

EXHIBIT 59

Declaration of M [REDACTED] J [REDACTED]-S [REDACTED]

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

1. I am 14 years old and my date of birth is [REDACTED]. I come from a province called Xela in Guatemala. I speak Spanish and Mam. My Mam is better than my Spanish. Spanish is a bit difficult for me, but I am able to get through with some Spanish.
2. I came to the United States with a 33-year old family friend who was also a neighbor. When we got to the US border, we looked for a border patrol agent to turn ourselves in. I have been housed at the Clint facility for 21 days.
3. I was in the first cell for 7 days, sleeping with no mattress. We had fabric blankets in our cell but no mattresses. It is hard to sleep when you don't have a mattress. I then came down with the flu. I then went into the flu cell for 7 days.
4. When you are in the flu cell, you also sleep on the floor, but you have a mattress. They were 21 other kids in that space with the flu. I had a fever in there and I was shaking. Some of the other kids were vomiting. They all had fevers. No one was taking care of the kids with the flu. They were all teenagers. Now I understand that there are some small children inside the flu cell. I don't know who is taking care of them.
5. We were not allowed to leave the flu cell, ever. It was very boring. I did nothing to entertain myself nor was anything offered. It was sad, very sad. I felt locked up and closed in. In the other cells, we can go out of the cell to get water one time a day. They say we can go outside once a day but I don't go because I am afraid of them yelling at me. I've only been outside twice in the 21 days since I've been here.
6. After the flu cell I went into a new cell. There are about 30 people in the same cell with me. At first, I was sleeping on the ground, and then for the last five days I have been sleeping in a bed.
7. Every day we get the same food: oatmeal, instant soup and a burrito. It's not enough. In the afternoons I get very hungry. The burritos we are given are not filling.

8. I have not talked to any family since I've been here. I have not spoken to my mother and don't know why I have been here so long. I just want to get out of here.
9. When I finally leave here, I think I will be sent to a different place; we are told that we will go from here to a shelter. Sometimes when we ask, we are told we will be here for months.

I, M [REDACTED] J [REDACTED] S [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]
M [REDACTED] J [REDACTED] S [REDACTED]

17 de Junio 2,019

Date

EXHIBIT 60

Declaration of
N [REDACTED] L [REDACTED] Q [REDACTED] D [REDACTED], [REDACTED]
With G [REDACTED] Y [REDACTED] A [REDACTED] D [REDACTED]

I, N [REDACTED] L [REDACTED] Q [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 15 years old. My brother is G [REDACTED] Y [REDACTED] A [REDACTED] D [REDACTED]. His birthday is [REDACTED]. He's 6 years old. We are from Honduras. We arrived in the United States 8 days ago. We came alone. It took 2 months to get here. I
2. One of the reasons I left my grandma and aunt in Honduras to be with my mother here in the United States. She has lived here about 17 months, and I miss her a lot. I also want to get an education here. Another important reason was because it is so dangerous where I live because of the gangs. They are all around where I live, and it is so bad, I'm afraid to go out of my house. I am afraid they'll rape me or kill me, because I know they do that.
3. When they picked us up, they took us to a place that was a tent. I was there a short time. Then they took us to Clint Border Patrol Station, the place I'm at now.
4. They gave both of us a burrito, juice, and a piece of chocolate. We get the same food every day. We are hungry all the time here. We can't have food between meals if we're still hungry.
5. G [REDACTED] is still wearing the clothes he had on for our trip. They were washed one time. I am wearing the shirt I had on for the trip from Honduras, too.
6. I can't sleep, because the room we are in is so crowded. When we got here, some people had the beds already. There are just a few. So we have been sleeping on a mat on the floor. G [REDACTED] does sleep well.
7. We aren't allowed to go to the bathroom at night. I have to put diapers on G [REDACTED] at night since he isn't allowed to use the bathroom. He didn't wear diapers for years, because he is 6.
8. There is soap and water to wash our hands after we use the bathroom. The bathroom is outside of the room where we stay.
9. I don't want to go back to my country.

I, N [REDACTED] L [REDACTED] Q [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.

[REDACTED]
N [REDACTED] L [REDACTED] Q [REDACTED] D [REDACTED] June 19, 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 N [REDACTED] I [REDACTED] Q [REDACTED] D [REDACTED] in Spanish.

Kathleen O'Gorman

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

June 19, 2019

EXHIBIT 61

Declaration of

S [REDACTED] P [REDACTED] T [REDACTED] G [REDACTED], [REDACTED]

I, S [REDACTED] P [REDACTED] T [REDACTED] G [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 S [REDACTED] P [REDACTED] T [REDACTED] G [REDACTED]. My birth is [REDACTED]. I am 12-years-old. I am from Guatemala. My brother, M [REDACTED] A [REDACTED] T [REDACTED] G [REDACTED] ([REDACTED]), was born on [REDACTED]. He is 11 months old. I am here with my mother, Antonia Francisca Garcia-Aguilar.
2. I ran across a bridge with my mother and baby brother yesterday afternoon. We ran because it is dangerous on the bridge. There were border police at the end of the bridge, and they told us to get into a car that was parked there. Then they took us here, to the Santa Teresa Border Patrol facility. They told us to take out our shoelaces and the hair bands from our hair. Everything went in the trash. They took my jacket and my mother's jacket and put it in the trash. My mother had a shawl to wrap my baby brother in. The officer put shawl in the trash, too. My mother had a t-shirt for my baby brother, too, and she told the officer that she wanted to keep it in case it was cold inside and he needed it. The officer just said, "No. In the trash."
3. After that we went into a room where we sat on the floor. Someone brought us tacos and fruit punch. We were thirsty but there was not water to drink. An officer came in and gave us an ugly stare, like he didn't want people to be there. There was an adult man in the room who knew some English and translated what the officer said. The man said that the officer had said, "*Pinches chapines otra vez*" [Fucking Guatemalans again]. My mother wanted to ask for some water, but she was afraid to because of the man's stare and what he said. A woman came in and told me and my mom to lift up our shirts so she could see if we had anything under them. They looked in my hair and in my baby brother's hair to see if we had anything hidden there. They took pictures of my mother. They were going to take my picture but then said they weren't going to.
4. After that an officer yelled at us to come with him. He took us to a different room where it was very cold. He came back for us after a while and called me, my mom, and my baby brother out into the hallway. There were computers on tables out there. He showed my mom a sheet of paper and said, "Sign it, and I'll explain it afterwards." My mother told the officer that it would be better for him to explain what the document was about first, before she signed it. The officer said to her in Spanish, "*Tenés huevos para responder*" [You have balls, talking back]. When he explained that the paper was to deport us, my mother she said that she wasn't going to sign it. He said that it didn't matter, that they were going to take us to Mexico the next day anyway. He said, "So you're not going to sign it?" and when my mother answered that she wouldn't, he pulled the file folder back and slammed it shut.
5. That is when the guard took us back to the cold room, where we have been ever since. There are about 50 people there. They are all mothers and their children. There is no furniture there. There are only cement benches. And it's very cold. We asked an officer for a blanket but he told us that there were enough in the room and to ask around. We were freezing for four hours until an older woman lent us her

blanket. The concrete was frozen underneath us, so we put the elderly woman's blanket between us and the cold concrete. My mother tried to wrap her shawl around me and M [REDACTED] but it is not big enough to keep us all warm. I wish that they had let us keep our jackets and her other shawl. My baby brother cried all night and couldn't sleep because of how cold he was. The lights were on all night. It was very noisy, and other people were crying. My mother and I cried and began to pray.

6. We were starving when the guards brought breakfast around 8am this morning, because the last thing we ate was when we first arrived yesterday afternoon. They brought the same tacos and fruit punch that we received yesterday. My mother gives my baby brother corn porridge at home, along with carrots and other vegetables that he can eat. He doesn't drink powdered milk and only take my mother's milk. Here he can only have my mother's milk because there is no food for him. My little brother had a dirty diaper this morning, and I asked an officer for wet wipes. He brought them back after twenty minutes.
7. My little brother has gotten bumps on his neck since we got here. They showed up on his neck this morning, after we spent the night here. The guard who brought us in to do this interview asked my mom if we had seen a doctor. We haven't yet. My mother says she is thinking about whether or not to ask to see a doctor, because the guards respond in a rough way when other people ask for something.

I, S [REDACTED] P [REDACTED] T [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.

S [REDACTED] P [REDACTED] T [REDACTED] G [REDACTED]

6/19/19

Date

Certificate of Translation

I, Katherine Hagan, certify that I am fluent in English and Spanish and that I read the above declaration to S [REDACTED] P [REDACTED] T [REDACTED] G [REDACTED] in Spanish. Executed this June 18, 2019, in Clint, Texas..



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