Exhibit 1

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

STATE OF WASHINGTON, et al., Plaintiffs, v. DONALD TRUMP in his official capacity as President of the United States, et al., Defendants.	NO. 2:18-cv-00939-MJP DECLARATION OF TAYLOR LEVY IN SUPPORT OF THE STATE OF WASHINGTON

I, Taylor Levy, declare as follows:

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

2. I am the Legal Coordinator for Annunciation House, a charitable nonprofit in the El Paso-Juarez border community. I have worked and volunteered with Annunciation House for almost nine years, and been in my current position since January 2017. I am a Fully Accredited Representative, which is an alternative accreditation that allows me to represent clients in immigration proceedings before the Executive Office of Immigration Review (Immigration Court). I frequently represent clients in Immigration Court who are seeking relief

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from removal through asylum, withholding of removal, cancellation of removal under the provisions of the Violence Against Women Act, and other forms of immigration-related relief. I have also recently graduated from law school.

3. I have been working on immigration issues along our Southwestern border for much of my career. For example, in the summer 2014, we began seeing a migration surge of asylum seekers along our border communities. At that time, I first worked with Annunciation House to coordinate an emergency humanitarian response to large groups of asylum-seeking family units released on recognizance by Immigration and Customs Enforcement (ICE) in the El Paso area. In August 2014, I changed roles to become part of the emergency pro bono immigration legal team through Las Americas Immigrant Advocacy Center, providing representation to asylum-seeking mothers detained with their children in Artesia, New Mexico. I spent approximately five months in this role, traveling from El Paso to Artesia three days per week.

4. The El Paso and Ciudad Juarez metropolitan area where I work is the biggest border community in the world. The combined population of both cities is close to 3 million people. El Paso and Ciudad Juarez are one of the main Southwestern border entry points into the United States. Through my work, legal training, and physical proximity, I am familiar with the conditions in our border community and interact daily with immigrants who have entered the United States through the El Paso ports of entry.

5. Annunciation House is an independent organization rooting in Catholic social teaching that accompanies the migrant, homeless, and economically vulnerable peoples of the border region through hospitality, advocacy, and education. From its beginnings, Annunciation House has sought to serve the most vulnerable people in our community. Migrants and refugees, who often cannot receive services from most established social agencies, have become the primary focus of our work over the years. Aside from our Executive Director and me, Annunciation House operates with an all-volunteer staff.

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6. Annunciation House has been located in El Paso/Ciudad Juarez since 1978, and it operates three houses of hospitality for migrants and refugees. Apart from our general population of guests, we also typically receive and serve 10,000-15,000 immigrants a year as they are released from ICE custody. Many of these people travel on to other points in the United States within a day or so, to stay with family as their immigration cases proceed.

7. **Annunciation House** is the entry point for most of our guests. It hosts guests with short-to mid-term needs, who stay for weeks to months. These range from people who have come to the US seeking work, to those who have fled violence and extortion in their home countries, to undocumented families living in El Paso who have come upon financial hardship.

8. **Casa Vides** is a longer-term house of hospitality primarily for guests with ongoing needs, such as political asylum cases or other immigration proceedings, or medical situations. Casa Vides also provides hospitality to a number of Mexican nationals, widows of U.S. citizens, who must spend a certain amount of time in the U.S. each year to collect the Social Security benefits to which they are entitled.

9. Additionally, since 2014, Annunciation House has overseen approximately one dozen different "overflow shelters" that serve our very short-term guests that have just been released from ICE custody. The overflow shelters are primarily located in churches and community centers, and they operate on a rotating basis depending on current needs and volunteer availability. The guests in these overflow shelters typically stay just 1-3 days, long enough to address their basic needs and connect with family or friends elsewhere in the U.S. These overflow shelters have high turnover and unpredictable numbers, with the guest population entirely dependent on ICE's release schedule each week.

10. In the summer and fall of 2017, I began to see a significant increase in clients that had suffered family separation in the El Paso area, meaning that parents were arriving at the border with their children but being separated and detained by immigration officials for long periods of time without reunification. Other advocates in our community reported similar

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increasing separations during this time. This increase was later confirmed to be due to a shift in Department of Homeland Security (DHS) policy.

11. Specifically, Annunciation House is a member of the Borderland Immigration Council, a coalition of immigration attorneys and advocates. On Oct. 24, 2017, the Borderland Immigration Council met with government officials in El Paso about immigration. It is my understanding that representatives from Customs and Border Protection (CBP), ICE, and DHS were present at that meeting and that they claimed that the new CBP policy was to separate children over 10 from their parents when they were taken into custody.

12. During this time, I worked directly with two women (B. and J.), who had been separated from their children soon after entering the country. Both women were being detained in the El Paso Service Processing Center after having been separated from their minor children and charged criminally with illegal entry after having been apprehended in the El Paso area.

13. I began visiting J. first in the late fall of 2017, after she made multiple calls and sent letters to Annunciation House requesting assistance. I met with her for several months in detention while attempting to place her case with alternate counsel due to a lack of capacity within my own workload. I spoke about her case with various attorneys working with national organizations as I sought counsel. I visited J in detention numerous times for several months, including on Christmas morning; she was always despondent. I spoke to her son's case workers and legal team in Chicago and kept them informed of my ongoing efforts to assist J.

14. In January 2018, I was finally successful in securing immigration legal representation for J through a joint partnership between Linda Rivas of Las Americas Immigrant Advocacy Center and Innovation Law Lab. I then stopped working on the case. I know that she ultimately became one of the named plaintiffs in a lawsuit in the Southern District of California seeking reunification.

15. In April 2018, J was granted a bond from an Immigration Judge and began living at Annunciation House. J has lived at Annunciation House since that time. It took more

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than two months for J to be reunited with her son, who was being detained in Chicago, even with the assistance of Annunciation House, Las Americas, and the ACLU.

16. In approximately January 2018, I also began assisting with the case of B, another woman who had been separated from her minor child in the fall of 2017 after being criminally prosecuted for illegal entry following apprehension in the El Paso sector. I began working on her case as an unpaid "on-the-ground" consultant for her immigration lawyers from ALDEA-The People's Justice Center, an organization headquartered out of Pennsylvania. I visited with B in detention and consulted with her attorneys. B was eventually granted an immigration bond in March 2018 and came to stay at Annunciation House. She has since reunited with her family outside of El Paso.

17. Following B's release from detention, on March 12, 2018, Annunciation House held a press conference to decry the practice of family separation. The press conference included the Annunciation House Director, Ruben Garcia; an Assistant Federal Public Defender, Sergio Garcia (B's criminal attorney); Christina Garcia from Las Americas Immigrant Advocacy Center; private immigration attorney and member of the Borderland Immigration Council Eduardo Beckett; B; and myself.

18. Following the Press Conference, a journalist, Angela Kocherga, from the Albuquerque Journal reached out to DHS for comment. The following was published in that article: "DHS does not currently have a policy of separating women and children," said Tyler Houlton, acting DHS press secretary in an emailed statement. "However, we retain the authority to do so in certain circumstances – particularly to protect a child from potential smuggling and trafficking activities." *See* https://www.abqjournal.com/1145759/advocates-decry-immigration-tactic.html. I also read other articles in the press reporting similar statements denying family separation from DHS spokespersons.

19. I am aware that on or about May 7, 2018, the press reported on an internal DHS memo that confirmed that DHS had piloted a secret test of the family separation policy in the

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El Paso area during July–November 2017. These news reports confirmed what I had observed: that DHS was intentionally separating families as they entered at the El Paso border as a deterrent to future immigrants. These news reports coincided with Attorney General Sessions' formal announcement of the "Zero Tolerance" border prosecutions policy, which effectively mandated family separation along the entire border. *See* https://www.texasmonthly.com/news/homeland-security-promises-to-prosecute-100-percent-of-illegal-immigration-cases/

20. After the announcement, I began to hear reports from other border areas that CBP and ICE were systematically turning asylum seekers away from ports of entry in other Southwestern border communities. I initially dismissed these reports as arising from a few individual CBP officers who were acting unlawfully, as I did not see a similar pattern in our El Paso community. While as early as the fall of 2016, I had heard some anecdotal reports of "metering"– a term that is frequently used to describe techniques to slow the number of asylum applicants who enter at any one time – at El Paso points of entry, I believed that these were isolated incidents.

21. During a press event in May 2018, I responded to a reporter's question by stating my belief that local ICE and CBP officers were not refusing to accept asylum seekers in our area. At that point, a nun from our community who was sitting in the audience raised her hand and offered that she had observed such refusals on the Paso del Norte, El Paso's main port of entry. That week, Annunciation House received a noticeable smaller number of ICE releases. Because of the week of lower client numbers, coupled with the reports from colleagues in other areas, increasing rumors in our community, and the nun's remarks, I decided to observe for myself what was occurring at the Paso del Norte.

22. On May 25, 2018, at approximately 9:30 a.m., I went to the Paso del Norte alone to observe. The Paso del Norte is the main bridge into El Paso from Mexico, and to the best of my knowledge, it sees more than 10,000 pedestrians crossing per day, traveling between

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the two countries. When I arrived that morning, there were CBP officers stationed near the middle of the bridge—where the border line is—but actually standing in a shady spot 5-10 feet onto U.S. soil. I observed them for approximately two hours, including during a few apparent shift changes when different CBP agents relieved the agents stationed at the middle of the bridge.

23. During those two hours, I watched the CBP officers conduct "random" identification checks of people crossing the middle point of the bridge. The officers did not appear to have a system (e.g., every ten people) for the checks; instead, to my observation, they primarily stopped those entrants who appeared to be Central American, particularly shorter, darker skinned people. During that time, I watched them turn away two people. I then approached those two people to ask what had happened; neither identified themselves as asylum-seekers. One was seeking assistance with obtaining medical records and the other said that he was simply waiting for a friend and had accidentally walked too far on the bridge.

24. At around 11:30 that morning, I watched a short, dark skinned man with a child approach the border and cross the middle of the bridge at the border line and into the United States. The CBP officers stopped the man. While I could not initially hear what they were saying, I watched them gesture to him to go back. As I watched, the CBP officer gestured forcefully again three times to the man to turn back and cross the border back into Mexico. I heard the CBP agent say to the man, "para alla" ("go there"), while gesturing forcefully towards Mexico. The man finally turned back.

25. When the man crossed back across the border line back into Mexico, I stopped him and introduced myself. He began shaking and crying. He told me that he was fleeing violence in Guatemala with his six-year-old son and that he had come to request asylum. As I had observed, he was prevented from presenting his claim by the CBP officers who he said told him to go away and that he cannot seek asylum. We stood and spoke for a while about what had happened and his intentions to seek asylum. The man was very afraid to return to

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Mexico or to Guatemala. After this discussion, I offered to accompany him if he wanted to enter again to present his asylum claim.

26. Together, the three of us began walking back across the middle point of the Paso del Norte Bridge. As we passed the border line at the middle of the bridge, and came into the United States, the same CBP officers stopped us. "Didn't we already tell you to go back?" one of them said to the man. They once again asserted that he could not come in to the United States.

27. I explained to the CBP officers that I was accompanying the man and his son in their attempt to lawfully assert a claim for asylum. Our conversation escalated, and the CBP officers called on their radio, saying "we have some noncompliants here," "we need a supervisor," and requesting additional support. Shortly thereafter, additional officers arrived, for a total of the two original CBP officers and four supervisors. They repeatedly told the man in my presence that he could not enter and claim asylum, that he and his child had to "wait until there was space" and similar statements.

28. During the course of our conversation, the CBP agents, including supervisors, made the following statements to me or in my presence: "We have orders not to let anybody in. As soon as we have room, yea." "We have an order." "This is a policy across the border." "There is no room for them right now. You can wait in line. Once there is room they can come in." "They can wait until we have room for them." "It's an order from Sessions."

29. After I protested that the refusal was unlawful and that the man was already on American soil, the CBP officers eventually relented and allowed the man and his son to proceed to have their asylum claim entered for processing.

30. After this incident, the two men I believe to be CBP supervisors pulled me aside and said, approximately, "we're all good now, right? We are being told to do this. We have bosses too."

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31. Two days later, the man and his son were released from ICE custody pending resolution of their asylum claims. I believe that had I not been present and willing to directly advocate for their right to present their claims at the port of entry, that CBP officers would have continued to deny them entry until they either gave up or attempted to enter elsewhere.

32. This experience was very upsetting on a personal level, as someone who has dedicated her work to immigrant communities and the law. I had only just recently graduated from law school a few days earlier and was shocked to hear CBP agents refusing to allow this young man and his small child to be processed properly in accordance with the law. It was especially infuriating to be told by the agents that there was no space to process these people when I knew personally from my work with Annunciation House that this was simply not true. Regardless, even if there was an actual lack of capacity at the bridge, the Immigration and Nationality Act and U.S. treaty obligations do not allow agents to reject asylum-seekers for alleged lack of capacity, *especially* when already standing on American soil.

33. About a week later, on May 30, 2018, I returned to the Paso del Norte with others, including the Executive Director of Annunciation House, Ruben Garcia, and a local reporter Bob Moore. Again, we went with the express purpose of observing whether CBP officers were refusing to allow asylum seekers to enter the country.

34. We observed a group of about 15 Guatemalan refugees who had reportedly spent the night on the bridge after having been turned away the day before. We spoke with them, and confirmed that all were seeking asylum and had been turned away from the border multiple times. Many members of the group were fathers traveling with their children, but there was also one mother with a three year old child and several unaccompanied minors.

35. After hearing their stories of being turned away, we decided to accompany the mother and one of the unaccompanied minors, a teenage girl, as they tried again to present themselves at the port of entry.

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36. Again we crossed the center of the bridge, over the border and onto U.S. soil. CBP officers stopped us, and told us and the women that there was "no space" and that they would have to come back some other time. In response to my protests that refusing an asylum applicant on U.S. soil is unlawful, again the officers called for a supervisor to assist with "noncompliants".

37. When the supervising officer arrived with other CPB officers, he asserted that the CBP was not "turning people away," but that they were not allowing people to cross until there was space. As we continued to discuss, one of the officers who was carrying a large gun moved to stand very near the mother with her three-year-old son. I observed her to be frightened and intimidated by his behavior, which I believe to have been intentional. The man, who was not wearing a name tag or other identification, then deliberately discharged his Taser at the ground right in front of us.

38. After more discussion, the CPB officers finally agreed to accept the women for asylum processing; once again, this seemed to occur in part because I pointed out that we were already standing on U.S. soil. Before we escorted them to the processing area, we saw one of the fathers and two other boys from the group standing on the U.S. side of the border. We explained to them that they did not have to leave, and were entitled to have their asylum applications heard. We left to accompany the other women to the processing area, leaving the other asylum-seekers behind. I did not return later to the bridge myself, but heard from Ruben Garcia and another Annunciation House volunteer that when they returned approximately an hour later with food and water, they could not find anyone else from the group.

39. Bob Moore, who was present, reported on these events. *See* Bob Moore, *Border Agents are Using a New Weapon Against Asylum* Seekers, Texas Monthly (June 2, 2018), *available at* https://www.texasmonthly.com/politics/immigrant-advocates-question-legality-of-latest-federal-tactics/**,** attached hereto as **Exhibit A**. I read the article at the time it was

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published, and both then and now I believe it to be an accurate recording of the events that he describes.

40. On or about June 20, 2018, I again went to Paso del Norte Port of Entry to observe and accompany asylum-seekers with Ruben Garcia. While I was walking across the bridge, I once again observed CBP officers stationed at the center of the bridge and checking documentation.

41. We crossed into Mexico and met up with two families of asylum-seekers who had previously been denied entry by agents stationed at the middle of the bridge. Annunciation House had become aware of these families through our contacts with nongovernmental humanitarian organizations in Ciudad Juarez. The two families were Mexican asylum-seekers with small children and they had agreed to allow the press to document the process of trying to seek asylum at the Paso del Norte Port of Entry.

42. There were approximately 30 reporters who joined us as we accompanied the two families across the bridge. At the middle point of the bridge, CBP agents once again turned us away, stating that they had no space. Several news outlets have published reports and video of the encounter. The agents did tell us that we could wait until there was space, and the two families were eventually permitted to cross the border onto U.S. soil and be processed as asylum-seekers.

43. Since the formal announcement of DHS' family separation policy, Annunciation house has seen a great number of separated parents. Many of these parents report that it was only when they had been turned away at the port of entry – sometimes multiple times – that they attempted to cross elsewhere and were prosecuted for unlawful entry.

44. For example, on June 29, 2018, I interviewed a young woman from Guatemala who was recently released from ICE custody after paying an immigration bond. She has not seen her 3-year-old daughter in more than 2 weeks. This young woman explained to me that she spent 2 days and 2 nights on the Paso del Norte Port of Entry with her 3-year-old trying to

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present herself for asylum-processing. She told me that she was turned away by the agents at the middle of the bridge several different times during those two days. Finally, someone walking on the bridge suggested that she instead try walking against pedestrian traffic on the other side of the bridge to present herself that way. Out of desperation—after having spent 2 days in the hot son on the bridge with her 3-year-old—this young woman decided to follow the man's advice. She crossed the bridge horizontally and began walking against the pedestrian traffic leaving the U.S; this was in broad daylight. She was quickly apprehended by CBP agents and charged with unlawful entry even though she was still on the bridge, just walking in the wrong direction. She was then forcibly separated from her daughter.

45. On June 30, 2018, I interviewed a man from Honduras who is currently detained in the El Paso area after having been separated from his 3-year-old son since approximately May 25, 2018. This man told me about attempting to cross the Paso del Norte Port of Entry three times before eventually deciding to enter irregularly. This man told me that during his first attempt, he was not stopped at the middle of the bridge and actually made it all the way to building at the end of the U.S. side of the bridge where he waited in line and presented himself for asylum to a CBP agent. The CBP agent ordered him to leave the building, saying they had "orders from Washington" to not allow anyone else in. The man left the building to take his 3-year-old son to the public restrooms right outside; he then returned from the bathroom and got on his knees in front of the CBP agent and begged to be allowed in for asylum processing. The CBP agent yelled at him and told him to get up and leave, while putting his hand on his gun menacingly. The man left. A few hours later, he decided to try and cross again, this time being turned away by CBP agents near the middle of the bridge, but several feet onto U.S. soil. The next day, he tried to cross the bridge once again, but was turned away this time by a Mexican official who was standing near the bridge and told him to leave or her would call Mexican immigration. It was only then that this man decided to attempt to cross the border irregularly.

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46. When ICE releases separated parents from custody here in El Paso, the parents are transported to our facility by bus or by van and dropped off with a 1-800 number for the Office of Refugee Resettlement (ORR) to call to try to locate their children. These mothers and fathers have almost no information about when they will be reunited with their children, and they arrive here terrified and shaken by their experience.

47. For example, on last Sunday, June 24, 2018, we received 32 parents who had been separated from their children. These parents arrived at Annunciation House absolutely despondent. The youngest separated child in the group of parents was only 4 years old, while the average age was 10 years old. The average length of separation was 25 days and the max was 40 days. Ninety-one percent of the parents said that they had never once spoken with their child since separation (though the majority said that their friends or family had been contacted by their children's social workers). Five of the parents reported that no one in their families had heard from the children since separation—they had absolutely no idea about their locations. It took Annunciation House volunteers four days and numerous phone calls to random social workers of other parents to find the location of one of these children; during those four days, we never received a call from ORR despite multiple calls to the ORR 1-800 number.

48. In my experience, ORR generally requires sponsor families who want to host an unaccompanied minor to complete a series of procedural checks. These include criminal background checks, fingerprinting, sometimes a blood test, and detailed financial information. ORR frequently requires a sponsor family to pay for the cost of airfare for the child and a roundtrip ticket for an ORR companion to accompany the child. A true and correct copy of ORR's Family Reunification Packet is attached hereto as **Exhibit B**.

49. The separated mothers and fathers that have arrived at Annunciation house recently are struggling to navigate ORR's reunification paperwork. They are being treated as new ORR sponsors – subject to a host of paperwork and procedural hoops – rather than the

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acknowledged parents of their children. Their social workers are insisting that they would need to file all the Family Reunification paperwork and come up with airfare for their children and ORR escorts before they would see their children again. All of these parents are deeply worried about the ORR process taking too long and being overly cumbersome, especially given their emotional states and long periods of separation.

50. As such, the majority of these parents have decided to travel to their family and friends in other cities across the U.S. Annunciation House is maintaining contact with these parents and attempting to match them with pro bono legal counsel in their receiving communities. We are also attempting to help them navigate the complex ORR bureaucracy.

51. At least two parents have chosen to remain in El Paso while we attempt to reunite them with their minor children (all three of whom are under the age of 10). In the case of these two parents, their minor children are in ORR custody *in El Paso*. However, both parents were originally told by their children's social workers that it was impossible for them to reunited with their children while living at our shelter. I was able to speak to both of these social workers on Friday, June 29, and they told me that they were asking their supervisors about reunification at our shelter. We are currently assisting them with the standard ORR reunification packet, but this seems to be an unnecessary bureaucratic burden—as of today, these two parents have been living at our shelter for an entire week, but they do not have their children back, even though they are in ORR custody just a few minutes away.

52. On Wednesday, June 27, 2018, seven separated mothers arrived at Annunciation house after being released by ICE from three separate jails. These mothers had been told by CBP that they were on their way to be reunited with their children *immediately*; they all believed that their children were already at our shelter waiting for them. When they arrived and realized that their children were not there, they were heartbroken. I personally observed the pain and trauma that they experienced in that moment.

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53. When I interviewed one mother than evening and explained the ORR process, she began to sob, shaking uncontrollably. She said she had stayed strong for approximately thirty days away from her child, but that having her hope dashed that she was going to be reunited with her child that day was simply too much for her to take. I spent close to an hour with her before she was able to stop sobbing.

54. As I explained above, I have been working with the asylum-seeking population in the El Paso area for approximately nine years. I have dedicated my work to this community and have encountered literally thousands of asylum-seeking men, women, and children. I have borne witness to countless stories of rape, torture, and murder. Despite all of this, I have never been as emotionally impacted by anything as intensely as I have been working with these mothers and fathers as they desperately struggle to reunite with their minor children. I simply cannot believe that my government could have done this to these people.

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

DATED this first day of July, 2018 at El Paso, Texas, United States.

TAYLOR LEVY

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Exhibit A

POLITICS

Border Agents Are Using a New Weapon Against Asylum Seekers

Federal law allows immigrants to step into United States and claim asylum; agents are physically preventing them from doing so.

BY ROBERT MOORE

DATE JUN 2, 2018

SHARE

NOTES 159 COMMENTS

agents, asked for documents, and told they would not be allowed to go further into the United States because of capacity issues. So began a tense standoff Saturday that marks an escalation in U.S. tactics to keep immigrants out of the country—including those legally entitled to enter and seek asylum—and relieve crowded immigration facilities that officials say are filled beyond capacity.

"I know you're not at capacity. I know that's what you've been instructed to say," said Ruben Garcia, a 72-year-old who was inspired by Mother Teresa to found Annunciation House in 1976. He has a good handle on how many people are being detained at the bridges, because Immigration and Customs Enforcement eventually releases many of them to Annunciation House. Taylor Levy, a recent law school graduate who is working with Annunciation House, told the agents they were legally required to let the Guatemalans make their asylum claim because they are already several steps inside the country, a boundary that exists at the bridge's apex.

The two CBP agents, whose nametags identified them as Armendariz and Avila, politely but firmly held their ground. Garcia asked to speak to a supervisor, and they made the call. Before the supervisor arrived, another agent came up to the group. His nametag was obscured by a tactical vest and a semiautomatic rifle.

The agents said they had been assigned to check IDs as people cross the boundary line, a highly unusual effort coming at a time when President Trump is expressing increasing frustration that his administration cannot control the nation's borders—a key campaign promise of his. IDs are usually required a couple hundred yards further north, and well into U.S. soil, at the port of entry, where people make citizenship and customs declarations—and apply for asylum. And while the agents at the top of the bridge said they were checking the identification of all people walking across the bridge, Levy noted that the agents weren't checking many IDs other than those of people with the dark skin and threadbare clothing that is typical of many Central American migrants.

New Tactics

Saturday morning, Garcia got a report that a group of Guatemalans was encamped in Juárez after being unable to cross the bridge. He invited me to accompany him and Levy as they investigated. We walked south across the Paso del Norte Bridge, the busiest pedestrian crossing between El Paso and Juárez, and saw two CBP agents standing at the top of the northbound pedestrian lanes. Minutes after crossing into Mexico, we spotted a group of about a dozen people huddled near public restrooms at the Mexican immigration office, one of the few spots offering shade. They told us that they had come from Guatemala and had been turned back by U.S. authorities the previous night.

CBP officials confirmed what Garcia has been hearing from immigrants, both at the bridge on this Saturday and in previous weeks at the Annunciation House shelter.

"Regarding what you witnessed today, U.S. Customs and Border Protection (CBP) is taking a proactive approach to ensure that arriving travelers have valid entry documents in order to expedite the processing of lawful travel," agency spokesman Roger Maier said in an email. "That being said, CBP processes undocumented persons as expeditiously as possible without negating the agency's overall mission, or compromising the safety of individuals within our custody.

"The number of inadmissible individuals CBP is able to process varies based upon case complexity; available resources; medical needs; translation requirements; holding/detention space; overall port volume; and ongoing enforcement actions. No one is being denied the opportunity to make a claim of credible fear or seek asylum. Once space is available and/or other factors allow then CBP officers allow more people into our facilities for processing. This has been occurring intermittently as needed for about a month here in El Paso and other locations as well where the volume of arriving people exceeds the capacity of our facilities."

Garcia, Levy, and other advocates for migrants say federal law prohibits agents from turning away people who say they want to seek asylum, which is a means of legal entry in to the United States. The Immigration and Nationality Act states: "Any alien who is physically present in the United States or who arrives in the United States ... irrespective of such alien's status, may apply for asylum." The

American Immigration Council last year filed a federal lawsuit in California challenging what it said was the Trump administration's efforts to illegally thwart the efforts of asylum seekers. The case is pending.

The group of Guatemalans gathered on the Mexican side of the Paso del Norte Bridge were the latest to be caught up in the Trump administration's efforts to reduce illegal immigration and clamp down on what it sees as exploitation of the asylum process. The group included several men traveling with their sons; a couple of teenage boys traveling without parents or guardians; the woman and her baby; and the 16-year-old girl traveling by herself.

Garcia and Levy introduced themselves and asked the migrants about their stories. They came from different villages but told similar tales of fleeing intense poverty, a corrupt government, and violent street gangs who were trying to dragoon young boys. The men and their sons wept openly as they spoke. The young mother told Garcia and Levy that she had been raped in Guatemala.

The only young girl in the group was more reticent to discuss what caused her to flee her home. "The pieces that she put out there was that she would go to school and then she would lock herself up in her room when she would come back. And I tried to get from her, 'Why do you feel you need to do that?,' and I couldn't get an answer to that," Garcia said.

One man, barely over five feet tall and wearing a tattered orange t-shirt, told Garcia that his two sons had joined him on the trek from Guatemala. But as they attempted to cross the bridge earlier that day, he had gotten separated from his sons, who crossed the bridge while he was turned back. The man sobbed as he told his story.

"He said there was a group of people and they kind of merged in with that group, kind of included themselves in that group. So they got in and he didn't, which is going to create a huge problem for him, huge problems not being with his kids," Garcia said.

Levy and Garcia huddled briefly to determine how to proceed. They decided to focus their efforts on the teenage girl, as well as the mother and child. Garcia told

the group of men and boys a bit about the U.S. asylum process, telling them they had to make such decisions themselves. He and Levy then began walking up the bridge with the mother, her baby, and the teenage girl. That's when they were met by the agents blocking their path at the top of the bridge.

"I'm Following Directions"

After the initial standoff with agents Armendariz and Avila at the top of the bridge, a supervisor arrived. He introduced himself as Agent Gomez and recognized Garcia, who has a long history of working with border law enforcement agencies.

"This mom is saying to me, 'I am afraid to be in my country, I'm afraid to go back to my country,'" Garcia said. Gomez asked, in Spanish, where the three migrants were from, and Garcia said Guatemala. Gomez replied, "OK, well, they're not in Guatemala," meaning they were now in Mexico. Levy corrected him, pointing out that they were standing in the United States.

Gomez told Garcia that he couldn't allow the Guatemalans to come forward because the holding cells at the port were at capacity. He reminded Garcia of past surges of Central American migrants that led to what the CBP official called "inhumane" conditions in packed port of entry holding cells. "We are not absolutely saying that they cannot (make an asylum claim), we are just saying that we cannot process them at this time," Gomez said.

When Garcia said the law required CBP to process their asylum claims, Gomez said: "Sir, I'm sure you know I'm following directions. And this is not even local directions."

Garcia wasn't buying it. "I know by the numbers (of migrants) that ICE is turning over to us that there is room, because the numbers are low and they have been low this whole week," he told Gomez.

Garcia and Gomez had been talking for about four minutes when Garcia asked: "So right now, as far as they are concerned, I'm understanding you to say you will not

allow them to present (for asylum)." Then Gomez changed course. "They are, as (Levy) pointed out, stepping on U.S. soil, so we are going to take them in" to process their asylum claims. Agents Armendariz and Avila escorted the mother, her baby, and the teen girl to the port of entry.

By this time, some of the other Guatemalans had made their way up the bridge. Four were standing just inside U.S. territory; three—including the father who had been separated from his sons earlier in the day— were on the Mexican side of the line. Two CBP agents who had been standing a few feet from the border stepped forward and stood directly on the line. I witnessed one of the agents, whose nametag said Augustin, take a couple steps into Mexico to prevent one of the Guatemalans from crossing into the United States. CBP spokesman Maier later said port officials denied that any agent crossed into Mexico.

Garcia told the two boys and two men who were just inside U.S. territory that they could not be ordered to move back across the line. He told them he was going to get some sandwiches and water in El Paso, and would return.

When he came back an hour later, everyone was gone. The four people who had been just inside the United States, gone. The other Guatemalans who had been in Mexico, either just on the other side of the boundary or at the foot of the bridge, gone.

Garcia approached the agents. "I said, 'What happened to them?' They said, 'They went back.' And I said, 'What happened to the ones that were standing right here on this side of the boundary line?' And they said, 'Well, they went back as well.'"

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COMMENTS

SHARE

TAGS: IMMIGRATION, ILLEGAL IMMIGRATION, IMMIGRATION AND CUSTOMS ENFORCEMENT, PRESIDENT TRUMP

Exhibit B

Administration for Children & Families
Office of Refugee Resettlement

Family Reunification Application

How to complete this application

IMPORTANT: If you cannot complete these steps within seven (7) days, please tell your Case Manager.

☐ **Step 1**

If you have not already done so, you must immediately sign and return the **Authorization for Release of Information** form and a copy of your government issued photo ID to your Case Manager.

If you are required to submit fingerprints, your Case Manager will assist you to schedule an appointment to submit your fingerprints within three (3) days. Contact your Case Manager if you have questions.

☐ **Step 2**

Read the **Sponsor Handbook** and the **Sponsor Care Agreement** which includes other important information you need to know about sponsoring a minor in our program.

☐ **Step 3**

Complete and sign the **Family Reunification Application** (pages 3-7 in this packet).

☐ **Step 4**

Gather the required documents listed on the **Supporting Documents** section (pages 8-10 in this packet).

☐ **Step 5**

Submit the **Family Reunification Application** (this application) and the required supporting documents to your Case Manager.

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Frequently Asked Questions

Can I sponsor my child if I am undocumented?
Yes. ORR/DUCO prefers to release a child to a parent or legal guardian, regardless of your immigration status.

Is there a cost to sponsor a child?
No. There is no fee to complete the requirements to sponsor a child, however you may be responsible for costs associated with the child's travel and escort.

Do I need an attorney to sponsor a child?
No. You do not need an attorney to complete the requirements to sponsor a child. If you need help completing the requirements, your Case Manager can assist you. If you seek additional assistance, note that there is no fee to complete the requirements to sponsor a child.

Why do I have to submit my fingerprints?
ORR/DUCO requires background checks to ensure the safety of the child. If you are required to submit fingerprints, your Case Manager will assist you to schedule an appointment to submit your fingerprints within three (3) days. Contact your Case Manager if you have questions.

What information do I have to provide?
You must complete the Family Reunification Application and supporting documentation. You must also answer questions from your Case Manager about your household, your relationship with the child, and your ability to care for the physical and mental well-being of the child. You must provide proof of your identity.

When do I need to give these documents to my Case Manager?
You should submit all required information within seven (7) days or earlier, if possible. The sooner you submit all required documents, the sooner ORR will make a decision on releasing the child to your custody. ORR will promptly inform you of a decision on releasing the child to your custody or will notify you if additional information or assessment is required.

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About you - the sponsor - and the minor(s)

1) Name(s) of the minor(s)
List the names of all children you are applying to sponsor

2) Your relationship to the minor(s)
e.g., mother, uncle, family friend

3) Your Name

4) Other names you have used
List other names you have used, such as your name before you were married or maternal last names (separate with commas)

5) Your country of origin
Where you were born

6) Your date of birth
e.g., 12/31/1979

7) Phone numbers
e.g., 210-555-1234

Primary Phone

Secondary Phone

8) Your email address or fax number

9) Language(s) you speak

Need Help? Contact your Case Manager.

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Where will you and the minor(s) live?

10) Address

Street Address
(+ apartment number, if applicable)

City

State

Zip code

11) Who currently lives at this address?

Household Member Name	Date of Birth	Relationship to you (the sponsor)	Relationship to the minor
(EXAMPLE) *Miguel Perez*	*12/31/1985*	*Brother*	*Uncle*

Need Help? Contact your Case Manager.

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Adult Who Will Care for the Minor(s) if You Cannot

If you might need to leave the United States or become unable to care for the minor(s), who will care for the minor(s)?

12a) Name of potential adult caregiver

12b) Date of birth of potential adult caregiver

12c) Contact information of potential adult caregiver

Phone Number

Street Address
(+ apartment number, if applicable)

City

State

Zip code

12d) What is their relationship to the minor(s)?
(grandparent, aunt, sibling over 18 years old, etc.)

12e) What is their relationship to you, the sponsor?

12f) How will the minor(s) be cared for if you leave the United States or become unable to care for them?

Need Help? Contact your Case Manager.

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Financial Information

13) How will you financially support the minor(s)?
Include all sources and amounts of your income (for example, the amount you are paid each week) as well as explaining any financial support from others who will help financially support the minor(s).

Health Information

14a) Does any person in your household have any serious contagious diseases (TB, AIDS, hepatitis, etc.)? If so, please explain:

14b) Are you aware of any health conditions the minor(s) may have (disabilities, allergies, diseases, etc.)? If so, please explain:

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Criminal History

If you answer "YES" to either of these questions, you will need to provide more information. See the Supporting Documentation page (page 9 of this packet) for more information.

15a) Have you or any person in your household ever been charged with or convicted of a crime (other than a minor traffic violation; e.g. speeding, parking ticket, etc.)?

◯ Yes ◯ No

15b) Have you or any person in your household ever been investigated for the physical abuse, sexual abuse, neglect, or abandonment of a minor?

◯ Yes ◯ No

Sign & Date Your Application

I declare and affirm under penalty of perjury that the information contained in this application is true and accurate to the best of my knowledge.

I attest that all documents I am submitting or copies of those documents are free of error and fraud.

I further attest that I will abide by the care instructions contained in the *Sponsor Care Agreement*.

I will provide for the physical and mental well being of the minor(s). I will also comply with my state's laws regarding the care of this minor including:

- enrolling the minor(s) in school;
- providing medical care when needed;
- protecting the minor(s) from abuse, neglect, and abandonment;
- and any other requirement not herein contained.

YOUR SIGNATURE _____ **DATE** _____

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Supporting Documents

Please provide a copy of the following documents below. If you are unable to provide the documents we ask for, please explain why. We may reject your application if any of the required information is missing, incomplete, or inaccurate.

1) Proof of Identity for you and any household members

A copy of a government issued ID. You may present one selection from List A or two or more selections from List B. If you present selections from List B, at least on selection must contain a photograph. Expired documents are acceptable.

List A
U.S. Passport or U.S. Passport Card
Foreign Passport that contains a photograph
Permanent Resident Card or Alien Registration Receipt Card (Form I-551)
Employment Authorization Document that contains a photograph (Form I-766)
U.S. Driver's License or Identification Card

List B
U.S. Certificate of Naturalization
U.S. Military Identification Card
Birth Certificate
Marriage certificate
Court order for name change
Foreign national identification card
Consular passport renewal receipt that contains a photograph
Mexican consular identification card
Foreign driver's license that contains a photograph
Foreign voter registration card that contains a photograph
Canadian border crossing card that contains a photograph
Mexican border crossing card that contains a photograph with valid Form I-94
Refugee travel documents that contains a photograph
Other similar government documents

Need Help? Contact your Case Manager.

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2) Proof of Minor's Identity
A copy of the minor's birth certificate

3) Proof of Relationship
Copies of documents to provide proof of a relationship between you and the minor. Expired documents are acceptable.

Your Relationship to the Minor	Acceptable Documents
Parent	• Birth certificates • Court records • Parent's government issued photo ID
Step-Parent You have legally adopted the minor	• Birth certificates • Parent's government issued photo ID • Step-Parent's government issued photo ID • Marriage certificate • Court order documents confirming adoption or legal guardianship has been established
Legal Guardian	• Court order documents confirming adoption or legal guardianship has been established • Birth certificates • Legal guardian's government issued photo ID • Guardianship records • Death Certificates • Hospital records
Family Member	• Birth certificates • Trail of familial birth and/or death certificates showing that you and the minor are related • Marriage certificates • Hospital records • Court records • Guardianship records • Baptismal certificate
You are not related to the minor	Please contact your Case Manager

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4) Legal Records (if applicable)

If you answered "YES" to either question 15(a) or 15(b) on this form, please provide us with the following information for each charge/conviction:

- Name of person involved
- Place and date of the incident
- Explanation of the incident
- Disposition of the incident (e.g., charges dropped, fined, imprisoned, probation)
- Copy of court record(s), police record(s), and/or governmental social service agency record(s) related to the incident(s)

5) Proof of Address

A copy of at least one form of documentation verifying your current address. Acceptable forms of documentation include:

- Your current lease with your name, dated within the last two months
- Your current mortgage statement with your name, dated within the last two months
- Your bank statement dated within the last two months
- An official payroll check stub issued by your employer, dated within the last two months
- Your valid unexpired State ID with your photograph and your current address
- Mail, preferably a utility bill or insurance statement, addressed to you at your current address, dated within the last two months
- A notarized letter from your landlord confirming your address and containing your name, the date you moved in, the number of bedrooms, and the expiration date of the lease
- Other similar documents reliably indicating that you live at your current address, dated within the last two months

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Exhibit 2

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

STATE OF WASHINGTON, *et al.*, Plaintiffs, v. DONALD TRUMP in his official capacity as President of the United States, *et al.*, Defendants.	NO. 2:18-cv-MJP DECLARATION OF ALMA POLETTI MERLO

I, Alma Poletti Merlo, declare as follows:

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

2. I am an investigator for the Office of the Attorney General of the State of Washington, in the Civil Rights Unit (CRU), where I have worked since May 2017.

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

4. In my time with the AGO's CRU, I have served as the lead investigator on several cases involving vulnerable populations and victims. I have worked directly with sexual

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harassment and assault victims in our workplace cases, and conducted interviews with dozens of immigration detainees at the Northwest Detention Center in connection with another lawsuit.

5. Between the dates of June 13 and June 18, 2018, I interviewed eight children in the Seattle area who were separated from their parent at the border and placed in Washington State by the Office of Refugee Resettlement. My observations and their accounts are as follows:

6. G is 15 years old and originally from El Salvador. In her home country, G was being threatened by a member of a criminal association. Her mother cried when G told her about this person. G and her mother fled to the U.S. They arrived in Texas in early June, 2018. Immigration officials at the border took them to a place G calls "the icebox."

7. They told her mother that G would be taken to another place where she would be able to visit her. G and her mother said goodbye to each other while crying, but G's mother comforted her, saying she was going to visit her wherever she was going. Only later did G realize this was not true. As she recounted this moment, G was sobbing and visibly distraught.

8. G was taken to a shelter about 15 minutes away, where she was detained for three days. G described this place as awful. It was a room with no windows divided in three by wire fencing that made them look like three cages. 20 girls were detained in each cage. The place was freezing because they kept the air conditioner on all the time, and each child was given a mat and an aluminum blanket to keep themselves warm. The girls placed their mats in the floor very close to one another, since there was not enough space to fit them more comfortably. Girls as young as 3 years old were detained in this place and without their mothers.

9. G described an incident where a 4 year old girl was crying and walking towards a female guard seeking comfort. The guard turned her away saying she had no time to lose and the girl was disrupting her work. The older girls attempted to console the girl.

10. G felt hungry most of the time she was there because the food they provided her wasn't good in quality or quantity. She could not sleep through the night; the guards would wake all the girls up at 4 am to count them by kicking on their mats. When G was finally able to fall

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back asleep, guards woke the girls up again to feed them. G cried when she told me she kept hoping her mother would show up to take her out of that horrible place, but that never happened. G asked the guards if they knew where and how her mother was, but they told her they knew nothing about her. G overheard a girl asking to make a phone call to her family, but she was told they did not allow girls to make phone calls while detained.

11. During these three days, G had no idea where her mother was, or how long she would be detained in that place. On the third day, G was told that since her mother did not show up to pick her up, she was going to be taken to a home. She was taken to the airport, where she flew to Washington State accompanied by two officers. She arrived in Washington State approximately June 4, 2018, and it was a few days later when G was finally able to talk to her mother. She told G she was still detained at the first icebox where Immigrations took her. G again broke down in tears when she explained that her mother reports going hungry at the place they are keeping her. She said her mother is her hero, a brave woman who always worked hard to support her and give her the best she could. G said that no Immigration official has ever asked her why they fled El Salvador.

12. V is 17 years old and originally from Guatemala. V came to the United States with her father on or about May 13, 2018. Immigration officials in the United States took V and her father to a house where they took away their belongings. They were then taken to another house about two hours away. At this house they separated V from her father. The separation was hard, V did not want to stay there without her father and cried when they told her they were taking her father to another place. She was crying when they took her father away, and the guards told her to shut up. V said she was detained for about three days in this place without her father. The guards gave her a mat and an aluminum blanket, the place was really cold. They fed her burritos and cookies about three times a day, it wasn't very good food so she didn't eat it most of the time.

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13. There were other 10 or 12 girls detained with V, some as young as 6 or 7 years old. The guards scared the girls saying things like "You will see what will happen next to you girls", frightening them. The guards told the younger girls they would be taken to jail afterwards, which frightened them. There was a female officer who would tell them that was a lie and tried to calm the girls down saying her colleagues were lying. On the fourth day, V was put on a bus and brought to Washington state, arriving here on or about May 16, 2018. It was another 15 days before she was able to talk to her father, who she believes is still detained in Arizona.

14. As of the time of our interview, V had only been able to speak to her father once, which caused her visible distress. She is worried about her dad being treated well. She is working with a therapist because she has nightmares.

15. On her journey with her father, V got hurt and received deep scratches from thorns in the bushes. At the time of our interview, she still had one thorn deeply lodged in her shoulder that was infected. She reported that she had been given medication for it and received treatment when she arrived to the home where she is currently living.

16. A is 15 years old and originally from Guatemala. A said that a man attempted to rape her in her home country, but the Guatemalan police did nothing to find or arrest this person. Her father decided to bring her to the United States. They arrived in Texas in mid-May, 2018. Immigration officers at the border drove them both to an icebox, but they were separated once they arrived and placed into different cells. They never warned them they were going to be separated, so she did not get a chance to say goodbye to her father.

17. A was placed in a room with other 12 women and girls. Most of the girls who were there were 17 or 16 years old, but there was one girl about 6 years old who was there without her mother. A was detained at the icebox for three days. She did not like the food she was given. The guards were angry and yelling, which scared her and the other girls.

18. A told the officer that interviewed her that she was afraid to go back home because of the man that tried to rape her. The guard told her he did not believe her, that she was telling a

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bunch of lies. He also told A that her father was going to be sent to jail for a long time, which scared A and left her very worried. A had tears in her eyes and was visibly upset while recounting these events. A was then told her father had been deported so she was going to be taken to a home. After three days of being detained in the icebox, she was escorted in a flight to Washington State where she arrived on or about May 16, 2018. Afterward, she was finally able to contact her family in Guatemala and speak to her father.

19. H is 13 years old and originally from Guatemala. She came to the United States with her father around mid-May 2018. Immigration officers took them to a house where another father and three kids were detained. They spent the night at this house and the following morning the officers took her to another house, without her father. They did not let her say goodbye to her father or tell them in advance that they were separating them. H started crying while recounting these events and was unable to continue speaking for some time.

20. H reported that the guards threatened the people that they detained with separating them and sending them back home, she overheard them telling others they would be jailed for about 10 or 15 years, which scared her. The younger children were crying.

21. H arrived in Washington State on or about May 22, 2018. At the time of our interview, H had not spoken with her father since they were separated. She believes he continues to be detained in the US but she is not sure where he is. She was visibly worried about him and could not talk about her father without breaking in tears. H had a hard time talking during most of the interview, was visibly upset and broke down in tears frequently.

22. T is 12 years old and originally from Guatemala. T came to California with his father but he was not sure when, he thinks in early January 2018. They were detained by Immigration officers at the border and taken to a house that was basically a room without a window. T could not tell night from day, so he is not sure how long they spent there. The room was divided in what seemed like halls with low walls that divided them. Two people slept in each hall. He and his father were given a mat and aluminum blankets to cover themselves.

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23. When they woke up, immigration officials told T to say goodbye to his father, and that his father was going to another place. T said this moment was sad, both cried, hugged and said goodbye. T was then taken to another house where he was hungry most of the time. He thinks he was detained at this house for two more days. He was sad because his father was not there and he felt lonely. After those two days they flew him to Washington State where he was able to speak to his family in Guatemala and to his father, who had been deported.

24. M is 13 years old and originally from Honduras. M came to the United States with her father in early June 2018. They encountered Immigration officers at the border, who took her backpack away and drove them both to the icebox. When they arrived the officers separated her from her father, she went to a room where only women were detained. They told her she was going to see him afterwards, but she never saw him again. M had tears in her eyes while recounting this part of the story, and said she misses her father and was scared when this happened.

25. M described the icebox as a very cold room with one window facing the offices, so they could not see outside the room. The air conditioner was always on. They gave the girls aluminum blankets to cover themselves. They fed her apples, cookies, chips and tacos. She was hungry sometimes. She was afraid because her father was no longer with her. After a while, she was taken to a second place, where people were separated in areas divided by wire fencing. M said some of the guards were mean to people, they scolded them and told them "we are in charge of this place, not you". It was only after she arrived in Washington State at the home where she is now living that she was able to speak with her dad. Her dad is still at the icebox in Texas and as of our interview, she had only spoken to him once.

26. D is 14 years old and originally from Guatemala. D came to Arizona with his father about four months ago, but he is not sure when. Immigration officers at the border took them to a house where they fed them a tamale and juice. The guards threw away their belongings, and left them with the clothes they were wearing. Right after this, they moved both of them to

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another house where he was able to sleep with his father. They gave him a thin mat and an aluminum blanket. The next day, Immigration officials moved them both to a different house where he spent half a day with his father.

27. The following day, Immigration officials told D's father that they were going to send D to a program where if he behaved well he was going to be able to stay in the United States. D was sad and upset; he did not want to leave his father. D was taken to a home in Arizona where he lived for a while. Weeks passed during which D had no information or contact with his father. He was then transferred to the home where he lives now in Renton, WA, several weeks ago.

28. D believes his father is still detained in Arizona. At the time of our interview, D had been able to speak to his father only once. He would like to speak to him again, he wants to know how he is doing, what food he is getting, and if they have given him clothes. D got emotional while talking about his worries about his father, he was visibly affected by it.

29. MN is 15 years old and originally from Guatemala. He came to the United States in January 2018 with his father. Immigration officials at the border took them to a house where he spent two days with his father. Afterwards, they told MN his father was going to be deported, so they had to move MN to another place. MN and his dad said goodbye, but officials never told him or his dad where they were taking MN. MN said he was sad to leave without his father.

30. MN was taken to a place that he described as very cold, there were no mats or blankets to rest and keep him warm. After a day he was sent to another location where they gave him a mat and blankets. The food was not much, and MN was hungry. After a day or two, MN was moved to a home he thinks is located in Arizona, where he was able to speak to his mother in Guatemala.

31. MN was only able to speak to his father afterwards, when he learned that his father had spent 22 days in jail and was deported without MN. MN was reluctant to speak much about his father, in my observation he appeared very concerned about his father's well-being.

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32. At the time of our interview, MN was in a home in Tacoma. He had been treated by a dentist in Arizona who had filled a cavity, but he did not do a good job. The filling did not last, and his tooth began hurting again. The day of our interview, his tooth hurt so much that MN had not been able to eat that day. MN wants to be reunited with his parents and siblings. He has asked for voluntary departure but has been told that he must wait 2 or 3 more months to have a hearing with a Judge before he can see his family. In the meantime, MN says that time goes by very slowly and that he misses his family very much.

33. Some of the other children I interviewed at the homes mentioned that when they were being transferred from a home in one State to the one they are now living in Washington state, they were told they were going to be reunited with family or that they were going to a better and bigger home. They expressed anger and feeling deceived when, after their flight landed in Washington, they realized they were brought to another facility and that reunification was not actually planned.

34. On June 20th, 2018, I went with five colleagues from the Attorney General's Office to visit the Federal Detention Center (FDC) located in SeaTac. We were received by FDC's Warden and other authorities who took us first to a pod of detained women identified as pod FC. The women who were detained in that pod gathered in the common area to speak to us.

35. We asked if any of the women there were mothers who had been separated from their children at the border. The women told us there had been more than 10 mothers in the pod that were separated from their children at the border, but that ICE had moved them out of the FDC the day of our planned visit. When asked where they were moved to, some said that ICE told the mothers they were going to be reunited with their children. They provided us a list of names of some of the mothers that were moved that morning.

36. Only two mothers who were separated from their children at the border remained in that pod. I conducted a more detailed interview with one of those mothers. She cried and had tears in her eyes from the beginning to the end of the interview. She has a 14 year old daughter

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from whom she was separated at the border over a month ago. As of the day I interviewed her, she had not been able to speak to her daughter and was deeply concerned about her wellbeing.

37. When we finished with these two interviews, we were taken to women's pod FB. Similarly to the previous pod, the women gathered in the common area and told us that 13 or 15 women who had been separated from their children at the border had been moved out of the FDC that morning. They also provided us with names of some of the mothers that were moved that morning.

38. A few days after our visit to the FDC, I looked up the names of the mothers that were moved out of the FDC the morning of our visit, using the ICE detainee locator website and Access Corrections website, and found out that most of those mothers are now detained in the Tacoma Northwest Detention Center.

39. Some of the women who were detained in pod FB told us about the poor treatment they received while being detained by ICE at the border. They were detained in places they called "hieleras" (iceboxes) because it was freezing in there. The floor was wet with water. The detainees knew their personal belongings were stored somewhere there by ICE, so they requested to get their coats back not to freeze in the iceboxes, but they wouldn't give them back to them. She said that they were only fed two tacos in the whole day. They gave them water with ice to drink, which was awful considering they were already freezing. They would sometimes provide them aluminum foil blankets. The women weren't allowed to shower, and the guards would make fun of them, telling them they stank.

40. Some of the women described how when they were taken to the airport in Laredo to wait for their flight to Seattle, they were detained in a small room from about 6 pm until early morning. They weren't able to sleep because there wasn't enough room for them to lay down. They were hungry the whole night because they weren't given any food. They also said they were disgusted when they were given used stained underwear to wear.

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41. The last pod they took us to visit was pod FA. FDC's officers warned us there had been a case of chicken pox in that pod, so they were on quarantine. There were at least 7 women in this last pod who stated they had been separated from their children at the border. I conducted a more detailed interview of one of these women. My team was able to interview some of the other women. The woman I spoke with had come to the U.S. with her 11-year-old only child, whom she hasn't heard from in over a month. The woman trembled while telling me she ran away from Honduras because she was being threatened after witnessing a murder. She couldn't contain her tears during the interview while talking about her son, who she is very concerned about.

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

DATED this 2nd day of July, 2018 at Seattle, Washington.

Alma Poletti Merlo

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Exhibit 3

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

STATE OF WASHINGTON, *et al.*, Plaintiffs, v. DONALD TRUMP in his official capacity as President of the United States, *et al.*, Defendants.	NO. 2:18-cv-00939 - MJP DECLARATION OF NICOLE ELIZABETH RAMOS

I, Nicole Elizabeth Ramos, declare as follows:

1. I am a U.S. licensed attorney practicing in the area of immigration law and human rights. I am barred by the State of New York, and I am a former Assistant Federal Public Defender. I am over the age of 18 and have personal knowledge of all the facts stated herein.

2. At present, I serve as the Project Director for the Border Rights Project of Al Otro Lado, a nonprofit organization based in Los Angeles. The Border Rights Project provides pro bono representation and know-your-rights education to refugees in Tijuana. As part of this representation, I accompany asylum seekers who wish to present themselves to Customs and Border Protection (CBP) officers at the San Ysidro port-of-entry (POE), and represent them at their credible fear interviews before the Asylum Office. In addition, I work with asylum seekers

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and other community advocates to document human rights violations by both U.S. and Mexican immigration authorities against asylum seekers.

3. In my experience, refugees seeking asylum at the POE near Tijuana face a widespread practice of CBP officers who refuse to allow them to access the legal process for asylum. In December 2015, I first began accompanying asylum seekers to the port-of-entry. Since that time, I have accompanied hundreds of asylum seekers to the port-of-entry over the course of dozens of different occasions. In addition, I also served as an organizing member of the legal team for five group presentations of asylum seekers from May 2017-May 2018, at the San Ysidro POE. Of those asylum seekers dozens had been previously turned away by CBP when they arrived at the port-of-entry to seek asylum.

4. With the exception of the large group presentations of asylum seekers, which were executed with the accompaniment of significant media attention, I have frequently observed CBP officers attempting to prevent asylum seekers from accessing the asylum process in violation of their obligations under Title 8 United States Code, Section 1225 and the 1951 Refugee Convention. The following are some examples of the obstacles that I have witnessed for asylum seekers attempting to present themselves at a POE in the last several years. These accounts are not comprehensive, but they are illustrative of the barriers that asylum seekers encounter here.

5. For example, on December 23, 2015, I accompanied a Salvadoran family, ABC and his three minor children to the San Ysidro POE. ABC fled El Salvador because of death threats and attempts on both his life, and the life of his then 16-year-old son. ABC was a testifying witness against one of the gangs during the investigation of his coworker's murder. His teenage son experienced three attempts on his life for refusing to disclose his father's whereabouts, and refusing to join the gang. These attempts included being stabbed and

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kidnapped, being shot as he rolled down a hillside after throwing himself off in an effort to escape, and being beaten unconscious and left to die in the street.

6. Upon approaching the POE, I spoke with a CBP officer, indicating that ABC and his family wished to seek asylum. The CBP officer told me that the family could not apply for asylum at the POE, and they had to apply at the consulate. I informed the CBP officer that this was not correct, and that inside the POE there was a line to the far left where asylum seekers lined up, waiting to be processed by officials.

7. The CBP officer then asked me whether I was an attorney. I informed him that I was indeed an attorney. He then inquired whether I was a U.S. licensed attorney or a Mexican attorney. Only when I informed him that I was a U.S. licensed attorney did he allow us to pass through the gate into the building of the POE.

8. During ABC's processing by CBP, he reported that officers insisted that he disclose the whereabouts of his children's mother, which he was unable to do. Despite these explanations, CBP officers threatened ABC and told him that if he did not disclose the location of his children's mother, that his children would wind up in foster care because he would remain detained.

9. On or around December 28, 2015, I accompanied DE, a Honduran mother, and her small child to the San Ysidro POE. DE was also then-pregnant with another child. DE fled Honduras because of brutal domestic violence at the hands of her cartel-connected long-time partner. In addition to subjecting her to years of brutal violence, he also attempted to have her killed by other members of his organization who once pushed her into oncoming traffic.

10. After arriving to the POE, I approached a CBP officer and explained that I was an attorney, and DE wished to apply for asylum. He stated that he was not sure whether she could do that at the POE, and I explained that she could. He then allowed us to pass the gate into the building of the POE.

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11. On February 18, 2016, I accompanied FG, a 15 year old child, to the POE. FG fled El Salvador alone after being threatened several times with death for refusing to join the local clique and help MS-13. FG never knew his father, was abandoned by his mother, and left to live with a grandparent at a very young age. FG was referred to me by Uriel Gonzalez, the director of the Casa YMCA, a shelter for migrant youth in Tijuana. The basis for this referral was because FG had previously tried to turn himself in to CBP on two separate occasions, at both the San Ysidro and Otay POEs and had been turned away and advised that he had to apply for asylum at the local consulate or at the U.S. embassy in El Salvador.

12. I approached a CBP officer with FG and explained that he was an unaccompanied child from El Salvador, and that he was there to present himself for asylum. The CBP officer advised that FG would have to apply for asylum at the consulate. I explained to the CBP officer that I had already brought asylum seekers to the POE before to present themselves, and that I already knew where FG was to wait for a CBP officer to process him.

13. The CBP officer asked whether I was an attorney, and I explained that I was an attorney. He then asked whether FG had a completed asylum application. I advised the officer that we did have a completed I-589. Only after this did he allow us to pass the gate into the building of the POE.

14. On March 17, 2016, I accompanied HI, a Mexican transgender woman to the POE to present herself as an asylum seeker. HI suffers from severe PTSD and a seizure disorder, is the survivor of multiple sexual assaults and domestic violence, and was once a victim of human trafficking. After advising the CBP officer on arrival that HI intended to apply for asylum, we were permitted to pass through the gate to the POE building. I left HI standing in the line with other asylum seekers and assumed that she would be processed several hours later. However, HI was not processed until approximately 36 hours later, during 30 of which HI and other asylum

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seekers had not been fed. Throughout HI's entire encounter in the POE she was subject to verbal degradation and abusive language by CBP officers.

15. At the end of May 2016, Tijuana experienced a significant increase in its refugee population, with hundreds of people arriving overnight. This sudden spike in asylum seekers included refugees from countries not typically seen in large numbers at that POE, including Haiti, Sierra Leone, Congo, Cameroon, Bangladesh, Armenia, Ukraine, and Russia, in addition to asylum seekers from southern Mexico and the Northern Triangle. In the weeks following, U.S. and Mexican authorities developed an ad hoc plan to have asylum seekers first "process through the shelters." This required all asylum seekers to first go to one of the four main migrant shelters in the city, even if they had never been to one, and give their name to be placed on a wait list. Each day Grupo Beta, an arm of Mexican immigration authorities, would ferry asylum seekers to the border in groups, with numerical limits, for processing by CBP.

16. On June 20, 2016, I contacted Casa Migrante, a migrant shelter in Tijuana, to arrange for housing for a Mexican female asylum seeker JK and her daughter. My reason for contacting the shelter, instead of simply accompanying JK and her daughter to the POE was because I was advised by Ms. Viruete, the staff attorney at Casa Migrante, that all asylum seekers had to process through the shelter system, regardless of nationality.

17. Ms. Viruete advised that asylum seekers would be placed on a waiting list, and then taken down to the POE in groups, by Grupo Beta, in order to be processed by CBP. She further advised that these instructions had come to all the shelters housing migrants, and were the result of meetings between CBP officials and Mexican immigration officials after hundreds of asylum seekers arrived at the POE and had been waiting to be processed for several days, creating a humanitarian crisis.

18. On June 21, 2016, I met my client at Casa Migrante. After escorting her to the room she would be sharing with other families, I made sure that JK was placed on the "list." On

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June 22, 2016, JK was brought down to the POE and processed by CBP officers. During JK's processing she was subject to verbal degradation and abuse. Even though JK explained that she was the survivor of a sexual assault, the victim of an international criminal organization, and a material witness for an ongoing FBI investigation (and even possessed a copy of the investigating FBI agent's business card) she was told by CBP officers that she was "full of shit" and a liar. After telling her story to one officer, he told JK "no mames," which, in Mexico, is a vulgar way of saying "stop kidding". I reported JK's terrible treatment to the FBI victim services coordinator.

19. The system of asylum seekers processing through the shelters was abandoned in the summer of 2016 in favor of a new ticket system. Specifically, CBP officers began directing asylum seekers to obtain a "ticket" from Grupo Beta, in order to seek asylum in the United States. By obtaining a "ticket," asylum seekers would be given a date, at some time in the future, when the asylum seeker could return to the POE to be processed by U.S. immigration authorities.

20. During this time, construction began at the San Ysidro POE and all asylum seeker processing shifted to the new Pedwest POE. At that time, CBP began refusing to process asylum seekers who showed up at the two other POEs in Tijuana - the old San Ysidro POE and the Otay POE. I am not aware of any legal basis for CBP to limit the processing of asylum seekers to one POE, particularly since for some asylum seekers, any delay in entering U.S. custody could mean the difference of life or death.

21. On August 4, 2016, I accompanied four Guatemalan youth (LM, NO, PQ, RS) to the Pedwest POE. On or about July 20, 2016, they attempted to turn themselves in to CBP officers at both the Otay and San Ysidro POEs, but were denied. Two were under the age of 18 years old.

22. I first attempted to present these youths to CBP officers at the San Ysidro POE. I was advised by Supervisor Abts that all asylum seekers must first obtain a ticket from Mexican

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immigration in order to be seen by CBP officers, even unaccompanied minors. He further advised that processing of asylum seekers was only occurring at the Pedwest POE, a 15 minute walk from the San Ysidro POE, and a nearly 30 minute drive from the Otay POE.

23. At Pedwest POE, I approached CBP Officer Saucedo and advised him that I was an attorney, and that I was presenting unaccompanied minor asylum seekers. Officer Saucedo advised that all asylum seekers, regardless of age, had to obtain a ticket from Mexican immigration authorities, and could not be processed right at that time. I explained that under the Trafficking Victim's Protection Act, there were specific protocol for processing unaccompanied minors, and that CBP had an obligation to process these asylum seekers in accordance with those regulations. I then requested to speak with a supervisor. A female supervisor arrived, and after explaining the situation to her, she advised Officer Saucedo that unaccompanied minors were not subject to the ticket system, and accepted the children for processing.

24. On August 23, 2016, I held a mini-legal clinic at the office space of the community organization Deported Mothers in Action. There I interviewed two young women from Guatemala. Both were fleeing extortion threats by the gangs in their city. They had attempted to enter the U.S. without inspection, through the mounts, approximately two weeks prior. They were apprehended by CBP, whom they told that they feared return to Guatemala, and their intention to seek asylum. However, neither woman was referred for a credible fear interview. Rather both reported being physically manhandled by CBP officers, and literally tossed back over the fence. One of the women showed me bruises and cuts on her legs from the fall. Neither woman wished to try to seek asylum in the U.S. again after this treatment. Both appeared very afraid.

25. On September 17, 2016, I accompanied VW, a Mexican woman, and her minor child, to the Pedwest POE. I approached the CBP officer and explained that my client was a Mexican citizen, and that I would not have her ask Mexican immigration authorities for

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permission to apply for asylum in the United States. The CBP officer allowed my client to pass through into the building of the POE.

26. As I turned to leave the POE, I could see some adult men, and male children lying on the floor outside the gate. I approached them and asked what they were all doing there. It was at this time that members of the group advised me that they were trying to apply for asylum but that no one would talk to them. I immediately inquired of the CBP officer what was going to be done about the people waiting to seek asylum. I was advised that if the men were Mexican, they could stand in the regular pedestrian lane, and wait to be processed. However, if the individuals waiting were from another country, that they would first have to obtain a ticket from Mexican immigration authorities.

27. I then advised the group, which was for the most part Mexican citizens, to get in the pedestrian line and to advise the CBP officer that they wished to seek asylum and wanted a credible fear interview with an asylum office. Two members of the group waiting were from El Salvador. I learned that they were cousins, and one was an unaccompanied minor, and the other was only 18 years old. Concerned for their safety, I explained to the boys that I was an immigration attorney, and if they wished, I would help them for free, and take them to a shelter for migrant youth where they would be safe. They agreed, and from there I drove XY and ZA to Casa YMCA.

28. The boys advised that they had been waiting at the POE for a few hours. They explained that they initially lined up with the other pedestrians and walked through the first gate into the POE without being stopped by a CBP officer. However prior to presenting for admission, the boys were approached by a CBP officer who asked for their documents. The boys explained that they were there to apply for asylum because they faced death threats in El Salvador. Both boys reported that the CBP officer told them that they could not apply for asylum right there, that they had to be put on a list. The boys were advised to go back out the gate of the POE and

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wait there until someone came out to speak to them. The boys reported waiting there for almost three hours without any CBP officer acknowledging their existence, despite them laying there in plain view for hours in the hot sun.

29. On October 28, 2016, I spoke on a panel at a binational border rights conference at Colegio de la Frontera in Tijuana. This conference was organized by the Los Angeles County Bar Association. At that conference, Assistant CBP Port Director, Nancy Carrillo, spoke about several matters, and fielded questions from the audience. During this meeting AD Carrillo addressed the "metering" system in Mexico, through which asylum seekers obtained a ticket from Mexican immigration authorities, and unequivocally stated that CBP did not have any involvement with the ticketing system.

30. During the question and answer session of AD Carrillo's presentation, I raised the issue of CBP officers turning away unaccompanied minors, advising them to obtain tickets from Mexican immigration, in violation of the Trafficking Victims Protection Act. Following her talk, I approached her personally to advise her that I had serious concerns regarding human rights violations occurring in the POE, and that I had collected significant data on this issue. I advised her that I could send her this information in writing. She declined to receive such document, and suggested I provide information through a "working group in San Diego." The gentleman standing next to her, who was also a higher-level official with CBP at the San Ysidro POE (one of two other CBP officers in addition to AD Carrillo in attendance) advised me in passing that he recognized my name "from a lot of paperwork" that I had been filing.

31. On November 15, 2016, I accompanied a Honduran family to the Pedwest POE. The family consisted of three adults (two parents, and a grandmother), FG, HIJ, KL, and FG and HIJ's three minor children. KL is a senior citizen and mentally ill. The family fled Honduras due to death threats by a gang who had kidnapped and held HIJ hostage for ransom for a week before

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her escape. The family fled out the back door of their home just as the gang had arrived in front of their house, with cans of gasoline to burn the family alive inside their home

32. At the POE, I spoke with a CBP officer and explained that this family was there to present themselves as asylum seekers. Upon hearing my explanation, the CBP officer at the gate advised that the family would first have to seek a ticket from Mexican immigration, and they could not apply for asylum at that time. I requested to speak with a supervisor. A CBP supervisor then came out to speak with me, and I advised the supervisor that the family was seeking asylum. The CBP supervisor also advised me, as did the officer before; that this family would first need to speak with Mexican immigration authorities and obtain a ticket before they would be permitted to seek asylum from U.S. immigration authorities. I explained to the supervisor that the ticket system was not designed to handle any other nationalities outside the influx of Haitian migrants, and that Mexico was not dispensing tickets to individuals without the appropriate voluntary departure documents, a particular document given to Haitian migrants at the southern border of Mexico. There was back-and-forth discussion with the supervisor before it was finally agreed that CBP would accept this family for processing.

33. On December 10, 2016, I organized a legal clinic to work with asylum seekers who had been identified by local migrant shelters and human rights observers as having been illegally turned away by CBP. At this clinic, volunteer attorneys worked with 8 people: two brothers from El Salvador KL and MN; a Salvadoran couple, OP and her husband QR, and their 8 month old baby; a single man from Belize ST; UV, a man from Colombia; and XY, a former policeman from Guatemala. All of these asylum seekers had attempted to present themselves multiple times at the Pedwest POE. All of these asylum seekers were told by CBP that they first had to obtain a ticket from Mexican immigration authorities.

34. On December 21, 2016, I accompanied UV, a cognitively disabled Mexican man, to the Pedwest POE. I was contacted regarding UV by his attorney, Nancy Alexander, in the

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United States. UV was involved in removal proceedings, was pursuing asylum relief, and had been designated as eligible for *Franco-Gonzalez* protections by the Immigration Court. UV had wandered into Mexico by accident, and had come to be interned and held against his will in a rehabilitation center. UV had no recollection how he had been committed to this facility, as he does not have a substance abuse problem. After securing UV's release from the facility, I presented UV to CBP officers at the Pedwest POE. Once again, I spoke with a CBP officer, advising him that UV was a mentally challenged asylum seeker already involved in proceedings in the U.S. I further advised the officer that we had with us court orders from the Immigration Court stating that UV was mentally incompetent, had appointed counsel, and had a hearing date in March 2017. A supervisor was called to come speak with us.

35. A few minutes later, Supervisor Wong approached with approximately four other CBP officers. Supervisor Wong asked why we were at the POE, and I explained to him the same information that I had explained to the previous officer. It was then that Supervisor Wong advised that I was "not in court of law," and that I had no right to present evidence. He further inquired whether I was a member of the American Immigration Lawyers' Association (AILA), to which I responded that I was not in fact a member. Supervisor Wong explained that CBP and AILA had been having meetings in which "the new policy" had been explained. However, when pressed to discuss what that new policy was, Supervisor Wong merely stated that if I was a member of AILA that I would know the policy. I inquired whether he was referring to the system by which CBP officers were refusing to process asylum seekers without them first obtaining a ticket from Mexican immigration authorities. Supervisor Wong advised that CBP had no involvement in that system and that was not the process to which he was referring, without ever clarifying the procedures asylum seekers were now to follow.

36. As a Mexican asylum seeker, UV was not even subject to the ticket system. When Supervisor Wong approached us with four other CBP officers in tow, seemingly in a display of

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official intimidation, my client immediately became very afraid as he has impaired cognitive functioning mimicking that of a child. I advised Supervisor Wong that I was aware CBP would not make a final decision on asylum, but that certainly asylum seekers could enter the POE and present themselves as asylum seekers, as I had been accompanying asylum seekers to the POE for a year. It was then that Supervisor Wong looked at me and stated "we know who you are, and what you do." It became clear to me then that CBP's responses to me would become more personal and retaliatory as I continued to accompany asylum seekers and demand they be afforded access to the asylum seeker process as laid out in federal law.

37. On December 28, 2016, and on January 4, 2017, I accompanied Attorney Tatyana Edwards to the Pedwest POE with her clients. On each occasion, we accompanied families from the Uzbek Republic, consisting of two parents and two children in each family. On each occasion, upon arriving at the POE, I explained to the front line CBP officer that I was an attorney, there with an asylum seekers and their attorney. On each occasion, the front line CBP officer advised that the family would first have to seek a ticket from Grupo Beta. On each occasion, I requested to speak with a supervisor. On each occasion, after speaking with the supervisor, we were asked whether the asylum seekers had brought with them immigration form G-28 (Notice of Attorney Representation), despite there being no requirement for an asylum seeker to be represented by an attorney to present themselves at the POE. After explaining to each supervisor that these families would be denied the ticket by Grupo Beta because they did not have the appropriate entry or exit documents for Mexico, the asylum seekers were permitted to enter the POE and referred for a credible fear interview.

38. On January 3, 2017, I accompanied WX to the Pedwest POE, along with her three minor children and her nephew. I approached the CBP officer at the front gate and advised that I had a family of Mexican asylum seekers. A supervisor then came out to take the family for

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processing. I provided the supervisor with the family's turn-in packets, which clearly stated that they were seeking asylum, and wished to have a credible fear interview with an asylum officer.

39. While waiting for the supervisor to arrive, I observed a CBP officer speaking with a woman clutching papers who appeared to be crying. I then saw the woman walk away. I waved to my paralegal and legal assistant waiting nearby so that they could intercept the woman, and ask if she needed help. Upon leaving the POE, I spoke briefly with this woman, also a female Mexican asylum seeker whose husband had been killed. She explained that the CBP officer at the gate had advised her that Mexicans were no longer getting asylum and that if she persisted in her claim the only result would be that she would be detained for a long time, and deported anyway.

40. Within less than 24 hours, WX and her children were deported. She had no idea where her nephew had been transferred, or whether he would be deported as well. WX contacted me from the office of Mexican Immigration at the Pedwest POE to advise me she was in the process of completing repatriation paperwork. I traveled to the POE and spoke with WX regarding what had transpired. She advised me that CBP officers berated her for several hours, before forcing her to recant her fear of return to Mexico on video. She made repeated requests for counsel which were ignored. Indeed, she was advised that if counsel cared about WX then counsel should have been there (despite the fact that CBP prohibits attorneys' presence during asylum seeker processing).

41. WX stated that CBP officers informed her that Mexicans did not qualify for asylum, that the practice of accepting Mexican asylum seekers "had ended five years ago." CBP officers advised WX that if she did not agree to state that she was not afraid on video, she would be banned from the U.S. for life, and never be able to fix her status. She was advised to return to Mexico and apply for a visa. WX reported feeling emotionally beaten down by the CBP officers, such that she felt like the only choice she had to make them stop berating her would be to do

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what they were demanding of her. After hearing WX's account, I brought her back to the POE and requested to speak to a supervisor, advising the front line CBP officer that WX was an asylum seeker who I had brought to the POE the day before, and who had been pressured by CBP officers to recant her fear of return on video. I demanded that she be reprocessed and referred for a credible fear interview. Supervisor Schneider arrived, and I explained the same to her, that WX had been coerced by CBP officers into recanting her fear on video, and that I expected her to be processed and referred for a credible fear interview in accordance with the agency's obligations under the law. WX was then taken back for processing by Supervisor Schneider.

42. On January 20, 2017, I accompanied four asylum seekers to the Pedwest POE, asylum seekers from El Salvador, 16-year-old, YZ and AB, his father, as well as YZ's 18 year old cousin CD. This family had fled El Salvador because of threats against their lives by the gang MS13. CD continued to face attempts on his life by MS members sent to hunt him because of his status as the last remaining witness to his sister's kidnapping. Within a week, her body was found, and since that time all other remaining witnesses had been killed, leaving only CD remaining. In addition, all three Salvadoran asylum seekers had survived a kidnapping in Chiapas, where they were held hostage in a house for one month, with approximately 30 other migrants, and were regularly starved, deprived of sleep, and beaten with fists and objects.

43. On this same date, I presented EF at the POE. EF is 20 year old Mexican woman with a gender-based asylum claim. EF's asylum claim was based on a similar nucleus of facts as that of her mother, who had received a grant of withholding of removal by an immigration court. Within 24 hours, I received a call from EF stating that she had been deported back to Mexico. I immediately went to the POE and interviewed EF regarding what happened. I later memorialized that interview by producing a video declaration of EF describing what CBP officers had done to her. Specifically, EF reported that CBP officers told her she did not qualify for asylum, that she

did not meet the requirements for "one of the six categories." She was told by CBP officers that Mexicans did not qualify for asylum. When EF tried to explain to CBP officers that she had an attorney, and she wanted an asylum interview, she was told that if her attorney really cared about EF then she would be present, but since EFs attorney was not present, they would proceed without her. EF was further advised she had no right to an attorney, and that she had no other choice but to recant her fear on video. It took a few takes for EF to be able to state on camera what the CBP officers wanted her to say, i.e. that she no longer feared return to Mexico.

44. After completing EF's video declaration, I returned with her to the POE, and advised the front line CBP officer that I needed to speak with a supervisor. Shortly thereafter, the chief on shift for the POE on January 21, 2017, came striding over demanding to know the nature of my complaint. It was apparent from the outset that the chief was hostile to my presence with my client. I explained to the shift chief, a tall African American gentleman, what had happened, and demanded that EF be reprocessed, and referred for a credible fear interview with an asylum officer. The shift chief became visibly agitated, and warned me that I had no right to be there presenting clients, that they had to present themselves. I advised him that my presence would not be necessary if the agency would comply with its existing legal obligations with respect to processing of asylum seekers. I advised the shift supervisor that the violations against asylum seekers have already been documented by journalists, including the Washington Post, and that if CBP officers continued to violate the law, I would continue to ensure that these violations were reported. The shift supervisor again told me that I had no right to be presenting asylum seekers, before taking EF back for processing.

45. I have interviewed dozens of other Mexican asylum seeking families who have also been forced to recant their fear of return under similar circumstances on video. All reported being berated for significant periods of time until agreeing to consent to removal, and to recanting on video.

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46. On January 26, 2017, I accompanied Attorney Tatyana Edwards, another male attorney, and Attorney Edward's client, a Turkish asylum seeker, to the Pedwest POE. This individual fled Turkey after being imprisoned by the government for his political views. His passport, along with his still-valid U.S. visa had been confiscated by his government. Upon arrival to the POE, I spoke with a front line CBP officer and advised him that we were there to present a Turkish asylum seeker. He advised that the asylum seeker would first have to go to Grupo Beta. I requested to speak with a supervisor, explaining that Grupo Beta did not give tickets to individuals present in Mexico on tourist visas, like this particular asylum seeker.

47. Shortly thereafter Supervisor Gomez arrived. She was immediately hostile and ordered the other two attorneys present, the Turkish asylum seeker's actual legal representative, to either enter the U.S. or to return to Mexico. Both complied with her order, and I was left standing with the asylum seeker. I attempted to explain to Supervisor Gomez the basic facts of this case, that the asylum seeker was a former political prisoner, whose valid U.S. tourist visa had been confiscated by the same government which persecuted him. Supervisor Gomez repeatedly told me, each time louder, that she would not speak with me, and that I had no right to be there. She refused to check the system to determine whether the asylum seeker did in fact have a valid tourist visa (and thus had been pre-vetted). She insisted that the asylum seeker first obtain a ticket from Grupo Beta despite me repeatedly trying to explain to her that this was not possible.

48. It was at this point that the interaction became more threatening. Supervisor Gomez at this point was shouting to the client that I was a liar, and a troublemaker, and that she knew that I had taught the client "how to lie." She then threatened several times to have me physically removed from the POE by Mexican authorities, Grupo Beta. Because of these threats we left the POE, and I drove the asylum seeker back to his hotel.

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49. On February 3, 2017, I presented eight asylum seekers at the POE, a Honduran family consisting of two parents and two children, a Colombian gentleman who had been turned away from the POE two times previously, two Mexican men, and the Turkish gentleman who I had previously attempted to present unsuccessfully. I arrived at the POE with three reporters, four other attorneys, and two other human rights monitors. Upon seeing the crowd, among which several were dressed in professional attire signaling the possibility that they could be attorneys, and noting that press were among us, CBP supervisors took the group in for processing.

50. I chose to present this group of asylum seekers in a group because I now feared for my safety. In addition, I enlisted the support of Amnesty International, who developed a check-in system with me to help ensure for my safety should American authorities again threaten me with arrest by Mexican officials, and should those Mexican officials actually follow through on that threat.

51. On February 5, 2017, I presented a Mexican woman and her two children at the POE to seek asylum. GH had attempted to seek asylum at the POE two times before, the second time the day before on February, 4, 2017, with the assistance of my colleagues Ian Philibaum and Alex Mensing, independent human rights monitors. Despite them presenting GH to CBP, with documents to show she was represented and seeking a credible fear interview, and despite the fact that I emailed these same documents to the designated supervisor email for CBP supervisors at the POE, GH was forced to recant her fear of return to Mexico on video.

52. GH was told that simply, by virtue of her being Mexican, she did not qualify for asylum. She was threatened, that if she did not withdraw her asylum claim, that the "next time she tried" to seek asylum, she would be facing a deportation.

53. When I re-presented GH to the POE on February 5th, I requested to speak with a supervisor. Several minutes later, I spoke with Supervisor DeJesus, and explained that CBP officers had been coercive and verbally abusive with GH, and that she had been removed despite

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her request, and my clear written request, that she be referred to an asylum officer for a credible fear interview. Supervisor DeJesus then advised me that they would "take her back and decide what she qualifies for." I reminded Supervisor DeJesus that making decisions as to eligibility was not within his authority under Title 8 of the United States Code, Section 1225.

54. In March 2017, I began working with two families, one family of five from Guatemala, and one family of four from El Salvador, both of whom had been turned away by CBP when they sought asylum at the port-of-entry. These families later joined the large group presentations of 94 asylum seekers at the San Ysidro POE in May 2017.

55. On the afternoon of April 9, 2017, at approximately 2:00 p.m., I, along with Attorney Seungwon Chung, approached the Pedwest port-of-entry with DS, a Honduran asylum seeker, and her three year old son, DG, a Mexican citizen, who was also seeking asylum with his mother. Upon approaching the gate, Attorney Chung and I informed CBP Sergeant Pacheco that we were present with an asylum seeker who was requesting a credible fear interview with an asylum officer. Sergeant Pacheco asked what country the adult asylum seeker was from, and whether the asylum seeker was a minor. We advised him that the asylum seeker was a mother and child. Sergeant Pacheco advised us to stand to the side of the gate and to wait for a supervisor.

56. Several minutes later Chief Soto approached and engaged Attorney Chung. She explained the purpose of our presence in the port-of-entry, and Chief Soto asked Attorney Chung whether she was aware of the process that she must follow. Attorney Chung advised Chief Soto that she was there to turn in a Honduran asylum seeker. Chief Soto then advised Attorney Sung that the asylum seeker would have to go to INAMI (Mexican Immigration) to be placed on a list and obtain a ticket, and that without this ticket, CBP would not process her.

57. Chief Soto's demeanor was hostile and insistent. He repeated that we needed to follow the rules, however, when presented with the plain language of the statutory language which requires CBP officers to refer asylum seekers for a credible fear interview with an asylum

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officer, Chief Soto replied "I don't care." We attempted to show Chief Soto written correspondence received by the Mexican National Human Rights Commission, in relation to another asylums seeker's case, in which the Instituto Nacioal de Migracion, officially stated that its agency is *not responsible for giving asylum seekers tickets to seek asylum in the United States.* Chief Soto refused to read this one-page document. Chief Soto then indicated that he would speak with us no longer, and that we needed to leave. Upon walking away, he advised the other officers who were standing at the gate that they were not to allow us in.

58. On May 7, 2017, we presented 78 asylum seekers to the port-of-entry as part of the Viacrucis Refugee Caravan. Of those asylum seekers, 8 family units -- totaling 39 family members -- were previously turned away by CBP between the months of February and April.

59. Throughout the remainder of 2017 and into 2018, I have continued to present asylum seekers at the POE, and routinely witness the kinds of resistance and obstacles detailed above. In almost every instance in which I have accompanied asylum seekers to the port of entry, CBP officers have attempted to turn them away. These interactions have often required a supervisor to address the matter, and reiterate the refusal. These issues are so prevalent that in July 2017, Al Otro Lado joined with individual asylum seekers to file a lawsuit challenging these practices. That case is pending in the Southern District of California.

60. I understand that some of the recalcitrance that I have encountered with CBP officers may have been a localized practice in the past, but it is also my understanding from my colleagues in other areas of the Southwestern border that CBP officers' refusal to process asylum seekers who present at regular POE may be developing into a policy across the Southwestern border.

61. I have seen crowds of asylum seekers gathered outside the POE due to refusal to process by CBP for at least the last 7 months. Since the announcement in April 2018 by Attorney

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General Sessions of the "100% enforcement" and family separation policy, I have not noticed any reduction in the numbers of people gathered at the POE to request asylum.

62. I have seen separated families struggle with the Office of Refugee Resettlement's (ORR's) requirements for reunification. For example, one of my clients was separated from his child upon entry. The child's mother later sought asylum at the POE with the couple's older child. It took her several weeks to obtain reunification, because she was required to complete the ORR paperwork required of family members seeking to sponsor an unaccompanied minor – including several weeks of delay for finger printing and blood tests. She was also required to pay for the airfare for her child and an ORR companion to escort the child back to her.

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

DATED this 2nd day of July, 2018 at New York, New York.

Nicole Elizabeth Ramos

Nicole Elizabeth Ramos

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Exhibit 4

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

STATE OF WASHINGTON, et al., Plaintiff, v. THE UNITED STATES OF AMERICA, et al., Defendants.	NO. 2:18-CV-00939 DECLARATION OF OLIVIA CACERES IN SUPPORT OF PLAINTIFFS' MOTION FOR EXPEDITED DISCOVERY

I, Olivia Caceres, declare as follows:

1. I am over the age of 18 and have personal knowledge of the facts herein. If called as a witness, I could and would testify competently to the matters set forth below.

2. My partner J. and I have two children, M. who was born in August 2016 and A. who was born in May 2013.

3. On October 8, 2017, my family and I left El Salvador to seek asylum in the United States. We traveled with a caravan of more than 230 persons, with the goal of presenting ourselves at a United States point of entry and seeking asylum.

4. As we traveled through Mexico, my youngest son, M., became ill. Due to M.'s illness and that we did not have enough money for the bus ticket to travel to Tijuana, Mexico, my partner and I decided to split up in the last part of the trip to reach Tijuana. We were concerned about M.'s health because he was only 14 months old and we wanted him to reach a

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safe place as soon as possible. Because my eldest son A. wanted to stay with me, J. went ahead with M. Before J. left with M., I made sure he was carrying his original identification and M.'s original birth certificate.

5. On November 12, 2017, before J. presented himself at the San Ysidro point of entry, I spoke with him. I confirmed that he was carrying his identification and M.'s birth certificate and that the attorneys from Pueblo Sin Fronteras had made copies of the documents.

6. On November 12, 2017 J., along with other caravan families, presented himself at the San Ysidro point of entry with M. Two days later, I arrived in Tijuana with A.

7. On November 16, 2017, I learned from other members of the caravan who crossed successfully the border that immigration officers took M. from J. I felt as if someone had dumped a bucket of cold water on me. I was very angry at J. for letting someone take the child away from him.

8. When I was able to speak with J. he was very desperate and anxious and told me that there was nothing he could have done to keep M. because the immigration agents threatened to use force to take M. away if he did not give him up. J. did not know where M. was or why they took him away from him.

9. I was desperate to find M. With the help of Pueblo Sin Fronteras I was able to obtain phone numbers for ICE and shelters where U.S. authorities keep immigrant children. I was never able to get a response from the ICE number. I called the shelters three times a day and at first they told me that M. was not in the system.

10. Finally, after 7 days of desperately searching for M. I was able to locate him in a shelter in Los Fresnos, Texas. While the person in the shelter confirmed that M. was there, he/she did not give me more information or let me speak to M. until my attorney sent documents verifying that he was my son.

11. Through my attorney I sent copies of M.'s birth certificate, the footprints of when he was born, and copies of J.'s and my identification cards and birth certificates.

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12. After 10 to 12 days I was finally able to speak with M. by video -- it was only for 5 minutes two times a week. During the first 3 or 4 calls M. would look around to find me in the room where he was and did not see me on the phone.

13. The agency would not release him to me. They were not satisfied with my birth certificate because it did not look the same as M.'s so I had to request a new copy from El Salvador which took almost a week to get.

14. Then they asked J. and me to interview with the Salvadoran consulate. I understand that J. was interviewed by video in December 2017, but M. was not released or reunited with J.

15. On December 28, 2017, I presented myself at the San Ysidro point of entry with my son A. and sought asylum. We were held in the iceboxes. While I was there, I witnessed two mothers being separated from their children. The mothers were taken to their interviews. Meanwhile, officers arrived with the kids' birth certificates and called their names. The kids looked scared and did not know what to do but went with the officers. When the mothers finished their interviews, the officers took them to a different room. At that point the children were outside and the mothers saw them, but they could not talk to them. Although one of the mothers was in a room where I could not hear her, I saw her crying and screaming for her children. The children were also crying and looked paralyzed.

16. On January 1, 2018, A. and I were released from immigration custody. I was required to wear an ankle monitor for a few months.

17. In early January I was interviewed by the Salvadoran consulate. Although we had provided all the information requested from us, I was still unable to get M. back.

18. The last requirement was for me to undergo a DNA test to confirm that I was M.'s mother At that point, my attorney threatened to file a suit because each time we provided the required information they kept asking for more and more proof.

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19. Finally, on February 7, 2018, I received a call indicating that M. would arrive at the Los Angeles airport the next day. On February 8, 2018, after 85 days, I went to the Los Angeles airport, showed my identification, signed some documents and they returned M. to me.

20. M. looked scared, he looked absent, he did not seem to capture that he was with me. He would only stare. When we got to the car, M. started crying and screaming. He seemed really scared. He continued to cry when we got home and would hold on to my leg and would not let me go.

21. When I took off his clothes he was full of dirt and lice. It seemed like they had not bathed him the 85 days he was away from us.

22. I cannot forget the first night after we were reunited. He cried the moment we got to the bed and refused to sleep. He finally fell asleep from exhaustion but he only slept on my chest. When I tried to put him on the bed he would cry again.

23. During the first few days after we were reunited, when I would tell him not to touch things around the house because he was going to break them he would run and hide in a corner. He seemed very afraid.

24. One day when we were returning home, I found some magazines in the mailbox, I rolled them up and put them under my arm. When M. saw what I was doing he immediately started crying and did not stop until I put the magazines away. His reaction makes me think he was abused in the shelter.

25. M. is not the same since we were reunited. I thought that, because he is so young he would not be traumatized by this experience, but he does not separate from me. He cries when he does not see me. That behavior is not normal. In El Salvador he would stay with his dad or my sister and not cry. Now he cries for fear of being alone.

26. Our family separation has also affected my son A. He asks me why we left M. alone. He is scared every time he sees a police car. Although he is attending a summer camp, he cries and is scared. He does not want to play with other kids or want to make friends.

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27. Before I was reunited with M., I could not sleep, I had headaches and I did not feel comfortable.

28. J. is still detained and, although we have tried to visit him twice, we have not been allowed to do so. His detention is causing our family more stress.

I declare under penalty of perjury under the laws of the State of California and the laws of the United States that the foregoing is true and correct.

Dated this 28th day of June 2018 in Santa Monica, California.

OLIVIA CACERES

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CERTIFICATION OF TRANSLATION

Manuel Duran, a translator certified by the Judicial Council of California and the Office of Federal Courts, certifies that he translated/transcribed completely and accurately, and to the best of his ability the English translation of the following Spanish document(s):

NO. 2:18-CV-00939

DECLARATION OF OLIVIA CACERES IN SUPPORT OF CLAIMANTS' MOTION FOR EXPEDITED DISCOVERY

I swear under penalty of perjury that the foregoing is true and correct. Signed on June 29, 2018 in Oceanside, California.

CALIFORNIA
JUDICIAL COUNCIL
CERTIFICATION 300344
June 29, 2018
DATE

Manuel Duran
California Certification No. 300344
Federal Court Certification No. 93-462

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

STATE OF WASHINGTON, et al., Plaintiff, v. THE UNITED STATES OF AMERICA, et al., Defendants.	NO. 2:18-CV-00939 DECLARACIÓN DE OLIVIA CÁCERES APOYANDO PETICIÓN DE LOS DEMANDANTES PARA EXHIBICIÓN DE PRUEBAS ACELERADA

Yo, Olivia Cáceres, declaro lo siguiente:

1. Tengo más de 18 años de edad y tengo conocimiento personal de los hechos en este documento. Si se me llamara como testigo, podría y testificaría de manera competente a las cuestiones que se exponen a continuación.

2. Mi pareja J. y yo tenemos dos niños, M. quien nació en agosto de 2016 y A. quien nació en mayo de 2013.

3. El 8 de octubre de 2017, mi familia y yo salimos de El Salvador para pedir asilo en los Estados Unidos. Viajamos con una caravana de más de 230 personas, con la meta de presentarnos en un punto de entrada de los Estados Unidos y pedir asilo.

4. Mientras viajábamos por México, mi hijo menor, M., se enfermó. Debido a la enfermedad de M. y que no teníamos suficiente dinero para el pasaje de autobús para viajar a Tijuana, México, mi pareja y yo decidimos separarnos en la última parte del viaje para llegar a

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Tijuana. Estábamos preocupados por la salud de M. porque solo tenía 14 meses de edad y queríamos que llegara a un lugar seguro los más pronto posible. Porque mi hijo mayor A. se quería quedar conmigo, J. se fue adelante con M. Antes de que J. se fuera con M., me aseguré que llevara su identificación original y el acta de nacimiento original de M.

5. El 12 de noviembre de 2017, antes de que J. se presentara en el punto de entrada en San Ysidro yo hablé con él. Yo confirmé que él llevaba su identificación y el acta de nacimiento de M. y que los abogados de Pueblo Sin Fronteras habían tomado copias de los documentos.

6. El 12 de noviembre de 2017 J., junto a otras familias de la caravana, se presentaron en el punto de entrada en San Ysidro con M. Dos días después yo llegué a Tijuana con A.

7. El 16 de noviembre de 2017, yo me enteré por medio de otros miembros de la caravana que habían cruzado la frontera exitosamente que a J. oficiales de inmigración le habían quitado a M. Yo sentí como si me habían tirado una cubeta de agua fría. Estaba muy enojada con J. por dejar que alguien le quitara al niño.

8. Cuando al fin pude hablar con J. él estaba muy desesperado y ansioso y me dijo que no había nada que el pudiera haber hecho para quedarse con M. porque los oficiales de inmigración lo amenazaron con usar fuerza para quitarle a M. si no se los entregaba. J. no sabía dónde estaba M. o porque se lo quitaron.

9. Yo estaba desesperada por encontrar a M. Con la ayuda de Pueblo Sin Fronteras pude obtener los números de teléfono de ICE y albergues donde autoridades de los Estados Unidos mantienen a niños inmigrantes. Nunca obtuve una respuesta del número de ICE. Yo llamaba a los albergues tres veces al día y al principio me dijeron que M. no estaba en el sistema.

10. Finalmente, después de 7 días de buscar a M. desesperadamente pude localizarlo en un albergue en Los Fresnos, Tejas. Mientras que la persona en el albergue me confirmó que

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M. estaba ahí no me dio más información ni me dejo que hablara con M. hasta que mi abogada enviara documentos verificando que era mi hijo.

11. Por medio de mi abogada envié copias del acta de nacimiento de M., las huellas de los pies de cuando nació, y copias de las identificaciones y actas de nacimiento de J. y mías.

12. Después de 10 a 12 días finalmente pude hablar con M. por video – solo fue por 5 minutos dos veces por semana. Durante las primeras 3 o 4 llamadas M. me buscaba en el cuarto donde él estaba y no me veía en el teléfono.

13. La agencia no me lo entregaba. No estaban satisfechos con mi acta de nacimiento porque no se parecía a la de M. así es que tuve que pedir una copia nueva de El Salvador que tomó casi una semana para obtener.

14. Después nos pidieron a J. y a mí que nos entrevistáramos con el consulado de El Salvador. Tengo entendido que J. fue entrevistado por video en diciembre de 2017, pero M. no salió ni lo reunieron con J.

15. En diciembre 28 de 2017, yo me presenté en el punto de entrada de San Ysidro con mi hijo A. y pedí asilo. Nos tuvieron detenidos en las hieleras. Mientras que estuve ahí, yo fui testigo de dos madres quienes fueron separadas de sus niños. Las madres fueron llevadas a sus entrevistas. Mientras tanto, oficiales llegaron con las actas de nacimiento de los niños y llamaron sus nombres. Los niños se veían asustados y no sabían que hacer, pero se fueron con los oficiales. Cuando las madres terminaron sus entrevistas, los oficiales se las llevaron a un cuarto diferente. En ese momento los niños estaban afuera y las madres los veían, pero no podían hablar con ellos. Aunque una de las madres estaba en un cuarto donde no la podía escuchar yo la veía llorando y gritando por sus niños. Los niños también estaban llorando y se veían paralizados.

16. El 1 de enero de 2018, A. y yo salimos de custodia migratoria. A mí se me requirió que tuviera un monitor en el tobillo por unos meses.

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17. A principios de enero fui entrevistada por el consulado de El Salvador. Aunque habíamos proporcionado toda la información que nos habían pedido todavía no podía recuperar a M.

18. El último requisito fue que yo me sometiera una prueba de ADN para confirmar que yo era la madre de M. En ese momento, mi abogada amenazó con entablar una demanda legal porque cada vez que proporcionábamos la información requerida nos seguían pidiendo más y más pruebas.

19. Finalmente, el 7 de febrero de 2018 recibí una llamada donde me dijeron que M. llegaría al aeropuerto de Los Ángeles el próximo día. El 8 de febrero de 2018, después de 85 días, fui al aeropuerto de Los Ángeles, presenté mi identificación, firmé unos documentos y me regresaron a M.

20. M. se veía con miedo, se miraba ausente, no parecía capturar que estaba conmigo. Nada más se quedaba viendo. Cuando llegamos al carro M. empezó a llorar y gritar. Se veía con mucho miedo. Siguió llorando cuando llegamos a la casa, se agarraba de mi pierna y no me dejaba ir.

21. Cuando le quité la ropa estaba lleno de tierra y piojos. Parecía que no lo habían bañado los 85 días que no estuvo con nosotros.

22. No puedo olvidar esa primera noche después de que nos reunimos. El empezó a llorar al momento que llegamos a la cama y no se quería dormir. Al fin se durmió de cansancio, pero solo durmió en mi pecho. Cuando yo trataba de ponerlo en la cama él lloraba otra vez.

23. Durante los primeros días después de reunirnos cuando le decía que no tocara cosas en la casa porque las iba a quebrar él corría y se escondía en una esquina. Parecía tener mucho miedo.

24. Un día cuando regresábamos a casa, encontré unas revistas en el buzón, las enrollé y me las puse debajo del brazo. Inmediatamente cuando M. vio lo que estaba haciendo

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se puso a llorar y no paró hasta que guardé las revistas. Su reacción me hace pensar que fue abusado en el albergue.

25. M. no es igual desde que nos volvimos a reunir. Yo pensaba que, porque está pequeño no iba a estar traumatizado por esta experiencia, pero no se separa de mí. Él llora cuando no me ve. Ese comportamiento no es normal. En El Salvador él se quedaba con su papá o mi hermana y no lloraba. Ahora llora por miedo a estar solo.

26. La separación de nuestra familia también ha afectado a mi hijo A. Él me pregunta porque dejamos solo a M. Se asusta cada vez que ve un carro de policía. Aunque está asistiendo a un campamento de verano, él llora y está asustado. No quiere jugar con otros niños ni quiere hacer amigos.

27. Antes de reunirnos con M., yo no podía dormir, tenía dolores de cabeza y no me sentía a gusto.

28. J. todavía está detenido y aunque hemos intentado visitarlo dos veces no nos lo han permitido. Su detención está causando más estrés a nuestra familia.

Declaro bajo pena de perjurio bajo las leyes del Estado de California y las leyes de los Estados Unidos que lo anterior es verdadero y correcto.

Fechado este 28 día de junio de 2018 en Santa Mónica, California.

OLIVIA CÁCERES

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916-445-9555

Exhibit 5

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF CALIFORNIA

STATE OF CALIFORNIA, et al. Plaintiff, v. THE UNITED STATES OF AMERICA, et al., Defendants.	NO. 2:18-CV-00939 DECLARATION OF VERONICA SILVA TAPIA IN SUPPORT OF PLAINTIFFS' MOTION FOR EXPEDITED DISCOVERY

I, Veronica Silva Tapia, declare as follows:

1. I am over the age of 18 and have personal knowledge of all the facts stated herein.
2. I presented myself at the San Ysidro Port-of-Entry as an asylum seeker on April 25, 2018, with the following people:
   a. My partner, AVV;
   b. My daughter, NCCS;
   c. And my grandchildren DSDG age 7, AOHG age 3.
3. My daughter (grandchildren's mother) was kidnapped and then murdered in Mexico on August 15, 2017.
4. Upon arrival to the San Ysidro Port-of-Entry on April 25, 2018, I presented my daughter's death certificate to Customs and Border Protection officials to explain the absence of my daughter (grandchildren's mother).

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5. While being processed, my grandchildren were separated from me.
6. I was told by Customs and Border Protection officials that I would see my grandchildren within 1-2 days.
7. I was transferred to the Otay Mesa Detention center on April 28, 2018, where I remain detained.
8. I did not receive any information about my grandchildren's whereabouts after they were separated from me on April 25, 2018.
9. On June 13, 2018, my grandchildren were released to my other daughter NCCS (my grandchildren's aunt).

After my grandchildren were released to my daughter NCCS, I learned they had been sent to a detention facility in Arizona. I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct.

DATED this 28 days of June, 2018 at San Diego, California.

(SIGNATURE)
Veronica Silva Tapia

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STATE OF CALIFORNIA
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916-445-9555

Certificate of Translation

I, Linda Feldman, declare under penalty of perjury that I am fluent in English and Spanish languages and that the above translation of the declaration, related to Veronica Silva Tapia, the original of which is in the Spanish language, is a complete and correct translation from Spanish to English to the best of my knowledge and ability.

Dated: June 28, 2018
San Diego, California

Linda Feldman
Printed Name

Signature

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STATE OF CALIFORNIA
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SACRAMENTO, CA 94815
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF CALIFORNIA

STATE OF CALIFORNIA, et al. Plaintiff, v. THE UNITED STATES OF AMERICA, et al., Defendants.	NO. 2:18-CV-00939 DECLARATION OF VERONICA SILVA TAPIA IN SUPPORT OF PLAINTIFFS' MOTION FOR EXPEDITED DISCOVERY

Yo, Veronica Silva Tapia, declaro as lo siguiente:

1. Soy mayor de 18 y tengo conocimiento personal de todos los siguientes datos.
2. Me presente en la frontera de San Ysidro solicitando asilo en el 25 de abril, 2018 con las siguientes personas:
    a. Mi pareja, AVV;
    b. Mi hija, NCCS
    c. Y mis nietos DSDG que tiene 7 años y AOHG que tiene 3 años.
3. Mi hija (la madre de mis nietos) fue secuestrada y después asesinada el 15 de agosto 2017 en México.
4. Apenas llegando a la frontera de San Ysidro en el 25 de abril, 2018, presente el certificado de defunción de mi hija a los oficiales de Aduanas y Protección Fronteriza para explicar la ausencia de mi hija (la madre de mis nietos).
5. Al momento que nos empezaron a procesar, separaron a mis nietos de mí.
6. Los oficiales de Aduanas me dijeron que podría ver a mis nietos en 1-2 días.
7. A mi luego me mandaron al centro de detención de Otay Mesa el 28 de abril 2018, donde ahorita aún sigo detenida.
8. No recibí información de mis nietos desde que nos separaron el 25 de abril 2018.

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9. El 13 de junio 2018 por fin soltaron a mis nietos y los mandaron con mi otra hija NCCS (la tía de mis nietos).

Después de que soltaron a mis nietos, me enteré de que ellos estaban detenidos en un centro de detención en Arizona.

Juro bajo pena perjurio y bajo las leyes del Estado de California y Estados Unidos que toda esta información es completa y verdadera.

Fecha: el día 28 del mes junio, 2018 en San Diego, California.

VERONICA SILVA
Veronica Silva Tapia

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Exhibit 6

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

STATE OF WASHINGTON, et al., Plaintiffs, v. THE UNITED STATES OF AMERICA, et al., Defendants.	Civil Action No._____

DECLARATION OF ANGELICA GONZALEZ-GARCIA

1. My name is Angelica Rebeca Gonzalez-Garcia.
2. I am 31 years old. I have an eight-year old daughter, S.K., who is currently being held away from my custody in a town called Harlingen, Texas. I have not seen her since May 11, 2018 and this hurts me deeply considering we have always slept in the same bedroom since the day she was born.
3. I came to the United States via Arizona on May 9, 2018 after leaving my country on April 26, 2018.
4. My daughter and I were fleeing Guatemala for many reasons, including abuse, domestic violence and discrimination against me and, consequently, my daughter. When I felt I could no longer live safely in my country, I left Guatemala.
5. I have no family in the United States, all of my family lives in Guatemala.
6. I was previously married in Guatemala. My husband was abusive to me and he is part of the reason I fled. When I fled, I had almost completed the process of divorce but could not pay the last filing fee.

7. When I first arrived near the border of the United States, I saw a group of other people who were also looking to find a way into the United States. Someone had told me to walk through a field with tall grass. I did that and saw a fence/wall type structure. I was able to go underneath that structure with my daughter. One person, who entered at the same time as I did, fell from the structure and broke her leg.
8. Shortly after entry into the United States, I would say about 40 meters into the United States, I was surrounded by what I now know to be Border Patrol officers. Approximately three cars surrounded us. The officers instructed my daughter and me to take off our jewelry, socks and shoes and laces. We complied.
9. The officers placed my daughter and me in the back of a pick-up truck. They drove us about ½ hour until we reached a stopping point. More people entered the car. The Officers then switched us to another car. The second drive took about 45 minutes or so.
10. When we arrived at the second stop, I was placed in a room with windows and cement floors. My understanding is this facility was in Arizona. Approximately 30-40 women and children stayed in this room. We had one mattress that four people had to sleep on, including my daughter and me. The locked room had a toilet and walls. The toilet had a partial wall and people laying on the floor could see. My daughter felt embarrassed to pee in that room with all those people. The guards were mostly men and could monitor the room through the windows, as well as enter and exit the room with a key. Although we left with clothes in a bag, the Officers took the clothes. When we were left in the room we were told not to complain or bang on the walls because we would be there for "four days at most" and that I would then be deported.

11. On May 10, 2018, the day after our arrest, Officers came into the room and told me that they intended to take my daughter away from me. The Officers told us that the law with minors was "done" and again said I was going to be deported. Most devastating of all, the Officers said I would never see my daughter again. When the Officers told me this, I felt like collapsing and dying. I cannot express the pain and fear I felt at that point. My daughter was only seven years old and she was much too young to be taken from me. When I asked why the Officers said that I had "endangered" her by bringing her here. They told me to sign a consent form to take my daughter, but that it did not matter whether or not I signed, because they were going to take her either way.
12. The officer came into the cell and called my daughter and me into the big office space. They told me that if I did not sign the paper they would still take my daughter from me, and they also said it would be worst for me. During this same conversation one of the officers asked me "In Guatemala do they celebrate mother's day?" When I answered yes he said, "then Happy Mother's Day" because the next Sunday was Mother's day. I lowered my head so that my daughter would not see the tears forming in my eyes. That particular act of cruelty astonished me then as it does now. I could not understand why they hated me so much, or wanted to hurt me so much.
13. The next morning, at five a.m., the Officers made me bathe my daughter and put oversized clothes on her, as well as put a ponytail in her hair. We were in a trailer-like vehicle with three shower stalls. My daughter and I were in one and there was another mother with her child in another stall. My body was shaking and I felt like dying. Instead, I tried to be strong for my daughter. I even remember trying to laugh so my daughter would not be scared. I told her that she did not need to cry and that it would

only be a couple of days that they would take her. I dressed her in the stall and then there was a little room where I brushed her hair.

14. We waited in that room until all of the kids had been bathed, and then they took all of us into a big office room. Then they told us that would be as far as we would go with our children and they made all of the children stand in a straight line. All of the kids were given the same jacket, pants, and oversized shirt to wear. The uniforms were dark blue but had no identifying information such as a number or facility name. The youngest child in line was about 5 years old and the oldest was about 12 years old. There were approximately 10 kids and the youngest ones were crying. My daughter looked like she wanted to cry; I held back my tears so she would not. I had no idea where they were taking her, they only told me they were going to take her to a shelter. The children were lead out of the building in a single line. All of the mothers were told to return to their cells. Only two women from my cell were separated from their children. We sat next to each other in the cell and cried together and asked God to give us strength.

15. I still cannot stop crying over this incident. Nothing can prepare a person for the pain of watching their child be forcibly removed from them. Heart wrenching and devastating are the only words I have. It is not clear that I can recover fully from this incident.

16. After they took my daughter from me, I immediately started looking for her. When I asked where they had taken my daughter, the guards told me there were many shelters and they did not know where she would end up. I put in request slips to the guards at the facility I was in and did not hear back. I was moved from that facility to another facility on May 16, 2018.

17. On May 18, 2018, I was moved to a facility in Colorado. The whole time I searched for my daughter. I cannot remember how many request slips I put in, but I recall filing many. The day I arrived to the facility in Colorado they did a medical check-up and asked me a lot of questions. I told them that I thought I was going to go crazy if I would have to be separated from my daughter for a long time. I told them I had trouble sleeping, I was crying a lot, and not eating. The next day they took me to see a psychologist. The psychologist asked me if I wanted to kill someone and I said no. Then they asked me if I was going to take my own life or hurt someone and I said no. I repeatedly told them I just wanted my daughter returned to me. I wanted to know about her and I wanted to hear her voice and know that she was okay.

18. One of the request slips I placed was on May 24, 2018. After I filed that May 24, 2018 slip, I gathered enough money to call home to Guatemala. When I called home, I learned that a shelter in Texas had called about my daughter. This was the first time I heard about my daughter's location. I believe I finally spoke to my daughter around May 26th or 27th. This call gave me such joy. I was so relieved to know they had not deported my daughter.

19. Since the day she was taken away from me, I have only spoken to my daughter five times. Three times, I was allowed a video link conversation and twice by phone. The rule at the shelter is I can call Tuesdays and Saturdays. However, the phone number I have only sends me to a phone manned by a person named Julian. Sometimes, when I call, Julian does not answer. Sometimes they cannot locate my daughter. I just cannot bear the pain of never speaking with my daughter. She is my only child and I miss her terribly.

20. My daughter is not happy in this shelter. First, she just wanted to be with me. Then she told me she had been sick with both a cough and a fever. She also told me that a boy had hit her in the head and she had a bruise as a result of the assault. She also told me that she has a problem with her eye which she was told was conjunctivitis, and that because of this she is being isolated from the other children in detention.

21. My daughter's 8th birthday passed in the shelter. I could hear the pain in her voice when she told me how upset she was to spend her birthday away from me Most often, my daughter simply asks when she is going to see me again. It breaks my heart and I don't know what to tell her.

22. One thing my daughter always asks me is "can I have pizza mommy?" I promised her, when I found her again, I would buy her a pizza all for herself.

23. After weeks in detention, I was finally able to complete asylum forms and I saw an immigration Judge on June 18, 2018 and was released the following day. I have continued to try to get my daughter back ever since I know my daughter at least takes comfort from the fact that I have been released from custody, but more than anything, she just wants to be with me. While in Jail, and still today, I have had trouble sleeping knowing my daughter could not be protected by me.

24. After I was released, I flew to Massachusetts because I had a friend from my town in Guatemala who said he would help me. My friend picked me up from the airport in Boston early in the morning on Wednesday, June 20, 2018 and brought me to Framingham, Massachusetts. In Framingham, I connected with a local advocacy organization that helped me find a lawyer and other community resources.

25. This past Friday, June 22, 2018, I was finally able to get through to someone at the shelter, but learned that the only way for S.K. to be returned to me was to submit a "reunification packet request" to the shelter in order to be qualified as a "sponsor" of my own daughter. The package was about 36 pages and someone had to help me fill it out. I am lucky that someone helped me.
26. On Sunday, June 24, 2018, an advocate from a local immigrant's rights organization obtained an attorney for me.
27. When the Attorney and I called the shelter, we were told we could not get help because "it was the weekend." This felt very frustrating to me, as my daughter and I had not seen each other in person since May 11, 2018.
28. After further calls, I have learned that in order to get my daughter back, I and every person in the house where I am staying will have to travel to New Jersey to provide fingerprints, and the government will only allow this to occur on July 16, 2018. Before they spoke to the Attorney, they told me that I could not have prints until July 31, 2018. I don't understand this because my fingerprints were taken when I was arrested at the border. We have tried to offer to send these fingerprints more quickly by sending them through organizations in Massachusetts, but those requests have been refused.
29. I feel terrible that my daughter remains alone, sick, and scared in the shelter for more weeks.
30. This delay is going to be extremely difficult for me and for my daughter, and I can't understand why the government won't recognize that I am her mother and release her to me.

31. I plan to stay in Massachusetts and hope to work to support my family once I get permission.
32. I would like my daughter to come to Massachusetts to live with me. I feel like I'm developing a support network for us here.
33. Once my daughter is in Massachusetts, I plan to enroll her in school in Framingham. Though I worry that it will be difficult for my daughter to leave my side and feel safe at school, I want her to get an education.
34. I also will make sure she gets the care that she needs for her psychological and physical health. I need to see my daughter to determine whether she needs mental health services because of the separation. I know she has received counseling at the shelter because she was crying so much.

Signed under pains and penalties for perjury, this 26 day of June, 2018.

ANGELICA REBECA GONZALEZ-GARCIA

I, Diego Low, certify that I am a disinterested adult competent to interpret from Spanish to English and that I interpreted the above-referenced document from English to Spanish for the above-referenced affiant.

Signed under pains and penalties for perjury, this 26 day of June, 2018.

DIEGO LOW

Exhibit 7

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

STATE OF WASHINGTON, et al. Plaintiffs, v. THE UNITED STATES OF AMERICA, et al. Defendants.	NO. 2:18-CV-00939-MJP

DECLARATION OF ELMER OLIVA AND LUDIN JIMENEZ

We hereby declare that we, Elmer Oliva and Ludin Jimenez, with our minor children, E.O., who is 17 years of age, and K.O., who is 9 years of age:

1. We are both over the age of 18, and we have personal knowledge of the facts herein expressed.

2. Elmer, Ludin, E.O., and K.O. are Guatemalan citizens.

3. Elmer fled from Guatemala fearing for his life, after several members of his family were murdered. He arrived to the United States two years ago, seeking asylum. Since then, he has lived in Westboro, Massachusetts.

4. When Elmer left Guatemala, he had to leave his wife Ludin Jimenez, and his children behind. Eventually, in May 2018, Ludin fled Guatemala with her children, after being threatened with kidnapping and violence.

5. Ludin crossed the border with her children at McAllen, Texas, looking for a place to seek asylum. They were detained by immigration officers, and taken to a detention center. Ludin was not charged with any crime. She never saw a judge, nor went to court.

6. At the detention center, officers told Ludin that she was to be separated from her children. She was told that she would be deported, and that her children would be put up for adoption. Ludin begged to not be separated from her children, and tried to explain to the officers that they were fleeing violence in Guatemala. Her daughter was crying.

7. Afterwards, the immigration officers took Ludin to a place called "the dog pound" without her children. There, Ludin was kept in a cell, with nearly fifty other mothers. The officers told them that they could not eat because they were asking about their children. There was a pregnant woman who fainted from hunger. The immigration officers took this woman to a clinic.

8. One immigration officer told Ludin, "how a drop of water destroyed a country."

9. The officers insulted Ludin and the other women in the cage. They called them names, and told them they were stupid when they asked about their children.

10. There was an immigration officer who was a good person. He said that he understood what was going on, but could not help. He brought them cookies, since he knew they did not get enough to eat.

11. Ludin was not allowed to bathe or brush her teeth for the eight days that she spent in the "dog pound."

12. Afterwards, they took Ludin to another detention center, in Laredo, Texas. There, they said she could bathe, they were going to give Ludin a telephone card with 3 minutes to call. Ludin called Elmer, who said he had spoken to their children, and that they were in Michigan.

13. Ludin was afraid to ask about her children, so she asked an officer when she could see a judge in court. The officer said they were investigating Ludin and Elmer, and that she must be patient.

14. After nine or ten days, they took Ludin to another detention center, in Taylor, Texas.

15. In Taylor, Ludin was finally able to speak to her children, after being separated from them for 21 days.

16. Ludin contacted someone in Catholic Charities in Taylor, Texas. Two days after speaking to the person from Catholic Charities, Ludin was able to obtain an interview of credible fear, and was granted freedom under a bail of $1,500.

17. After leaving the detention center in McAllen, E.O. and K.O. were taken to another detention center. They separated E.O. and K.O. in different cells, one in front of the other. Even though E.O. was able to see his sister, when he tried talking to her, the immigration officers yelled at him.

18. In the Texas center, there were two year old children in the same cages as older children.

19. An immigration officer told E.O. that he knew that he was over 17 years of age, and that his birth certificate was a fake. When E.O. insisted that he was 17, the officers kicked him.

20. Once, they awoke K.O. in the early morning, pulling his hair, and saying he had to take a shower.

21. K.O. and E.O. did not have shoes or blankets in the detention center, and there were people in the cells that had to sleep standing up. They did not have enough to eat either, and could not drink the water, because of the chlorine they added to it.

22. E.O. and the incarcerated children were insulted - called named such as "animals" and "donkeys."

23. They took E.O. and K.O. to Michigan in an airplane, but upon arriving Michigan they were separated. They took E.O. to a shelter, whereas K.O. went to a foster home.

24. In the Michigan shelter, the children could speak to Elmer several times per week.

25. After 21 days of separation from their mother, finally E.O. and K.O. were able to speak to their mother on the phone. K.O. was so sad after this first call that the shelter officers took E.O. to a place to comfort his little sister.

26. After filling a lot of forms, the shelter allowed Elmer to meet his children in Massachusetts. They flew to Boston from Michigan on June 19th, 2018; after five weeks of separation.

27. On June 28th, 2018, Elmer, E.O. and K.O. met with Ludin at the Boston airport, after more than six weeks of separation.

28. Elmer is going to enroll E.O. and K.O. in the Westboro Public Schools, in Massachusetts.

29. Elmer and Ludin are working to find medical attention for the family. They think that K.O., in particular, needs to see a psychologist.

We declare under penalty of perjury of the laws of the United States of America that the aforementioned is true and correct.

Given on the _____ day of the month of June of 2018, in Boston, Massachusetts.

_____
ELMER OLIVA

_____
LUDIN JIMENEZ

With our minor children, E.O. and K.O.

EXHIBIT A

Nosotros, Elmer Oliva, y Ludin Jiménez, con nuestros hijos menores, E.O., quien tiene 17 años, y K.O., quien tiene 9 años, declaramos lo siguiente:

1. Ambos tenemos más que 18 años y uno o ambos tenemos conocimiento personal de los hechos aquí expresados.

2. Elmer, Ludin, E.O., y K.O. son ciudadanos de Guatemala.

3. Elmer huyó de Guatemala por miedo por su vida después de que varios de los miembros de su familia fueron asesinados. Él llegó a los Estados Unidos hace dos años para buscar asilo. Desde entonces, él ha vivido en Westboro, Massachusetts.

4. Cuando Elmer dejó a Guatemala, tuvo que dejar a su esposa, Ludin Jimenez, y sus hijos. Eventualmente, en mayo de 2018, Ludin huyó de Guatemala con sus hijos después de recibir amenazas de secuestro y violencia

5. Ludin cruzó la frontera con sus hijos en McAllen, Tejas, buscando un lugar para presentarse para pedir el asilo. Fueron detenidos por oficiales de inmigración y los llevaron a un centro de detención. Ludin no fue cargada con un delito. Ella nunca vio a un juez o fue a la corte.

6. En el centro de detención, oficiales dijeron a Ludin que le iba a separarse de sus hijos. Se dijeron que les iban a deportar y sus hijos serian puestas en adopción. Ludin les suplicó que no la separara de sus hijos e intentó de explicar a los oficiales que estaban huyendo de violencia en Guatemala. Su hija estaba llorando.

7. Luego, los oficiales de inmigración llevaron Ludin a un lugar que se llama "la perrera" sin sus hijos. Allá, Ludin estuvo en una jaula con casi cincuenta otras madres. Los oficiales dijeron que ellas no podían comer porque estaban preguntando por sus hijos. Había una mujer embarazada que se desmayó debido al hambre. Los oficiales de inmigración llevaron esta mujer a una clínica.

8. Un oficial de inmigración dijo a Ludin, "como una gotita de agua, destruyó su país."

9. Los oficiales insultaron a Ludin y las otras mujeres en la jaula. Las llamaron nombres malos, y dijeron que fueran estúpidas cuando preguntaron por sus hijos.

10. Había un oficial de inmigración muy bueno. Él dijo que el entendía lo que estaba pasando, pero no podía ayudar. Él les traía galletitas, porque sabía que no tenían suficiente de comer.

11. Ludin no fue permitida bañarse ni cepillarse los dientes durante los ocho días que estaba en la perrera.

12. Luego, llevaron a Ludin a otro centro de detención en Laredo, Texas. Alla, dijeron que después de ducharse, ellos iban a regalar a Ludin una tarjeta de llamada con tres minutos. Ludin llamó a Elmer, quien dijo que había hablado con sus hijos y que ellos estaban en Michigan.

13. Ludin tenía miedo de preguntar por sus hijos, así que preguntó a un oficial cuando podía ir a ver a un juez en una corte. El oficial dijo se estaban investigando a Ludin y a Elmer, y que ella debería tener paciencia.

14. Después de 9 o 10 días, llevaron Ludin a otro centro de detención en Taylor, Texas.

15. En Taylor, por fin Ludin fue capaz de hablar con sus hijos, después de 21 días de separación.

16. Ludin se conectó con alguien de Caridades Católicos en Taylor, Texas. Dos días después de hablar con la persona de Caridades Católicos, Ludin logró a conseguir una entrevista de temor creíble, y salió bajo una fianza de $1,500.

17. Después de salir del centro de detención en McAllen, E.O. y K.O. fueron llevados a otro centro de detención. Separaron E.O. y K.O. en jaulas diferentes, uno frente al otro. Aunque E.O. podía ver a su hermana, cuando intentó de hablar con ella, los oficiales de inmigración lo gritaban.

18. En el refugio en Texas, había niños que tenían dos años en las jaulas juntos con niños mayores.

19. Un oficial de inmigración dijo a E.O. que él sabía que E.O. tenía más que 17 años y que su acta de nacimiento era falsa. Cuando E.O. insistía que tenía 17 años, los oficiales le patearon.

20. Una vez, se despertaron a K.O. en la madrugada, jalando por el pelo diciendo que tenía que ducharse.

21. K.O. y E.O. no tenían ni zapatos ni mantas en el centro de detención y había tantas personas en las jaulas que tenían que dormir a pie. Ellos tampoco tenían suficiente de comer y no podían tomar el agua debido al cloro que añadieron.

22. E.O. y los otros niños encarcelados fueron insultados – llamados nombres como "animales" y "burros."

23. Llevaron E.O. y K.O. a Michigan juntos en un avión, pero al llegar a Michigan los separaron. Llevaron a E.O. a un refugio, mientras K.O. fue a una casa foster.

24. En el refugio en Michigan, los hijos podían hablar con Elmer varias veces cada semana.

25. Después de 21 días separados de su madre, por fin E.O. y K.O. podían hablar con su mama por teléfono. K. O. estaba tan triste después de esta llamada que los oficiales del refugio llevaron a E.O. a un lugar para consolar a su hermanita.

26. Después de llenar muchos formularios, el refugio dejó Elmer reunir con sus hijos en Massachusetts. Ellos volaron a Boston desde Michigan el día 19 de junio, 2018, después de cinco semanas de separación.

27. El día 28 de junio, 2018, Elmer, E.O. y K.O. se reunieron con Ludin en el aeropuerto en Boston después de seis semanas de separación.

28. Elmer va a inscribir a E.O. y K.O. en escuelas públicas en Westboro, Massachusetts.

29. Elmer y Ludin están trabajando para encontrar atención médica para la familia. Ellos piensan que K.O., en particular, necesita ver a una psicóloga.

Declaramos bajo la pena de perjurio de las leyes de los Estados Unidos de América que lo anterior es verdadero y correcto.

Ejecutado el día 28 de junio de, 2018 en Boston, Massachusetts.

ELMER OLIVA

LUDIN JIMENEZ

Con nuestros hijos menores, E.O. y K.O.

EXHIBIT B

Baystate Interpreters, Inc.
55 Lake Street
Gardner, MA 01440

Phone (888) 663-8000
Fax (888) 663-9000

Website: www.BaystateInterpreters.com
Email: service@BaystateInterpreters.com

CERTIFICATION OF TRANSLATION

Commonwealth of Massachusetts
County of Worcester

I, Mellissa Richard, Translation Coordinator, Baystate Interpreters, Inc., hereby attest that the attached translation has been made by qualified bilingual staff of Baystate Interpreters, Inc. and that it is a true and correct English version of the document provided in Spanish to the best of my knowledge and belief.

I also certify that the attached is an accurate and certified copy of the document provided by the client who understands that he/she may be required to submit the original document at a later date.

Signature Mellissa Richard Date: 06/29/2018

File Registration Code: SPA.

On this 29th day of June, 2018 before me, the undersigned notary public, personally appeared Mellissa Richard, proved to me through satisfactory evidence of identification to be the person whose name is signed on the preceding document and acknowledged to me that she signed it voluntarily for its stated purpose.

Gayle S. Le Clair

Print Name: Gayle S. Leclair
Notary Public
My Commission Expires: March 23, 2023

Exhibit 8

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

STATE OF WASHINGTON; COMMONWEALTH OF MASSACHUSETTS; STATE OF CALIFORNIA; STATE OF MARYLAND; STATE OF OREGON; STATE OF NEW MEXICO; COMMONWEALTH OF PENNSYLVANIA; STATE OF NEW JERSEY; STATE OF IOWA; STATE OF ILLINOIS; STATE OF MINNESOTA; STATE OF RHODE ISLAND; COMMONWEALTH OF VIRGINIA; STATE OF NEW YORK; STATE OF VERMONT; STATE OF NORTH CAROLINA; STATE OF DELAWARE; and THE DISTRICT OF COLUMBIA, Plaintiffs, v. THE UNITED STATES OF AMERICA; DONALD TRUMP, in his official capacity as President of the United States of America; U.S. DEPARTMENT OF HOMELAND SECURITY; U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT; U.S. CUSTOMS AND BORDER PROTECTION; U.S. CITIZENSHIP AND IMMIGRATION SERVICES; U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES; OFFICE OF REFUGEE RESETTLEMENT; KIRSTJEN NIELSEN, in her official capacity as Secretary of the U.S. Department of Homeland Security; THOMAS HOMAN, in his official capacity as Acting Director of U.S. Immigration and Customs Enforcement; KEVIN K. MCALEENAN, in his official capacity as Commissioner of U.S. Customs and Border Protection; ALEX AZAR, in his official capacity as Secretary of U.S. Department of Health and Human Services; SCOTT LLOYD, in his official capacity as Director of Office of Refugee Resettlement; and JEFFERSON BEAUREGARD SESSIONS III, in his official capacity as the Attorney General of the United States, Defendants.	No.

DECLARATION OF MR. C[redacted]

I, Mr. C[redacted] hereby declare as follows:

1. I am pursuing claims for asylum, withholding of removal, and for relief under the Convention Against Torture. My daughter and I have been the target of extortion, violence, and death threats by gang members and police officers in Honduras, and for that reason I wish for my identity to remain anonymous. If my identity were publicly revealed, I fear that the individuals who have pursued me in Honduras would harm me and my family. They have already killed [redacted], as well as [redacted]. I am willing to submit an unredacted version of this declaration to the court for inspection, and for the Defendants to confirm my identity, but I am not willing to identify myself publicly.

2. In March 2018, my daughter and I entered the United States at a legal port of entry at Hidalgo, Texas. Upon reaching the border guards and showing our Honduran identification, both my daughter and I were detained. After several hours, my daughter was taken from me without any explanation. The separation was very difficult for me and my daughter who suffers from asthma. The border guards were verbally abusive and refused to allow me to speak with her to assure her that everything would be okay. My daughter was very upset and confused.

3. I have not seen my daughter since that day in Hidalgo, Texas, more than three months ago.

4. During my detention, I repeatedly asked for information regarding my daughter and when we could be reunited. No one provided me with an answer to these questions. I did not know where she was or if she was safe.

5. During my detention, I was transferred to several different facilities. At one point, I was transferred—in the dead of night, shackled at the wrists, waist and ankles with other detainees—to a bus and then an airplane, eventually arriving at [redacted] after a full

day of travel. Because the detainees were chained together at the ankles, several stumbled and fell as we struggled to ascend and descend the steps of the bus and airplane. One man urinated himself as the detainees were not given bathroom privileges.

6. I have been detained in [redacted] for the past several months. My detention center provided me with a telephone number to obtain information about my daughter. I called that telephone number repeatedly but was not able to get information about my daughter's whereabouts from anyone.

7. In April 2018, I passed my "credible fear interview."

8. Although the authorities did not notify me of my daughter's whereabouts and did not put me in contact with my daughter, I was able to discover her location through the help of [redacted]. My daughter had memorized the phone number of [redacted] who lives in the states. [redacted] was able to arrange a three-way call approximately two months after I had been separated from my daughter.

9. I now understand that my daughter has been placed at a crowded facility with many other children. I will not say specifically where my daughter is located for fear of her safety.

10. Since my first contact with my daughter, approximately one month ago, we have been permitted to speak once per week for only a few minutes each time. My daughter and I miss each other very much and I can tell that she is upset on our phone calls.

11. I understand that my daughter is being held at a facility that is very close to where I am being held. Although the authorities at the facility where I am being held have said that they allow visitations, the people who are holding my daughter have not permitted her to visit me. My

attorneys have offered to arrange for transportation and to coordinate with the facility, but these people have not allowed me to see my daughter.

12. I have submitted an application for parole. I have a parole sponsor who is a legal resident of the United States, and I am willing to cooperate fully with the authorities. I hope that I can be released on parole and reunited with my daughter.

13. I fully intend on pursuing my claims for asylum, withholding of removal, and for relief under the Convention Against Torture. I was a victim of gang and police violence in Honduras and I understand that my claims are strong.

14. Both my daughter and I are scared. I just want to see her again and to know that she is okay.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on this 28 th day of June, 2018 in [redacted].

[redacted]
Mr. C[redacted]

Certification of Translation

I am fluent in English and Spanish. I read the above declaration to the declarant, Mr. C[redacted], and he confirmed its accuracy before he executed the declaration. I declare under penalty of perjury that the foregoing certification is true and correct.

Executed on this 28 th day of June, 2018 in [redacted].

Mr. J[redacted]

Exhibit 9

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

STATE OF WASHINGTON, et al., Plaintiffs, v. DONALD TRUMP in his official capacity as President of the United States, et al., Defendants.	NO. 2:18-cv-00939-RAJ DECLARATION OF G. DOE IN SUPPORT OF MOTION FOR A PRELIMINARY INJUNCTION

I, G. Doe, declare as follows:

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

2. I am currently being held in the Federal Detention Facility in Sheridan, Oregon. Immigration and Customs Enforcement (ICE) brought me to Sheridan after presenting myself as an asylum applicant at a border port of entry.

3. I respectfully ask the Court allow me to submit this declaration under a pseudonym, G. Doe. I came to the United States seeking asylum for my family and myself. I am afraid that if my name, or my family members' names, are publically available, that we will be subject to retaliation, abuse, and more violence.

4. I am twenty-five years old. I have been with my partner and the mother of my child for over five years. Our son is four.

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Portland, OR 97201
Tel: (971) 673-1880 / Fax: (971) 673-5000

5. My family traveled to the United States seeking safety from threats and violence in our home country. Many horrible things happened to people in my community at home. For example, a close friend of mine was murdered for his beliefs, leaving behind eight children. When they began to come for me, threatening my family, we had no choice but to leave.

6. We arrived at the border on the third week of May. We told the officials there that we were afraid to return to our country.

7. On the first night we arrived, my family and I were taken to a large room without beds or other facilities and we waited out the night there.

8. The following day they took my partner and four-year-old son away from me. ICE didn't explain why they were taking them away. I asked to speak with my partner. All they said was that they didn't have time for me; nothing more was explained.

9. After they separated me from my family, I was then taken to a room where sixty men were kept caged in very tight quarters, with only three toilets to share. We were in there, day and night, for thirteen days. During those thirteen days, I hardly slept. People were getting sick and catching coughs and flus. There was hardly any food provided to us and I went to bed hungry most nights.

10. After thirteen days in this cell, I was transferred to Sheridan, Oregon. I still had not spoken to my partner or my son for weeks.

11. When I arrived at Sheridan, many more days passed until I was finally able to speak with my partner. I waited, not knowing where they were, or what had happened to them since we had been torn apart weeks before.

12. I was finally able to speak with my partner and receive news of my son on June 23, 2018 – over a month after being separated from them. I was able to speak with them for only fifteen minutes.

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Tel: (971) 673-1880 / Fax: (971) 673-5000

13. I cannot describe the relief I felt when I spoke with my partner. Until that point, I was ready to give up on everything. They had taken everything away from me and it was like I was living in purgatory. I knew I could not protect my son or my partner and this caused me so much pain. My stomach hurt constantly, and the racing thoughts I had at night kept me awake.

14. I want to be with my family, to see my son and my partner. I have to find the strength to keep going. I want to know when this will end.

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

DATED this 27th day of June, 2018 at Sheridan, Oregon.

G. Doe

Oregon Department of Justice
100 SW Market St
Portland, OR 97201
Tel: (971) 673-1880 / Fax: (971) 673-5000

Exhibit 10

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

STATE OF WASHINGTON, et al., Plaintiffs, v. DONALD TRUMP in his official capacity as President of the United States, et al., Defendants.	NO. 2:18-cv-00939-RAJ DECLARATION OF L. DOE IN SUPPORT OF MOTION FOR A PRELIMINARY INJUNCTION

I, L. Doe, declare as follows:

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

2. I am currently being held in the Federal Detention Facility in Sheridan, Oregon. Immigration and Customs Enforcement (ICE) brought me to Sheridan after presenting myself as an asylum applicant at a border port of entry.

3. I respectfully ask the Court allow me to submit this declaration under a pseudonym, L. Doe. I came to the United States seeking asylum for my family and myself. I am afraid that if my name, or my family members' names, are publically available in connection with this lawsuit, that we will be exposed to more retaliation, abuse, and more violence.

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Portland, OR 97201
Tel: (971) 673-1880 / Fax: (971) 673-5000

4. I came to the United States a month ago with my wife, my five-year-old son and my one and a half year-old daughter.

5. My family and I travelled to the United States to pursue asylum and other humanitarian relief.

6. Once we entered the border, they began separating us. They sent the men in one direction and the women and children in another.

7. I did not know where my wife and two children were going or why they were taking them away from me.

8. For eight days I was held in a small room with over 60 men. We called it The Freezer because the air conditioning was so strong that we felt like ice. The men got sick inside and we had to sleep, use the toilet, and pass the time all in the same tiny room.

9. The day before I was transferred, I was informed that I was going to Tacoma and was given some sort of card. I had no idea where my family was or whether they were going to join me in Tacoma, Washington.

10. I wasn't taken to Tacoma, however, I was taken to a federal corrections facility in Sheridan, Oregon.

11. It wasn't until June 14 that I was finally able to speak with my wife, briefly on the phone.

12. Being separated from my children has been so hard. I have been very stressed, I have headaches, and I can't sleep.

13. When I finally spoke to my wife, my five-year-old son cried and cried. I know that I cannot stop his crying and that every day his pain is worse. My son offered to ride his bike here, to try to get me out. He doesn't understand that he can't save me.

14. My daughter is at such an enjoyable age, when it is so sweet to be with her. I am sad because she is so young and I cannot watch her grow.

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15. My thoughts run in circles, and I feel as though I am going to lose my mind. I need to see my family and take care of them.

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

DATED this 27th day of June, 2018 at Sheridan, Oregon.

Javier
L. Doe

Oregon Department of Justice
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Portland, OR 97201
Tel: (971) 673-1880 / Fax: (971) 673-5000

Exhibit 19

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

STATE OF WASHINGTON, Plaintiff, v. DONALD TRUMP in his official capacity as President of the United States, et al., Defendants.	NO. **DECLARATION OF** Nery Flores-Oliva

I, Nery Flores-Oliva, am over eighteen years of age, have personal knowledge, and am competent to testify regarding the facts contained herein, and hereby declare the following:

1. I came to the United States with my 6-year-old son, afraid after the killed my husband's two brothers.
2. I entered the United States on May 14, in Reynoso. I was picked up and taken to the "icebox," a cold room. They treated us badly. My son was with me.
3. The following day the officer told me that they were going to take my son to shower and

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(206) 464-7744

And they sent me somewhere else and they never returned with my son. I felt deceived. I never saw him again.

4. From there we were taken to a detention facility in McAllen, TX. The conditions were bad. We were treated badly. The water was [illegible]. White bread for 4 days, 3 times a day, no showers for 4 days.
5. I spoke with the officer but we never spoke about asylum.
6. On June 3, they brought me to Washington by plane.
7. I only ask that I be reunited with my son. He is young. He needs me.

I hereby declare under penalty of perjury under the laws of the state of Washington and the United States that the aforementioned is true and correct.

ON this day, June 20, 2018 in Seattle, Washington.

_____

Name: Nery Flores Oliva

OFFICE OF THE ATTORNEY GENERAL OF WASHINGTON
800 Fifth Avenue, Suite 2000
Seattle, WA 98104-3188
(206) 464-7744

Multilingual CONNECTIONS

CERTIFICATE OF ACCURACY

I certify that the Declaration of Nery Flores-Oliva was translated into English by a translator and editor working for Multilingual Connections who are both competent and qualified to perform translation into this language. These document has not been translated for a family member, friend, or business associate. I attest that the final target file is an accurate and complete translation of the original Spanish version.

Raudel Caldera
Senior Project Manager
Multilingual Connections, LLC

June 26, 2018
Date

ata American Translators Association CORPORATE MEMBER

Multilingual Connections, LLC #255450

Subscribed and sworn to before me this
26 day of June, 2018, in
Evanston, County of Cook, State of Illinois.
Notary Public

OFFICIAL SEAL
KATHERINE INGRID BAUMANN
NOTARY PUBLIC, STATE OF ILLINOIS
My Commission Expires Jun 15, 2020

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

STATE OF WASHINGTON, Plaintiff, v. DONALD TRUMP in his official capacity as President of the United States, et al., Defendants.	NO. DECLARACIÓN DE Nery Flores-Oliva

Yo, Nery Flores-Oliva, tengo más de dieciocho años de edad, tengo conocimiento personal y soy competente para testificar sobre los hechos aquí contenidos, y declaro lo siguiente:

1. Yo me vine a los Estados Unidos con mi hijo de 10 años, por miedo despues que mataron a los dos hermanos de mi esposo.
2. Entre a los Estados Unidos el 14 de Mayo en Reynosa. Me recogieron y llevaron a la "hielera" un cuarto frio. Los trataban mal. mi hijo estaba con nosotros.
3. El siguiente dia el oficial me dijo que se iba llevar a mi hijo a bañar y

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me mandaron por otro lado y nunca regresaron con mi niño. Me sentí engañada. Ya no volví a verlo.

4. De ahí me llevaron al centro de detención McAllen Tx. Las condiciones estaban malas. Los trataban mal. La agua fría. pan blanco por 4 días 2 veces por día, sin baño por 4 días.

5. Hablé con el abogado pero nunca hablo con mugo de asilo.

6. El 3 de Junio me trajeron a Washington por avion.

7. Solamente lo que pido es reunir me con mi niño. El está pequeño. El me necesita.

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Seattle, WA 98104-3188
(206) 464-7744

Declaro bajo pena de perjurio bajo las leyes del estado de Washington y de los Estados Unidos que lo anterior es verdadero y correcto.

FECHADO este 20 día de Junio, 2018 en Seattle, Washington.

Nombre: Nery Flores Oliva

ATTORNEY GENERAL OF WASHINGTON
800 Fifth Avenue, Suite 2000
Seattle, WA 98104-3188
(206) 464-7744

Exhibit 21

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF WASHINGTON

STATE OF WASHINGTON, et al., Plaintiffs, vs. THE UNITED STATES OF AMERICA, et al., Defendants.	Civil Action No. _____

DECLARATION OF W.R.

1. I am thirty-five years old.
2. I have a nine-year-old son, A.R., who was forcibly separated from me and is currently being held in a facility in a town called Baytown, Texas. I have not seen him since May 30, 2018.
3. I came to the United States on May 28, 2018, after leaving my country on May 23, 2018.
4. My son and I were fleeing Brazil for many reasons, including abuse, domestic violence, threats to my life, and threats to involve my young son in drug trafficking. Though I went to the authorities in Brazil on numerous occasions, they refused to protect my son and I. I was fearful for my life and my son's life.
5. I was married in Brazil. My husband was an alcoholic, used drugs, sold drugs, and was abusive to me and my son. He beat me, causing bruises, bleeding, and pain to many parts of my body. He also beat and burned my son, A.R. On more than one occasion, he threatened me with his gun. On more than one occasion, he

threatened my son and me with a knife. I have been trying to get a divorce in Brazil for the past six years, however my husband would not allow me to do so.

6. I sought police protection, particularly when I had been severely beaten, but the police refused to intervene and told me they would not get involved in "domestic disputes."
7. My husband is involved in drug trafficking and has associates and family members who I am very afraid of. He believes that he will make more money if he uses a child to sell drugs. He has done this with a son from another marriage, and that older son has now been arrested many times. My husband has threatened to kill me if I do not allow him to use A.R. to sell drugs with him. My husband's older son has also threatened me. A.R. has never had any involvement with drugs and I want to protect him from that life.
8. I understand that this declaration is for purposes of a lawsuit challenging separation of families. There is much more to say about why I left my country and what happened when I presented myself at the border, but I am focusing here on how I was separated from my son and the impact that separation is having on us.
9. I have family in Massachusetts, my brother, sister-in-law, and nephews.
10. After arriving near the southern border of the United States, I walked on foot for over two hours through desert and fields to cross into the United States.
11. I was carrying with me some belongings, the entirety of my savings, passports for myself and A.R., IDs for myself and A.R., A.R.'s birth certificate, and A.R.'s vaccination record.

12. Shortly after entering the United States, I saw an individual who I now know was be a Border Patrol officer. I immediately surrendered both myself and my son.
13. The Border Patrol officer took our belongings, including our money, jewelry, passports, IDs, other records, coats, hats, and backpack.
14. He spoke to me in Spanish, but I did not understand because I speak Portuguese. He used his cell phone to translate text in an effort to communicate with me. The Border Patrol officer required me to fill out paperwork, but I do not know what the paperwork was. The Border Patrol officer then called another officer.
15. While we were waiting for the second officer, the first officer asked me why I was coming to the United States, and I told him it was because I was afraid of dying in my country. This conversation occurred using the Border Patrol Officer's cell phone. During the entire time I was held in detention facilities, no one else asked me why I had come to the United States.
16. When the second Border Patrol officer arrived, my son and I were loaded into a truck and taken to a detention facility somewhere in Arizona.
17. When we arrived at the facility I was fingerprinted and photographed. I was told we would only be at this location for "a few days."
18. Immediately after our arrival, my son A.R. was separated from me. As officers led me to a cell, I took A.R.'s hand and tried to bring him with me. The officer stopped me and abruptly took A.R. away. A.R. was crying and calling out for me, but the officer quickly removed him. Everything occurred so fast, I was very confused.

19. I was placed in a cell that I believe was meant to hold 20 or so women. It was approximately 15 feet by 15 feet. There were approximately 90 other women in this cell. The cell had cement floors, and no beds or mattresses. There was not enough space to lay down. We were given aluminum sheets for warmth. It was very cold. The cell had a small bathroom with no door, with a video camera that faced the toilet; the camera filmed everything when you used the toilet.
20. My son was taken to a similar cell. If I walked to the front of my cell, and he walked to the front of his cell, we could see each other from afar. He was held with other children of all ages. The children's' cell also had no beds or mattresses.
21. I could see A.R. crying in his cell. He appeared very upset and scared. I was also so upset and so afraid. It was the worst experience of my life.
22. While I was in this facility I was cold, hungry, and thirsty at all times. The only food we were given were "Cup of Noodle" cups. Most of the time, these noodles were not cooked, though there were a few times they gave us hot water. The only water available to drink came from a small sink next to the toilet and tasted as if it had been treated with bleach. The water was very hard to drink and burned my mouth. The children were given the same food and water as the adults. There was no way to bathe or shower, no soap, and no way to maintain basic hygiene. The cells were never cleaned during the approximately 10 days I was held there.
23. On May 30, 2018, I observed an officer enter the children's' cell and choose some of the children. A.R. was among those chosen and taken out of the cell. When I saw this I began pounding on the door of my cell and screaming for help but no

one came. I did not know what was happening. I was terrified of what was happening to my son.

24. Later that day an officer came to my cell and called for me. He asked me questions, including whether I had any more money. He told me that A.R. was going to be transferred to another location. I objected, but the officer told me not to worry because when I left detention I would be able to pick up my son.

25. The officer brought A.R. to the front of my cell, and I was able to hug him goodbye. The officer then took A.R. away, and I was returned to my cell. This is the last time I saw my child. I cannot express the pain and fear I felt at that point.

26. I stayed in the detention facility in Arizona for approximately ten days. I asked about A.R. every time there was an officer on duty who spoke Portuguese. The officer would not give me any information, except to say that I could see my son when I was released from detention. I had no contact with my son whatsoever.

27. During these ten days I remained in the same cell with the same conditions. I was not allowed out of the cell at any time. I remained cold, hungry, thirsty, and was unable to bathe myself. When I slept, it was on the cement floor.

28. On or around June 6, 2018, I was transferred via bus to a different location. Many other women were transferred with me. I do not know where this facility was located. At this location I was held in a smaller cell, but the conditions were the same as the first facility. During this time, I was not provided any information about my son, A.R.

29. After a day or two, I was transferred again to a third detention center. This was an all-male detention center; however, many women were transferred with me.

They had only one cell for women. This facility provided small mattresses, milk, a piece of bread, and a piece of fruit. At this facility, I was allowed to shower for the first time since being detained. During this time, I was not provided any information about my son, A.R.

30. On or about June 8, I was transferred yet again to a detention center that I now know was in Eloy, Arizona. When I arrived in Eloy they performed medical tests, such as a urine test for pregnancy, and performed mental health screenings. During these appointments a Portuguese interpreter was only available by telephone. I was asked to sign paperwork, but I do not know what the paperwork was for.

31. At the facility in Eloy, I was given a small room with a bed, was allowed to shower, and was given regular meals for the first time.

32. On or about June 9, 2018, I learned that I could submit a request for information about my son. I submitted a "Detainee Request Form" and asked for information about A.R. I received a written response, in Spanish, which stated that my son was in a facility for minors, and that I could call or contact him by phone at 210-556-5030. I was not provided the name or location of the facility. I was told that I could not call the facility until Wednesday, June 13, 2018. I was never provided with my son's immigration case number.

33. I called twice and was told that I could not speak with my son. I spoke to my son on the telephone for the first time on or about June 19, 2018. This was about 20 days after he had been separated from me.

34. When I spoke to A.R., someone was with him monitoring his phone call. He was not allowed to tell me his location or how he got there. He was only allowed to tell me that he was doing alright, that he had a bed, and that he was going to school. If he tried to tell me anything else, the phone was taken away from him.
35. While I was at the facility in Eloy, I was told that I could leave if someone could pay a bond for me. I was told that if I did not pay the amount they requested, I would be deported. The officers did not mention my son.
36. I was allowed to call my brother, who lives in Malden, Massachusetts. My brother paid my bond of $7,500.
37. After my bond was paid, I was loaded onto a bus with other men and women. We were driven to a bus station and released. When I asked about my son after my release, I was told that President Trump had changed the policy now my son would not be released to me.
38. After I was released I traveled to Malden, Massachusetts, to live with my brother.
39. Since I was released, I have been able to call certain phone numbers to speak with A.R. The phone number for me to call has changed over time; to date I have been given three different phone numbers. Sometimes, I am allowed to talk to him, but sometimes I am not. Occasionally, A.R. calls me. During this time, his phone calls continued to be monitored. I asked the adults who answer the phone where my son is located, but they refused to confirm the name or location of the facility where he is being held.
40. I sought assistance from the Brazilian Workers' Center, who have continued to provide me with referrals, assistance, and interpreter services.

41. On June 25, 2018, I was finally able to speak to a case worker at the facility where my son is being held, and I was told that the only way for A.R. to be returned to me was to submit a "Family Reunification Packet" to the Office of Refugee Resettlement. This paperwork requires me to apply to be qualified as a "sponsor" for my own son. The package was complex and lengthy and someone from the Brazilian Workers' Center had to help me fill it out. I submitted this paperwork right away that same day, via fax, to the Office of Refugee Resettlement. I included in this paperwork A.R.'s birth certificate and a copy of my identification.
42. On June 26, 2018, I met with an attorney for the first time and secured *pro bono* representation.
43. On June 27, 2018, I had a telephone "interview" with a case worker from BCFS Baytown in Texas. This was the first time that someone confirmed my son's location. I wanted my attorney present at the meeting. At first it did not seem like the caseworker would be willing to speak with me with my attorney present. I asked several questions about my son, some of which the case worker answered and some of which she refused to answer. Specifically, I asked for my son's alien registration number, but the case worker refused to provide it. The case worker then told me that she really needed to get through the interview, and that because I had so many questions she was going to "have to reschedule the interview." I did not want to do anything to delay my son's release, so I stopped asking questions about my son and asked her to continue the interview. During the interview, she referred to me as a "sponsor" – not a parent.

44. The first questions the case worker asked were about my religion and religious practices. She specifically asked me whether I was Christian and attended church. When I said I was religious, the case worker responded favorably saying: "Great!"

45. She then asked me about my marital status, and how I "disciplined" my son. She then asked where my son would live, sleep, and go to school, and who would take him to and from school. She also asked if I knew where the closest hospital or clinic was located, and if my son had any health or behavioral problems. The case worker then asked me many questions unrelated to my care of my son, such as when we left Brazil, who planned the trip, how we paid for the trip, how we traveled to the United States, and why we came to the United States. I felt that I must answer all of her questions, even the ones I did not want to answer, or I would not get my son back.

46. The case worker informed me that the next step was that myself and all adults in my brother's household had to be fingerprinted. The case worker also said that once the fingerprinting was complete, it would take another "3-5 business days" to get the results of the fingerprints, and that only after everyone in my household "cleared" the fingerprinting process would they continue to process my sponsor application.

47. Upon hearing how much time it would take, I felt awful. I had been trying to get my son back for nearly a month, and I was exhausted and very upset. I cried in my attorney's office. I did not understand why I needed to be fingerprinted again, because I was fingerprinted when I was first detained at the border. I felt like my

life had become a nightmare. The worst thing that has ever happened to me is having my son taken from me.

48. Later that evening, the caseworker at BCFS Baytown called me and told me that me, my brother, and my sister in law could go for a fingerprinting appointment at 10:00am the following day. My brother took off work so that he would be able to attend. I still felt heartbroken, but I was very grateful to have the fingerprinting appointment in order to get my son back as quickly as possible.

49. On the morning of June 28, 2018, my family members and I arrived for our fingerprinting appointment. Once there, we learned that the appointment was not for fingerprinting, but was instead for a "legal orientation program" for potential sponsors. This orientation was in Spanish, which I do not understand. I was very upset, because I had been told that fingerprinting was required in order to get my son back. Despite this, I stayed and attended the orientation program and a friend translated the program from Spanish to Portuguese so that I could understand.

50. That same morning, I received a call from another case worker at BCFS Baytown, who informed me that the first available fingerprinting appointment was not until July 12, 2018. She informed me that the only place I could go for fingerprinting was at a particular vendor in Worcester, Massachusetts. Worcester is located over 50 miles away from the town where I live. If I cannot get a car ride, I will have to take a bus and a train, and travel for nearly two hours to get to Worcester. I offered to go to the USCIS building in nearby Boston for fingerprinting, but I was told that I could not go there. I was very upset to learn I could not be

fingerprinted until July 12 because it meant I would not be reunited with my son for weeks.

51. This delay is very difficult for me and my son, and I cannot understand why the government will not immediately release my son to me. I am his mother.

52. I want my son to live with me in Massachusetts. Here we will have a safe place to live, the support of my brother and sister in law, and the support of the Brazilian community with which I have already made connections.

53. I plan to enroll him in the same school that my nephews attend, to make sure that he gets a good education.

54. I hope to work to support my son and I once I get permission to do so. Until then, my brother is willing and able to support us. I will make sure than my son gets all necessary care for his physical and psychological health. The Brazilian Worker Center has already indicated that they will connect us to free psychosocial support through volunteers affiliated with the National Association of Social Workers.

55. This has been the most horrible experience, being separated from my son. I left my country in order to protect my son from violence and from other dangers such as drug trafficking. But since arriving in the United States I have been unable to care for him and have been denied contact with him.

56. I want my son returned to me so that I can make sure he is healthy, happy, and so that I can protect him. I fear for my son's safety as long as he is in detention and separated from me.

Signed under pains and penalty of perjury, this 29 day of June, 2018.

WR

I, Natalicia Tracy certify that I am a disinterested adult competent to interpret from English to Portuguese and that I interpreted the above-referenced document from English to Portuguese for the above-referenced affiant.

Signed under pains and penalties for perjury, this 29 day of June, 2018.

Exhibit 22

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

STATE OF WASHINGTON, et al., Plaintiff, v. THE UNITED STATES OF AMERICA, et al., Defendants.	NO. 2:18-cv-00939 DECLARATION OF ALEXANDER MENSING IN SUPPORT OF PLAINTIFFS' MOTION FOR EXPEDITED DISCOVERY

I, Alexander Mensing, declare as follows:

1. I am a resident of the State of California. I am over the age of 18 and have personal knowledge of all the facts stated herein. If called as a witness, I could and would testify competently to the matters set forth below.

2. I am currently a volunteer project coordinator with Pueblo Sin Fronteras, a position I have held for about four years. Pueblo Sin Fronteras is an organization that works in both Mexico and the United States to provide humanitarian aid to migrants and refugees through legal presentations, emergency shelters, and human rights monitoring and reporting.

3. In my role, I organize and plan logistics for Pueblo Sin Fronteras activities, a lot of which involves providing accompaniment to migrants traveling to the United States in caravans. I help coordinate with organizations, attorneys, and legal assistants in Mexico and the United States who can provide orientations and legal representation to migrants traveling by

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caravan. I go to Mexico to participate in workshops and presentations informing migrants of the immigration process in the United States. For the past year, I have been communicating with immigrants held in detention centers in California.

4. I was most recently involved in coordinating legal presentations and workshops for a migrant caravan that entered the United States in late April 2018. There were approximately 250 people in this caravan who turned themselves in at the San Ysidro port of entry.

a. Between late March and late April 2018, I met several migrant parents traveling with their children, who eventually joined the April 2018 caravan, entered the United States, and were separated from their children.

b. I met these migrant families, as well as other migrants traveling without children, in Tapachula, Puebla, and Tijuana – all cities in Mexico where the caravan made stops. Most migrants I met were fleeing countries in Central America, including El Salvador, Honduras, and Guatemala.

c. The members of the migrant caravan planned to seek asylum on Sunday, April 29, 2018, including all of the families traveling with children. The group attempted to enter the United States at the San Ysidro port of entry, but was told by Customs and Border Patrol (CBP) that there was no capacity and no one could seek asylum right now. They provided no time frame and refused to clarify. The group of asylum seekers set up an encampment nearby. Eventually, this group of migrants was processed by CBP over six days – from April 30, 2018, to May 5, 2018.

5. Contact information for Pueblo Sin Fronteras was given to all asylum-seekers who presented themselves at the San Ysidro port of entry as part of the caravan. Several people have reached out to me by phone since crossing the border, including parents who have been separated from their children and are currently in detention.

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Individual Family Separation Stories

6. I am aware of nine parents who were separated from their children. I or a member of Pueblo Sin Fronteras met each parent before they crossed the border. Each of them had their children with them. We recorded parent and child information, including names and ages. After they crossed the border, they were separated from their children. Six parents turned themselves in at a U.S. port of entry. Three mothers did not cross the border at a port of entry.

7. Of the six parents who turned themselves in at a U.S. port of entry, I know the following:

a. One mother and her three children, ages 2, 6, and 13, sought asylum from Guatemala. I have not spoken with the mother, but I have spoken with the children's father, who is in Mexico. After crossing the border, the mother and children were first sent to a family detention facility in Texas. After a positive credible fear interview, her children were taken from her. The mother is now detained in Texas; her three children are in ORR custody in New York. A family member in California has been identified as a sponsor for the children, but the children have not yet been released from ORR's custody. The father told me that when he has been able to talk with his kids, they kept crying.

b. M.S. is an asylum-seeker from El Salvador who was separated from her 2 and 7-year-old children. She called me after she had been separated from her children. She cried on the phone. Her children are supposed to be released to her uncle in Washington, D.C., but she has had a very difficult time getting her children released. During one call, M.S. told me that ORR was requesting original identity documents from her uncle. However, CBP took her original identification documents and birth certificates when she turned herself in at the border. When M.S. asked the ICE deportation officer where the documents were, he didn't know. On another call, she told me she talked to an ORR case worker, who told

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M.S. that she needs to do a DNA test so ORR could release her children to her uncle. The caseworker said it might take several weeks. She burst out crying as she told me this. She had been hopeful that her children would not have to be in ORR custody too much longer, but the caseworker was telling her it may be several more weeks. On another call, she told me that someone told her uncle that someone had come to do the DNA test on M.S., but that M.S. was not at Otay Mesa, when in fact she was at Otay Mesa. M.S. was very frustrated by this process. M.S. was also told she can only call her children on Thursdays. She has spoken with her children only four times since being separated. M.S. wrote a letter that was given to Pueblo Sin Fronteras describing her experience. Attached hereto is Exhibit A, a true and correct copy of a letter given to Pueblo Sin Fronteras from M.S. and a certified translation of the letter.

c. One father and his 12-year-old son sought asylum from Honduras. His son's mother was murdered a year before in Honduras and his son had become very attached to him. He was separated from his son after crossing the border and is detained at Otay Mesa. The father has called me several times, often crying. After crossing, the father was fingerprinted, cuffed at the wrists and ankles in front of his son, and then taken away. His son cried as this happened. The father wanted to know how to be reunified with his child. I gave him the ORR hotline number, which had not been provided to him. His son is being held at an ORR facility in Maryland. His son is supposed to be released to his grandmother in Florida. I have also spoken with the grandmother. The grandmother says that the ORR caseworker won't answer the phone. She does not know why the child has not been released to her yet. A volunteer with Pueblo Sin Fronteras went to visit the father at Otay Mesa. The father said that he was requesting deportation to Honduras because he did not know when he would be released and did not know

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if he would ever get his son back. The father is now in Honduras. His son is still in ORR custody.

d. J.A.A. and his 12-year-old son from El Salvador sought asylum at the border. J.A.A. called me from the Federal Building in San Diego. He did not know why he was being held, especially because he saw that other parents with children had been released, and was worried because of this. The next time he called me was from Otay Mesa. His son had been taken from him. J.A.A. wrote a letter that was given to Pueblo Sin Fronteras describing his experience first hand. Attached hereto is Exhibit B, a true and correct copy of a letter given to Pueblo Sin Fronteras from J.A.A. and a certified translation of the letter. J.A.A. often calls me when he cannot talk to his child or his wife. He often calls me crying. He told me that when he and his son were about to be separated, a federal agent had called his family in Texas to tell them to buy a ticket because his son was going to be released. He had expected that his son was being sent directly to his family in Texas. But his son was not sent to his family. He didn't know where his son was. I gave him the ORR hotline number, and he found out that his son was being held in an ORR facility, but he was unable to speak to his son. When he finally got an ORR caseworker's number, he called multiple times. When they have answered, he is given different excuses for why he is unable to talk with his child. He has also tried calling the ORR hotline number. The operators have only told him where his child is being kept, and that he is fine. He has sent an ICE information request saying that he wants to talk to his son. J.A.A. was unable to speak to his son a single time while he was in ORR custody. I have also been in touch with J.A.A.'s wife and mother of his son, who has since crossed the border with their other son, was detained in family detention, and then released. On one occasion, an ORR caseworker informed the mother that the son would be released on a

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particular date, but then called back to say that the son would not be released for another few weeks because ORR needed to re-verify a birth certificate through the El Salvador consulate. The mother was distraught from this experience. On June 24, 2018, the son was finally released to his mother, almost 2 months after he was first taken into ORR custody. J.A.A. has established credible fear, but is still detained at Otay Mesa.

e. One father and his 5-year-old son sought asylum from El Salvador. They were separated after crossing the border. The father has not been able to talk with his child. The last time the father called me on the phone, he sounded angry and frustrated because he has not been able to actually speak with his son. The other day I received a message from the child's mom, who is not detained, who said that she felt like she was going to give birth; she's so anxious to have her son with her. The father is still detained at Otay Mesa. The child turned six in ORR custody.

f. One father and his 13-year-old son sought asylum from El Salvador. He was separated from his child after crossing the border. His child is currently in Crittenton. The father has called me from Otay Mesa. He is very upset and worried that ORR wants to give his child to the mom, who lives in the U.S. The mother abused and neglected the child in El Salvador. The father is also scared about the mom's current partner because she has a history of dating abusive men.

8. Of the three mothers who did not turn themselves in at a U.S. point of entry, I know the following:

a. O.E.G. and her four children, ages 8, 12, 15, and 17 are from Honduras. O.E.G. called me from Otay Mesa. She'd been taken to jail, then court, and then the current detention center. She was confused and frustrated by what had happened to her. She wanted to know how to talk with her children, and how she could talk

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with them more frequently. O.E.G. had her first phone call with her children 25 days after being separated. I recently spoke with her and she's now concerned because she hasn't been given a credible fear interview, is not getting closer to getting back with her kids.

b. M.R.R and her 8-year-old child are from El Salvador. When I first spoke to M.R.R., she was also confused by the whole experience of going through the criminal justice system and then coming to Otay Mesa. She has called me a number of times to try to figure out logistics of how to get her child released.

c. M. and her 12-year-old child are from El Salvador. M. called me once she was at Otay Mesa. When in criminal custody, she asked everyone about how to get in touch with her child and nobody knew. She became so stressed that guards gave her medicine in the form of green pills to calm her down. She believes those pills made her sick. While in criminal custody, she started experiencing a health problem that she'd only had as a kid. The problem affects her heartbeat; she feels weak, gets headaches, and faints. Once she was transferred to Otay Mesa, she was still experiencing medical issues. She stopped taking the green pills, but says she still does not sleep or eat well. She's called me crying on a number of occasions because she is worried about her own health, as well as her child's whereabouts. The National Immigration Justice Center was eventually able to locate her child. The first time she could talk with her child was a month and 5 days after they were separated. During the limited times she can make calls, she has had difficulty getting the ORR hotline to work and getting through to the caseworker. When she does get in touch with a caseworker, she has been told that her child was eating, sleeping, or in class, and that the child could not talk to her at that time.

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9. Through my work with Pueblo Sin Fronteras, I also familiar with the separation of J.D.F. from his son, who was about 1-years-old, who sought asylum from El Salvador. They presented themselves at the San Ysidro port of entry in November 2017. J.D.F. called me from the Federal Building in San Diego less than an hour after his child was taken from him. J.D.F had been with three other fathers when all of their children were taken from them. They were told by a federal officer that all the kids had to come with him. J.D.F and the other fathers refused. The officer left and then came back with multiple officers. The officers threatened J.D.F and the other fathers that that if they did not give their children up, they would have legal problems and could be punished. Again, J.D.F and the fathers refused. When the officers came back a last time, J.D.F and the fathers were told that if they did not want their children to see the officers use force on all the fathers, they should give up their children. So J.D.F finally had to give his child to the officers. He was subsequently transferred to Otay Mesa. He was upset and angry as he told me what had happened to him. When J.D.F was not reunited with his son even after publically talking about what had happened, he stopped calling me and everyone at Pueblo Sin Fronteras. I am also in touch with J.D.F's wife, who often calls me. She crossed the border with their 5-year-old son, and was released with an ankle monitor. Their 1-year-old was released to her from ORR after 85 days in custody. The whole experience of knowing that her son had been separated from her husband has been soul-crushing for J.D.F's wife. She speaks out a lot about what happened, but she has also called me crying many times. A few weeks ago, I went to visit J.D.F's wife and family. At the end of the visit, everyone was asked to share something they were thinking about. When J.D.F's oldest son spoke, he said that he wanted his father back.

Common Issues Facing Parents and Families after Child Separation

10. The majority of my interaction with separated parents is from when they call me from detention. Parents have a very limited amount of time during which they can place calls. Additionally, calling from detention is costly. I or other volunteers at Pueblo Sin Fronteras

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deposit money to detainees' accounts so they can continue to make calls to us and to whoever they need to have their children released.

11. Many times, parents are not given the ORR hotline number. I have often had to give the number to parents. Various parents have told me that sometimes the hotline works, and sometimes it doesn't. They have to try dialing the number in different ways to get it to work, if it works at all. Additionally, when parents do obtain a caseworker number, the caseworker often does not pick up, which prompts the parent to call the ORR hotline again, which then directs the parent back to the unresponsive caseworker.

12. Parents are desperate to talk with their children. Every time a parent has called me after calling their child, they cry.

13. Entire families have been affected by separation. Because many parents have my contact information, I have also been contacted by non-detained family members of families that have been separated. Some people are afraid to ask questions, interact with ORR, or provide documents because many of these families have undocumented members in their family. I also get phone calls from family members living abroad who are extremely confused and sad that their kids and grandkids have been separated.

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

DATED this 28th day of June, 2018 at San Francisco, California.

ALEXANDER MENSING
Volunteer Project Coordinator
Pueblo Sin Fronteras

EXHIBIT A

17-05-2018

Querido y estimado presente recivan un cordial saludo esperando q. se encuentren muy bien de salud alado de quienes los rodean despues de este corto saludo paso alo siguiente.

El motivo de esta carta. Es para contarles un poco como fue mi entrada ala frontera. Pues me bine en la carabana de inmigrantes por amenasas de mi pais pues gracias a dios yegamos atijuana Yo biaje con mis 2 hijos uno de 7 años y el otro de 2 años pues los decidimos entregar todos el dia domingo pero al yegar ala frontera dijerón los ajentes q. iban ameter a 50 personas pues no los metieron los tubieron ai esperando y no paso nadie y dos dias despues comenzaron adentrar algunos compañeros de la carabana Pues el dia miercoles 2 de mayo me toco entrar ami con mis 2 hijos pues caminamos por el puente para yegar ala puerta de una vez los entraron para adentro pues en seguida los revisaron y luego los pasaron donde estan los otros ajentes pues me preguntaron aque bienes les conteste apedir asilo tengo miedo de regresar ami paiz pues me pidieron los documentos los actas de nacimiento de mis hijos y el Dui mio de el salvador y pues despues los yebaron ala sala de espera pues luego los yamarón para tomarlos Gueyas y tomarlos Fotos ami y amis hijos despues los yebaron alas Yeleras los entregaron una sabana cadano y pues el Jueves ala 5 de la mañana me yeboron a una entrevista solo ami mis hijos esperaron en la yelera pues despues me regresaron ala yelera y ai estube pues el dia lunes yamaron amis 2 hijos afuera q. les acian unas pregontas yo solo los miraba atravez de un bidrio luego me yamaron y me hicieron otras preguntas y luego los bolbieron a entrar el dia Martes como alas 8 pm. yamaron solo amis 2 hijos pues yo sali y me dijeron Señora seban solo eyos yo pregunte para donde me dijeron donde ay mas niños yo les dije no me pueden separar de mis hijos son mis hijos y les enseñe una carta donde decia q. ya soy la madre y no me pueden separ de eyos me dijeron eso aqui no bale pues me dijeron q. les dijera cuales eran los pertenencias de eyos para yebarselos y me dijeron tiene 10 minutos para q. se despida de eyos yo les dije pero porq. me los quitan y solo me dijeron donde tu bas no pueden estar eyos despidate yo me dijeron pues

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el niño mas grande al escuchar eso comenzo allorar y me decia llorando mami no me quiero ir no quiero que los separen y el otro niño al ber al otro llorando comenzo a llorar tanbien yo me sentia tan mal pues yo solo los abraze y los bese y le dije bayase hijo primero dios ya estaremos juntos cuide asu hermanito le dije yo los amo mucho alos 2 le dije pues dijo el oficial ya yegaron por ellos me dijo puede caminar el mas chico si le dije bajelo me dijo pues el mas grande lo tomo de la mano y comenzaron a caminar luego boltieron aber y cuando bieron q. yo no iba de tras de eyos yoraban mas y pues asta q. se cubrieron yo bolbi apreguntar para donde se los abian yebado pues solo me dijeron a un albergue pues q. despues me explicarian y me boltiron a yebar ala yelera como alas 2 de la tarde me trasladaron pues yo bolbi a preguntar por mis hijos pues el oficial me dijo q. no sabia nada pregunte a otro y me dijo q. no sabia pero q. me iba aberiguar luego regreso y me dijo yamaron a tu tio para ber si los recibia y luego me trajieron esposada de pies y manos y sin tura a otay mesa detencion y pues yegue aqui pregunte y me dieron una yamada y able con mi tio y me dijo q. si le abian ablado pero q. solo le pidieron q. mandara unos documentos y pues yo sin saber adonde se los abian yebado mande un reyues el siguiente dia q. yegue y pues luego me dijo mi tio donde estaban pero la respuesta del reyues me yego asta el 17. la contestacion pues hoy tanbien tube mi entrebista de miedo creibre y solo estoy esperando la respuesta y pues mis niños aun estan en un albergue y no se si se los daran ami tio ogue el esta asiendo todo lo posible para que se los den el a entregado varios papeles q. asta los mando atraer al salvador bueno otra cosa la carabana me sirbio de mucho pues me ayudo a yegar asta aqui pero si yo no ubiera dado cuenta de la carabana yo siempre me ubiera benido ang. se q. me ubiera costado mas pero siempre me ubiera binido porque mis hijos corian peligro aya y solo buzco un bienestar para eyos y se q. los espuse pero se q. los tengo con vida y si yo ubiera seguido en el salvador alomejor ya no estubiera yo o ya no los tubiera a eyos y q. quede claro q. me los traje para protejerlos porq. los amo y pues esto q. me esta pasando.

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Me duele tanto que hay leses ya no se que aser me desespero demasiado me deprimo al no tener amis hijos con migo y pues no hay segundo de tranquilidad para mi al no tener a mis hijos no hay noche que no llore al pensar que no estan con migo y que me necesitan pues solo quiero decirles al ministerio de gobernación que se pongan un rato en mi lugar y que piensen yo creo q. la mayoria tiene hijos que piensen que sintieran si por un momento los separaran de sus hijos sintieran el dolor q. yo de madre siento y alo mejor así entiendan que no es necesario q. se paren alos hijos de sus padres porque uno biene huyendo de sus paises no tengue los que sufren mas son eyos al estar separados de sus padres y solo les digo que se pongan la mano un rato la mano en su corazon y sientan el dolor que sienten los padres al estar separados de sus hijos y solo le digo al precidente que no esta bien lo que esta asiendo y que primero dios nunca pase por el dolor que yo estoy pasando y decirle q. nosomos criminales q solo somos personas que necesitan asilo para estar bien con nuestros hijos y decirles que no jusguen ala carabana porque eyos lo que an echo es ayudarnos y yo selos agradesco y decirles no somos criminales y pues primero Dios todo me saldra bien confio en dios q. el me ba a yudar. no soy una persona q. solo abla o escribe soy una madre desesperada por sus hijos son tan injustos al separarnos de eyos pero tengo fe q. Dios les toque el corazon. y algo mas no somos criminales ni animales bueno con esto me despido Atentamente. M[redacted]

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English Translation of Letter by "M[redacted]"

Dear and respected reader, please accept my cordial greeting, hoping that you are in good health alongside those who are around you. After this brief greeting I continue to the following.

The reason for this letter is to tell you a little about how I entered the border. I came on the migrant caravan because of threats in my country. Thanks to god we made it to Tijuana. I traveled with my 2 children, one of them 7 years old and the other 2 years old. We all decided to turn ourselves in on Sunday but when we got to the border the agents said that they were going to let 50 people in, but they didn't let them in. They had us waiting and nobody was let in and two days later they started to let in some of our companions of the caravan.

On Tuesday, May 2nd, it was my turn to enter with my 2 children. We walked along the bridge to get to the door, and right away we entered inside and they inspected us and then they sent us where the other agents are. They asked me why I came and I answered, to seek asylum, I am afraid of returning to my country. They asked for my documents and my children's birth certificates and my Salvadoran ID and then they took us to a waiting area. Then they called us to take our fingerprints and photos of me and my children. Then they took us to the iceboxes and gave us each a sheet and on Thursday at 5 in the morning they took me to an interview by myself and my children waited in the icebox. Then they sent me back to the icebox and I remained there.

On Monday they called my 2 children out and they asked them questions and I just watched them through a window and then they called me and they asked me other questions and then they sent us back in.

On Tuesday at about 8am they called just my 2 children and I went out and they said "Miss, only they are going." I asked where and they told me where there are more children. I told them they cannot separate my children from me, they are my children, and I showed them a letter where it said that I am the mother and that they cannot separate them from me. They said that that didn't matter here and they told me to tell them which were their belongings to take them and they told me I had 10 minutes to say goodbye to them. I said, "but why are you taking them away?" And they just said that where you are going they cannot be, they said to say goodbye right away.

The older child, when he heard that, started to cry and said to me, crying, "mommy I don't want to go, I don't want them to separate us," and the other child, when he saw the other crying, began to cry as

well. I felt so badly I just hugged them and kissed them and told them, “go son, god willing we will be together soon. Take care of your little brother,” I said “I love you two very much.”

Then the officer said “they are here for them. Can the little one walk?” “Yes,” I told the officer. “Let him down,” they told me. The older one took his hand and they started to walk. Then they turned around to look and when they saw that I was not going after them they cried more and when they were out of sight I asked again where they had taken them. They only told me “to a shelter” and that they would explain to me later and they took me back to the icebox.

At about 2 in the afternoon they transported me and I asked again about my children. The officer told me he didn’t know anything. I asked another and they said they didn’t know but they would ask. Then they came back and said to me “they called your uncle to see if he would take them in.” And later they took me, cuffed at the feet and hands and waist, to Otay Mesa Detention.

I got here and asked and they gave me a call and I spoke to my uncle and he told me that yes, they had called him but they had only asked him to send some documents. Well, I didn’t know where they had taken them, so I sent an [ICE information request] the day after I arrived and later my uncle told me where they were but the response to my [ICE information request] didn’t come until the 17th.

Today I also had my credible fear interview and I am just waiting for the result, and well my children are still in a shelter and I don’t know if they will give them to my uncle here. He is doing everything possible for them to give them to him. He has sent various documents that he even had to send for from El Salvador.

Another thing, the caravan was very useful for me. Well, it helped me get here, but if I hadn’t learned about the caravan I would have come anyways. Even though it would have been difficult for me I would have come anyways because my children were in danger there and I am only looking out for their well-being, and I know I exposed them but I know they are alive. If I had stayed in El Salvador maybe I wouldn’t be here anymore or maybe they wouldn’t be here anymore.

And let it be clear that I brought them to protect them because I love them and what is happening to me hurts so much that there are times when I don’t know what to do, I get so desperate and depressed not having my children with me, and there isn’t a second of peace for me while I don’t have my children by my side. Not a night goes by without me crying, thinking that they aren’t with me and that they need me. Well I just want to tell the Government Committee to put yourselves in my place for a bit and think. I think most of you have children. Think about what you would feel if they separated your children from you for a time. If you could feel the pain I feel as a mother maybe you would

understand that it isn't necessary to separate children from their parents because we come fleeing from our countries.

Don't you see that they are the ones who suffer the most when they're separated from their parents? And I only ask that you put your hands on your heart for a little bit to feel the pain that parents feel when they are separated from their children. I only tell the president that what he is doing is not okay and that god willing he never has to go feel the pain I am feeling. I tell him that we are not criminals, that we are only people who need asylum to be well with our children. And I tell you not to judge the caravan, because what they have done is help us and I thank them and say that we are not criminals, and god willing everything will be okay and I trust that god will help me.

I am not someone who is just talking or writing. I am a mother who is desperate for her children. They are so unjust for separating us from them, but I have faith that god will touch your hearts. And another thing: we are not criminals or animals.

Well with that I bid farewell.

Sincerely,

M[redacted]

I, Alexander Mensing, do swear and confirm that I am fluent in the Spanish and English languages and that the foregoing is a true and accurate English translation of the Spanish-language original to the best of my knowledge.

Alexander Mensing

May 20, 2018
Date

EXHIBIT B

18/marzo/2018

- Sali de mi pais por la inseguridad ~~de mi pais~~ porq el gobierno del el Salvador no puede hacer nada para poder defendernos a los jovene y a adolecentes y clase trabajadora, Sali de mi pais por persecucion del mismo gobierno y pandilleros q el mismo gobierno protege.

- Deci salir rumbo a mexico, para poder crusarlo y llegar a los estados unidos, llegando a Tapachula, Chiapas (mexico) se oian romures de una caravana sobre inmigrantes, q salio del parque central de Tapachula, nos reunimos un par de veces antes de salir, Ahi nos explicaron q las personas q dirigian en ningun momento nos daban papeles de estados unido, q ivamos a luchar todos hombro con hombre, para poder salir a delante, con la ayuda de dios salimos el 25/03/2018 juntos todos.

- Salimos junto a mi familia tubimos una ventura muy agradable y una experencia q jamas olvidare ratos caminamos, ratos en bus y ray, junto a mi esposa y mis hijos dormis en parques comimos gracias a la gente de los pueblos de mexico q nos ayudaron y al mismo gobierno mexico gracias, nos subimos a la bestia (el tren) fue una experencia bonita, gracias ~~a~~ a los de la caravana logramos llegar con la ayuda de dios y el ~~gente~~ pueblo mexico y gobierno.

- Gracias a dios llegamos a Tijuana nos recibieron a todo dar, estavomos emocionados q ya ivamos a entrar y nos de tubieron por la razon de q no podimos entrar fue q no abia espacio, estuvimos a fuera esperando el llamado.

- ~~Al e~~ yo ese dia q yo entre fue un dia jueves junto con mi hijo gracias a dios no me lo separaron de mi estuvimos 5 dias en la ilera junto con mi hijo despues fuimos trasladados para un hotel, en todo ese tiempo estuve con mi hijo el sabado en la noche me separaron de mi hijo senti q mi vida se me iva al ver q me lo quitavan llore como un niño llorava y llorava, fue un dolor muy grande, estoy detenido y hasta el dia de hoy sigo llorando

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octubre 22, 2013
9:29 am

lo q' quiero decir con esto q' no somos criminales para q' nos hagan esto somos padres luchadores q' salimos huyendo de nuestro pais, para poder darles una vida segura y sin miedo para q' los hijos y familia esten seguro eso esto q' decir al gobierno de E.E.U.U al juez y todos presente, somos padre no criminales eso no es pecado ser padre.

Enlaces patrocinados

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Si encuentras algún contenido o comentario que no cumpla con los requisitos mencionados, escríbenos a comentariosyquejas@aristeguinoticias.com

Declinar por alguien no es una opcion: Zavala

Todo lo que gasté en mi campaña, los otros lo gastaron en 3 o 4 dias: Zavala (Video)

Requiere de mucha valentía para retirarme: Zavala

VIRAL

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English Translation of Letter by J[redacted]

March [sic] 18, 2018

I left my country because of insecurity because the government of El Salvador cannot do anything to defend the youth or adolescents or the working class. I left my country because of persecution by my own government and the gang members that the very government protects.

I decided to leave towards Mexico to be able to cross it and get to the United States. Arriving in Tapachula, Chiapas (Mexico) we heard rumors of a migrant caravan which would leave from the central park of Tapachula. We met with them a couple of times before leaving. There they explained to us that the people who led it would not in any moment give us papers for the United States, that we would all struggle side by side to be able to carry onward. With god's help we left on 03/25/2018 all together.

We left together with my family, we had a very pleasant adventure and an experience that I will never forget. Sometimes we walked, sometimes we were on buses or hitch-hiking. Together with my wife and children we slept in parks and we ate thanks to the people of the towns of Mexico who helped us and thanks even to the Mexican government. We boarded "La Bestia" (the train). It was a nice experience thanks to those on the caravan we were able to arrive thanks to god and the Mexican people and government.

Thanks to god we arrived in Tijuana. They received us with everything they could. We were excited because we were going to enter, and they held us back with the reason that we couldn't enter because there was no space. We were outside waiting to be called.

On the day that I entered it was a Thursday, together with my son. Thank god they did not separate him from me. We were in the icebox for 5 days, together with my son. Then we were transported to a hotel. That whole time I was with my son. On Saturday at night they separated my son from me. I felt that my life was leaving me when I saw that they took him from me. I cried like a child. I cried and cried. It was a very great pain. I am detained and to this day I continue crying.

What I want to say with this is that we are not criminals for this to be done to us. We are hard-working fathers who fled our country to be able to give our families and children a life with security and without fear so they can be safe. And that is everything to say to the US Government, to the judge and to everyone. We are parents, not criminals. It is not a sin to be a parent.

I, Alexander Mensing, do swear and confirm that I am fluent in the Spanish and English languages and that the foregoing is a true and accurate English translation of the Spanish-language original to the best of my knowledge.

Alexander Mensing

May 20, 2018
Date

Exhibit 23

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

STATE OF WASHINGTON, et al. Plaintiff, v. THE UNITED STATES OF AMERICA, et al., Defendants.	NO. 2:18-CV-00939 DECLARATION OF MONIKA Y. LANGARICA OF THE ABA IMMIGRATION JUSTICE PROJECT OF SAN DIEGO IN SUPPORT OF PLAINTIFFS' MOTION FOR EXPEDITED DISCOVERY

I, Monika Y. Langarica, declare as follows:

1. I am over the age of 18 and have personal knowledge of all the facts stated herein.
2. I am the Senior Staff Attorney with the ABA Immigration Justice Project (IJP) of San Diego, California.
3. The IJP works primarily with immigrants who are detained at the Otay Mesa Detention Center in San Diego, California.
4. Through our work with detained people at the Otay Mesa Detention Center over the last month, our staff has come into contact with several adults detained there who have been affected by forcible family separation at and near the border, including:
    i. A 54-year-old asylum-seeking woman from Mexico who has been separated from her 16-year-old son, who has been unable to

ATIORNEY GENERAL OF CALIFORNIA
1300 I Street
Sacramento, CA 94815
916-445-9555

communicate with her son for the month that she has been detained, and who believes her son is being detained at a Los Angeles shelter.

ii. A 60-year-old woman from Mexico who has been separated from her two children and who was unable to communicate with her children for over two weeks.

iii. A 26-year-old man from Honduras who was separated from his minor-aged daughter who he believes is currently being detained in a shelter in Chicago.

iv. A 70-year-old woman from Guatemala who was separated from her minor-aged granddaughter, who she believes is currently detained at a detention facility in Texas, and who she has been unable to communicate with.

v. A 44-year-old asylum-seeking man from Mexico who was separated from his wife, who is currently detained in Tacoma, Washington. Both him and his wife have been separated from his wife's 14-year-old and 17-year-old sisters, who he believes are currently detained in Atlanta, Georgia.

vi. A 62-year-old man from Mexico who was separated from his adult daughter, who is currently detained in Texas. His daughter's minor children were separated from him and from their mother, and he believes they are currently detained in Arizona.

5. As of our last communications with them, none of the above individuals had been informed of plans to reunite them with their minor children, grandchildren, or other minor-aged family members.

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916-445-9555

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

DATED this 28th day of June, 2018 at San Diego, California.

MONIKA Y. LANGARICA
Senior Staff Attorney
ABA Immigration Justice Project

ATIORNEY GENERAL OF CALIFORNIA
1300 I Street
Sacramento, CA 94815
916-445-9555

Exhibit 24

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

STATE OF WASHINGTON, et al. Plaintiff, v. DONALD TRUMP in his official capacity as President of the United States, et al., Defendants.	NO. 2:18-cv-00939 DECLARATION OF GLORIA ROBERTS-HENRY

I, Gloria Robert-Henry, declare as follows:

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

2. I am an Investigator with the Office of the Attorney General for the District of Columbia. I have served in this position for 8 years. I previously worked as a Bilingual Investigator with the D.C. Department of Consumer and Regulatory Affairs. I am fluent in English and Spanish.

3. On June 28, 2018, I interviewed a woman named Maria who entered the United States with her two children, and requested asylum.

4. Maria prepared a statement describing the circumstances of her arrival at the port of entry and what happened in the days after her arrival. Maria's statement is attached hereto as Exhibit 1. I confirmed with Maria that this statement was written by her and is valid. Her two young sons, ages two and seven, were taken from her soon after their arrival in the United States.

5. An English language translation of Maria's statement was prepared by a translator. That translation is attached hereto as Exhibit 2. I can also confirm that the English translation is accurate.

6. After Maria's two young children were taken from her, she was later informed by a social worker with Lutheran Social Services that her children are in New York.

7. Maria told me that her uncle, Francisco Serrano, lives in the District of Columbia.

8. Maria said that she was released on a bond of $10,000 on the night of June 27, 2018.

9. Maria told me that Lutheran Social Services informed her that she and her sons will have to have DNA testing before she can be reunited with her sons.

10. Maria stated that it is possible she will have to travel to New York to have a DNA test. She had to obtain permission from the Department of Homeland Security to travel to New York for this testing.

11. Maria told me that she spoke with her uncle on June 28, 2018, and she is currently travelling by bus to her uncle's home in the District of Columbia.

I declare under penalty of perjury under the laws of the District of Columbia and the United States of America that the foregoing is true and correct.

DATED this 1st day of July, 2018 at District of Columbia.

GLORIA ROBERTS-HENRY
Investigator

EXHIBIT 1

17-05-2018

Querido y estimado presente recivan un cordial saludo esperando q. se encuentren muy bien de salud alado de quienes los rodean despues de este corto saludo paso alo siguiente.

El motivo de esta carta. Es para contarles un poco como fue mi entrada ala frontera. pues me bine en la carabana de inmigrantes por amenasas de mi pais pues gracias a dios yegamos tijuana Yo biaje con mis 2 hijos uno de 7 años y el otro de 2 años pues los decidimos entregar todos el dia domingo pero al yegar ala frontera dijeron los ajentes q. iban ameter a 50 personas pues no los metieron los tubieron ai esperando y no paso nadie y dos dias despues comenzaron adentrar algunos compañeros de la carabana Pues el dia miercoles 2 de mayo me toco entrar ami con mis 2 hijos pues caminamos por el puente para yegar ala puerta de una vez los entraron para adentro pues en seguida los revisaron y luego los pasaron donde estan los otros ajentes pues me preguntaron algue bienes les conteste apedir asilo tengo miedo de regresar ami paiz pues me pidieron los documentos los actas de nacimiento de mis hijos y el Dui mio de el Salvador y pues despues los yebaron ala sala de espera pues luego los yamaron para tomarlos Gueyos y tomarlos Fotos ami y amis hijos despues los yebaron alas Yeleras los entregaron una Sabana Caduno y pues el Jueves ala 5 de la mañana me yebaron a una entrevista solo ami mis hijos esperaron en la yelera pues despues me regresaron ala yelera y ai estube pues el dia lunes yamaron amis 2 hijos afuera q. les acian unas preguntas yo solo los miraba atravez de un bidrio luego me yamaron y me hicieron otras preguntas y luego los bolbieron a entrar el dia Martes como alas 8 am. yamaron solo amis 2 hijos pues yo sali y me dijeron Señora sebaan solo eyos yo pregunte para donde me dijeron donde ay mas niños yo les dije no me pueden separar de mis hijos son mis hijos y les escribe una carta donde decia q. yo soy la madre y no me pueden separar de eyos me dijeron eso aqui no bale pues me dijeron q. les dijera cuales eran las pertenencias de eyos para yebarselos y me dijeron tiene 10 minutos para q. se despida de eyos yo les dije pero porq. me los quitan y solo me dijeron donde tu bas no pueden estar eyos despidate ya me dijeron pues

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el niño mas grande al escuchar eso comenzo allorar y me decia llorando mami no me quiero ir no quiero que los separen y el otro niño al ber al otro llorando comenzo a llorar tanbien yo me sentia tan mal pues yo solo los abraze y los bese y le dije boyase hijo primero dios ya estaremos juntos cuide asu hermanito le dije yo los amo mucho alos 2 le dije pues dijo el oficial ya yegaron por ellos me dijo puede caminar el mas chico si le dije bajelo me dijo pues el mas grande lo tomo de la mano y comenzaron a caminar luego boltieron aber y cuando bieron q. Yo no iba detras de eyos yoraban mas y pues asta q. se cubrieron Yo bolbi apreguntar para donde se los abian yebado pues solo me dijeron a un albergue pues q. despues me explicarion y me boltiron a yebar ala yelera como alas 2 de la tarde me trasladaron pues Yo bolbi apreguntar por mis hijos pues el oficial me dijo q. no sabia nada pregunte a otro y me dijo q. no sabia pero q. me iba aberiguar luego regreso y me dijo yamaron a tu tio para ber si los recibia y luego me trajieron esposada de pies y manos y sin tura a otra mesa detencion y pues yegue aqui pregunte y me dieron una yamada y able con mi tio y me dijo q. si le abian ablado pero q. solo le pidieron q. mandara unos documentos y pues Yo sin saber adonde se los abian yebado mande un reyes el siguiente dia q yegue y pues luego me dijo mi tio donde estaban pero la respuesta del reyes me yego asta el 17. la contestacion pues hoy tanbien tube mi entrebista de miedo creibre y solo estoy esperando la respuesta y pues mis niños aun estan en un albergue. y no se si se los traran ami tio ogue el esta asiendo todo lo posible para que se los den el a entregado barios papeles q. asta los mando atraer al salvador bueno otra cosa la carabana me sirbio de mucho pues me ayudo a yegar asta aqui pero si yo no ubiera dado cuenta de la carabana yo siempre me ubiera benido aunq. se q. me ubiera costado mas pero siempre me ubiera binido porque mis hijos corian peligro aya y solo buzco un bienestar para eyos y se q. los espose pero se q. las tengo con vida y si yo ubiera seguido en el salvador alomejor ya no estubiera yo o ya no los tubiera a eyos y q. quede claro q me los traje para protegerlos porq. los amo y pues esto q. me esta pasando.

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Me duele tanto que hay veces ya no se que aser me desespero demasiado me deprimo al no tener a mis hijos con migo y pues a hay segundo de tranquilidad para mi al no tener a mis todo me hay noche que no llore al pensar que no estan con migo y que me necesitan pues solo quiero pedirles al ministerio de gobernación que se pongan un rato en mi lugar y que piensen yo creo q la mayoria tiene hijos que piensen que sintieran si por un momento los separaran de sus hijos sintieran el dolor q. yo de madre siento y lo mejor asi entiendan que no es necesario q se parecen a los hijos de sus padres porque uno viene huyendo de sus países no tengo que los que sufren mas son exos al estar separados de sus padres y solo les digo que se pongan la mano en un rato la mano en su corazon y sientan el dolor que sienten los padres al estar separados de sus hijos y solo le digo al presidente que no esta bien lo que esta asiendo y que primero dios nunca pase por el dolor que yo estoy pasando y decirle q. nosomos criminales q solo somos personas que necesitar asilo para estar bien con nuestros hijos y decirles que no jusguen ala carabana porque exos lo que an echo es ayudarnos y yo selos agradesco y decirles no somos criminales y pues primero Dios todo me saldra bien confio en dios q. el me ba a yudar. no soy una persona q. solo abla o escribe soy una madre desesperada por sus hijos son tan injustos al separarnos de exos pero tengo fe q. Dios les toque el corazon. y algo mas no somos criminales ni animales bueno con esto me despido Atentamente. Maria.

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EXHIBIT 2

English Translation of Letter by "Maria"

Dear and respected reader, please accept my cordial greeting, hoping that you are in good health alongside those who are around you. After this brief greeting I continue to the following.

The reason for this letter is to tell you a little about how I entered the border. I came on the migrant caravan because of threats in my country. Thanks to god we made it to Tijuana. I traveled with my 2 children, one of them 7 years old and the other 2 years old. We all decided to turn ourselves in on Sunday but when we got to the border the agents said that they were going to let 50 people in, but they didn't let them in. They had us waiting and nobody was let in and two days later they started to let in some of our companions of the caravan.

On Tuesday, May 2nd, it was my turn to enter with my 2 children. We walked along the bridge to get to the door, and right away we entered inside and they inspected us and then they sent us where the other agents are. They asked me why I came and I answered, to seek asylum, I am afraid of returning to my country. They asked for my documents and my children's birth certificates and my Salvadoran ID and then they took us to a waiting area. Then they called us to take our fingerprints and photos of me and my children. Then they took us to the iceboxes and gave us each a sheet and on Thursday at 5 in the morning they took me to an interview by myself and my children waited in the icebox. Then they sent me back to the icebox and I remained there.

On Monday they called my 2 children out and they asked them questions and I just watched them through a window and then they called me and they asked me other questions and then they sent us back in.

On Tuesday at about 8am they called just my 2 children and I went out and they said "Miss, only they are going." I asked where and they told me where there are more children. I told them they cannot separate my children from me, they are my children, and I showed them a letter where it said that I am the mother and that they cannot separate them from me. They said that that didn't matter here and they told me to tell them which were their belongings to take them and they told me I had 10 minutes to say goodbye to them. I said, "but why are you taking them away?" And they just said that where you are going they cannot be, they said to say goodbye right away.

The older child, when he heard that, started to cry and said to me, crying, "mommy I don't want to go, I don't want them to separate us," and the other child, when he saw the other crying, began to cry as

well. I felt so badly I just hugged them and kissed them and told them, "go son, god willing we will be together soon. Take care of your little brother," I said "I love you two very much."

Then the officer said "they are here for them. Can the little one walk?" "Yes," I told the officer. "Let him down," they told me. The older one took his hand and they started to walk. Then they turned around to look and when they saw that I was not going after them they cried more and when they were out of sight I asked again where they had taken them. They only told me "to a shelter" and that they would explain to me later and they took me back to the icebox.

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I got here and asked and they gave me a call and I spoke to my uncle and he told me that yes, they had called him but they had only asked him to send some documents. Well, I didn't know where they had taken them, so I sent an [ICE information request] the day after I arrived and later my uncle told me where they were but the response to my [ICE information request] didn't come until the 17th.

Today I also had my credible fear interview and I am just waiting for the result, and well my children are still in a shelter and I don't know if they will give them to my uncle here. He is doing everything possible for them to give them to him. He has sent various documents that he even had to send for from El Salvador.

Another thing, the caravan was very useful for me. Well, it helped me get here, but if I hadn't learned about the caravan I would have come anyways. Even though it would have been difficult for me I would have come anyways because my children were in danger there and I am only looking out for their well-being, and I know I exposed them but I know they are alive. If I had stayed in El Salvador maybe I wouldn't be here anymore or maybe they wouldn't be here anymore.

And let it be clear that I brought them to protect them because I love them and what is happening to me hurts so much that there are times when I don't know what to do, I get so desperate and depressed not having my children with me, and there isn't a second of peace for me while I don't have my children by my side. Not a night goes by without me crying, thinking that they aren't with me and that they need me. Well I just want to tell the Government Committee to put yourselves in my place for a bit and think. I think most of you have children. Think about what you would feel if they separated your children from you for a time. If you could feel the pain I feel as a mother maybe you would

understand that it isn't necessary to separate children from their parents because we come fleeing from our countries.

Don't you see that they are the ones who suffer the most when they're separated from their parents? And I only ask that you put your hands on your heart for a little bit to feel the pain that parents feel when they are separated from their children. I only tell the president that what he is doing is not okay and that god willing he never has to go feel the pain I am feeling. I tell him that we are not criminals, that we are only people who need asylum to be well with our children. And I tell you not to judge the caravan, because what they have done is help us and I thank them and say that we are not criminals, and god willing everything will be okay and I trust that god will help me.

I am not someone who is just talking or writing. I am a mother who is desperate for her children. They are so unjust for separating us from them, but I have faith that god will touch your hearts. And another thing: we are not criminals or animals.

Well with that I bid farewell.

Sincerely,

Maria

I, Alexander Mensing, do swear and confirm that I am fluent in the Spanish and English languages and that the foregoing is a true and accurate English translation of the Spanish-language original to the best of my knowledge.

Alexander Mensing

May 20, 2018
Date

Exhibit 25

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

STATE OF WASHINGTON, Plaintiff, v. DONALD TRUMP in his official capacity as President of the United States, et al., Defendants.	NO. DECLARATION OF CONGRESSMAN EARL BLUMENAUER

I, Earl Blumenauer, declare as follows:

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

2. I currently serve as the U.S. Representative from the State of Oregon's Third Congressional District, which includes much of Multnomah and portions of Clackamas counties, and most of the City of Portland. In the House of Representatives, I serve on the Committee on Ways and Means.

Oregon Department of Justice
100 SW Market St
Portland, OR 97201
Tel: (971) 673-1880 / Fax: (971) 673-5000**Error! AutoText entry not defined.**

3. As a U.S. Representative, I am committed to ensuring that every person in Oregon receives the rights and protections guaranteed under the U.S. Constitution and all applicable laws.

4. On June 7, 2018, I learned that the Trump Administration had transferred over one hundred immigrants to Sheridan Federal Prison in Sheridan, Oregon, which is near my Congressional District. Based on news reports and other sources, I was concerned that some of these immigrants had been separated from their children at the southern border due to the Trump administration's recently adopted family-separation policy. I was also concerned that these immigrants were seeking asylum in the United States.

5. I requested access to the federal prison so that I could evaluate the conditions of detention and speak with the immigrants detained inside. My request was granted.

6. On June 16, 2018, I visited the Sheridan federal prison. There, I learned that U.S. Immigration and Customs Enforcement (ICE) was detaining 123 immigrants at the facility—all men. The men came from more than 10 different countries, including several in southeast Asia. A number of the men were from Honduras, Cuba, El Salvador, and Guatemala, and many were Spanish speakers.

7. Facility staff told me that they only recently learned of the immigrants' arrival just before immigrants were transferred.

8. The Sheridan federal prison is surrounded by layers of barbed wire. The security is extremely tight. They carefully checked our IDs, sent us through a metal detector, and stamped our hands. Then we entered a separate room where we were shut in until an ultraviolet light checked our hands. Armed guards are everywhere.

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9. I spent nearly one and a half hours meeting with the 123 men, almost all of whom are asylum seekers. Despite their seeking asylum, the men had told us they not been given an opportunity to be heard on their claim of credible fear, the basis for asylum, and instead had been incarcerated without any adjudication.

10. A number of the men are fathers who were forcibly separated from their children, ranging in age from 1-year-olds to teenagers. Most were asking for asylum because they experienced violence or persecution in their home countries. Several had traveled to the border with a wife and a child, or children; none knew where their family members are.

11. A number of the fathers presented themselves with their children at the border, to Border Patrol to request asylum. Most have been held in one detention facility or another for over a month.

12. I learned that the men are being held in their cells for 22 hours a day, to prevent them mixing with the regular prison population, which contains persons convicted of federal felonies. The other non-immigrant prisoners get far more time out of cells.

13. I learned that many of the fathers have not been given access to a phone or an attorney.

14. I learned that the fathers were separated from their wives and children while in DHS custody, often shortly after being detained, without explanation, and with no promise or opportunity for communication post-separation.

15. I learned that the fathers were suffering from physical, emotional, or psychological trauma as a result of being forcibly separated from their children.

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16. Some of these fathers described leaving violent and dangerous situations in their home countries.

17. The men we spoke with were divided into groups by native language. First we spoke with Spanish speakers who were separated from their families. We asked them why they left their home countries and what they expected would happen to them if they were sent back. One man said that people who had threatened his safety had burned his property, and he believed they were going to come and kill him next. He sought safety for himself and his family in the United States, but instead of getting an opportunity to make a case to an immigration judge, he was separated from his wife and child and incarcerated in a federal prison. One of the men we spoke with came here with his wife and two children, ages 5 and 18 months. They were separated at the border and he did not know where any of them were.

18. A Spanish-speaking man showed us where he had been shot, twice. When asked if he was able to see a doctor since being detained, he said no. Another man lifted his pant leg and showed us what looked like an open wound on his leg. He had not received any medical care for this wound since coming to the Sheridan federal prison in Oregon.

19. Most of the men had not spoken with a lawyer who could explain their rights. Only one showed us a lawyer's business card. They said that it was hard to make calls; they either didn't have money for phone calls or didn't know who to call. One man said he was given a piece of paper with a lawyer's phone number, but it was with his clothes and the guards took his clothes away.

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20. These stories we heard were compelling and disturbing. These men were victims of horrific crimes or unbearable persecution. Instead of getting information about their rights to request asylum, they were treated as criminals.

21. It is not a crime to come to the United States and request asylum. It is protected by international treaty. Even if these men are not able to win their case in front of an immigration judge, they have the right to present that case. And they certainly should not be held in prison like serious felons or separated from their families while their cases are pending.

22. Having met with these detainees, I am extremely concerned about these fathers' children, especially the young children, and their families. The unnecessary and cruel trauma will have detrimental consequences for the children for years to come. The American Academy of Pediatrics has said separating families will cause irreparable harm, which all parents understand instinctively.

23. I am very concerned about the rights of the men and how they are being treated at a prison. We heard that someone at the prison told some of the men that if they didn't sign a voluntary agreement for deportation, they could be in the federal prison for five years. With the stress of being incarcerated, two men signed. That kind of coercion is unacceptable, and likely illegal.

24. The United States of America was built by immigrants and has for centuries offered immigrants an opportunity to build a life with freedom and hard work. That's the American Dream. Today the Trump Administration and Attorney General Jeff Sessions are turning a blind eye to our nation's rich welcoming history and causing long-term damage to innocent children. It's abhorrent and it must stop.

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25. Many of the men I spoke with were extremely upset. The fathers expressed great fear about their children's whereabouts and safety, as well as fear and confusion about their detention and treatment after arriving at the border seeking asylum. The men appeared visibly traumatized by their experience with U.S. immigration officials.

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

DATED this 29th day of June, 2018 at Portland, Oregon.

Earl Blumenauer
U.S. Representative for the State of Oregon

Oregon Department of Justice
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Portland, OR 97201
Tel: (971) 673-1880 / Fax: (971) 673-5000**Error! AutoText entry not defined.**

Exhibit 26

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

STATE OF WASHINGTON, Plaintiff, v. DONALD TRUMP in his official capacity as President of the United States, et al., Defendants.	NO. DECLARATION OF CONGRESSWOMAN PRAMILA JAYAPAL IN SUPPORT OF THE STATE OF WASHINGTON

I, Pramila Jayapal, declare as follows:

1. I am over the age of 18 and have personal knowledge of all the facts stated herein and am competent to testify about them.

2. I currently serve as the U.S. Representative from the State of Washington's 7th congressional district, which encompasses most of Seattle and surrounding areas in King County. I serve on a number of House committees, including as Vice Ranking Member of the House Budget Committee and as a member of the Subcommittee on Immigration and Border Security. I also serve on a number of congressional caucuses, including as Co-Chair of the Women's Working Group on Immigration.

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3. As a U.S. Representative, I am committed to ensuring that every person in Washington receives the rights and protections guaranteed under the U.S. Constitution and all applicable laws.

4. As the first Indian-American woman in the House of Representatives, I have spent the last twenty years working internationally and domestically as a leading national advocate for women's, immigrant, civil, and human rights.

5. I began working in international public health in 1991 at Program for Appropriate Technology in Health (PATH), a nonprofit based in Seattle. At PATH, I served for several years as the director of the Fund for Technology Transfer, a loan fund that provided capital for socially responsible health projects, including primary health clinics, small businesses, and micro-credit programs across Africa, Latin America, and Asia.

6. After the September 11, 2001 attacks, I founded the nonprofit Hate Free Zone (now OneAmerica). I served as Executive Director for 11 years, growing the organization to be the largest immigrant advocacy organization in Washington State and one of the largest in the country. Under my leadership, OneAmerica successfully worked to stop the deportations of thousands of Somalis across the country; to help end Special Registration of Muslims and Arabs; and to lead the fight for comprehensive immigration reform. OneAmerica also led the effort to establish an Office of Immigrant & Refugee Affairs in Seattle, and to make Seattle one of the first cities to ban asking about immigration status by law enforcement or city officials.

7. I also have led a national coalition, We Belong Together, to bring a gender lens to immigration reform. The coalition played a key part in adding important provisions in the 2013 comprehensive immigration reform bill that ultimately passed the U.S. Senate with 68 bipartisan votes, but was stalled in the House.

8. On June 7, 2018, I learned that the Trump Administration had transferred a large number of immigrants to SeaTac Federal Detention Center in Seattle. I suspected that

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some of these immigrants had been separated from their children at the southern border due to the Trump administration's recently adopted family-separation policy.

9. I requested access to the federal detention center so that I could evaluate the conditions of detention and speak with the immigrants detained inside. My request was granted.

10. On June 9, 2018, I visited the detention center. There, I learned that U.S. Immigration and Customs Enforcement (ICE) was detaining 206 immigrants at the facility—32 men and 174 women. The women came from 16 different countries, but the vast majority were from Honduras, Cuba, El Salvador, and Guatemala, and approximately 90 percent were Spanish speakers.

11. Facility staff told me that they only learned of the immigrants' arrival the day the immigrants were transferred, pursuant to a Memorandum of Agreement.

12. I spent nearly three hours meeting with the 174 women, almost all of whom are asylum seekers. Over a third of the women are mothers who had been forcibly separated from their children, who range in age from 1-year-old to teenagers. A number of the mothers had presented themselves with their children to Border Patrol to request asylum. Most have been held in detention for more than two weeks and many for over a month.

13. The mothers reported being separated from their children while in DHS custody, often shortly after being detained, without explanation, and with no promise or opportunity for communication post-separation. One woman stated that her six-year-old daughter was taken away on her second day in custody; she has not had any contact with her daughter since then. Another woman explained that she was told she would be taken to see a judge; when she returned, she was taken to a different cell and her children were gone. One woman said that her child—who is now with the woman's sister—has not stopped crying and asking for her mom.

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14. Some of the mothers explained that when they were detained, the parents were placed in one line and their children in another. The mothers were not given the opportunity to say goodbye to their children prior to being separated. Almost all of the mothers had not spoken with their children in weeks and have no idea where their children are.

15. The mothers reported suffering from physical, emotional, or psychological trauma as a result of being forcibly separated from their children. Some were told that they would "never see [their] children again," that they would have to give their children up for adoption, or that their "families no longer existed." One mother is not eating because she is claustrophobic, and traumatized because officers have told her that she will be deported but that her children "will stay with us." She says she has been hospitalized twice. She explained to me that she fled Honduras because gangs were terrorizing her clothing business and had made death threats. She has not spoken with her children in over two weeks.

16. Some of these mothers described leaving violent and dangerous situations in their home countries. One mother fled her home country because her husband was imprisoned for raping a young child, and the woman feared for her 12-year-old daughter. This mother had had her 8- and 12-year-old children taken from her at the border and had not seen them for several weeks at the time of our conversation. Another mother from Guatemala said that her 14-year-old child was killed nine months ago; another child was paralyzed in a shooting; and she left bringing one of her children who had not been shot because she feared that gangs would harm her and her other child. Another woman said that she fled her home country after her husband—a police officer in her home country—was shot by gangs; she fears being killed if she returns. According to facility staff, 29 immigrants were identified as having a history of victimization and were being provided counseling.

17. The women reported sub-standard conditions of confinement prior to arriving at the Federal Bureau of Prisons facility in SeaTac. Women reported being detained in rooms with 12-16 people where they slept on the floor without blankets, or with dirty blankets.

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Many referred to some of the facilities in which they had been held by Spanish nicknames such as the "hielera"—the Spanish word for "ice box"—due to frigid, cold conditions. They also described being held in inhumane fenced cages, which they called "perrera"—the Spanish word for "dog pound." The women were not given opportunities to shower or bathe. One woman said she was not fed for four days; another for seven days. Others reported that they had had no clean drinking water, in one case for five days. They also complained of minimal food and of being fed frozen food.

18. The women also reported suffering from verbal abuse and humiliation. For example, women described being mocked for crying, and being told that they were "filthy" and "stinky." Some describe being treated like animals. One woman said that if she sat, she was screamed at to stand up.

19. Some women also suffered physical trauma as a result of their detention. One woman reported that she was hit in the face twice by the officer who apprehended her. Another said that her wrists hurt from being handcuffed, and another reported being chained on the plane which resulted in her legs and arms swelling.

20. The women I spoke to were extremely upset. Many of the women cried during our meeting. The women expressed great fear about their children's whereabouts and safety, as well as fear and confusion about their detention and treatment after arriving at the border seeking asylum. The women appeared visibly traumatized by their experience with U.S. immigration officials.

21. Women reported that Border Patrol agents told them to tell their stories to other potential immigrants who wished to cross the border to deter them from coming.

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

DATED this 15th day of June, 2018 at Seattle, Washington.

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Pramila Jayapal

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Exhibit 27

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

STATE OF WASHINGTON, et al. Plaintiffs, v. THE UNITED STATES OF AMERICA, et al. Defendants.	NO. 2:18-CV-00939-MJP

DECLARATION OF MARJEAN A. PERHOT

I, Marjean A. Perhot, hereby declare the following:

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

2. I am the Director of Catholic Charities Archdiocese of Boston Refugee and Immigration Services ("Catholic Charities") in Boston, Massachusetts.

3. I have been in the field of serving refugees and immigrants for over 23 years and in my current role for 13 years. I have worked on issues affecting unaccompanied minors for over 10 years, including direct services, referrals, and local and national advocacy.

4. I have either personal knowledge of the matters set forth below or, with respect to those matters for which I do not have personal knowledge, I have reviewed information gathered for me in my professional capacity.

5. Catholic Charities, through its 85 programs in 27 locations in Massachusetts serves all people in need regardless of race, religion, orientation, legal status or origin. Catholic Charities has specific programs to serve unaccompanied (alien) children ("UACs") in Massachusetts: direct representation, family reunification case management, and legal orientation.

6. Currently, in our Immigration Legal Services program, our attorneys represent 45 Massachusetts UACs in various stages of immigration proceedings. The UACs we represent have all been victims of violence, sexual or physical abuse, or neglect, and some are victims of trafficking. All these UACs need significant social and mental health support in addition to direct representation.

7. In partnership with the U.S. Conference of Catholic Bishops, Catholic Charities provides family reunification services to UACs released from the care of the Office of Refugee Resettlement ("ORR") pending their immigration court proceedings. Our services include case management, referrals for legal representation and mental health, basic needs and social supports. Among the hundreds of UACs who are placed with Massachusetts-based sponsors

each year, an average of 11% receive case management services from Catholic Charities. In the last five years, Catholic Charities has served 122 UACs in this program.

8. Pursuant to a contract with the Executive Office for Immigration Review, Catholic Charities also provides a Legal Orientation for Custodians Program ("LOPC") for UACs and their sponsors. We are one of just a handful of LOPC providers in the country. LOPC services include orientation to the Immigration Court system, overview of options for immigration relief, referrals to immigration attorneys and self-help workshops. All services provided are in an effort to decrease the number of UACs who fail to appear in Immigration Court and therefore have their cases decided in absentia. Through the LOPC, Catholic Charities has served over 1,500 UACs in Massachusetts.

9. In recent months, three parents or caregivers in Massachusetts who participated in our LOPC reported having been separated from their children at the border. One father reported it took him 5 days to find out where his daughter was being held by ORR and that they remain separated. Another caregiver reported that her 11 year old niece was separated from her mother at the border and they have not be reunited yet. Finally, a father reported that his 8 year old son was separated from his mother at the border. He has been reunited with his son, but the mother is still separated.

10. Historically, the UACs served by Catholic Charities were actually unaccompanied, meaning they crossed the border without a parent and were apprehended, transferred to ORR custody, and then released to a relative or other sponsor in Massachusetts (after proper vetting). In recent months, however, Catholic Charities has encountered children in Massachusetts who were classified as UACs because they were separated from a parent by federal officials after crossing the border.

11. In October 2017, we provided case management services to two boys in Massachusetts who were separated from their parent(s) at the border. In the case of one of boys, we were asked to provide post-release case management after the boy attempted suicide while

in ORR custody due to his trauma from being separated from his father. In general, all children who cross the border, whether unaccompanied or with a parent, have undergone an unusual amount of trauma, often fleeing violence or death, or due to the perils of a long journey from their home country to the United States border.

12. The trauma UACs have experienced after having made their way from their home countries to the United States and then to Massachusetts is significant and results in complex and challenging service and case management needs. For example, some of our UACs witnessed the death of a loved one in their home country and now, even though in a safe environment, cannot escape nightmares or anxiety. Many of the UACs we serve have depression and need counseling, but there is a lack of bilingual mental health services. Most UACs face a long legal challenge to be allowed to remain in the United States and earn lawful permanent residence. However, there are not enough reputable and affordable immigration attorneys.

13. Children who have been forcibly separated from their parents face not only this trauma, but also the trauma of having been torn from their parents, placed in detention or shelter, and brought to new places and people that they may not know.

14. Based on our experience with UACs in general, as well as with those who are unaccompanied due to family separation, Catholic Charities anticipates that migrant children who arrive in Massachusetts after suffering the trauma of having been separated from their parents will likely require a variety of intensive case management, basic provisions (food, clothing), mental health care, and legal services.

15. They may access these services through state-funded programs, including MassHealth, emergency rooms for medical care, and possibly the Department of Children and Families. Due to the lack of an immigration legal status that confers public benefits, UACs cannot access TANF, SNAP, or public benefits, except for MassHealth Limited. In our current caseload of UACs, the only benefits some UACs are able to access are WIC and MassHealth Limited until they reach 18 years of age.

16. These children will also enroll in Massachusetts public schools. Many will experience particular difficulty adjusting to school due to trauma, anxiety, and other mental health needs that result from being separated from their parents. As a result, they may require additional services, such as intensive English language training, customized education plans, and after-school activities while their caregivers are at work.

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

Executed on this 29th day of June, 2018 at Boston, Massachusetts.

MARJEAN A. PERHOT

Exhibit 28

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF WASHINGTON

STATE OF WASHINGTON, *Plaintiff*, v. DONALD TRUMP in his official capacity as President of the United States, et al., *Defendants*.	W.D. Wash. Case No. _____ **DECLARATION OF TARA FORD IN SUPPORT OF PLAINTIFF'S PRELIMINARY INJUNCTION**

I, Tara Ford, declare as follows:

1. I am over the age of 18 and have personal knowledge of all the facts stated herein except as to those facts which are stated on information and belief, and as to those facts I believe them to be true.
2. I am an attorney licensed to practice in the State of New Mexico. I graduated from Stanford Law School in 1993, and have worked continuously over the last 25 years as a child advocate.
3. I am the Clinical Supervising Attorney for the Youth & Education Law Project at Stanford Law School's Mills Legal Clinic, an in-house teaching clinic working with economically disadvantaged children and their families in education–related matters.
4. I am a founder of Pegasus Legal Services in Albuquerque, New Mexico, a private, non-profit agency that serves the civil legal needs of New Mexico's vulnerable children and youth.
5. Since its founding in in 2002, Pegasus has partnered with private and community foundations, individuals and business donors to provide legal representation for New Mexico children in the fields of education and youth law, kinship guardianship, child abuse and neglect.

6. The mission of Pegasus is "to promote and defend the rights of children and youth to safe, stable homes, quality education and healthcare, and a voice in decisions that affect their lives."
7. As part of that mission, we at Pegasus emphasize that the right of children to participate in determining their placement, education, services—and their futures—is paramount.
8. At Stanford, I train future lawyers to build awareness, capacity and expertise to represent and advocate for the rights of children in the courts and in the community.
9. As housing solutions are quickly contrived for children who appear at the country's southern border, appear unaccompanied or who were separated from their families under the Zero Tolerance policy of the current administration, I am confident that children's rights have been or will be violated and that the State of New Mexico will be ill-prepared to provide a healthy environment for them should they be placed in New Mexico. In addition, placing children and their families in military facilities under these circumstances conflicts with well-established New Mexico law.
10. I am informed and believe based on published audit information that children held at the Otero County ICE detention center in Southern New Mexico lived with unsanitary bathrooms and were subjected to unjustified lock-downs and solitary confinements, and that the privately-operated facility was exempted from ICE's standards for recreational opportunities and natural light.[1]
11. Research demonstrates that restraint and seclusion, such as solitary confinement, are ineffective methods of behavioral control and result in severe physical and psychological harm to children,[2] especially to children who have already experienced trauma. New Mexico

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[1] *See* Office of Inspector General "Concerns About ICE Detainee Treatment and Care at Detention Facilities" (Dec. 11, 2017) available at: https://www.oig.dhs.gov/sites/default/files/assets/2017-12/OIG-18-32-Dec17.pdf (last visited on June 28, 2018); *see also* Las Cruces Sun News, "Problems at Otero County ICE detention center found in audit, December 23, 2017."

[2] David Weissbrodt, Willy Madeira, Daniel Stewart, and William Dikel, *Applying International Human Rights Standards to the Restraint and Seclusion of Students with Disabilities*, 30 LAW & INEQ. 287 (2012), available at http://scholarship.law.umn.edu/faculty_articles/. *See also*, Seclusions and Restraints:

law protects children from these practices in treatment centers and in schools. N.M. Stat. Ann. § 32A-6A-9; § 22-5-4.12. Allowing a child to be placed in unjustified lock-downs and solitary confinements violates a child's right to be free from improper and harmful restraint and seclusion.

12. Over the last two decades representing children, I have witnessed firsthand the trauma children experience when they are separated from their families. The research I have reviewed confirms what we see in the field – that children need to be with loving parents or caretakers. I am informed and believe that separation from loved ones is one of the most profound traumas a child can experience.[3]

13. Research also shows that exposure to trauma can lead to palpable, physiological harm to a young person's developing brain. I am informed and believe that trauma is associated with mental health conditions, developmental disruption and consequent educational loss for children.[4]

14. New Mexico law protects family preservation. "It is the policy of the state that its laws and programs **shall**:

    A. Support intact, functional families and promote each family's ability and responsibility to raise its children;

    B. Strengthen families in crisis and at risk of losing their children, so that children can remain safely in their own homes when their homes are safe environments and in their communities;

Selected Cases of Death and Abuse at Public and Private Schools and Treatment Centers, U.S. Government Accountability Office (2009) found at: https://www.gao.gov/new.items/d09719t.pdf (last visited June 28, 2018)

[3] The Nat'l Child Traumatic Stress Network, *Children with Traumatic Separation: Information for Professionals* 2, https://www.nctsn.org/sites/default/files/resources//children_with_traumatic_separation_professionals.pdf.

[4] Bruce D. Perry & Ronnie Pollard, *Homoeostasis, Stress, Trauma, and Adaptation: A Neurodevelopmental View of Childhood Trauma*, 7 CHILD ADOLESC. PSYCHIATR. CLIN. N. AM. 33, 36 (1998). *See also* Ray Wolpow et al., *The Heart of Learning and Teaching: Compassion, Resiliency, and Academic Success* 12, 13 (Wa. State Off. of Superintendent of Pub. Instr., 3d prtg. 2016).

C. Promote the creation of well-paying, stable jobs so that families can provide for their basic needs, including health, education, food, clothing and shelter, and

D. Halt the breakup of the nuclear family, stabilize neighborhoods and strengthen communities.

N.M. Stat. Ann. § 40-15-3.

15. New Mexico law recognizes the importance of keeping children with their loved ones and promoting safe home environments for children in the community. Hastily placing immigrant children and families in military facilities is contrary to established New Mexico policy.

16. For these reasons, I oppose plans to house immigrant families in military facilities pending adjudication and, in circumstances where children already have been separated from and not returned to their families, the continued separation of children from their parents.

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

Executed this 29th day of June, 2018 at Stanford, California.

Tara Ford
Clinical Supervising Attorney
YOUTH AND EDUCATION LAW PROJECT
MILLS LEGAL CLINIC
STANFORD UNIVERSITY

Exhibit 29

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

STATE OF WASHINGTON, *et al.*, Plaintiffs, v. DONALD TRUMP in his official capacity as President of the United States, *et al.*, Defendants.	NO. 2:18-cv-00939 - MJP DECLARATION OF ALISON M. GRIFFITH

I, Alison M. Griffith, declare as follows:

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

2. I am a Staff Attorney in the Refugee and Immigrant Program at The Advocates for Human Rights, a Minneapolis based non-profit organization. In that capacity, I represent individuals eligible for relief from deportation before U.S. Citizenship and Immigration Services and the Executive Office for Immigration Review (Immigration Court). Our office primarily represents asylum seekers, but this affidavit focuses on my representation of a child forcibly separated from her parents and urgently seeking voluntary departure from the United States.

3. Beginning in June of 2018, I began representing an 8-year-old girl from Guatemala who desperately wants to return to her mother and father and four younger siblings in Guatemala.

4. In connection with my representation of this child, I have interviewed both her and her father. I interviewed the child in person at my office, and her father via an international telephone call, as he currently resides in Guatemala.

Family Life In Guatemala

5. My client's father shared that his family is extremely poor. He struggles to give his children basic nutrition, clothing and educational opportunities. His goal for them is that they have a better life, so they do not have to struggle as he and their mother have struggled all their lives. He also reports that the family lives in a dangerous environment, including a significant presence of criminal groups who kidnap children and rob both children and adults. He fears that his daughters will be kidnapped and harmed, in the same way that so many individuals in the region where he resides have been. He became particularly afraid for his family's safety after a man was murdered at work in a nearby town by an unknown criminal group. Based on autopsy results, the man was brutally beaten and knifed in the stomach and died as a result of those injuries.

Journey Of Father And Child To The United States

6. In November of 2017, my child client and her father traveled to the U.S. seeking safety and a better life. My client and her father suffered on their journey to the U.S.- they went days with little sleep and sometimes no more than a soda for nourishment in an

entire day. However, my client's father was desperate, after trying for many years to work hard enough to offer his family a safer, better life in Guatemala and finding no way to do so.

7. Shortly after my client and her father reached the U.S. border, they encountered Customs and Border Patrol Officers who requested papers from them and then arrested them.

8. After their arrest, my client and her father were told by Border Patrol officers they could not stay together. My child client described her and her father's encounter with Border Patrol in this way:

> My papa explained that he wanted to stay with me, his daughter. I also told the officer the same thing, that I wanted to stay with my papa. The officer said that parents cannot go with their children and took my father to jail. I was very sad and cried a lot when we were separated. My papa cried a lot too. I did not know at that moment where I would go. A woman took me after that to another place.

9. My client's father recalls that he was not told where his child was being taken. He recalls that his daughter was holding onto him, with her arms around his stomach, begging to stay with him, and that Border Patrol officers forcibly pulled the child away as she embraced him. He recalls that the officers told him not to bring his other children to the U.S., since they would have to stay in the U.S. and the adults would face immediate deportation.

10. After his daughter was taken away, my client's father asked repeatedly for information about her whereabouts. For fifteen days, no officer would tell him where she was. He spent many sleepless nights while detained, worrying and wondering where she was and when he would be able to talk to her. He became sick, and began to have stomach problems. He asked the Border Patrol officers for medication, but they paid no attention to this request. He was only able to receive treatment for these medical issues after he was deported back to Guatemala.

11. After about 15 days, one officer finally agreed to "do him a favor" and looked his daughter up in some information system to which the officer had access. Using that system the officer verified that my client was in New York at a shelter and told my client's father. However, it was not until after my client's father was deported to Guatemala that they were finally able to speak to one another.

12. While my client's father was detained, he repeatedly told Border Patrol officers that he wanted to fight his case. He was told that he would be unable to fight the case and that instead he would be deported. He remembers that one officer told him that he should not try to fight his case because he would have to spend 8 to 12 months detained while fighting to stay in the United States. When he heard that, he thought of his children going so many months with no financial support and decided that the officers were right to tell him he should not fight to stay.

13. While my client's father was detained and for some time after he was deported, my client was placed by the Office of Refugee Resettlement in federally licensed foster care placements in New York for several months while the ORR completed their procedures for evaluating whether her aunt, who resides in Minnesota, would be a safe and proper placement for the child. Once their evaluation was complete, they released the child to her aunt, and assigned a social worker to conduct post-release services to the child.

14. The child has lived in Minnesota for several months. However, the child's aunt reports that the child continues to cry herself to sleep, missing her family and wanting only to go home to them. Distracted by thoughts of returning to her family, she struggles to concentrate in school.

15. My client reports that she wants to go back to "my mama and my papa, and my three little sisters and my little brother" as soon as possible. After being separated from her father, she has no interest in remaining in the United States, even if she has a valid claim to legal status here. Therefore, respecting her wishes and those of her family, my office is seeking Voluntary Departure on her behalf.

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

DATED this 28th day of June, 2018 at Minneapolis, Minnesota.

Alison M. Griffith
Staff Attorney

Exhibit 31

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

STATE OF WASHINGTON, Plaintiff, v. DONALD TRUMP in his official capacity as President of the United States, et al., Defendants.	NO. 2:18-cv-00939-RAJ DECLARATION OF HARRY GILMORE

I, Harry Gilmore, declare as follows:

1. I am over 18 and have personal knowledge of the facts stated herein.

2. I am the Licensing Coordinator Manager of the Oregon Department of Human Services' ("Oregon DHS") Children's Care Licensing Program ("CCLP"). The CCLP is responsible for the licensing, oversight, and regulation of Child-Caring Agencies in Oregon. Child-Caring Agencies must be licensed pursuant to Oregon Revised Statute 418.240. Child-Caring Agencies include but are not limited to residential treatment facilities. In addition to ensuring that licenses are granted only to Child-Caring Agencies that meet Oregon DHS' administrative rules and requirements, CCLP staff are obligated to conduct periodic inspections to ensure children receiving care and services in Child-Caring Agencies are safe

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and that programs are maintained and operated in accordance with all applicable rules and laws.

3. I hold a bachelor's degree in business administration and history from Principia College. Prior to my current role within CCLP, I held various management positions in Oregon DHS' Office of Licensing and Regulatory Oversight. I have served as a Manager in Oregon DHS' unit overseeing the Interstate Compact on the Placement of Children ("ICPC") and Contracts. In that role, I administered ICPC for the state of Oregon, managed eighteen staff members, and oversaw contract specialists who wrote and administered child welfare contracts. I have also managed background check policy for prospective foster and adoptive parents, and served as a Compliance Specialist for child welfare overseeing Child-Caring Agency contractors. Prior to my work with Oregon DHS, I worked for a number of non-profit organizations serving children and adults with developmental disabilities.

4. Morrison Child & Family Services ("Morrison") is a non-profit organization that specializes in providing services to children and young adults coping with adversity and trauma. Morrison operates a number of programs to serve its clients, including a residential care facility in Portland, Oregon, that is licensed as Child-Caring Agency. This residential care facility is currently serving four minors who have been separated from their families and are being detained by the federal government. The children were placed at Morrison pursuant to a contract with the Office of Refugee Resettlement.

5. I individually interviewed three detained children on June 20, 2018 to determine if they were safe and if they had been affected by the federal government's family separation policy.

6. The children detained at Morrison are represented by counsel. Each child's attorney was present during the child's interview. Due to counsel's concerns about the children's wellbeing and ability to preserve asylum or other immigration claims, I was

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permitted to ask the children four pre-approved questions only. I was permitted by the children's attorneys to interview only three of the four children who were separated from their parents.

7. I learned from each of the three children that they do not have ties to anyone in Oregon and do not have friends or family members in Oregon to stay with. I learned that each child had sought to enter the United States with a parent or parents, and was separated from that parent or parents at the border by immigration officials.

8. In response to questions about how they were being cared for at the Morrison Center, each explained they had enough to do at Morrison and that they were allowed to leave the facility on outings with Morrison staff, that they received medical care when needed, and received food at Morrison, which was so-so.

9. Based upon my experience, if children in Oregon have no family or any other source of support in Oregon, it is likely that at some point in the future, the children will enter the Oregon foster care system or become dependent on some other source of public assistance or support if they remain in our state.

I declare under penalty of perjury under the laws of Oregon, Washington and the United States that the foregoing is true and correct.

DATED this 29th day of June, 2018 at Salem, Oregon

Harry Gilmore
Licensing Coordinator Manager
Children's Care Licensing Program
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Exhibit 32

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

STATE OF WASHINGTON; COMMONWEALTH OF MASSACHUSETTS; STATE OF CALIFORNIA; STATE OF MARYLAND; STATE OF OREGON; STATE OF NEW MEXICO; COMMONWEALTH OF PENNSYLVANIA; STATE OF NEW JERSEY; STATE OF IOWA; STATE OF ILLINOIS; STATE OF MINNESOTA; STATE OF RHODE ISLAND; COMMONWEALTH OF VIRGINIA; STATE OF NEW YORK; STATE OF VERMONT; STATE OF NORTH CAROLINA; AND THE DISTRICT OF COLUMBIA,

Plaintiffs,

v.

THE UNITED STATES OF AMERICA; DONALD TRUMP, in his official capacity as President of the United States of America; U.S. DEPARTMENT OF HOMELAND SECURITY; U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT; U.S. CUSTOMS AND BORDER PROTECTION; U.S. CITIZENSHIP AND IMMIGRATION SERVICES; U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES; OFFICE OF REFUGEE RESETTLEMENT; KIRSTJEN NIELSEN, in her official capacity as Secretary of the U.S. Department of Homeland Security; THOMAS HOMAN, in his official capacity as Acting Director of U.S. Immigration and Customs Enforcement; KEVIN K. MCALEENAN, in his official capacity as Commissioner of U.S. Customs and Border Protection; ALEX AZAR, in his official capacity as Secretary of U.S. Department of Health and Human Services; SCOTT LLOYD, in his official capacity as Director of Office of Refugee Resettlement; and JEFFERSON BEAUREGARD

No. 2:18-cv-00939

SESSIONS III, in his official capacity as the Attorney General of the United States,

Defendants.

DECLARATION OF CONGRESSMAN DONALD S. BEYER, JR.

I, Congressman Donald S. Beyer, Jr., declare that the following facts are true to the best of my knowledge, information and belief:

1. I represent Virginia's 8th congressional district in the U.S. House of Representatives and have served in that position since January 6, 2015.

2. I am aware that the federal government recently embraced a policy of separating parents from their children for the purpose of deterring immigration along the Southwestern border.

3. Due to my concerns about the family separation policy, I visited Youth for Tomorrow in Bristow, Virginia on June 25, 2018. Youth for Tomorrow has been caring for immigrant teenagers under a contract with federal officials. I understood that the facility was housing children who had been separated from their parents at the border.

4. During my visit to Youth for Tomorrow, I met with several children at least three of whom voluntarily agreed to talk about the events that led to them being housed in Virginia. Each of the children told me that they had recently been separated from their parents at the Southwestern border, and that they had been housed in Virginia at Youth for Tomorrow for at least a couple of weeks and as much as a few months.

5. I remain concerned about the effects of the family separation policy, and I anticipate learning of other similarly distressing stories about immigrant children being forcibly separated from their parents and brought to Virginia.

Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury that the foregoing is true and correct.

Executed on June 29, 2018.

DONALD S. BEYER, JR.

Exhibit 33

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

STATE OF WASHINGTON, et al., Plaintiffs, v. THE UNITED STATES OF AMERICA, et al., Defendants.	NO. 2:18-cv-00939 DECLARATION OF KAY BELLOR IN SUPPORT OF PLAINTIFF STATES

I, Kay Bellor, declare as follows:

1. I am the Vice President for Programs for Lutheran Immigration and Refugee Service, Inc. ("LIRS") and also have served as its Acting President and CEO. I am responsible for LIRS's programs for refugees, unaccompanied children, and migrants, including our Children and Family Services Program, and have managed crisis response to historic challenges to the U.S. Refugee Admissions Program. I have also served as the Vice President for US Programs at the International Rescue Committee, a global humanitarian aid agency that assists refugees, other displaced persons, and survivors of natural disasters. As Associate Director of Church World Service, a refugee resettlement and asylee assistance organization, I coordinated all operations, including an overseas refugee processing program and 40 domestic resettlement offices.

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2. I have worked on refugee, migrant, asylee and unaccompanied alien children's ("UAC") issues for over 30 years. In my work, I have developed expertise in the policies and programs administered by The United States Department of Health and Human Services' Office of Refugee Resettlement (ORR), and the Department of State's Bureau of Population Refugee and Migration (PRM). Through my work with LIRS's programs, I am familiar with UAC cases during the fiscal years of 2015 through 2018, including those which involved the separation of families by the United States government.

3. LIRS is a service provider for ORR, offering a number of different services to unaccompanied alien children (UACs). LIRS works with only a small fraction of the children for whom ORR provides transitional care and custody, but it does so in a variety of different settings.

4. When U.S. Customs and Border Protection (CBP) detains an unaccompanied child, they are required to refer the child to ORR within 72 hours. ORR then places these children with licensed care providers, including LIRS.

5. ORR places most children over the age of ten in larger shelters, none of which are operated by LIRS.

6. A much smaller segment of unaccompanied children are placed by ORR in transitional foster care, which provides short term care while efforts are made to reunify a child with his or her family or find a longer-term placement. LIRS is one of the agencies that provides such transitional foster care. Children stay in LIRS transitional foster care an average of 60 days, though the length of stay has increased in recent months. LIRS work with fully licensed child welfare organizations to provide transitional foster care both in group homes and with foster families. Our transitional foster care sites are located in Riverside, California, Crofton, Maryland, Grand Rapids, Michigan, and Columbia, South Carolina. Many of the children placed in ORR transitional care are children of "tender age," usually 10 years old or younger. All of

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these sites are caring for children separated under the May 7, 2018 family separation policy announced by Attorney General Sessions ("separated children").

7. While children are in transitional foster care, LIRS providers work to find sponsors – usually family members – to whom a child can be released out of federal custody.

8. Related to familial reunification and sponsorship, LIRS operates programs to conduct home studies, provide post-release case management, conduct background checks, and provide assistance with family reunification procedures. LIRS provides such services in various states such as Alabama, California, Colorado, Georgia, Florida, Kansas, Louisiana, Maryland, Massachusetts, Michigan, Nebraska, New Jersey, New York, North Carolina, North Dakota, Ohio, South Carolina, Virginia, Tennessee, and Texas.

9. When such sponsorship is not possible and it is determined that a UAC has a pathway to legal status in the United States, children can be placed in long-term foster care. And once legal status is obtained, a foster child would be transferred to unaccompanied refugee minor ("URM") foster care. LIRS operates long-term foster care programs for UACs as well as URM foster care programs. LIRS provides long-term and/or URM foster care in Lansing, Michigan, Columbia, South Carolina, Worcester, Massachusetts, Grand Rapids, Michigan, and Sacramento, California.

10. LIRS is the primary federal grantee for short term and long term foster care. In turn, LIRS works with a national network of partners who offer trauma-informed care for children who urgently need safe shelter, clothes, and counseling. These local partners are identified as subgrantees on the federal grant.

11. Historically most of the children over the age of ten with whom LIRS has worked were unaccompanied because they crossed the border without a parent.

12. More recently, however, an increasing number of these children are unaccompanied because they were separated from a parent at the border. LIRS has seen a dramatic increase in the number of cases of immigrant children separated from their parents in

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recent months, especially since the Trump Administration adopted a "zero tolerance" prosecution policy. As of June 15, 2018, LIRS had served a total of 148 unaccompanied children since May 2017, 59 of whom had been separated from their parents under the policy. The ages of the 59 children separated from their parents at the border and sent to the LIRS network have ranged from less than 12 months to 17, with an average child age of 8. Of those 16 children are age 5 or younger; 43 are age 6 or older. Separation of minor children from their parents can cause significant trauma, hinder psycho-social development, and cause physical harm.

13. When LIRS is notified that a child in one of our transitional foster care programs has been separated from a parent by the U.S. Government, we go to work through the ICE Detention Reporting and Information Line to try to find the parent who has been detained. LIRS was able to release 48 children to family members prior to the announcement of the "zero tolerance" policy. Five family reunifications have occurred after the announcement of the policy.

14. If we are able to locate the parent, we help the parent understand the process for their child and ask about possible family or community sponsors that could take the child into their care while the parent awaits federal processing.

15. A sponsor can be a biological parent, family member, or non-family member that is not currently in detention. In our experience, parents with whom children have been separated are treated as "sponsors" for purposes of reunification.

16. Between January 1, 2017, and June 15, 2018, LIRS has been able to place 53 of the children in our care with family sponsors.

17. If no sponsor is identified, LIRS will seek to place the child in long-term foster care.

18. Many of the parent-child separation cases LIRS currently receives are due to CBP referring a parent for criminal prosecution for the misdemeanor of illegal entry, without considering humanitarian factors that warrant keeping a family unit together, and without taking

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into account whether the family has a bona fide claim for asylum. CBP refers and transfers custody of the parents to the U.S. Marshall Service (USMS) for criminal prosecution—and the result is that the separated child is transferred to ORR custody.

19. Criminal prosecutions for illegal entry are often resolved within several weeks, at which point the parent is returned to ICE custody and children could be reunited with their parents. But ICE does not generally make efforts to reunite these families. Our caseworkers are never informed when a parent is back in immigration custody, even though at this point, the basis for separation no longer exists. After separating the parent and the child—often detaining the children thousands of miles away—caseworkers often find it challenging to locate parents in ICE custody, schedule calls between children and parents in ICE custody, and obtain other information from parents that will assist in providing care and support to their children. Caseworkers have been challenged, but generally, we have located the parents within two weeks.

20. Also, because the parent is often the person who has best knowledge of any immigration claims the child can bring, the separation of parent and child often hampers the ability of caseworkers and attorneys to advocate and pursue immigration claims on behalf of the children.

21. Furthermore, separation of the child from the parent puts enormous pressure on parents to give up their asylum cases, because of the emotional distress and despair the separation engenders. In LIRS's experience, this is often a very difficult choice to make for parents, as the family may have fled due to real threats of persecution. Yet for a parent and child, a prolonged family separation lasting many months can cause serious emotional and physical distress and harm.

22. Unfortunately, in those situations where a parent decides to give up their claims and agrees to expedited removal, it usually takes at least several months after a parent's deportation before the child can be processed through removal proceedings and allowed to leave the country. During this time the child remains in ORR custody, separated from their parent,

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even though the parent has been returned to their home country and wants to be reunited with their child.

23. LIRS program social workers have expressed concern that ICE does not appreciate the urgency of trying to expedite removal proceedings in these children's cases so that they can be more promptly reunified with their parents.

24. Of particular concern are children of tender age, for whom placement in foster care for several months represents a significant portion of their life and can create strong attachments. When these attachments need to be broken, the children experience additional trauma.

25. The President's June 20 executive order appears to propose indefinite family detention of children and families crossing the border between points of entry while they await the outcomes of criminal and then immigration proceedings.

26. For more than a decade, LIRS has worked with individuals and families in detention, and reports show that this setting traumatizes families, undermines the basic family structure, and has devastating psycho-social impact on children.

27. Families should have the ability to live within communities and be provided with case management support as they endure their immigration proceedings. There are proven and effective alternatives to detention, including ICE's own family case management program, that show the government does not need to detain families in order for them to abide by immigration laws.

28. The following are two examples of the types of cases that LIRS is encountering.

Sophia

29. The first story is about a girl whom I will call Sofia. In March 2018, Sofia, an eight month old girl, was taken from her father when they crossed the Mexico/US border. Sofia's father, José, was detained at Rio Grande Detention Center in Laredo, Texas while Sofia was transferred to an LIRS-affiliated short-term foster care program in Michigan.

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30. Sofia's foster care case manager made multiple failed attempts to contact José in the detention facility. When the case manager was finally able to reach José, he shared that he was extremely worried because he did not know where Sofia had been taken. Sofia was too young to share information about herself, so her case worker went to work trying to locate Sofia's mother in Honduras or other family members living in the United States with very little information. Sofia's mother, Maria, described how Sofia and her father crossed the border to find safety after José faced political persecution for his membership and support for a certain political party. She additionally shared that about two months prior to Sofia's journey to the United States with her father, her family's car was set aflame. Fearing further retaliation, Sofia's family arranged her journey to the United States with her father. Maria made the agonizing decision that she could not take the journey with her daughter and husband because she needed to remain in Honduras to care for her own ailing mother.

31. After separation and while in short-term foster care, Sofia appeared irritated and tired. She had also come down with a runny nose, fever and a cough. However, once she arrived to her foster home and was held in the arms of her foster mom, she comfortably fell asleep. While in foster care, Sofia received a routine medical screening. She was described as a happy, calm and normal infant who loved to play, and ate and slept without disruptions. The stable, family oriented home environment had a beneficial effect.

32. Although Sofia's father is applying for asylum based on political persecution aimed at himself and his family, he made the decision for Sofia to be reunified and live with his mother (Sofia's paternal grandmother), who he described as a stable resident in the United States. Sofia was ultimately released to her paternal grandmother, but it was determined that she did not need post-release services, despite the fact that she was only eight months old. Post release services have proven to be essential following family reunification to ensure a child's safety and well-being, and increasing the ability of caregivers to protect and supervise the child. Although family reunification, when safe and appropriate, is in the child's best interest, it can also be a

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highly stressful time for caregivers who need support, culturally-appropriate services, and community referrals.

Catalina

33. The second story is about a three-year-old girl from Honduras whom I will call Catalina. In May 2018, Catalina crossed the border in Laredo, Texas with her father, mother and nine-month-old brother. Upon apprehension, Catalina was removed from her mother's arms, while her mother and brother were separated together and the father separated and detained at the Rio Grande Detention Center. Shortly after being separated from her family, Catalina was placed in an LIRS short-term foster care program in Michigan. Upon arriving at the foster care program, Catalina was noticeably impacted by her separation from mom, dad and brother; while telling her story, Catalina was despondent, crying and easily upset. Although multiple contacts were made to reach Catalina's father in the detention facility, facility staff did not connect the case manager to Catalina's father, nor did they relay messages to her father to facilitate communication.

34. While in short-term foster care, Catalina has been engaged in play therapy. Although she was initially reluctant to attend, crying during her first session, she has since been willingly participating—playing with the sand tray, engaging with the therapist, often demonstrating she is comfortable by searching for toys and instructing the clinician on what to do while playing together. Overall she presents as happy and is very talkative. However, during one therapy session, Catalina shared a horrific event during which she indicated she had witnessed a police officer murder her grandmother. Shortly after recounting these events, Catalina cried and was consoled by the therapist.

35. In early June, Catalina's mother was finally released along with her infant son and made contact with the LIRS short-term foster care program. Catalina was finally able to speak to her mother through a video call. She sobbed throughout the call and said she wanted to be with her mom. It was a heartbreaking call for the therapist to observe, however, the mother

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and clinician were able to comfort and soothe Catalina. Shortly after this call, Catalina began playing as usual in the sand tray, but immediately asked about her father and several minutes later, Catalina began crying and sobbing again. Catalina's foster parents are learning relaxation techniques to help Catalina cope. Despite Catalina enjoying playing with her infant foster sister and crying less and less at bedtime since her arrival to the program, she is unable to provide great insight into her emotions, thoughts and experiences and frequently asks to go home to her mother and father.

36. A family friend was identified as Catalina's potential sponsor but has not actively participated in reunification process. At this time, Catalina remains in the LIRS short-term foster care program until the reunification process is successfully facilitated.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 29th day of June, 2018 at Baltimore, Maryland.

Kay Bellor
Vice President, Programs
Lutheran Immigration and Refugee Service, Inc.

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