

EXHIBIT 49

Declaration of
E [REDACTED] Y [REDACTED] F [REDACTED] C [REDACTED], [REDACTED]
Mother of E [REDACTED] T [REDACTED] M [REDACTED] F [REDACTED], [REDACTED]

I, E [REDACTED] Y [REDACTED] F [REDACTED] C [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 El Salvador. I am the mother of E [REDACTED] T [REDACTED] M [REDACTED] F [REDACTED]. Her date of birth is [REDACTED]. Today is E [REDACTED]'s five-month old birthday.
2. I was apprehended with [REDACTED], my 20-year old sister who is 8 months pregnant, and her 3-year-old son. We crossed into the U.S. by land and presented ourselves to border agents on or about June 14, 2019. We were taken to a facility that was very cold. We were each given an aluminum blanket.
3. After about 2 or 3 hours E [REDACTED] and I were taken by bus to the Clint facility, where we have been ever since. My sister and her son stayed behind. Yesterday, they told me my sister was released and is going to a place she can live with family. I wish E [REDACTED] and I could be released too.
4. I have been at the Clint facility for about 3 days. I don't want to be here. I feel like I have been incarcerated. When I think of the days that E [REDACTED] and I have already spent here, I start to cry.
5. At Clint I am fed three times a day. For breakfast it is oatmeal with jello and juice. For lunch I have soup, juice, and a cookie. For dinner, I have a burrito, jello, and juice. They have milk but only give it to the babies. There is water here and we can drink it any time with cups.
6. I am breastfeeding E [REDACTED]. I do not know if baby formula is available.
7. The room we are in is very crowded. There about 30 people in a room, including about 4 kids younger than a year and a few who are about 9 years old.
8. I wish I could wear clean clothes. I have been wearing the same clothes for days. My pants were dirty when we got here so officials took mine and gave me another pair to wear. I'm still wearing my own shirt, but it is dirty and has stains from breastmilk on it. My socks have a hole and are dirty. E [REDACTED] has also been wearing the same clothes for days. We have not been given an opportunity to change.
9. The first two nights here we had to sleep on the floor without a mattress. Last night was the first night we were given a mattress. The lights are turned off from 11 pm to 5 am. It is cold in the room all the time. I have a lot of difficulty sleeping here. It's so cold it's making people sick. I worry that E [REDACTED] and I will get sick from the cold.
10. The bathrooms do not have any walls. There is no privacy. Everyone can see me when I am using the toilet which is humiliating. We can wash our hands in the bathroom but there is no soap to use. E [REDACTED] and I have not been allowed to bathe since we were apprehended. We have also not been given toothbrushes or toothpaste.

11. Some of the guards here at Clint are mad a lot of the time. When we ask them things, they respond in an angry way. I'm scared to ask them to raise the temperature because I don't want to make them more angry. All of us feel scared of the guards getting angry. One day I was crying because I didn't want to be here. A male guard came up and said to me, "Why did you come here if you don't like it?" When I think about what he said, I start to cry. It is so difficult to be here. At times I am sobbing.
12. There is a nurse here but neither E [REDACTED] or I have seen her. I don't think that there is a doctor here. I don't know if there are any counselors, social workers, or mental health professionals here.
13. I don't know when I will be released. I want to go live with E [REDACTED]'s father in Washington, D.C. He is here legally. However, yesterday an official who was a woman told me that I would have to be here one and a half to two weeks longer. Even though I want to live with E [REDACTED]'s father, they said that there wasn't space available for us anywhere else. Other girls have told me that they have been here 20 to 26 days. The girl whose mat is next to mine said she's been here more than 20 days. Whenever I think of how long other girls have been here, and how long E [REDACTED] and I might be here, I start to cry. This is not a place where children and babies should be. Just like me and E [REDACTED], other girls here have family members who can care for them in the United States.
14. I don't know if I can call my mother.
15. I have not been told about any rights my daughter or I may have under Flores.

I, E [REDACTED] Y [REDACTED] F [REDACTED] C [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.

[NAME]

6/7/2019
Date

- 16. There are children who are very young here, only two or three years old, and their mother is not with them. They cry for their mothers all the time. Other children who are older try to take care of the little ones. It is an incredibly sad situation.

Certificate of Translation

I, Elora Mukherjee, certify that I am fluent in English and Spanish and that I read the above declaration to
E [REDACTED] Y [REDACTED] F [REDACTED] C [REDACTED] in Spanish. Executed this 17 of June in Clint, Texas.



[NAME OF TRANSLATOR]

[ORGANIZATION]

[ADDRESS]

Elora Mukherjee
Morningside Heights Legal Services, Inc.
Columbia Law School
435 W. 116th Street
New York, NY 10027
212-854-4291

EXHIBIT 50

Declaration of

G [REDACTED] M [REDACTED] M [REDACTED] A [REDACTED]. [REDACTED]

I, G [REDACTED] M [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 17 years old. I am from El Salvador. I came with my younger brother, Y [REDACTED] A [REDACTED] M [REDACTED] A [REDACTED] [REDACTED] who is 13 years old and with my older brother, N [REDACTED] d J [REDACTED] L [REDACTED] A [REDACTED], who is 25 years old.
2. When I got to the U.S., Border Patrol got me within 5 minutes or so. They took me to a place with tents, and they took my fingerprints, and gave me a number.
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 younger brother. The older one has a business, and MS 13 was telling him he had to give them \$5 every day. When he couldn't do that anymore, they started coming to my school to find me and tell me they were going to hurt me and do horrible things to me. I didn't go to school for 2 weeks, and I was terrified. I couldn't leave my house. My mother and father are both in the United States, so I wanted to come to live with them to be safe.
4. I was allowed to talk with my mother yesterday, 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.
5. When they brought me to the tent place, it was about 2 in the afternoon. I was in the tent about 1 hour. They gave me a burrito and apple juice, but they told me to eat fast, and I was so scared my hand was shaking, and I couldn't drink the juice.
6. They separated me from my brothers there. They put me in a room that was freezing, and three other girls there gave me a sweater to try to keep me warm. I was still freezing. There were 2 blankets on the floor that were like aluminum, but the officials didn't give me one. There were 4 of us in the room.
7. I slept on the floor until they woke us up at about 2 in the morning to look at my documents, and at 4 they woke us up again to bring me here (Clint Border Patrol Station).
8. When I got here sat on the floor until 11 in the morning. They gave me oatmeal, juice, and a chocolate pudding. I eat what everyone else here eats, and I'm always really hungry. Between lunch and dinner, I can get 1 cookie, but that's all. I'm losing weight.
9. I can't see my younger brother who is also here. I asked permission to see him, and they said "No." There was one day when he asked, and they finally let us see each other for about 3 minutes. I was very happy to see Y [REDACTED], but it was very hard, too. I don't know where my older brother is. I think he is in prison and will be deported, but I don't know.
10. I told the guard yesterday that I felt sick, because I had a sore throat. I went to the doctor, and she said I had a little fever, but she didn't look at my throat. She gave me a piece of candy and sent me back to the room I was in. I felt worse later—my throat hurt more—and when I asked to see the doctor again, the doctor

said she was very busy and I should go back and wait. I went back again and had to wait an hour. She didn't do anything to help. I feel sicker today. My throat is very sore.

11. The room I'm in had about 40 girls in it at the beginning, but now it's mostly very small children. There are about 28 now. Two of them, a girl who is 4 and another who is 5, don't know their names and don't know where they're from. The 4-year-old has been here a long time, and the other about 10 days. They don't have a mother or father to care for them, so 2 girls are taking care of them.

12. There are 8 bunk beds and 2 mats on the floor for sleeping. The smaller ones sleep in the beds, and the ones here the longest time sleep on the mats on the floor. The beds are next to one another, so we all sleep next to one another. I don't sleep much because the air bothers me.

13. The toilet is in the same room we're in. There is no curtain or anything. We try to hold a cover up when we use it, but the girls on the top bunk beds can see everything. There is water but no soap to wash our hands after using the bathroom.

14. The water they give us makes us sicker. It smells like chlorine.

15. One of the guards came in yesterday afternoon and asked us how many stripes were on the flag of the United States. We tried to guess, but when we were wrong, he slammed the door.

I, G [REDACTED] M [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

G **M** **M** **A**

Certificate of Translation

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

Kathleen O'Gorman

June 19, 2019

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

EXHIBIT 51

Declaration of

G [REDACTED] M [REDACTED] C [REDACTED] B [REDACTED]

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

1. My name is G [REDACTED] M [REDACTED] C [REDACTED] B [REDACTED]. My birthday is [REDACTED]. I am 7 years old. I am from El Salvador. I came with my Aunt K [REDACTED] L [REDACTED] A [REDACTED] C [REDACTED] and her female cousin. They are both big. We came to the United States because there were people who wanted to hurt us. There were people who had eyes on me whenever I went to school. My aunt, her cousin, and I looked for Border Patrol after we walked into the United States. We found them right away, and they told us to get into a car with the other people that we had come with.
2. From there they took me to a tent where it was very cold, and there were no blankets. My aunt, her cousin, and I slept on the ground in the tent. We spent the night there. I woke up in the very early morning. It was still dark outside. I was scared because my aunt was not there next to me anymore. My aunt's cousin told me that she wasn't there anymore because she was pregnant and the baby was on the way. I started to cry. Someone called my name about an hour later, and they took me to where my aunt was. She was sitting in a normal chair and was not connected to anything. I was very, very scared, but it was a relief to see her.
3. I was there with my aunt in a small room for just a little while. Then we were both taken outside. An officer told me to get into a car. My aunt was standing outside the car. They told me that she was not coming with me. I wanted to go back to where my aunt's cousin was, but they would not let me. When I went to go see my aunt, I did not know that they would not bring me back to my aunt's cousin. I felt like they had tricked me. A lady officer brought me here, to the Clint Border Patrol Station. Today is the fourth day that I have been here.
4. I am in room 203 with between 10 and 20 girls. On some days a nurse comes and brings two combs for everybody to share. One is a lice comb and the other one is a normal hairbrush. They leave the combs with the children in the room for about 15 or 20 minutes. Then someone comes back and tells us to give them back the lice comb and hairbrush.
5. Yesterday after lunch a nurse brought the lice comb and hairbrush. A little while later a guard came back and asked for the lice comb and hairbrush. He was bald and had a light complexion. When the guard asked for the lice comb and hairbrush, we did not know where they were. We looked at each other to see who had the combs. The guard was angry and asked in a rough voice who had the brushes. The other kids were scared, and so was I. I felt dizzy and started to cry. He said that we had ten minutes to look for the combs, and that if we could not find them, we were going to be without beds and without covers. He gave us ten minutes. All of us were panicked looking for the combs. We looked under the beds. Kids asked each other if they had seen the brushes.
6. He came back and yelled at us, asking if we had found the combs. We had to tell him that we couldn't find them. When we told him, officers came into the room and started taking everything away. They took pillows and blankets. We had a blanket that we were using to hold up in front of the bathroom

because there is not a door. The officer took even that one. He said that we were going to sleep in the floor. He said it was punishment for losing the combs.

7. What he said was true. We all slept on the hard tile floor last night. Nobody tried to climb into a bed because the guard said that they were going to take away anybody who tried to get into the bed. They told us that we could not have blankets anymore.
8. I asked to call my dad, who lives in Washington, DC. An officer took me out into the hallway to call my dad. I told my dad what happened. My dad asked to speak to someone who works in the place where I am being held. I passed the phone to a man officer, but I cannot remember what the officer said to my dad.

I, G [REDACTED] M [REDACTED] C [REDACTED] B [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]
G [REDACTED] M [REDACTED] C [REDACTED] B [REDACTED]

02 20 19
Date

Certificate of Translation

I, Katherine Hagan, certify that I am fluent in English and Spanish and that I read the above declaration to G [REDACTED] M [REDACTED] C [REDACTED] B [REDACTED] G [REDACTED] in Spanish. Executed this June 20, 2019, in Clint, Texas.



Katherine Hagan, MTS, MS, CHI
1873 Columbia Alley
Eugene, OR 97403

EXHIBIT 52

**Declaration of G [REDACTED] S [REDACTED] C [REDACTED] C [REDACTED], [REDACTED] with F [REDACTED] I [REDACTED] C [REDACTED]
C [REDACTED] (an Infant)**

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

1. I came from San Vicente, El Salvador, with my baby son, F [REDACTED] Is [REDACTED] C [REDACTED]. My baby is eight months old. His birthdate is [REDACTED] His [REDACTED] [REDACTED]. My birthdate is [REDACTED]. I am 17 years old.
2. I left El Salvador because my baby and I were in danger from the gangs. They wanted money from me, but I don't have money and so they said they would kill us. My father and H [REDACTED] father both disappeared and so my older sister and I decided to come to the U.S. where our cousin lives because we were fearful for our lives.
3. My older sister's name is A [REDACTED] R [REDACTED] C [REDACTED] C [REDACTED]. She is 28 years old. I don't know her A number. They separated us shortly after we arrived in the U.S. about three weeks ago and I have not been allowed to speak to her ever since.
4. I don't know where we crossed into the U.S., but we came across a river. The Border Patrol were waiting for us as soon as we crossed the river, and they took us about half an hour away by car to a tent where there were a lot of people from Central America. At the tent, they gave us a bad tortilla, which I could not eat. They gave us no water at first, but then later, they gave us water after we asked for some. My baby had a fever and I had brought medicine for my baby but a U.S. government official made me throw away the baby's medicine. I explained that my baby was sick, but they made me throw away my baby's medicine anyway. He also made me throw away my baby's clothes, bottle, baby formula, baby food, and diapers.
5. We arrived at the tent area in the morning. It was very hot. There were too many people to fit inside the tent, including lots of children and young mothers with babies. I could not find shade, but I had a baby so people let me inside the tent. Other children and young mothers with baby were not able to be inside the tent. We waited there all day until the night came. It was very cold at night and they did not give us any blankets. The baby and I slept on the ground and tried to keep warm the best we could with body heat. They had taken my baby's medicine away and so his fever came back that night. I asked for medicine for my baby and the guard asked me, "Who told you to come here with your baby anyway?"
6. They woke me up at 4:00 a.m. and then took my baby and me to a place called the Ice Box. It took about an hour by car. They did not have a car seat for the baby so I held him in my arms. They did not have a seat belt for me.
7. When we got to the Ice Box, I told them that my baby was sick, but they would not give me any medicine. They had someone examine him and that person saw that my baby had a fever and so sent him to the hospital. The hospital gave him medicine (Amoxicillin) and then sent us back to the Ice Box.

8. They do not treat children well at the Ice Box. They gave us nothing to eat the entire time we were there except a cookie and some water. The water tasted ugly, like chlorine. It was very cold and the baby and I had to sit on concrete floors. They had thrown our clothes away and so we were freezing. I asked for a blanket but they only gave us a metal sheet.
9. In the afternoon, they brought us to Clint. It took about an hour by driving. There was no car seat for the baby and no seat belt for me. I just held him in my arms.
10. We have been here for 18 days and they never gave us a shower or bath until yesterday. It was the first time since we came to the U.S. that they let us use soap or wash our bodies. Day before yesterday, they finally gave us clean clothes. My son was sick and so his shirt had been covered with mucous. I tried to wash it the best that I could with water but they never gave us soap until yesterday. They only let me brush my teeth twice—ten days after we arrived and then three days later. They took the toothpaste and toothbrush away afterwards so that I can't brush my teeth. It makes me feel very bad not to be able to clean myself and my baby here.
11. I am always hungry here. They do not give us enough to eat. For breakfast, they give us one package of instant porridge and a pouch of juice. That's all. For lunch, they give us one bowl of soup, one cookie, and a pouch of juice. It is the same soup every day. We cannot get more than the one bowl. There are no snacks. For dinner, they give us one bean burrito, a cookie, and one pouch of juice. The baby is losing weight and so am I. I am nursing my baby and it is not enough nutrition for a breastfeeding mother. I cannot make enough milk to meet my baby's needs and they threw away his formula and baby food (baby cereal) so they gave him some food, but it is the same food they give us. His body could not process it so he threw it up and got diarrhea.
12. We sleep in a room with three bunk beds. There are about 25-30 people in the room. There are only beds for six people so we have to share them. The room is full of unaccompanied girls and mothers with babies. There were three mothers with babies, but now there are two. Four of us (two mothers with babies) share a mattress. The other mother and baby slept on the floor. Most of the girls sleep on the floor. Usually the oldest girls sleep on the beds and share a mattress. Usually the youngest children in the room sleep on the floor. Most of the children are all alone. One was only two years old. She came to the U.S. with her aunt, but they separated her. One of the girls tried to take care of her. Sometimes the 2-year-old who was all alone had to sleep on the floor. It is concrete. It is very cold. There are only two mats in the room and so most of the children on the floor sleep directly on the concrete. That little girl slept like that for most of the twelve days she was kept her. Most of the children in our room are kept her for weeks at a time like that—often sleeping on the concrete floor.
13. I don't know why they have kept us here for so long. I gave them the information for my cousin who lives in the U.S. the first day arrived here in the morning. Her name is M [REDACTED] Q [REDACTED] C [REDACTED]. Her telephone number is [REDACTED]. She says that I can live with her. They never called even called her until two days ago. They said that

they cannot send me to go live with her, but have to send me and my baby somewhere else and the people at that facility will decide where I go next.

14. I have asked to speak to my mother or sister (whom I came to the U.S. with) but the officials will not let me. I keep asking and they keep saying, "No."

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

G. S. C.C

June 17, 2019

G [REDACTED] S [REDACTED] C [REDACTED] C [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 G [REDACTED] S [REDACTED] C [REDACTED] Co [REDACTED] in Spanish.



Kathleen O'Gorman
Illinois Wesleyan University
1312 Park Ave.
Bloomington, IL 61701

June 17, 2019

EXHIBIT 53

Declaration of
J [REDACTED] V [REDACTED] S [REDACTED] M [REDACTED], [REDACTED]
Mother of I [REDACTED] M [REDACTED] C [REDACTED] S [REDACTED], [REDACTED]

I, J [REDACTED] V [REDACTED] S [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 name is J [REDACTED] V [REDACTED] S [REDACTED] M [REDACTED]. I was born on [REDACTED]. I am the mother of I [REDACTED] M [REDACTED] C [REDACTED] S [REDACTED], who was born on [REDACTED]. We are from El Salvador.
2. I crossed the border into the United States by land on or about May 31, 2019. I crossed with my daughter I [REDACTED] and my thirteen-year old sister. We were walking, then approached by border patrol officers in cars. They took us in a car to a detention center called a *hielera* (an icebox), where we were detained for one or two hours. Then officers called our names and brought us here in a van. There was no car seat for I [REDACTED]; she sat on my lap. The van had about ten people in it, mostly girls.
3. My daughter, my sister, and I have been in the Clint detention center for 17 days. I feel sad here because I should be with my family. I miss my family and I really want to leave this place. I wish I could live with my father in Oklahoma. He has been in the United States for about ten years.
4. I have had a hard time here at Clint because both my daughter and my sister were sick. My daughter had the flu for five days, and my sister had the flu for seven days. My daughter had a fever, a cough, an infection in her eyes and ears, and a rash on her stomach, back, and legs. During this time, we were isolated in a room with other girls who were sick.
5. We are not permitted to bath or shower regularly here. We have only been permitted to shower two times in 17 days. Our showers are only five minutes long. My daughter's rash was terrible, perhaps because she could not bathe and clean her skin. For the two times we could shower, we had access to soap. We have no access to soap at any other time.
6. We are not permitted to brush our teeth regularly here. The doctor let us brush our teeth two times in 17 days. We do not have toothbrushes or toothpaste at any other time.
7. We are locked in a room for most of the day. The room has no windows. It is very crowded with about 50 of us crammed in together. All of us are 17 years old or younger. Some of the children are one or two years old, like my daughter. There are about five mothers with children, including me. Some of the children are only five years old and do not have their mothers or fathers to care for them.

8. In the room, there are a few mats and cots, but no beds or mattresses. For the past several nights, my daughter, my sister, and I have been sleeping on the cement floor because there is no other place to sleep. There are not sufficient mats and cots for everyone. Before my daughter got sick, we were able to sleep on a mat. But then we had to be isolated with the others who were sick. When we were allowed to return to the room, someone else had occupied the mat that we used to sleep on. We now have no choice but to sleep on the cement floor. Each night about fifteen girls sleep on the floor. Sometimes in the middle of the night, at about 3 or 4 a.m., the guards will come to call people, which wakes everyone up.
9. During the day, the guards often close the door of our room. When this happens, my daughter feels so sad and starts to cry. She says she wants to leave, she wants to go out. I feel so sad too.
10. There is no privacy for using the toilets. Everyone can see me when I am using the toilets. At times I feel so embarrassed because there are boys watching me when I am using the toilets.
11. Every morning, we wake, then get breakfast, then return to the room until lunchtime, then get dinner, then stay in the room. We just sit around in the room all day. There is nothing else we can do. Only three times over 17 days, I have been allowed to go outside. Each time, I was allowed outside for only 20 minutes. I wish I could go outside with my daughter more often.
12. At times I am hungry here. Every day, we are given the same food: oatmeal and juice for breakfast; soup, a cookie, and juice for lunch; and a bean burrito, yogurt, and juice for dinner. There is no milk available for my daughter, my sister, or me. Sometimes I ask for more food, and the guards refuse to give it to me. "You have had your ration," they tell me. My daughter does not like the oatmeal.
13. For 17 days, my daughter and I have been wearing the same clothing. We do not have opportunities to wash our clothes. Our clothing is dirty. I wish we could change our clothes.
14. I have not received any information about when I will leave this place. I have asked an official when I am going to leave because I have been here so long. He only told me to have patience.
15. It seems that children who are here at Clint without their own children are often detained about ten days. Their time here can be longer if they sick, so that these kids are here for about two weeks.

16. But children like me who are here with our own children are detained longer. One teenage girl with a child was here for 23 days. Another teenage girl with a child was here for 21 days. I do not know why they are here so long.
17. There are some children here without their mothers who are very young, only two or three years old. The guards tell other girls to take care of these youngsters, even though some of the girls do not want to take care of such young children. There are a lot of children who are five or six years old who are here without their mothers.
18. One day I asked a teenager if she was the mother of a young baby girl who was only about six meses o one year old. The teenager said no. She said that she had to take care of the baby because the baby's mother was pregnant and had been taken to the hospital. The baby was here without her mother for eight or nine days. I felt very upset to learn this terrible information. I would never want my own daughter to be here alone without me. I have not seen this baby for a number of days.
19. I wish I had more opportunities to call my family. About five times, I asked guards if I could call my father. The guards let me call him about three times in 17 days, for only five minutes each time. I wish I could speak with my father more often and for longer times. Sometimes the guards say that they are too busy to let me make a phone call.
20. The guards here are both men and women. Some of them are mean. They do not smile.
21. I do not know if there are any counselors, social workers, or mental health professionals here.
22. I have not received an explanation of the rules here.
23. I have not received any information about the rights that my daughter, my sister, and I have under the *Flores* settlement agreement.

I, J████████V████████S████████M████████, swear under penalty of perjury that the above declaration is true and correct to the best of my abilities. This declaration was provided in English and was read back to me in Spanish, a language in which I am fluent.

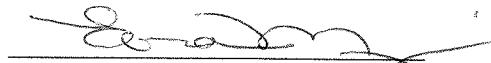
J████████V████████S████████M████████

17-06-2019

Date June 17, 2019

Certificate of Translation

I, Elora Mukherjee, certify that I am fluent in English and Spanish and that I read the above declaration to J█████████ V█████████ S█████████ M█████████ in Spanish. Executed this 17th of June in Clint, Texas.



Elora Mukherjee
Columbia School of Law
435 W. 116th Street
New York, NY 10025

EXHIBIT 54

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

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

1. I came from Santa Rosa Barbarena, Guatemala. My birthday is [REDACTED]. I am 14 years old.
2. I left Guatemala with my 18-year-old sister, A [REDACTED] C [REDACTED] R [REDACTED], because the gangs wanted us to join them, but we did not want to. We knew that they sometimes rape or kidnap girls who do not do what they want. That is what they did to girls in our old neighborhood so when they came to make us join us in our new neighborhood, we knew we had to leave and so we left a week later.
3. Our father, J [REDACTED] A [REDACTED] R [REDACTED] C [REDACTED], lives in Northern California and so we came to the U.S. so that we could live with him and be safe. His telephone number is [REDACTED]. Our mother does not take care of us. She leaves for long periods of time and often yells at us. My sisters have raised me.
4. We crossed a small tributary on Friday and immediately an official met us and took us to an area with a tent about ten minutes away. They lined us up and checked our skin and our hair. Then they checked our birth certificates and other paperwork. That is when they took my sister away from me and now I am very worried about her. I don't know where she is or if she is ok. I am worried they will send her back to Guatemala and something will happen to her there because she would not join the gang.
5. Afterwards they took us to a building and placed me in a small room. It was freezing. I slept on the ground. It was concrete. There were other people in the room. One was a grandma and said she had been there for 20 days.
6. I am currently at Clint. I am in a room with about 50 children. There are three boys, ages about 2, 8, and 10 years of age. Another boy came today. I think he is about eight years of age. The rest of the children range from ages of about 4 to 17 years of age. There is one mother with a baby. There are ten bunkbeds and one single bed. If someone leaves a bed, you just have to grab it. The youngest children often have to sleep on the concrete floor. There are two large pads on the floor that sleep two or three children, and there are two pads that are very thin and sleep two children per pad. There are about twenty children who sleep on the concrete every night.
7. There are young children with no parents. There was an 8-year-old with no parent here who was trying to take care of a little 4-year-old girl. She did not know how to take care of a little girl so she kept asking me what to do, and I started telling her but then just started taking care of her myself. I take her to the bathroom, give her my extra food if she is hungry, and tell people to leave her alone if they are bothering her. She has been sick the whole time I have been taking care of her, and is coughing and has mucous. She doesn't talk hardly at all, just yes and no. She wears diapers and I change them for her. Her bracelet says her name is K [REDACTED] X [REDACTED] M [REDACTED], but I

don't know where they got that name. The roster says her birth date is [REDACTED], and her A number is [REDACTED].

8. I am also taking care of another little girl who arrived yesterday. The roster says her name is G [REDACTED] M [REDACTED] C [REDACTED] B [REDACTED] and her A-number is [REDACTED]. It says her birthdate is [REDACTED]. She said that she came to the U.S. with her aunt and cousin, but was taken away from them by the guards. Like me, she is very sad and crying all the time. Right now, I am holding both little girls in my lap to try to comfort them.
9. I need comfort, too. I am bigger than they are, but I am a child, too. I have not been able to talk to my father or my sister and I want to speak with them. It is very upsetting to be separated from our families.

I, K [REDACTED] R [REDACTED] L [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]
[REDACTED]
K [REDACTED] R [REDACTED] L [REDACTED]

June 17, 2019

Certificate of Translation

I, Kathleen O'Gorman, certify that I am fluent in English and Spanish and that I read the above declaration to K [REDACTED] R [REDACTED] L [REDACTED] in Spanish.



Kathleen O'Gorman
Illinois Wesleyan University
1312 Park Ave.
Bloomington, IL 61701

June 17, 2019

EXHIBIT 55

Declaration of

K [REDACTED] A [REDACTED] S [REDACTED] D [REDACTED] [REDACTED]

I, K [REDACTED] A [REDACTED] S [REDACTED] D [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. I am detained with my brother, J [REDACTED] E [REDACTED] S [REDACTED] [REDACTED]. His birthdate is [REDACTED] and he was also born in Guatemala. I am age 15 and my brother is age 13.
2. My brother and I left Guatemala because the neighborhood that we lived is a very dangerous with a great deal of gang activity. My father abandoned our family when I was young. My mother came to the United States about eleven years ago. My brother and I were living with our grandparents who are now elderly. It was very difficult for our grandparents to care for us and protect us any longer.
3. We were apprehended by when we crossed the border. We presented ourselves at the border on or about June 9 or 10. We were taken into custody and taken to the *hieleras* for several hours.
4. After several hours, we were brought to the Clint CBP facility. We have been in this facility for about 9 days.
5. We have contacted our mother who lives in Maryland with our aunt and uncle. My mother wants to be reunited with us. We have her telephone number and we have provided her contact information to CBP authorities. No one at this facility has discussed a release plan. We do not know what is going on.
6. I am in a room with about 15 other girls. Some little girls are 3 and 4 years old. Their parents are not here, and they are expected to take care of themselves. I have to sleep on the floor because there are not enough beds for everyone.
7. My brother was in a room with about 25 other boys. Due to bad air circulation and others who were sick, my brother got the flu. He has been in a room with other boys who have the flu for the last day. He has been given medicine but is confined to the room with other sick boys.
8. My brother and I have been separated. We only see each other during meal times.

I, K [REDACTED] A [REDACTED] S [REDACTED] D [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] S [REDACTED] D [REDACTED]

6-19-19

Date

Certificate of Translation

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█████████████████████
A████████████████████ S████████████████ D████████████████ in Spanish. Executed this June 19, 2019, in Clint, Texas..



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