

1 I, Alma Poletti, declare as follows:

2 1. I am over the age of 18 and have personal knowledge of all the facts stated
3 herein.

4 2. I am an Investigation Supervisor for the Washington State Attorney General's
5 Office (AGO), in the Civil Rights Division, where I have worked since May 2017.

6 3. Prior to joining the Attorney General's Office, I investigated document fraud
7 and human trafficking cases in Paraguay, my native country, for the U.S. State Department.
8 This work involved interviewing victims who had experienced significant trauma and had
9 limited knowledge of the laws of Paraguay and/or the United States. Many times, the
10 people I interviewed feared that cooperation with my investigation could endanger
11 themselves or their families. I am a native Spanish speaker.

12 4. In my time with the AGO's Civil Rights Division, I have served as the lead
13 investigator on several cases involving vulnerable populations and victims. I have worked
14 directly with sexual harassment and assault victims in our workplace cases, and conducted
15 interviews with dozens of immigration detainees at the Northwest Detention Center in
16 Tacoma, Washington. Last year, together with licensors from the Division of Licensed
17 Resources within the Washington State Department of Children, Youth, and Families, I
18 interviewed eight children in the Seattle area who were separated from their parent at the
19 border and placed in Washington State by the U.S. Department of Health and Human
20 Services, Office of Refugee Resettlement.

21 5. Between the dates of July 17 and 19, 2019, I led a group of four AGO
22 employees who, together with me, supported four licensors from the Licensing Division
23 within the Washington State Department of Children, Youth, and Families. On those dates,
24 the Department conducted licensing inspections of Washington facilities that house

1 children in the custody of the Office of Refugee Resettlement to ensure they are meeting
2 Washington’s minimum licensing standards for facilities that care for children away from
3 their parents. *See* Wash. Rev. Code § 74.15.030 (2019); Wash. Rev. Code § 74.15.090
4 (2017).

5 6. Over three days from July 17 to July 19, Washington State employees
6 interviewed a total of 28 children in Western Washington. Of these, 22 were detained at
7 U.S. Customs and Border Protection (CBP) facilities at the U.S./Mexico border for various
8 periods of time within the past 12 months, and subsequently placed by the Office of
9 Refugee Resettlement in Washington State. Although they were not certain about some of
10 the precise dates, the children were detained by CBP at the border during the time period
11 from approximately August 2018 to mid-July 2019. Their ages ranged from 12 to 17-years
12 old. The following are observations of the team of interviewers and accounts of some of
13 the 22 interviewed children who experienced conditions at the border in the last year.

14 7. Most of these children came to the United States unaccompanied by their
15 parents, a guardian, or an adult relative. Ten of the children interviewed reported they were
16 detained at a CBP detention facility at the border for more than three days. The maximum
17 stay reported was for ten days. Some of these children met other children in detention who
18 had been held at CBP facilities for over ten days. Most of the children did not know or did
19 not recall the name of the facility where they were detained or where it was located.

20 8. The children described their time in CBP facilities as filled with uncertainty,
21 since most of them were not told how long they would be kept in detention or what would
22 happen to them next. Even when taken to the airport to be transferred to another facility or
23 to Washington State, some youth reported that they did not know where they were being
24 sent.

1 9. Children described these facilities as rooms of different sizes with no windows
2 to the outside and where lights were kept on 24-hours per day. Most of the children reported
3 these detention facilities were freezing, kept at extremely cold temperatures. Children were
4 only given “aluminum” blankets to keep themselves warm. Some of them had sweaters or
5 spare clothes with them when they arrived at the detention facility, but these were
6 confiscated by the immigration officers (the children referred to them as “officers” or
7 “guards”) and they were never returned to them even if a child asked for warm clothes or
8 additional blankets. One girl recalled instances when mothers who were detained with their
9 children complained to the officers about the cold temperatures because their kids were
10 getting sick. An officer would then grab the air-conditioner remote. After that, the room
11 would get colder, as if the officer had been annoyed by the request and decided to lower
12 the temperature even further.

13 10. Children reported lack of sleep or not being able to sleep throughout the night
14 during the length of their stay. Kids listed several common reasons for not being able to
15 sleep: (1) the detention facilities were housing so many people that there was not enough
16 room for everyone to lie down at the same time; (2) if they were provided with mats to
17 sleep on, they were very thin and uncomfortable – some did not even get mats and had to
18 rest on the bare cold floor; and (3) the lights were kept on at all times and children could
19 not tell the difference between night and day.

20 11. Two girls who were detained at the border for nine and ten days, respectively,
21 did not get mats for the entirety of their detention and only had the option to lie down on
22 the bare floor. The girl who was at the border facility for ten days did not even get a blanket,
23 and said because the room was so crowded she would have to wait her turn to be able to
24 get a couple of hours of poor sleep, curled up on the bare floor. Two boys who spent eight

1 days in CBP custody also did not get mats to sleep on, and had to try to sleep on the bare
2 floor or on benches.

3 12. Some of the children reported that guards would interrupt the little rest they
4 had, waking them up in the middle of the night for roll call, or to put out food. Children
5 reported feeling like there was no need for the guards to wake them up in the middle of the
6 night and that officers were doing it on purpose to intentionally disrupt their sleep. One girl
7 said guards would take away their “aluminum” blankets every morning at 4 a.m. The
8 blankets were the only thing they had to keep themselves warm in the freezing facility, so
9 kids wanted to keep them, but would be yelled at by the guards when they asked if they
10 could have the blankets back.

11 13. Most of the children reported being hungry while detained due to insufficient
12 food or because the food was so terrible that they could not eat it. Some children reported
13 the burritos they were fed were cold or still frozen. Others complained the bread in the
14 sandwich was hard and tasted like dirt, or that the ham seemed to have gone bad.

15 14. The food also lacked variety. Some children said they were given only burritos
16 for each meal, three to four times a day, for the entire length of their detention. Two girls
17 who spent eight and ten days in detention, respectively, were fed only burritos during the
18 entire time. There were no vegetables, milk, or any other type of food for meals other than
19 previously frozen burritos. One of them received snacks (an apple and juice) at night
20 occasionally.

21 15. In one specific facility, the lack of enough food caused kids to fight amongst
22 themselves. One girl described how guards would throw the food on the ground at them as
23 if they were animals, and because there was not enough food to go around, fights would
24

1 break out among the kids over the food. She remembers a fight over food where one of the
2 guards grabbed a kid by the neck to get him to stop fighting.

3 16. One boy was detained in a border facility for 24-hours, but in those 24-hours
4 he said he was only given one sandwich and one bottle of water, and believes everyone in
5 the facility only received one meal in those 24-hours he was there. He remembers being
6 very hungry and thirsty during this time in detention.

7 17. As far as children could tell, everyone in the facility received the same type
8 of food, except babies who were given formula. One 16-year old girl who was pregnant
9 could not keep the frozen burritos down due to her morning sickness. She asked the guards
10 if they could give her milk or “suero” (a fortified drink, like Pedialyte), because she was
11 pregnant and feeling weak after not being able to keep food down for a lengthy period. The
12 guards told her that she needed to eat what she was given, and if she did not like it, “that’s
13 too bad.” The guards warned her that if she did not stop asking questions, they were going
14 to deport her. Another girl said she heard mothers asking for more formula for their hungry
15 babies, but their requests were denied.

16 18. Some children complained that there was not enough water available for them
17 to drink, so they were thirsty while detained. These children said they were provided small
18 personal bottles of water with each meal, but they did not have access to drinkable water
19 whenever they felt thirsty. Other kids said that there were water dispensers available for
20 them to drink water whenever they wanted, but some of them said the water did not taste
21 right, and that it tasted like chlorine, soap, or dirt, so they would not drink it and would go
22 thirsty.

23 19. Half of the interviewed kids said they were not given toothbrushes or
24 toothpaste to brush their teeth while they were detained. Kids detained as long as ten days

1 could not brush their teeth for the entirety of their detention. Access to showers and soap
2 was also limited. One girl who was detained for ten days only showered once at her arrival
3 and never brushed her teeth. Another girl was detained for ten days and never offered a
4 shower, even though she was on her period and was given only one sanitary pad a day.
5 After a number of days, she summoned her courage and asked for a shower, and was given
6 one. She recalls there was another girl at the facility who was also on her period. They were
7 each given one sanitary pad per day. Although the guards knew they had their periods, they
8 were not offered showers or a change of clothes, even when the other girl visibly bled
9 through her pants. This girl had no choice but to continue to wear her soiled underwear and
10 pants.

11 20. Half of the interviewed kids complained that it was very uncomfortable to use
12 the toilets because they had no privacy to use them. Toilets were located inside the room
13 where they were detained and only separated from the rest of the space by a low wall. Girls
14 tried to make them more private by having other girls hold up aluminum blankets to cover
15 them. One girl said toilet paper was sometimes an issue since it was refilled only once a
16 day. If they ran out of toilet paper, they had to wait until the next day to get more.

17 21. Most of the children interviewed reported never going outside even once
18 during the entire period of their detention. One girl who was detained for ten days said one
19 guard took the children outside to spend 15 minutes in the sun on two of the days while
20 she was detained. At least seven kids said the facilities did not have TVs or any toys, books,
21 or other entertainment available for them, so the hours were long, boring, and filled with
22 worries.

23 22. Some of the kids recalled children as young as four or five-years old who were
24 detained with them. One 16-year old girl said she was kept in one room with eight kids

1 who were around six-years old and were detained without their parents. The children were
2 scared, crying, hungry, and uncomfortable. One small girl was also in pain because she had
3 hair lice and was scratching so much she had sores. The older girls in the room were told
4 to take care of the small children, they had to help them use the toilet and wipe them after,
5 feed them, and give them water. Older girls were constantly told to keep the younger kids
6 quiet and stop them from crying “or else.” Without toys, adequate space, food, or
7 assistance, they were overwhelmed and could not help the smaller children feel safe or stop
8 crying. If the children would not stop crying, a guard would open the door, ask the crying
9 child to come to the door, and then threaten them. The 16-year old girl heard guards tell
10 children that if they did not stop crying, they would be “left in a corner” with no one to
11 help them, or that they would be “sent to a dark room.” Over the ten days this girl was
12 detained, she saw three children taken away only to return the next day; when they got back
13 they said they had been kept in a dark room alone. One six-year old boy was taken to the
14 dark room because he accidentally clogged the toilet with toilet paper.

15 23. Another girl recalled that younger kids (around seven or eight-years old) were
16 often put in small metal cages (“jaulas”) on their own if they misbehaved or were restless.
17 They would be kept in the jaulas for two days and fed an apple and water for each of the
18 first two meals (while the rest of the children were being fed burritos), and a sandwich at
19 dinner. The girl felt this punishment was not fair because “it was a scary situation and
20 young kids by nature are restless and have lots of questions.”

21 24. A different girl remembers that two guards started cursing at a seven-year old
22 girl with horrible words that she refused to repeat to interviewers. The guards were yelling
23 and swearing at the younger girl because she would not stop crying.

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1 25. Children reported various other forms of demeaning treatment by the officers.
2 A girl said that when kids would tap the guards to get their attention, some of the guards
3 would make comments like, “don’t touch me, I don’t want to get your diseases.” Another
4 boy remembers an officer making fun of his given name, telling him it was “really ugly.”
5 One girl recalls that when mothers of young children would knock on the door of the room
6 they were kept in to get the guards’ attention and ask them for medicine or baby formula,
7 the guards would open the door, laugh at their request, and shut the door again.

8 26. Some of the children did not receive any medical care while detained at the
9 border, even if they complained of coughs, a fever, or other medical issues to the guards.
10 One girl remembers mothers asking for medicine for babies’ or small children’s colds, but
11 the officers ignored their requests. After a while, women stopped asking for things their
12 babies needed because the officers would not pay attention to their requests, sometimes
13 even laughing at them after hearing what they needed. Another girl remembers a 17-year
14 old mother who asked for milk and medicine for her baby who looked very pale and sick.
15 The guards told her they did not have any of those things.

16 27. The following paragraphs recount the individual stories told by some of the
17 children interviewed by Washington State staff during the July 2019 licensing visits.

18 28. Maria¹ is 16-years old and originally from Guatemala. She entered the United
19 States on May 30, 2019, and was detained by immigration officials who drove her for about
20 two hours before arriving at a detention facility, the name and location of which is unknown
21 to her. When they arrived at the facility, they were forced to sit in a small area for four

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24 ¹ In order to protect the children’s privacy, and at the request of their current care providers,
I refer to the youth using pseudonyms matching each child’s identified gender.

1 hours as she was individually processed. There were more than 100 people of all ages in
2 the room. They were only given a small plastic cup of water, which the workers refused to
3 refill when asked. They were also not allowed to go to the bathroom; when asked, the
4 workers told them that they would just have to “do it on themselves.” They were not given
5 any information on where they were, how long they would be there, or what would happen
6 next.

7 29. Each person was asked to turn over their belongings. They were also asked to
8 take off and turn over any jackets/vests/hoodies, their shoelaces, and any hair ties. As these
9 items were turned over, Maria watched as the workers would throw them into trash bins.
10 Maria lost her extra clothes, a pair of shoes, and a watch she had received as a gift.

11 30. After a physical inspection, Maria and others were transported for about an
12 hour and a half to another facility, where Maria was detained for ten days. She thinks this
13 facility was in a city. She was in an area for girls under 18, and remembers about nine total
14 rooms. Kids under six-years old who were detained without their parents were housed with
15 the older girls. She was kept in a room with approximately 11 other children under 18. The
16 room was approximately 10 x 14 feet, and contained a bathroom. One of the walls had a
17 pane of glass that began halfway up the wall and went to the ceiling. The window faced a
18 wall, and she thinks it was there to allow the guards to see inside the detention cell. The
19 remaining area was so small that they could not all sit, let alone lie down at the same time.
20 The facility also kept the lights turned on at all times, and she did not get a blanket or a
21 mat. Some of the children did have blankets, but she believes that they were given the
22 blankets before they were transferred. Maria would have to wait her turn to be able to get
23 a couple of hours of poor sleep, curled up on the bare floor. She could only tell the passage
24 of time, and the general time of day, by the meals they would receive. The area would

1 either be incredibly cold or incredibly hot. She feels like there was some sort of air
2 conditioning system that would turn on and off, but she had no sense of time and could not
3 figure out what the air conditioner's cycle was.

4 31. Of the children in the room with Maria, eight were around six-years old. Six of
5 them were little boys, and the other two were little girls. She recalls hearing other small
6 children, presumably in the other rooms. The children were scared, crying, hungry, and
7 uncomfortable. One of the girls was also in pain—she had hair lice and was scratching so
8 much she had sores. The older girls in the room were told to take care of the small children,
9 and were constantly told to keep them quiet and stop them from crying “or else.” Maria said
10 that without toys, adequate space, food, or assistance, they were overwhelmed and could
11 not really help them feel safe or stop them from crying.

12 32. Maria remembers being hungry the whole time she was in detention. The
13 children were fed three times a day in their cell. She recalls getting oatmeal in the morning,
14 soup for lunch, and a burrito for dinner, all with a small juice. The burritos would often be
15 cold or still frozen. The little children would get the same food. If they did not like the
16 food, or if it was inedible, they would have to go hungry because no snacks were provided
17 between meals.

18 33. They did not have drinking water in the room. If they were thirsty, they could
19 try to drink from the sink in the bathroom. If they wanted cold water, they could ask the
20 guards, who would take them to a water cooler to get a small cup of water. She recalls
21 doing so a few times over the ten days she was in detention because she was accompanying
22 a younger child who needed cold water (as discussed above, the older children in the room
23 had to take care of the younger children, which included accompanying them if they needed
24 water).

1 34. Maria’s cell had a bathroom area with a sink and toilet. There were three walls
2 about five feet high but no door, which meant that there was not any real privacy, and that
3 you always needed to have someone with you to stand in front of the open area holding
4 one of the few available blankets to cover the opening. The smaller children needed help
5 to go to the bathroom, so the older girls would have to take them to the bathroom. They
6 would help the children get on the toilet, wipe themselves, and rinse their hands (there were
7 no soap or towels). Someone came in to clean the cell daily, and at that time would
8 replenish the toilet paper. If the children ran out of toilet paper, they would have to wait
9 until the next day for it to be replenished. This happened a few times.

10 35. For the ten days that Maria was in this detention facility, the guards did not
11 give the children toothbrushes, toothpaste, hair brushes, any type of soap, or towels. They
12 were never offered showers. After a number of days, she summoned her courage and asked
13 for a shower, and was given one. She was not offered a change of clothes, and the spare
14 clothes she brought with her had been thrown away during intake, so she had to put on the
15 same dirty clothes she had just taken off for her shower.

16 36. Maria and another girl had their periods while they were in the facility. They
17 each received one sanitary pad per day. Although the staff knew they had their periods,
18 they were not offered showers or a change of clothes, even when the other girl visibly bled
19 through her pants. She had no choice but to wear her soiled underwear and pants.

20 37. One guard made the effort to take them out of their cells. He took the
21 occupants of each cell out to an outside area where they could be in the sun for 15 minutes.
22 In ten days, that happened twice. Other than that, the children were not allowed outside the
23 room unless they were going to get water. There were no recreational activities, no access
24 to the radio or television, or access to toys or books.

1 38. Maria’s interactions with the guards were almost exclusively negative. She
2 said that they would only speak with the children when they were being punished. The
3 older kids were told multiple times daily that they had to keep the younger children quiet,
4 and stop them from crying. If a child would not stop crying, a guard would open the door,
5 ask the child to come to the door, and threaten the child. Maria heard guards tell children
6 that, if they did not stop crying, they would be “left in a corner” with no one to help them,
7 or “sent to a dark room.” Over the ten days Maria was detained, three children were taken
8 away only to return the next day; they reported being kept in a dark room, alone.
9 One six-year old boy was taken to the dark room because he accidentally clogged the toilet
10 with toilet paper.

11 39. During her whole stay, she recalls children asking the guards questions
12 regarding how long they would be there, where they would be sent, or if they would see
13 their families. Every time, the guards said they did not know, and that it was not their
14 responsibility—they were not the ones who decided to come to the United States. She
15 learned she was being transferred when she was summoned and asked to leave the cell. She
16 was transported to the airport with three other girls, and was only told that she was going
17 to a “group home.” Maria remembers that when she left, children who were in the detention
18 facility even before she arrived were still there, detained at the same facility.

19 40. Ana is 15-years old and originally from El Salvador. She was detained at a
20 border detention facility for ten days. She came to the United States with her older sister,
21 who is 19-years old, and was separated from her almost immediately by immigration
22 officials, who drove them to different places. She did not get a chance to say goodbye to
23 her sister and, as she was recounting the separation, she was visibly upset and said that she
24 still has not spoken to her sister and does not know where she is now.

1 41. Ana does not know the name of the detention facility where she was taken or
2 where it was located. Upon arrival, she was told to line up for a shower. She was given
3 temporary clothes, while her own clothes were laundered. This was the only shower she
4 was allowed to take for the ten days she was detained there.

5 42. Ana met kids at that detention facility who had been there about 16 days.
6 Although she primarily was held in an area with older children and separated by gender,
7 she did see some younger children including a child who looked as young as five-years
8 old. Mothers and their children were kept together but in a separate room. Ana referred to
9 the detention rooms as looking like cages (“jaula”).

10 43. The “cage” that Ana was detained in was almost bare, without any furniture.
11 She was given a green sleeping pad and “aluminum” blanket. It was freezing cold in the
12 room, and the lights were always on—even at night. They were only given aluminum foil
13 blankets to cover themselves. About 50 to 70 kids were placed in the same room, which
14 was too small to hold that many people. It was difficult to lie down with that many people
15 in such a small room. Ana could not sleep a full night for the ten days she spent in the
16 detention facility.

17 44. If kids were talking at night, or if they were not sleeping like they were
18 supposed to, the guards would punish them by making them stand up in another room until
19 they were ready to sleep.

20 45. The only food she was given during the ten days she was detained was
21 burritos. They would feed everybody the same burritos three times a day. Sometimes a
22 snack was provided at night. Ana said the burritos were not good, so she did not always
23 finish them and was usually hungry. They had to sit on the ground to eat them since there
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1 was no table or chair to sit on. Everybody who was detained at this facility was fed the
2 same type of food, burritos. The babies were given milk (powder, maybe formula).

3 46. These meal times were also the only time they would be given a water bottle.
4 Ana could not ask for more water separate from those meal times. Ana was thirsty while
5 detained because she only got three small water bottles a day, provided during meal times.

6 47. Ana said no one was ever given a toothbrush or toothpaste. Ana did not have
7 a chance to brush her teeth the entire ten days she was detained by CBP. There was also
8 not one time that the guards took the children and women outside to be able to play or
9 spend time outside. There was a TV, but no toys or entertainment games or books available,
10 so the hours were very long and boring—with little to do except being scared. The CBP
11 officers were very angry all of the time. She was afraid to ask them for anything because
12 they always yelled at them. Ana saw two officers yell at a seven-year old girl, cursing at
13 her, because she would not stop crying. They used swear words that Ana did not feel
14 comfortable repeating to interviewers.

15 48. Juana is 16-years old and originally from Honduras. She came to the United
16 States in June of 2019 with her younger brother. They were held in a detention facility in
17 McAllen, Texas where she was kept for nine days.

18 49. The room where they were detained was large and divided by metal fencing
19 (similar to chain-link fence) into eight cells, with each cell being about 6 x 10 feet. Juana
20 does not remember how many children shared the cell, but recalls that there were so many
21 kids in her cell that at any given time, some had to be standing. During the day, they were
22 separated into cells by nationality, and at night they were separated by age. The ages of the
23 children at the facility ranged from approximately five to 18-years old. The lights were
24

1 kept on all the time. The guards did a roll call at the following times every day: 6 a.m., 12
2 p.m., 3 p.m., 10 p.m., and 3 a.m.

3 50. There were no beds or mats in Juana's cell. The children were not given
4 blankets or pillows, just an aluminum foil blanket that was given to them in the evening
5 and taken away and thrown in the trash every day at 4 a.m. Those that tried to keep the foil
6 blanket for use during the day because they were cold would be yelled at by the guards.
7 There was not enough room for everyone to lay down to sleep. Those that did lay down
8 had to scrunch up their bodies because there was not enough room to extend their legs.
9 Juana felt that the guards intentionally tried to deprive them of sleep with the roll calls at
10 10 p.m., 3 a.m., and the 4 a.m. wake up to take their blankets away. She found it very
11 difficult to sleep because of these conditions.

12 51. The food consisted of burritos for breakfast and lunch, and a sandwich for
13 dinner, with a small bottle of water at each meal. Juana said that as far as she saw, all of
14 the children in the facility ate the same food, except for kids who were being punished by
15 being kept in solitary cells. Those kids were only given an apple and a bottle of water at
16 breakfast and lunch, and a sandwich for dinner. Juana said that she would get more water
17 if she asked for it, but the water looked dirty and tasted weird, like dirt.

18 52. Juana said that they did have access to showers but that they were all scared
19 to take showers because they did not want to miss a roll call. She heard from guards and
20 other kids that if they missed a roll call, their time in the detention facility would be
21 extended. For that reason, she only took a shower on her last day. For the nine days she
22 was detained, Juana was not allowed outside. Children were not given any type of
23 recreational activities.

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1 53. Juana recalled many negative interactions with the guards. She said that
2 younger kids (around seven or eight-years old) were often put in even smaller cages by
3 themselves if they misbehaved or were restless. They would be kept in this solitary
4 confinement for two days and fed an apple and water for each of the first two meals, and a
5 sandwich at dinner. Juana felt that this was not fair because “it was a scary situation and
6 young kids by nature are restless and have lots of questions.” She was personally pushed
7 once by a guard, which she also considered unnecessary. Juana was visibly upset and
8 uncomfortable in the parts of the interview in which she talked about the border detention
9 facility, compared to when she was speaking about her experience in the Washington State-
10 licensed shelter.

11 54. Carmen is 17-years old and originally from Guatemala. She came to the
12 United States in June of 2019. Carmen recalls the first officers she encountered were very
13 rude to her, and kept saying that they were tired of receiving immigrants. The officers were
14 very aggressive in the way they spoke to Carmen, which scared her. The officers drove
15 Carmen to a detention facility. She does not know the facility’s name or where it was
16 located. She was kept in detention for eight days, the entire time wearing the same clothes
17 she arrived in.

18 55. Carmen described the detention facility as a big room with no window to the
19 outside. It only had a small window that looked out to a hallway and the rest of the facility.
20 There were about 70 people detained in this room, they were all female, adults and minors.
21 Carmen remembers a nine-year old girl who was there alone, without parents or family
22 members. That girl had arrived in the United States with Carmen, and she was detained in
23 this room as long as Carmen was, for eight days. Carmen remembers that the nine-year-
24

1 old girl did not eat anything after arriving at the detention center and said her stomach was
2 hurting. She was taken to the infirmary and only came back after four days.

3 56. Carmen said that there was not enough room for everyone who was detained
4 to lie down at the same time. Officers said that only minors under the age of 12 could lie
5 down in the thin mats that were available. The rest had to sit on narrow benches or on the
6 floor. But there were not even enough mats for all the kids under 12. Most of the nights in
7 which Carmen was detained in the facility, she noticed many kids under 12 did not have a
8 place or mat to lie down, so their parents would lay them on the bare benches so they could
9 rest. Carmen could not sleep for a full night during any of the eight nights she spent in this
10 facility. She tried to get some sleep each day, but it was difficult either because officers
11 interrupted them, there was noise, or because the lights were always on. Carmen could not
12 tell night from day in that location because the lights were never turned off. The officers
13 would wake them up at around 1 a.m. and again at 7 a.m. to give them burritos.

14 57. Carmen said that the temperature in the facility was very cold because the air
15 conditioner was always on. The officers gave them aluminum blankets to cover themselves
16 but it was not enough. Carmen had a sweater when she came to the detention facility but it
17 was taken away from her when she arrived and the officers would not return it to her even
18 though it was so cold. No one was allowed to keep their sweaters. Carmen remembers
19 mothers complaining about the cold temperatures because their kids were getting sick. An
20 officer would then grab the air-conditioner remote. After that, the room would get colder,
21 as if the officer had been annoyed by the request and decided to lower the temperature even
22 further.

23 58. The only food Carmen was given during the eight days she was detained was
24 burritos. The guards would feed everybody a burrito at 7 a.m., 1 p.m., 7 p.m., and at 1 a.m.

1 Carmen said this was not enough food and she was usually hungry. Everybody who was
2 detained at this facility was fed the same type of food, burritos, except kids under 12-years
3 old, who also got cookies and a little box of juice. The babies were given milk (powder,
4 maybe formula) about four times a day. Mothers who asked for more milk did not get any.

5 59. Carmen recalls there were some little kids who were sick with colds or flu and
6 their moms asked officers for medicine, but their requests were unanswered. Women would
7 knock on the door of the room they were held in to get the officers' attention and ask them
8 for medicine or baby formula, but officers would just open the door, laugh at their request,
9 and shut the door closed again. Since officers did not pay any attention to any of their
10 requests, people stopped complaining or asking for things.

11 60. Carmen said that in the room there was a gallon of water available for people
12 to drink, but the water tasted like chlorine. Carmen was thirsty while detained at this place
13 because she could not drink much of that water, it tasted too much like chlorine.

14 61. There was one toilet inside of the room where Carmen was held. The toilet
15 was separated by a low wall that was as tall as Carmen's waist. Since the room was so
16 crowded and a lot of the women were standing, there was no privacy to use the toilet since
17 it had no doors or walls around it. The women would use the aluminum blankets they were
18 given to try to cover the toilet and have some more privacy. There was a sink in the room
19 with running water to wash your hands after using the toilet, but no soap.

20 62. Carmen was able to shower twice in the eight days she was detained at this
21 facility. The first time was three days after she arrived and the second was right before she
22 was transferred to Washington State. They gave her soap, but no towels to get dry. Instead,
23 they gave her a paper towel to dry herself. They also did not give her shampoo, or a comb,
24 so she was not able to wash or comb her hair for the eight days she was there. She was also

1 never given a change of clothes, so after showering she would put back on the same clothes
2 and underwear in which she came from the border. Everybody at that facility was wearing
3 the same clothes they arrived in, so everyone's clothes were dirty and smelly.

4 63. Carmen said no one was ever given a toothbrush or toothpaste. Some people
5 arrived to the facility with their own toothbrush or toothpaste, but they were taken by the
6 officers and thrown away. No one was able to brush their teeth while detained there.

7 64. In the eight days that Carmen was detained in CBP custody, they never took
8 her or the other children or women outside. There was no TV, toys, games, or books
9 available, so the hours were very long and boring. Carmen spent her time worrying about
10 when she would be released and where CBP would send her, but no one would give her
11 that information even when she asked.

12 65. Instead, officers would make fun of them, saying that they were all going to
13 be sent back to Mexicali. Carmen was very afraid of this possibility, because she had heard
14 horrible stories about how dangerous Mexicali was and she did not know anyone in Mexico
15 who could help her. She had heard that immigration agents would just drop people there
16 without money or anything, which put them in a lot of danger. Officers would laugh and
17 tell them: "welcome to the U.S., you're all going to be sent back to Mexicali, but at least
18 you got to see what the U.S. looks like," referring to the detention facility.
19 Carmen remembers that officers made detainees sign documents without explaining to
20 them what they were signing and then they got deported. She believed people were
21 agreeing to be deported back to Mexico without knowing what they were agreeing to when
22 they signed those documents.

23 66. Carmen said interaction with the officers was very scary. She remembers that
24 officers once yelled at the women in her room because they were trying to look out the

1 little window to the hallway. Through the window, the women had seen a man fall to the
2 floor in the hallway and they wanted to find out what was going on. The officers yelled at
3 them to not look outside, saying they had to just sit or stand there quietly. Carmen said it
4 was really tough, all these people locked up and crowded together in this room for eight
5 days without anything to do, and they were not even allowed to look out the window.

6 67. Ricardo is 16-years old. He was detained at a border detention facility in Baja,
7 California, the name of which he does not remember, for six days in early February of
8 2019. Ricardo said he was kept in a room that he described as small, roughly 7 x 12 feet,
9 that he shared with 25 other kids from the ages of 15 to 17. He said it was so cramped that
10 some had to stand at any given time. There was not enough room for everyone to sit or lie
11 down at the same time. There were no windows in the room and the ceiling lights were
12 always on. There were no beds, just approximately three-inch mats for them to sleep on.
13 There were not enough mats for all of the kids in the room since there was not even enough
14 room for all of them to lie down at the same time. There were no blankets or pillows; they
15 were given aluminum foil blankets to try to keep warm.

16 68. Ricardo said it was nearly impossible to sleep because the guards would wake
17 them up every few hours during the night. He said it was a roll call that they would do at
18 12 a.m., 3 a.m., 6 a.m. and 9 a.m. He felt that the guards were intentionally depriving them
19 of sleep by doing roll call in the middle of the night.

20 69. During the six days that Ricardo was detained at this facility, the food he was
21 given was cold, small burritos for breakfast, lunch, and dinner. All of the kids in the room
22 ate the same thing for every meal.

23 70. Ricardo said there was a toilet in the room, but there was no privacy because
24 the walls were short and there was no door. They would use their aluminum foil blankets

1 to cover themselves if they needed to use the toilet. He was not given a toothbrush and was
2 told by the guards that it was for safety reasons, so he did not brush his teeth for six days
3 straight.

4 71. Ricardo said he arrived to the facility with a fever and did not see a medic
5 even though he told the guards that he was ill. He was not given any medicine. The fever
6 eventually went away on its own. The interviewer noted Ricardo seemed upset and
7 uncomfortable recalling his time at this detention facility, which was different from his
8 more calmed reaction to other parts of the interview where he discussed the conditions at
9 the Washington-State licensed facility.

10 72. Margarita is 16-years old, originally from Honduras, and she is five-months
11 pregnant. She arrived to the United States at the end of April 2019. She was taken directly
12 to a detention center and she was not given a change of clothes even after she asked. She
13 had to remain in her clothing, which had gotten wet, but eventually dried, the entire time
14 she was there. She was not allowed to shower until her last day, at which point the guards
15 also gave her a new set of clothes. She then realized they had a large quantity of extra
16 clothes that they could have given her when she was asking for them some days prior.

17 73. Margarita was kept in a room approximately 15 x 10 feet, that she shared with
18 nine to ten other girls between the ages of 12 and 17. She said that all of the kids in the
19 facility looked sick and weak. They did not have beds to sleep on, they were only given
20 very thin mats, similar to yoga mats. They did not have blankets or pillows, but were given
21 aluminum foil blankets. There were windows to other areas inside the facility, but no
22 windows to the outside. The only way she knew if it was day or night was because of the
23 morning roll call by the guards. Margarita was not able to sleep well for a variety of
24

1 reasons, mainly because of how cold it was and a lack of blankets to help keep them warm,
2 and also because the lights were never turned off at this facility.

3 74. The meals in the facility consisted of cold burritos and juice, twice a day.
4 Margarita recounted that the guards would throw the food on the ground at the children, as
5 if they were animals. There often was not enough food distributed to her room, so fights
6 would break out amongst the kids over the food. She remembers a fight over food where
7 one of the guards grabbed a kid by the neck to get him to stop fighting. Margarita said the
8 drinking water at the facility looked clean but had a dirty taste.

9 75. Due to her pregnancy, Margarita's stomach was sensitive, resulting in her
10 throwing up the burritos. She asked the guards if they had any other food and they said no.
11 She explained to them that she was pregnant and could not keep down the food they were
12 giving her and that she felt weak. She asked if they could give her milk or "suero" (a
13 fortified drink, like Pedialyte) and they told her that she needed to eat what she was given,
14 and if she didn't like it "that's too bad." The guards warned Margarita that if she did not
15 stop asking questions, they were going to deport her.

16 76. Margarita mentioned that there were two girls in her room that were sisters,
17 around the ages of 16 and 17, who had been in the detention facility for a month. The
18 guards seemed to favor these sisters and gave them snacks whenever they asked for them.
19 She also mentioned that when she first arrived at the detention center, there was a girl
20 around 17-years old who had a baby that looked very sick and pale. The girl had asked the
21 guards for milk and medicine for the baby and the guards said they did not have any of
22 that.

23 77. Margarita said there was a toilet in the room, but it did not have a door and
24 had short walls around it. The girls would use their aluminum blankets to cover the door

1 gap, for privacy. Additionally, there was a camera in the room, right in front of the
2 bathroom. Margarita said she felt uncomfortable using the bathroom because the camera
3 was right there. During the whole time at this facility, Margarita was not given a toothbrush
4 or toothpaste.

5 78. Margarita describes the guards as rude and intimidating. If she or any of the
6 other kids tried to ask them a question, the guards would ignore them or say something
7 mean. When the kids would tap the guards to get their attention, some of the guards would
8 make comments like, “don’t touch me, I don’t want to get your diseases.” Margarita felt
9 the treatment by the guards was unnecessarily mean and degrading. Throughout the
10 interview, she mentioned multiple times that they were treated like animals by the guards.

11 79. Manuel is 17-years old and originally from Honduras. He arrived in the United
12 States in January 2019. After arriving, he was driven several hours to the detention facility
13 he referred to as the “perrera” (dog kennel). He was detained at the perrera for about
14 24 hours, which he described as one big room that was divided into jail cells by metallic
15 wire divisions.

16 80. Manuel estimated there were around 100 people in each of the jail cells. In the
17 cell where he was placed, there were only minors, some as young as six-years old. Some
18 of the younger kids were alone, without their parents or any family member. He also met
19 a 16-year old kid who said he had been detained there for about a week.

20 81. Manuel said that no one was given a mat to sleep on, people had to lie on the
21 bare cement floors. Some girls could lie on top of pieces of plastic sheeting. There was not
22 enough space for everyone to lie down. If some people were laying down, the others would
23 have to stand or sit. Manuel also said the perrera was very cold because the air conditioner
24 was on all the time, and they only had aluminum blankets to keep themselves warm.

1 82. In the 24-hours that he was detained at the perrera, Manuel said that the only
2 meal anyone was provided was one sandwich. Manuel said the sandwich was awful; the
3 bread was very hard and tasted like dirt. Manuel was hungry while detained at the perrera.
4 Manuel said he was also only given one bottle of water in the 24-hours that he was detained.
5 There was no more drinkable water available for anyone as far as he could see. One bottle
6 of water was not enough for the full day so Manuel was also thirsty.

7 83. Manuel explained they had toilets inside the jail, but there was no privacy to
8 use them. There was only a low wall dividing the toilet from the rest of the room, so
9 everyone who was standing up could see you. For those reasons, he did not use the toilet
10 while he was detained at the perrera. To wash their hands, they only had a sink with running
11 water, no soap was available.

12 84. Manuel said the officers were rude. He remembers specifically how one of the
13 officers, after learning Manuel's name, laughed and said his name was ugly, which
14 offended Manuel. Manuel saw a boy get ordered by the officers to strip down to his
15 underwear. The officers then threw away all of his clothes, leaving the boy with only a t-
16 shirt on for a while.

17 85. Manuel said he was sick with a cold and fever while he was detained at the
18 perrera but he did not receive medical attention.

19 86. Manuel said that within that same building where he was detained, there was
20 a smaller room that they called "la hielera" (icebox) because it was so cold. Manuel said
21 that kids would be sent to la hielera as punishment. La hielera did not have a bathroom
22 inside and people would have to call for the guards every time they wanted to go out to use
23 the bathroom. Manuel said that no one wanted to be moved to la hielera because it was so
24 cold, and because no one wanted to depend on the guards to have access to the toilets.

1 87. Pablo is 14-years old and originally from Honduras. He arrived to the United
2 States in November 2018, and was detained at a CBP border facility in Texas for eight
3 days. He came to the U.S. with his 24-year old cousin, but they were separated into different
4 rooms at “la hielera” (the icebox). Pablo was not allowed to talk with his cousin until the
5 third day of detention, when his cousin was being transferred to another facility.

6 88. Pablo described the room where he was detained as a small room where he
7 was kept with five or more kids. For the eight days he was detained, he was not provided
8 a mat or anything to sleep on. Kids would have to sit or lay on blocks of cement about two
9 feet tall that were placed up against three of the rooms’ walls. The kids used the cement
10 blocks as benches to sit or sleep on. The children were only given an aluminum blanket to
11 cover themselves. He said the lights were left on all the time so he could not sleep very
12 much.

13 89. Pablo said everyone was fed the same amount of food three times a day,
14 usually burritos or a cup of soup. Pablo said no one was allowed to get more food, so he
15 remembers being hungry every day during the eight days he was detained.

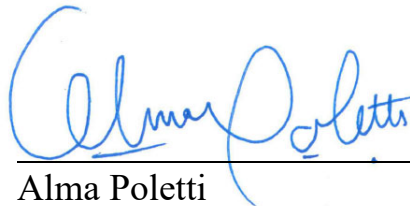
16 90. Rafael is 12-years old and originally from Honduras. He entered the United
17 States in June 2019 and was detained at the border for eight days. While at the detention
18 facility, Rafael was given the chance to take showers. There was soap and shampoo
19 available in the showers, but the shampoo was for dogs. He distinctly remembers that the
20 shampoo bottle had a picture of a dog on it.

21 91. These summaries represent some of the details learned during Washington
22 State’s interviews with 22 children detained by CBP at the border from August 2018 to
23 July 2019. It was obvious to interviewers that most of these children were upset and scared
24 by the conditions and their treatment in CBP custody. By contrast, the children described

1 their treatment in the state-licensed facilities to be much better. They had access to food in
2 adequate amounts, educational materials, recreation, doctors, and generally reported being
3 well-treated by staff. The differences between the kids' described conditions in the CBP
4 detention centers versus the state-licensed facilities were stark, and interviewers noted
5 signs that could be the result of trauma while children recounted their times at the border
6 facilities.

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

9 DATED this 23rd day of August 2019, at Seattle, Washington.

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11 
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Alma Poletti