morning and one cookie at night but no baby food.
7. There are toilets near the cage but not inside. Sometimes the guards get angry and will close them. Sometimes there is water and soap to wash your hands, but not now. We have only been allowed to shower and brush our teeth one time since we arrived nine days ago. A woman in my cell was here for twenty days and not allowed to shower.
8. Five days after we arrived here, my baby started coughing and having diarrhea. The guards told me that only the very sick babies can see doctors so my baby can't go although she has had a fever and was vomiting. She hasn't vomited for over a day but she still has a very bad cough, fever, and

continues to have diarrhea. There are many sick children and they are not being taken to the doctor.

9. I am very scared and anxious. I worry about my baby because she is sick and I don't know what will happen to us.

10. I have not been told about our rights or what is going to happen to us.

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

[REDACTED]
12 de Junio 2019

Date

K [REDACTED] L [REDACTED] R [REDACTED]-L [REDACTED]

Certificate of Translation

I, Kathie O'Gorman, certify that I am fluent in English and Spanish and that I read the above declaration to K [REDACTED] L [REDACTED] R [REDACTED] in Spanish. Executed this ___ of June in McAllen, TX.



Kathie O'Gorman
Center for Human Rights and Constitutional Law

EXHIBIT 27

Declaration of

K [REDACTED] G [REDACTED] G [REDACTED] Q [REDACTED] ([REDACTED])

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

1. I, K [REDACTED] G [REDACTED] G [REDACTED] Q [REDACTED] ([REDACTED]), was born on [REDACTED]. I am sixteen.
2. My son, C [REDACTED] A [REDACTED] R [REDACTED] G [REDACTED] ([REDACTED]), was born on [REDACTED], he is two years, 10 months old. We are from El Salvador.
3. In El Salvador, I was studying for my bachelor's degree and was doing well. But my father and uncle were soldiers during El Salvador's civil war. They were threatened, and my baby and I were threatened, too. My sister, who is Hyattsville, Maryland, said it would be better to come to the United States to be safe.
4. We came to the United States on May 28 or 29, 2019. I crossed the river in a small boat (una balsa) at night. We continued walking and eventually encountered the Border Patrol, who stopped us. The Border Patrol then put us in a car and brought us to a location 10 minutes away to take our information. I did not tell the Border Patrol why I had come to the US.
5. At this first location, the Border Patrol offered us water. However, there was no food there, and the Border Patrol did not offer my baby food. There also were not diapers for my baby at this location. The guards took our clothes and personal items from us and gave us a ticket for those items.
6. We then were loaded into a bus for minors under 18 years old, and we were transported to Ursula. Upon arriving to Ursula, we were offered cookies, water, diapers (although my son did not need them). We were given aluminum blankets and directed to sleep on the floor. Later, around 11 pm or midnight, some sleeping mats arrived. These were clean but are very thin and not very comfortable. I slept and continue to sleep with my son.
7. The bathrooms at Ursula do not have water for handwashing. What little water we are given, we need to use to wash our hands. Sometimes, there is not enough water for drinking and handwashing, so we do not wash our hands.
8. Three days after our arrival at Ursula, we were permitted to shower. I was told to put my remaining clothes, including the ticket for my personal items that were registered by the Border Control (at the first location where I was detained) in a bag. When we left the showers, we were told that the Ursula guards had thrown away our bags of clothing and my ticket for personal items. The guards told me that I not could not get back my items.

9. We are permitted to shower only every five or six days.
10. It is very cold here. We have only an aluminum blanket for warmth, and this is not enough. We are always cold.
11. We cannot sleep. The guards never turn off the lights in the location where we are kept. We cannot sleep because of the light and the noise of everyone talking.
12. We receive food three times a day. The breakfasts and lunches are warmed food. However, my baby is not eating the food. He keeps refusing the food and has diarrhea.
13. We are given two bottles of water per meal. This water is clean because it is bottled.
14. My baby has not eaten a full meal in 15 days. I am very worried and don't know what to do. This makes me cry. I have not told the guards that my son is not eating, but I don't know how to make him eat. I have tried to give him the baby food for very little babies, and he will eat some of this.
15. I have asked for a doctor to see my baby because he has diarrhea and is coughing. Today, I was put in a long line to see the doctor. Then, it was time for the count of detainees, so we were told in English, "Sorry." I do not know when I will be able to consult a doctor for my son.
16. I want to go to live with my sister, who is in Hyattsville, Maryland. She is 27 years old. I have her telephone number, and I have called her to tell her that we are here. I have not asked the guards to let us leave to go to my sister. But, when I was first detained, I told the Border Patrol that I wanted to go to my sister.
17. I have not been told about the Flores agreement, our rights, or what is going to happen to us.

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

[REDACTED]
K [REDACTED] G [REDACTED] G [REDACTED] Q [REDACTED]

June 12, 2019
Date

Certificate of Translation

I, Genevieve Grabman, certify that I am fluent in English and Spanish and that I read the above declaration to K█████ G█████ G█████ Q█████ in Spanish. Executed this 12 of June in McAllen, TX.



Genevieve Grabman
Center for Human Rights and Constitutional Law

EXHIBIT 28

Declaration of K [REDACTED] B [REDACTED] A [REDACTED] J [REDACTED]

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

1. I am from Chimaltenango, Guatemala. My date of birth is [REDACTED]. I am 17 years old.
2. I am the mother of K [REDACTED] E [REDACTED] A [REDACTED], who was born [REDACTED] in Mexico. I gave birth in a hospital in Mexico. I had a cesarean. I had the stiches taken out and then came to the United States.
3. I am currently detained at the Ursula Processing Center together with my newborn daughter.

Medical Issues

4. I crossed the river into Texas with my newborn daughter on Tuesday, June 4, 2019. Two people carried me because I was having trouble walking. My left leg hurt a lot.
5. When we encountered Border Patrol, they had to help me up into the vehicle.
6. They took us to the perrera, the dog pound. My daughter and I were put in a pen with other moms and children. The mothers were older than 18.
7. I sat on a bench that was in the cage, but I could not sleep. My leg hurt me so much. I was kept in the perrera for four days (three nights). I did not sleep at all because I was in so much pain.
8. I asked to see a doctor and complained about the pain. The doctor said that the pain was normal and that I would be fine.
9. I was really worried about my baby. I was exhausted and could not hold her. Other mothers carried her for a time. I was afraid to fall asleep and have her drop. I ended up putting her on the bench so she could sleep.
10. The cage had a toilet and a sink with water but no soap. I could not wash my hands or my baby.
11. On Wednesday, June 5, I was trying to go to the bathroom but could not walk. An officer told me to wait. The officer was able to find a wheelchair, which I have used since then.
12. The guards only gave us juice and cookies the four days I was in the perrera. I was not producing a lot of milk because I was not getting water. Finally, the guards gave me two water bottles. Then, the milk started coming again.
13. At the perrera, the officers told me to throw away the backpack that had my baby daughter's clothes. The officers told me that I would be given clean clothes for my baby, but I have not received any.

Ursula

14. I was transferred to Ursula on Friday, June 7.
15. I am now in a cage with other girls. It's very crowded.

16. I am now in pain from the waist down. I am in such pain that I still can't sleep. The lights are on all night. I usually remain sitting in the wheelchair. I can not walk without falling. My left leg cannot support any weight. I just fall.
 17. I have seen a doctor twice here at Ursula. They gave me a couple of pills that actually make the pain worse.
 18. I have tried to lie down on the thin mattress officers give us for sleeping. It hurts more when I lie down than when I sit, so I remain in my chair.
 19. It is very cold. My daughter is freezing. Her hands and feet are cold. She doesn't have clothes. My daughter and I are still in the clothes we traveled in. Another migrant lent me a sweatshirt for my daughter. I keep asking for new clothes for my daughter, but I have not received any yet.
 20. I have not washed my baby because I don't have any clean or warm clothes for her.
 21. My daughter is sick. She sneezes and has mucus running from her nose.
 22. We do not have toothbrushes or toothpaste or towels.
 23. I have not been able to shower or brush my teeth during the time I have been in detention. No one has helped me take a shower or otherwise bathe myself.
24. Officials was never told me about my rights under Flores.

I, K [REDACTED] B [REDACTED] A [REDACTED] J [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.

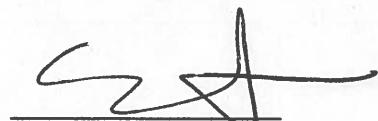
[REDACTED]
K [REDACTED] B [REDACTED] A [REDACTED] J [REDACTED]

June 11, 2019

CERTIFICATE OF TRANSLATION

I, Elissa Steglich, certify that I am fluent in English and Spanish and that I read the above declaration to K [REDACTED] B [REDACTED] A [REDACTED] J [REDACTED] in Spanish.

Executed this 11th of June 2019 in McAllen, Texas.



Elissa Steglich
University of Texas School of Law
727 E Dean Keeton St
Austin TX 78705
(512) 232-1387

EXHIBIT 29

Declaration of
L [REDACTED] L [REDACTED] M [REDACTED]-G [REDACTED]

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

I was born on [REDACTED] and I'm 17. I am traveling with my son D [REDACTED] C [REDACTED] M [REDACTED]-G [REDACTED] born [REDACTED]. We are from Honduras.

I came into the US at about 5pm. I walked for about two hours before I found an immigration agent. I was taken directly to the Ursula Processing Center where I have been held for 20 days today.

D [REDACTED] got sick with a fever and a cough after we were here for two days. I did not take him to the clinic because the other girls told me if I did I would stay longer. So I just put wet towels on his forehead. D [REDACTED] had gotten sick on the trip so I had medicine for him for fever, but when immigration grabbed me when I first came to the US they took it away.

I got the flu two days ago. I'm still a little sick. I didn't see the doctor.

I am held with my son in a cage. There about 60 people in my cages and more in some of the other cages. There are 6 cages in my area. They are all very very full.

There are narrow benches along three sides of the cages.. At the beginning they put all moms with children together, but now I'm with other girls who are 17 even if they don't have children. It's very crowded in the cage so much so that girls are lying down and the floor and there's not even enough room for the baby to crawl so I hold him all the time.

We sleep on the floor on a mat. I only have one mat. I only get one thin aluminum blanket for myself and my son. It's very cold all the time and I have trouble sleeping at night because of the cold. My son get so cold he feels frozen to the touch. The lights are on all the time. There is lots of noise all the time because they are girls and children who can't sleep and who cry a lot. We are all so sad to be held in a place like this.

When I got here, I got a ham sandwich. The ham was slimy. I got water. There is water in the cell but it tastes like bleach. I don't drink the water from the cooler because I'm afraid it will poison the baby because I'm still nursing. They give me a water in a bottle with each meal.

In the morning at 7 they give me something they call a burrito with rice and beans inside, an apple, a cookie and the water. They give me one jar of baby food for D█████. I breast feed him. I don't make enough milk so I have to give him some powdered milk. It made him sick at first. He isn't getting enough to eat so I also feed him the rice from the burrito.

I don't get any snack and neither does the baby. The next time we eat is lunch at noon where we are given the same thing except the burrito has a little bit of chicken. Then we don't eat again until dinner at 4 when we get a sandwich with ham and lettuce, potato chips and an apple— every night the same. My son gets baby food. He also gets baby food at 7.

I get a cookie at 9. That's all the food until the morning.

The toilet and sink are outside the cell in another cage. The toilets are portable toilets. I do not have soap, towel or toothbrush. Every five days I get to shower. On that day, I get a toothbrush, but I can only use it then. I can only bathe the baby when I bathe.

In my cage there is a girl in a wheelchair. When she was in Mexico she got cramps and now she can't walk. No one is helping her. She's been here 4 days. An officer came and in front of all of us said it was a total lie that she was sick. Once when we were waiting to go into the shower, women officers came and told us that we got pregnant just to be able to come to the US and that we aren't worth anything.

No one has told me about my rights or about Flores. I have not talked with a lawyer or anyone else who can help me.

I, L [REDACTED] L [REDACTED] M [REDACTED] G [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.

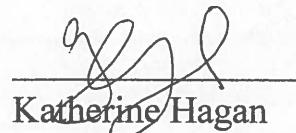
L [REDACTED] L [REDACTED] M [REDACTED] G [REDACTED]

06/10/2019

Date

Certificate of Translation

I, Katherine Hagan, certify that I am fluent in English and Spanish and that I read the above declaration to L [REDACTED] L [REDACTED] M [REDACTED] in Spanish. Executed this 10 of June in McAllen, Texas.



Katherine Hagan