

CENTER FOR HUMAN RIGHTS & CONSTITUTIONAL LAW
Carlos R. Holguín (Cal. Bar No. 90754)
crholguin@centerforhumanrights.org
Bardis Vakili (Cal. Bar No. 247783)
bardis@centerforhumanrights.org
Sarah E. Kahn (Cal. Bar No. 341901)
sarah@centerforhumanrights.org
1505 E 17th St. Ste. 117
Santa Ana, CA 92705l
Telephone: (909) 274-9057

Attorneys for Plaintiffs

Additional counsel listed on following page

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

Jenny Flores, *et al.*,

Plaintiffs,

v.

Todd Blanche, Acting Attorney General
of the United States, *et al.*,

Defendants.

Case No. CV 85-4544-DMG-AGRx

**PLAINTIFFS' RESPONSE TO JULY 1,
2026 ICE JUVENILE COORDINATOR
ANNUAL REPORT**

Honorable Dolly M. Gee
Chief United States District Judge

1 NATIONAL CENTER FOR YOUTH LAW

2 Mishan Wroe (Cal. Bar No. 299296)

3 Diane de Gramont (Cal. Bar No. 324360)

4 428 13th Street, Floor 5

5 Oakland, CA 94612

6 Telephone: (510) 835-8098

7 Email: mwroe@youthlaw.org

8 NATIONAL CENTER FOR YOUTH LAW

9 Rebecca Wolozin (admitted *pro hac vice*)

10 2300 18th St. NW, P.O. Box 21156

11 Washington, DC 20009

12 Telephone: (202) 964-0406

13 Email: bwolozin@youthlaw.org

14 CHILDREN'S RIGHTS

15 Leecia Welch (Cal. Bar No. 208741)

16 2021 Fillmore Street

17 San Francisco, CA 94115

18 Telephone: (415) 602-5202

19 Email: lwelch@childrensrights.org

20 CHILDREN'S RIGHTS

21 Eleanor Roberts (admitted *pro hac vice*)

22 88 Pine Street, Suite 800

23 New York, NY 10005

24 Telephone: (212) 683-2210

25 Email: eroberts@childrensrights.org

TABLE OF EXHIBITS

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July 1, 2026 ICE Juvenile Coordinator Annual Report

Exhibit No.	Exhibit Description
1	Declaration of Leecia Welch, July 15, 2026 ("Welch Decl.") and Attachment A, 2025-26 Excerpts from Declarations of Families Detained at Dilley ("Attach. A")
2	Declaration of Avneet Chhabra, July 10, 2026 ("Chhabra Decl.")
3	Declaration of Elora Mukherjee, July 11, 2026 ("Mukherjee Decl.")
4	Declaration of Rodolfo Altillo, July 9, 2026 ("Altillo Decl.")
5	M.A.B.H. Declaration (Dilley), June 1, 2026 ("M.A.B.H. Decl.")
6	J.C.B. Declaration (Dilley), June 3, 2026 ("J.C.B. Decl.")
7	N.A.A. Declaration (Dilley), June 2, 2026 ("N.A.A. Decl.")
8	L.R.V. Declaration (Dilley), June 2, 2026 ("L.R.V. Decl.")
9	M.P.O Declaration (Dilley), June 1, 2026 ("M.P.O. Decl.")
10	L.R.P Declaration (Dilley), June 8, 2026 ("L.R.P. Decl.")
11	M.G.O. Declaration (Dilley), June 2, 2026 ("M.G.O. Decl.")
12	J.C.M. Declaration (Dilley), June 8, 2026 ("J.C.M. Decl.")
13	D.C. Declaration (Dilley), June 2, 2026 ("D.C. Decl.")

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1 **I. INTRODUCTION**

2 ICE resumed incarcerating children and families at the South Texas Family
3 Residential Center in Dilley, Texas (“Dilley”) more than a year ago. Since then, Plaintiffs
4 have repeatedly brought the same serious violations of the *Flores* Settlement Agreement
5 (“FSA”) to Defendants’ attention. Yet those violations persist unabated. Thousands of
6 children have endured prolonged detention in unlicensed facilities with unsafe and
7 unsanitary conditions while being denied meaningful access to information about their
8 *Flores* rights. The ICE JC Annual Report continues to portray a fiction of compliance,
9 ignoring the extensive record of *Flores* violations documented by Plaintiffs and
10 experienced daily by detained children. ICE Juv. Coord. Annual Rep. 2026 [Doc. # 1802-
11 1] (“ICE JC Annual Rep.” or “JC Report”); *see* Welch Decl, Attach. A.¹

12 Since Dilley re-opened, ICE has detained thousands of children there for more than
13 20 days. The May 2026 ICE JC Report calculated that children detained during February
14 and March spent an average of nearly 60 days in custody. May 4, 2026 ICE Juv. Coord.
15 Suppl. Rep. at 4 [Doc. # 1768-1] (“May ICE JC Rep.”). Yet the ICE JC Annual Report
16 asserts average lengths of stay of only 47.5 days in February and 40.2 days in March, and
17 claims that the average length of stay from June 1, 2025 through May 31, 2026 was 27.4
18 days. JC Report at 3 [Doc. # 1802-1]. Even that unreliable figure exceeds this Court’s 20-
19 day benchmark.

20 More importantly, however, the reported averages warrant careful scrutiny because
21 they likely undercount children’s total time in DHS custody including time at the border
22 and isolated in hotel rooms, and they obscure the egregiously prolonged detention many
23 children have experienced since Dilley reopened. The JC Report omits critical
24 information, including the monthly number of children detained for more than 20 days,
25 and once again fails to provide the specific, individualized evidence this Court has
26 required to justify detaining any child beyond 20 days. *Id.*; *see* Apr. 24, 2020 Order at

27 _____
28 ¹ All page references herein are to page numbers inserted by the CM/ECF system. All
previously filed documents, including declarations, include docket numbers.

1 15–16 [Doc. # 784].²

2 The JC Report again disputes that there are any *Flores* violations at Dilley, except
3 that education services are rated “Compliant with Issues.” JC Report at 14 [Doc. # 1802-
4 1]. Presumably as evidence of purported *Flores* compliance, the JC Report asserts that (a)
5 of the 386 grievances submitted by residents from June 2025 to April 2026, only 26 were
6 founded; (b) the 14 food service grievances were all unfounded; (c) of the separate 69
7 medical grievances noted in the “Medical Grievance Log,” none were “found in favor of
8 the resident.” *Id.* at 20-22;³ ICE Juv. Coord. Annual Rep. 2026 Exhibits at 39-43 [Doc. #
9 1802-2] (“ICE JC Exhibits”). Measured against Plaintiffs’ voluminous evidence of *Flores*
10 violations over the same period, this grievance data demonstrates nothing more than
11 failed self-monitoring.

12 Class member declarations from June 2026, as well as the chart summarizing
13 declarations previously filed with this Court, show year-long ongoing FSA violations by
14 DHS. *See* Welch Decl. ¶¶ 8, 44-46, Attach. A. These include inadequate medical care,
15 lack of information about *Flores* rights and access to counsel, lack of access to healthy
16 child-friendly food and safe drinking water, lack of adequate clothing, inability of class
17 members to sleep due to lights on in their living areas all night, lack of free calls to
18 family members, and inadequate education and developmentally appropriate activities.
19 *Id.* at ¶ 8. Violations at Dilley continue to inflict profound harm on children. Class
20 members consistently describe feeling depressed and anxious, losing weight, becoming ill
21 from the food, crying frequently, and struggling to sleep. *Id.*; *see* Sections II.B.1, 4, 5.

22 **II. ICE Continues to Violate the *Flores* Settlement Agreement**

23 Since Dilley re-opened in May 2025, Plaintiffs’ counsel have conducted 12 site
24 visits. Welch Decl. ¶ 2. After each site visit, Plaintiffs’ counsel provided Defendants with

25 ² Court orders are identified by date, in accordance with the citations in the Court’s Sept.
26 26, 2025 Order [Doc. # 1672].

27 ³ The JC Report references 69 medical grievances in one section and 64 medical
28 grievances in another section. *Compare* ICE JC Annual Rep. at 22 [Doc. # 1802-1] *with*
ICE JC Exhibits at 39 [Doc. # 1802-2].

1 a detailed, comprehensive list of *Flores* violations. Welch Decl. ¶ 3. The concerns raised
2 in the last letter sent on June 4, 2026, remain virtually the same as the concerns raised in
3 the first letter sent on May 7, 2025. *Id.* ¶ 5. Plaintiffs' counsel have also raised emergency
4 time-sensitive concerns about particular children via email after each site visit and on
5 several other occasions. *Id.* ¶ 3.

6 Pursuant to this Court's orders, the parties conducted mediation sessions from
7 January to April 2026. *Id.* ¶ 4. Despite some progress in children's length of stay at
8 Dilley and an agreement to have Dr. Paul Wise conduct medical site visits at Dilley, the
9 parties still fundamentally disagree as to FSA compliance at Dilley. *Id.*

10 **A. Children Are Subjected to Prolonged and Unexplained ICE Detention**

11 **1. Prolonged Detention at Dilley**

12 ICE's prior JC reports indicate that nearly 1,560 children were detained at Dilley
13 for over 20 days during just one six-month period.⁴ In Defendants' May ICE JC Report,
14 Defendants reported detaining 567 children for more than 20 days in February and March
15 2026, with 171 of those children facing detention for between 51 and 90 days, and 80
16 children languishing at Dilley for over 90 days. *See* May ICE JC Rep. at 3 [Doc. # 1768-
17 1]; Ex. A, Feb. and Mar. 2026 ICE Fam. Residential Ctr. 20-day Rep. [Doc. # 1768-2];
18 Pls.' Resp. to May 4, 2026 ICE JC Report at 8 [Doc. # 1779].⁵

19 ⁴ ICE's 20-day census data has only been provided to the Court for August, September
20 and December 2025, and January, February and March 2026. *See* Ex. A, Feb. and Mar.
21 2026 ICE Fam. Residential Ctr. 20-day Rep. [Doc. # 1768-2]; May ICE JC Rep. at 3, 5
22 [Doc. # 1768-1]; Jan. 2026 ICE Fam. Residential Ctr. 20-Day Rep. [Doc. # 1736-3]; Dec.
23 2025 ICE Fam. Residential Ctr. 20-Day Rep. [Doc. # 1736-2]; Sept. 2025 ICE 20-Day
24 Rep. [Doc. # 1692-9]; Aug. 2025 ICE 20-Day Rep. [Doc. # 1692-6]; Dec. 1, 2025 ICE
25 Juv. Coord. Suppl. Rep. at 2 [Doc. # 1692-4] ("Dec. ICE JC Rep.") (tallying reported
26 numbers). Plaintiffs' counsel's review of Defendants' past data indicates there may be
27 duplications or other possible errors. Counsel are unable to independently verify these
28 numbers but rely on what Defendants have reported to the Court and Plaintiffs' counsel.

26 ⁵ Previous ICE JC Reports provided similarly high numbers of children detained at
27 Dilley longer than 20 days, and these lengths likely excluded children's length of stay in
28 hotels, transit, and CBP. *See* Pls.' Resp. to Mar. 13, 2026 ICE JC Rep. at 8, [Doc. # 1748]
("During December and January, ICE [reported that they] detained at least 595 children

1 Rather than disclose how many children were detained for 20 days or longer over
2 the past year, the JC Report instead only provides monthly average daily population
3 counts and monthly averages of the length of stay for children who have been released or
4 removed from Dilley. JC Report at 1-3 [Doc. # 1802-1]. ICE’s presentation of the data
5 obscures the true scope of prolonged detention in three important ways. First, although
6 still above this Court’s 20-day limit, the reported averages are substantially lower than
7 those ICE previously reported to the Court – but ICE offers no explanation for the
8 discrepancy.⁶ Compare May ICE JC Rep. at 4 [Doc. # 1768-1] (reporting a 57-day
9 average for February and March) with JC Report at 3-4 [Doc. # 1802-1] (reporting
10 averages of 47.5 and 40.2 days for those same months and an annual average of 27.4
11 days). Second, data providing *only* the averages conceals the extraordinary length of
12 detention experienced by hundreds of individual children who have been detained for
13 over 80 days during the past year. *See, e.g.,* Chhabra Decl. ¶ 21, Ex. B; Pls.’ Resp. to
14 Mar. 13, 2026 ICE JC Rep. at 8, [Doc. # 1748]. Third, the ICE JC Annual Report again
15 fails to provide the individualized evidence this Court has repeatedly required to justify
16 detaining any child beyond 20 days.

17 _____
18 for more than 20 days. . . . At least 265 of these children were detained for more than 50
19 days and a shocking 55 children were detained more than 100 days.”); Pls.’ Resp. to Dec.
20 1, 2025 ICE JC Rep. at 6-7, [Doc. # 1706] (“ICE [reported that they] detained nearly 400
21 children for more than 20 days at Dilley in August and September 2025 alone.” In
22 September alone, “over 50 children were held for at least 30 days, and over 25 for at least
23 40 days, not counting time in hotels or transit.”). Before the May 2026 report, ICE’s data
24 did not include custody between apprehension and book into Dilley, indicating many
25 more children with stays over 20 days were likely excluded from the reported data.

26 ⁶ The June 15, 2026 Order requires Defendants to provide data on: “(ii) the average time
27 in CBP or ICE custody *for minors currently in the agency’s facilities* and for minors who
28 have been released during the period from June 2025 to May 2026.” *Id.* at 1-2 [Doc. #
1794] (emphasis added). They have failed to do so. Defendants may be artificially
lowering the average length of stay, as their data excludes all children with long stays
who continue languishing in detention. Additionally, since this average refers only to
time in ICE custody, it necessarily excludes the days any released children spent detained
in CBP. The total secure detention daily average is likely higher.

1 Plaintiffs' site visits confirm what ICE's averages conceal. During the March,
2 April, and June 2026 site visits, alone, *Flores* Counsel met with families who had been
3 detained for 323 days (O.S. May Decl. ¶ 4 [Doc. # 1779-11]), 143 days (S.D.C. Decl. ¶ 4
4 [Doc. # 1779-8]), 135 days (A.O. Decl. ¶ 4 [Doc. # 1779-5]), 91 days (E.C.M. Decl. ¶ 4
5 [Doc. # 1779-14]), 90 days (C.G.C. Decl. ¶ 4 [Doc. # 1779-4]), 77 days (A.L.G. Decl. ¶ 3
6 [Doc. # 1779-12]), 76 days with 10 of those days spent in CBP (M.T.H. Apr. Decl. ¶ 4
7 [Doc. # 1779-6]), two months (W.L. Decl. ¶ 4 [Doc. # 1779-15]), and 50 days (J.A.I.
8 Decl. ¶ 4 [Doc. # 1779-16]). Welch Decl. ¶ 10. During most site visits, the number of
9 children experiencing exceptionally prolonged detention exceeded the number of families
10 Plaintiffs' counsel were able to interview. *Id.* Given the numerous children who have
11 been detained at Dilley for more than 50, 80, or 100 days, ICE's attempt to attribute its
12 prolonged detention practices to a handful of purported outliers lacks credibility. *See* JC
13 Report at 5 [Doc. # 1802-1]; Mukherjee Decl. ¶¶ 8-23; Altillo Decl. ¶¶ 10-15.

14 Nor has ICE complied with this Court's repeated orders requiring individualized,
15 fact-specific explanations for every child detained beyond 20 days. For nearly a decade,
16 this Court has rejected the type of generalized justifications ICE nonetheless has
17 continued to provide over the past year, and has required ICE to identify the specific facts
18 justifying each child's continued detention. *See, e.g.,* June 27, 2017 Order at 25-27 [Doc.
19 # 363] (requiring individualized assessments and evidence to justify detention longer than
20 20 days); Apr. 24, 2020 Order at 14-18 [Doc. # 784] (same); June 26, 2020 Order at 5
21 [Doc. # 833] ("For each minor detained at an FRC for more than 20 days . . . the ICE
22 Juvenile Coordinator shall give a detailed individualized explanation of why that minor is
23 a flight risk (cursory explanations such as 'In custody-pending IJ hearing/decision,'
24 'pending USCIS response,' 'plaintiff in a pending lawsuit' . . . shall not be acceptable
25 explanations) . . . [rather] a prior unexplained failure to appear at a scheduled hearing
26 would be a satisfactory explanation for continued detention if that explanation is verified
27 in a declaration by an ICE representative under penalty of perjury."); Sept. 18, 2020
28 Order at 13 [Doc. # 987] (Requiring "[s]pecific explanations for the continued detention
of each minor detained at an FRC beyond 20 days,"); Sept. 26, 2025 Order at 2 [Doc. #

1672] (same); Apr. 3, 2026 Order at 2 [Doc. # 1755] (same). Despite attributing prolonged detention to a small number of purported “Failure to Comply” cases and national security concerns,⁷ ICE has never submitted evidence demonstrating why any particular child posed a flight risk or safety concern. *See, e.g.*, June 26, 2020 Order at 5 [Doc. # 833]. *See* Alttillo Decl. ¶ 12; Mukherjee Decl. ¶¶ 10, 12-22. Without individualized evidence, these generalized assertions cannot justify prolonged detention under *Flores*.

ICE’s release decisions further demonstrate the arbitrary nature of its detention practices. Hundreds of children were detained for weeks or months before being released without any explanation for why prolonged detention had supposedly been necessary. *See, e.g.*, Pls.’ Resp. to May 4, 2026 ICE JC Rep. at 11 [Doc. # 1779]; Pls.’ Resp. to Mar. 13, 2026 ICE JC Rep. at 9 [Doc. # 1748]. As one parent observed:

Every day I just hope they will let us go. . . . But we know there are some moms with children who have been here for 50 days. It makes me lose hope and feel demoralized when I hear that such long detention is possible. It’s so hard, because it makes it clear that in reality the government does not apply the *Flores* laws that they had us sign, because if they did, we would not be here still.

M.A.B.H. Decl. ¶ 37.

At no point during the past year has ICE been compliant with the FSA’s prohibition against prolonged detention of children in unlicensed detention facilities.

2. The Report Fails to Address Continued Prolonged Hotel Detention

On April 3, 2026, the Court reminded Defendants that, “[a]s previously ordered, Defendants shall cease placing minors at hotels, with a narrow exception for brief, one to

⁷ *Flores* counsel has met at least one of the families with such a “national security designation” and is aware of the background of the family’s case. Significantly, a federal judge ordered ICE to release the family (which included five-year-old twins) from Dilley after a successful habeas petition. *El Gamal v. Noem*, No. 5:25-cv-1261, R. & R. at 23-24 (W.D. Tex. Apr. 20, 2026) (Chestney, Mag. J.) [Doc. # 59] (“The Government has intervened in this case repeatedly and aggressively from its inception (addressed *infra*), which has significantly contributed to the reality of Petitioners’ prolonged detention.”).

1 two-night stays while in transit or prior to flights.” Apr. 3, 2026 Order at 4 [Doc. # 1755].
2 The Court later denied Defendants’ motion for reconsideration and reiterated that
3 prolonged hotel detention is not permitted without a showing of exigent circumstances
4 and good cause. May 18, 2026 Order at 4 [Doc. # 1775].

5 Despite these orders, ICE continued to hold children in hotels for prolonged
6 periods of time in April and May 2026. In May 2026, ICE held 24 children in hotels for
7 over three days, including two children held in various hotels for over 15 days and four
8 additional children held in hotels for over 10 days. Chhabra Decl. ¶ 22, Ex. B. In April
9 2026, ICE held 36 children in hotels for over three days, including numerous children
10 held for over five days. As Plaintiffs have previously established, prolonged unlicensed
11 hotel detention violates the FSA and is fundamentally inappropriate for children,
12 particularly because children detained in hotels are denied access to counsel and the
13 outdoors. *See* Pls.’ Opp’n to Defs.’ Mot. to Reconsider at 6-11 [Doc. # 1764]; *see also*
14 M.S.P. Decl. ¶¶ 10-14 [Doc. # 1748-5]; Marcelino Schalkwyk Decl. ¶¶ 4-13, 16 [Doc. #
15 1764-4].

16 The ICE JC Annual Report provides no justification or explanation for these
17 prolonged hotel stays. Remarkably, the JC Report fails to mention hotel detention at all,
18 despite the Court’s recent orders related to hotel detention and the Court’s order that the
19 Annual Reports include “discussion of compliance with the terms of the FSA as to any
20 minors detained by the agencies during the reporting period.” June 15, 2026 Order at 2
21 [Doc. # 1794].

22 **B. Conditions of Detention at Dilley Continue to Violate the FSA**

23 Dilley remains a highly restrictive, unlicensed detention facility. Welch Decl. ¶ 8.
24 As discussed repeatedly in Plaintiffs’ four previous responses to the ICE JC reports over
25 the last year, class members and their families have consistently reported serious
26 concerns regarding inadequate medical care, lack of information about *Flores* rights and
27 access to counsel, lack of access to healthy and safe child-friendly foods and safe
28 drinking water, lack of adequate clothing, lack of sleep due to lights on in their living
areas all night, lack of free calls to family members, and lack of adequate education and

1 developmentally appropriate activities. Pls.’ Resp. to May 4, 2026 ICE JC Rep. [Doc. #
2 1779]; Pls.’ Resp. to Mar. 13, 2026 ICE JC Rep. [Doc. # 1748]; Pls.’ Resp. to Dec. 1,
3 2025 ICE JC Rep. [Doc. # 1706]; Pls.’ Resp. to Sept. 8, 2025 ICE JC Rep. [Doc. # 1656];
4 Welch Decl. ¶ 8.⁸

5 **1. Children at Dilley Are Treated Like Prisoners**

6 Dilley’s harsh, prison-like environment remains harmful and unsuitable for
7 children. *See, e.g.*, J.C.B. Decl. ¶ 64 (“My child has visited Germany, and we’ve seen the
8 concentration camps in Munich. We’ve been to Dachau. He asked me if we are in a
9 concentration camp here. . . . My kid says, ‘Dad, but it is equal to where we are. And they
10 don’t let us leave.’ They aren’t killing us, but it feels like it.”); N.A.A. Decl. ¶ 21 (“It
11 feels like a jail here. Some of the guards actually tell us we’re here because we
12 committed crimes and we should be happy to be here. . . . They try to make you feel like
13 you’re a criminal even when you’re a straight A student.”); L.R.V. Decl. ¶ 24 (“It feels
14 like a prison – even with the school and things – they are constantly counting us,
15 surveilling us, and monitoring our every move.”); M.P.O. Decl. ¶ 22 (“I wouldn’t wish
16 this place on anyone.”); M.A.B.H. Decl. ¶ 19.

17 Children and families report demeaning, rude and racist treatment by guards at
18 Dilley on each site visit. *See, e.g.*, L.R.P. Decl. ¶ 32 (“Some staff . . . speak to us in a
19 gross and rude way. Sometimes, they are racist.”); J.C.B. Decl. ¶ 69 (“I feel like we are
20 treated as animals here. This feels like a business.”); L.R.V. Decl. ¶¶ 14-15 (“[The
21 guards] treat us like animals. One time a guard in the cafeteria was complaining about the
22 families at Dilley and said we should be appreciative of the food here. She said, ‘Why are
23 they complaining? If they were in their own countries, they would be eating shit.’”);
24 N.A.A. Decl. ¶ 18; M.G.O. Decl. ¶ 40; M.P.O. Decl. ¶ 11 (“We can’t even vent or laugh
25 with other families without having an issue with the guards. They will threaten you with .
26 . . a report or make a loud ‘shhh’ noise for you to stop talking.”); Altillo Decl. ¶¶ 25-26.

27 ⁸ In this response, Plaintiffs cite to declarations from our June site visit as well as to
28 previously filed declarations to demonstrate that FSA violations are ongoing. Attachment
A to the Welch Decl. compiles 12 categories of the most persistent *Flores* violations in
declarations filed during the past year.

The JC Report alleges no use-of-force incidents involving minors, no restraint incidents involving minors, and no minors placed in isolation or room restriction from April 7, 2025 to April 30, 2026, even though many declarations over the past year raised use of force and room restrictions. *Compare* ICE JC Exhibits at 31 [Doc. # 1802-2] *with* e.g., C.C.A Decl. ¶ 14 [Doc. # 1748-4] (“For the past couple of days, my children and I have been locked down in our room. They put us on lockdown after a staff member pushed my daughter and took all of her coloring materials away.”), N.P.V. Decl. ¶ 19 [Doc. # 1748-8] (“It was difficult during the protests because we kept getting put on lockdown in our rooms. They would make us stay in our rooms, and we were unable even to go to medical.”), *and* M.B.O.D. Decl. ¶ 26 [Doc. # 1748-19] (“On January 9, 2026, staff started yelling at us in the morning to go to our rooms and then locked us all in our rooms without any explanation. They did not tell us when we would be allowed to leave. . . . [T]he children all started crying. It was terrifying.”).

Dilley is not a safe environment for children. In June 2026, one family described several deeply troubling incidents they experienced while detained at Dilley. *See* L.R.V. Decl. ¶¶ 8-10, 14-17. For example, the parent recounted:

[T]wo of my daughters went to take a shower. One was changing and one was in the shower. One of the male cleaning staff came in the bathroom without knocking and my daughter raced into the shower again because she was partially undressed. . . . Then my daughter, who was showering, yelled out to ask if her sister was still there. Then the staff member left and went outside. He then knocked and said “cleaning” – but came right back in. My daughter came out of the shower after getting dressed and was startled and stared at him and then he left again. My daughters were really shaken up about the incident. I submitted a grievance right after it happened. Later that day, the manager said the girls had to do a physical and mental exam as part of the procedure for the grievance. . . . Since that day, my daughters have been scared to go in the bathroom alone and I have been scared, too. Now they only go to the bathroom together, and someone stands outside.

L.R.V. Decl. ¶ 17. Plaintiffs do not know whether CoreCivic investigated this grievance, what findings, if any, it reached, or what corrective action, if any, was taken.

Despite the constant threat to children’s safety at Dilley, ICE’s grievance system is, at best, ineffective. The JC Report states that families filed 132 grievances regarding

1 staff treatment,⁹ yet CoreCivic deemed only six “founded.” JC Report at 20-21 [Doc. #
2 1802-1]; *see also* ICE JC Exhibits at 34 [Doc. # 1802-2]. The JC Report does not explain
3 the standards used to classify grievances as “founded,” “unfounded,” or “ungrievable.”
4 However, it appears that complaints that fall under the categories of “State and Federal
5 Court decisions” and “State and Federal laws and regulations” are not grievable, which
6 would seem to *preclude* class members from using the grievance system to redress FSA
7 violations. JC Report at 21 [Doc. # 1802-1]. This revelation undermines the credulity of
8 Defendants’ repeated insistence that class members use the grievance system. At base, a
9 grievance system that families do not understand, that rarely substantiates complaints,
10 and that provides little transparency about investigations or outcomes does not
11 meaningfully protect children.

12 **2. Dilley Provides Inadequate Medical Care to Children**

13 Class members and their families continue to report that Dilley neither provides
14 adequate medical care nor appropriately accommodates children’s special needs.
15 Mukherjee Decl. ¶¶ 24-34 (child detained at Dilley for about 170 days developed
16 breathing difficulties and regressed behaviorally; a nonverbal five-year-old with
17 developmental delays struggled to eat and did not have a bowel movement for nine days);
18 Alttillo Decl. ¶¶ 16-22 (discussing lack of medical treatment for chronic medical
19 conditions, lack of medical treatment for a child with bloody stools, denial of medical
20 care for child with a jaw condition, and delayed medical care for child having an allergic
21 reaction). Since Dilley re-opened, families have raised medical care concerns to RAICES
22 attorneys *on at least 1,480 occasions*. Alttillo Decl. ¶ 16; Pls.’ Resp. to Mar. 13, 2026 ICE
23 JC Rep. at 14 [Doc. # 1748].
24

25 ⁹ The JC Report states that 386 grievances were filed from June 25, 2025 to April 2026,
26 with 132 relating to staff treatment, but Exhibit I states that 375 grievances were filed
27 from April 7, 2025 to April 30, 2026, with 115 relating to facility staff. *Compare* JC
28 Report at 20-21 [Doc. # 1802-1] *with* ICE JC Exhibits at 34 [Doc. # 1802-2]. It is unclear
why the longer time frame reflected in the Exhibit lists fewer grievances than the shorter
time frame listed in the JC Report.

1 Certain especially egregious medical concerns from the past year are illustrative: a
2 two-month-old baby developed a respiratory infection after being put in isolation with his
3 15-month-old sister who had COVID and multiple other infections (M.L.S. Decl. ¶¶ 14,
4 16-19 [Doc. # 1748-36]); a pregnant woman with Hepatitis B whose viral load was so
5 high she risked getting liver cancer and passing the disease to her baby was denied
6 treatment (N.M. Decl. ¶¶ 13-17 [Doc. # 1748-27]); a child with a serious tooth and gum
7 infection received only ibuprofen and a liquid diet for more than 20 days while the
8 underlying infection persisted (S.K. Decl. ¶¶ 21-24, 26-27 [Doc. # 1748-15]); a child
9 suffering in agony from appendicitis was told during a medical exam to come back in
10 three days (the examiner believed he was exaggerating his symptoms), delaying his
11 transfer to the emergency room (O.S. Aug. Decl. ¶¶ 25-30 [Doc. # 1748-30]); and a child
12 with Hirschsprung's disease was not provided the treatment or diet her condition required
13 resulting in the child going 34 days without a bowel movement, and experiencing
14 extreme pain, fevers, and vomiting (D.C.R.R. Decl. ¶¶ 3-5, 8 [Doc. # 1706-20]; D.R.R.
15 Decl. ¶ 7 [Doc. # 1748-29]).

16 Despite the number of dangerous medical situations faced by children and raised to
17 Defendants, families continue to report that Dilley medical staff minimize, misdiagnose
18 or ignore their concerns, delay treatment, and deny access to doctors.

19 Medical seems incompetent. My sister and my dad go a lot. The nurses
20 supposedly consult with the doctor, but we never see the doctor when we go
21 to the medical unit. My dad has a problem with his spine. In California, he
22 was getting injections and special medicine for his back pain because it's so
23 bad. Here, they just give him ibuprofen, and this causes his stomach to hurt.
24 My dad also had an infection where he was peeing blood here, and he never
25 saw a doctor for that.

26 L.R.P. Decl. ¶¶ 19-2.

27 When you go to the doctor here, you have to wait for a long time. Four days
28 ago, I asked for an appointment for medicine for a yeast infection, but they
did not give me an appointment. Then, I went back, and they told me they did
not have the cream I needed to treat the infection. I am still waiting for it. They
said I might not get it until Friday, which is four days from now.

1 M.A.B.H. Decl. ¶ 36; J.C.M. Decl. ¶¶ 16-19 (mother concerned with lack of adequate
2 diagnoses and treatment after daughter fell off monkey bars); N.A.A. Decl. ¶ 20; J.C.B
3 Decl. ¶¶ 44-46 (ten-year-old with heart murmur not seen by cardiologist for 60 days).

4 The information Defendants provide in their report about the medical, dental, and
5 mental health services purportedly available at Dilley provides no insight into diagnoses
6 and treatment protocols and practice, which the above examples demonstrate can mean
7 the difference between a treated and manageable illness and a life-threatening medical
8 condition. *See, e.g.*, JC Report at 9 [Doc. # 1802-1]. Nor do Defendants acknowledge or
9 provide updates on the status of any alleged improvements to medical services as
10 discussed in the May Report. May ICE JC Rep. at 21-22 [Doc. # 1768-1].

11 In addition, children's mental health continues to deteriorate at Dilley, and is
12 exacerbated by increased lengths of stay. *See* Mukherjee Decl. ¶ 35 ("Every child who I
13 have represented in federal immigration custody from March 1, 2026 to date has
14 experienced mental health distress in detention."); Altillo Decl. ¶¶ 23-24; J.C.M. Decl. ¶¶
15 13-14 ("My daughter is . . . stressed. She was very social and liked to play and hangout
16 with younger kids before coming here, but now she doesn't. I have noticed a big change
17 in her."); D.C. Decl. ¶ 28 ("[My son] had these hyperactive behaviors before we got here,
18 but now they've gotten worse. He's deteriorated a lot in the past few days. It's not
19 controllable now."); L.R.P. Decl. ¶ 38 ("Being at Dilley makes me nervous. I am not free,
20 and my only friends are my sisters. I am sad after two months of living here.").

21 I have trouble sleeping because of all my racing thoughts. Will I go back to
22 school? Will I go back to LA? Has my GPA gone down? I had a 4.0, and I
23 was hoping to get scholarships. Now I don't know what is going to happen. .
24 . . My little brother is not doing okay. He is crying a lot, and always saying
25 how much he misses his family. . . . He's always saying how much he doesn't
26 want to be here.

27 N.A.A. Decl. ¶¶ 16, 19.

28 Being here is terrible for my son. He says he does not want to be here. My son
feels really sad, especially in the morning. When he wakes up, he tells me he
does not like being incarcerated. I tell him he must have faith in God that soon
we will get out of here. My son no longer wants to eat.

1 M.A.B.H. Decl. ¶¶ 19-20; L.R.V. Decl. ¶¶ 20-21.

2 The ICE JC Annual Report paints a picture of mental health services at Dilley
3 starkly at odds with the experiences reported by class members. The JC Report asserts
4 that: “Therapeutic approaches include Cognitive Behavioral Therapy (CBT), Dialectical
5 Behavior Therapy (DBT), trauma-focused CBT and DBT, somatic experiencing, and
6 brain spotting.” JC Report at 10 [Doc. # 1802-1]. But families consistently report they
7 lack therapeutic supports their children need:

8 My son [] has autism. We have very clear medical documentation of his diagnosis.
9 The conditions in this detention center have severely negatively affected him. . . .
10 We do see the psychologist sometimes, but it’s super brief. They ask how the kids
11 are doing and if we’re getting what we need. We respond, and that’s it. That is the
12 5-minute conversation and then we meet in a week, and we get a sticker. And
13 that’s the whole visit.

14 S.S. Decl. ¶¶ 16, 28 [Doc. # 1748-24]; J.B.A. Decl. ¶ 10 [Doc. # 1748-28] (“[M]y son
15 was diagnosed with ADHD and we were in the process of getting treatment when we
16 were arrested. . . . [T]he psychologist told us that there was nothing they could do for
17 him, and we should basically keep him inside of his room at all times.”); C.R.B. Decl. ¶
18 16 [Doc. # 1748-34] (“[M]ental health appointments here. . . . aren’t helpful. They last
19 not even ten minutes.”). Although Defendants assert that “services include family
20 sessions, group sessions, psychoeducation, parenting education, and therapeutic or
21 wellness-related programming such as Zumba and crochet,” no family has ever reported
22 receiving any wellness-related programming beyond brief check-ins, and Plaintiffs’
23 counsel have never witnessed evidence of Zumba or crochet on any facility tours. JC
24 Report at 10 [Doc. # 1802-1]; Welch Decl. ¶ 16.

25 **3. Children Have Not Been Provided Notice of Their *Flores* Rights or 26 Free Access to Counsel**

27 The ICE JC Annual Report again asserts that a video and resident handbook that
28 do not mention *Flores* at all, together with two documents that address only the right to
use the telephone, be represented by a lawyer, and have a hearing before a judge, satisfy
Defendants’ *Flores* rights notice obligation. See JC Report at 14, 18 [Doc. # 1802-1].
This Court has repeatedly held otherwise. See, e.g., Jan. 5, 2021 Order Approving Final

1 Notice of Rights [Doc. # 1056]. Plaintiffs attempted to resolve this issue during
2 mediation, but Defendants have not responded to Plaintiffs' proposal. Welch Decl. ¶ 21.
3 Defendants were noncompliant with the FSA's notice of rights requirement throughout
4 the reporting year.

5 Plaintiffs' counsel have not spoken with any families at Dilley who recall learning
6 about their child's full *Flores* rights in a video, training, or documentation provided by
7 ICE or CoreCivic. See Welch Decl. ¶ 20; see, e.g., D.C. Decl. ¶ 43 ("I don't recall any
8 know your rights presentation. I remember I was given info on pro bono lawyers, but that
9 was it."); J.C.M. Decl. ¶ 7 ("I have never received an orientation or video about my
10 rights."); L.R.P. Decl. ¶ 15 ("No one ever explained my rights to me here. I asked for
11 them, and ICE told me they don't know what our rights are."); J.C.B. Decl. ¶ 24 ("We
12 received no presentation about rights.").

13 Recently, families started reporting that ICE required them to sign a document
14 informing them that children have the right to be released within 20 days, while
15 simultaneously telling them that those rights did not actually apply:

16 They did not tell us anything about our *Flores* rights. Earlier that day, we met
17 with an ICE agent, and they showed us a piece of paper saying that children
18 could not be detained more than 20 days, but they didn't explain anything.
I'm not sure what the point of the paper is since we've been here more than
40 days so far.

19 N.A.A. Decl. ¶ 11.

20 No one has given me a handout about my children's rights. I do not remember
21 watching a video about my children's rights either. They showed us a video
22 when we got here, but it was about immigration law and credible fear
23 interviews. I've heard from many people that they are no longer showing the
24 immigration video, though. I have not heard about my children's right to be
released from Dilley without me. No one has told me anything about bond
hearings.

25 M.G.O. Decl. ¶¶ 16-19; L.R.V. Decl. ¶ 6; L.R.P. Decl. ¶ 16 ("When we first arrived to
26 Dilley, we signed a form about *Flores*. But ICE told me we don't qualify for *Flores*.
27 They didn't tell me why.").

1 Class members also consistently report barriers to making free legal phone calls,
2 emailing counsel, and preparing their immigration cases. Welch Decl. ¶ 23; Mukherjee
3 Decl. ¶¶ 38-43; *see, e.g.*, M.A.B.H. Decl. ¶ 32 (“I have not been able to call lawyers and
4 do not have money for lawyers. . . .”); O.B. Decl. ¶ 12 [Doc. # 1779-18] (“I have not
5 contacted lawyers because I thought I have to pay. This is the first time I am hearing I
6 don’t have to pay for calling lawyers.”); S.D.C. Decl. ¶ 21 [Doc. # 1779-8] (“I haven’t
7 been able to make any free pro bono calls here by using the system where you are
8 supposed to mark 6. I saw a woman try it recently, and it did not work.”); Z.V. Decl. ¶ 24
9 [Doc. # 1748-21] (“I cannot call my lawyer for free either. I have to pay to call him on
10 his cell phone. I have never heard anyone tell me I should be able to call my lawyers for
11 free.”). Although the JC Report asserts “indigent residents may request free domestic
12 calls . . . [for] legal calls,” not one family Plaintiffs’ counsel have spoken to has ever been
13 aware of this option. JC Report at 23 [Doc. # 1802-1]; Welch Decl. ¶ 26.

14 We never received information about how to call lawyers or how to call
15 people for free. I only learned how to call *Flores* attorneys, because other
16 people detained here gave me your information. I used my money to pay for
17 that call, because I do not know how to make calls any other way.

18 M.L.S. Decl. ¶ 28 [Doc. # 1748-36].

19 Despite Defendants’ claim that “Gmail access was restored on March 6, 2026
20 through library computers,” families have consistently reported since March 6 that there
21 is still little to no Gmail access and the other services are limited. JC Report at 19 [Doc. #
22 1802-1]; Mukherjee Decl. ¶¶ 40-41; *see, e.g.*, M.A.B.H. Decl. ¶ 33 (“When I got here,
23 there was no way to use my own email address. I cannot open my Gmail account or
24 create new Gmail accounts. There are a lot of restrictions, and we can only use the email
25 they allow here.”); M.G.O. Decl. ¶ 30 (“I cannot use my Gmail here either because they
26 took away my phone and the computers only allow you to access Proton for email.”);
27 A.L.G. Decl. ¶ 20 [Doc. # 1779-12] (“We still do not have access to Gmail here to
28 contact our lawyers. Yesterday, someone new to Dilley asked the library how to email his
lawyers, and the people in the library said he could not use Gmail But people have
to pay for Proton.”); Welch Decl. ¶ 25. Recently, some families with long detention stays

1 reported to their attorneys that their email accounts were suddenly closed down without
2 advance notice resulting in the deletion of all previous emails. Mukherjee Decl. ¶ 41;
3 Altillo Decl. ¶ 35.

4 Limited interpretation access for some languages and documents further
5 exacerbates families' confusion about their legal cases, potential release dates, and their
6 *Flores* rights. J.C.M. Decl. ¶¶ 10-11 ("These papers are all in English. . . . [W]e don't
7 receive the papers in our own language. For the *Flores* document, an ICE agent told me
8 what it means, but the paper was still in English. We didn't even get a copy of that
9 one."); O.B. Decl. ¶¶ 13-14 [Doc. # 1779-18] ("I can't understand anything here – no one
10 has explained anything to me in French. . . . My daughter speaks only [language]. I have
11 not had a translator or interpreter since we arrived here.").

12 Together, evidence demonstrating the lack of notice of children's *Flores* rights,
13 lack of access to free legal calls and email communication, and lack of consistent
14 language access reveals that Defendants have been non-compliant with the FSA's notice
15 of rights and access to counsel requirements throughout the reporting-year.

16 **4. Children Still Lack Access to Child-Friendly Foods, Healthy Snacks, and Safe Drinking Water**

17 Families continue to report concerns about their children's nutrition at Dilley.
18 J.C.B. Decl. ¶ 58 ("The food here is not healthy. All the kids need this to be better.") In
19 June, children and parents continued to report that the food makes them sick. *See* J.C.M.
20 Decl. ¶ 20 ("The food here makes us sick. We are losing weight. We eat the food and
21 have to go right to the bathroom. Sometimes we eat, sometimes we don't. If we do eat,
22 we go directly to the bathroom afterwards."); N.A.A. Decl. ¶ 12 ("Often when I eat the
23 food, it will hurt my stomach. I have lost six pounds. My little brother also doesn't like
24 the food. He would eat it at first, but then he started getting belly aches and now he
25 doesn't want to eat it at all."); M.G.O. Decl. ¶¶ 37-38 ("My children have been sick with
26 stomach aches since getting here I think the food makes them sick to their stomachs.
27 . . . There are so many kids who do not eat because they get stomach pain and diarrhea.");
28 M.A.B.H. Decl. ¶ 21-22 ("[E]very time I eat, I get a lot of gas and stomach pain

1 [M]y son had a really intense pain in his stomach, and I took him to the doctor here. They
2 said his pain may just be because he is not eating well.”).

3 Children and their parents also continuously express concerns about the food taste,
4 variety, quality, over-use of sauces and condiments, and lack of special diets.¹⁰ See, e.g.,
5 Mukherjee Decl. ¶ 37 (“Every verbal child and parent who I have worked with at Dilley
6 from March 1, 2026 to date has reported that the food is not appropriate or palatable for
7 children and families.”); Altillo Decl. ¶¶ 27-28; N.A.A. Decl. ¶ 12 (“The food here
8 overuses condiments, and I don’t eat much of it. I will just eat a few of the meals. Even
9 the fruit is bad – it’s canned and tastes metallic like it’s expired.”); M.G.O. Decl. ¶ 38
10 (“The food here is repeated a lot. It’s always the same. It also has too many condiments
11 for children to eat it. . . . [T]he staff just give us the same food over and over again.”);
12 L.R.P. Decl. ¶ 17 (“Most of the time, the food here is horrible.”).

13 [My son] is simultaneously hungry and doesn’t want to eat anything, so I
14 mostly give him milk and cookies. As a mom, it makes me feel worried that
15 he has not been eating. . . . We have not been able to get a special diet for him
16 either because it’s so complicated to be eligible for one. So, I just pray to God
17 that we will get out of here soon.

18 M.A.B.H. Decl. ¶¶ 21, 23.

19 My twelve-year-old has had an especially hard time with the food. . . . she is
20 allergic to artificial coloring. Lately, she’s had a horrible allergic reaction to
21 the artificial coloring in the food here. It has really flared up badly. Her lips
22 and mouth have been swollen and inflamed. She really can’t eat much of
23 anything. I asked for her to be put on a special diet, but they said that is not
24 necessary and she should just avoid foods with artificial coloring.

25 L.R.V. Decl. ¶ 12.

26 Rather than responding to these concerns, the JC Report simply echoes previous
27 assertions about Dilley’s menu and claims that there have only been 18 food service

28 ¹⁰ While the ICE JC Annual Report devotes several pages and exhibits to explaining the
availability and contents of special meals, the “Special Diets for Minors Log” lists only
nine children who have received special diets at Dilley over the last year – out of
thousands of detained children. ICE JC Annual Rep. at 5-7 [Doc. # 1802-1]; ICE JC
Exhibits at 25 [Doc. # 1802-2]. According to the log, only two children have been given
special diets in 2026 so far. *Id.*

1 grievances from June 2025 to April 2026, none of which have been founded. JC Report at
2 6 [Doc. # 1802-1]. In light of Plaintiffs' evidence, the absence of a single founded food
3 service grievance is not believable.

4 Despite installation of water filters in the living quarters following months of
5 complaints from class members, families still repeatedly report that the water tastes bad
6 and makes them sick. *See, e.g.*, M.G.O. Decl. ¶ 39 ("The water here is really bad, too. We
7 do not have enough money in our commissary account to buy water, so we have to drink
8 water from the tap, but it gives us diarrhea. So, we have consistent diarrhea."); M.A.B.H.
9 Decl. ¶ 21 ("For the most part we are buying potable water bottles here . . . I am always
10 trying to make sure I can buy it for my son because I don't want us to get a stomach
11 illness. It is expensive but we do it to stay healthy."); Altillo Decl. ¶ 27; Mukherjee Decl.
12 ¶ 36.

13 When we first arrived, my son drank the water. It made his stomach hurt and
14 he got diarrhea that day. The water also comes out dirty. . . . I raised the issue
15 with medical, and they said the filtered water was fine. I asked her why all the
16 medical staff drink bottled water and she just kind of stared at me.

17 L.R.V. Decl. ¶ 13.

18 I don't drink the water from the tap here because it tastes really bad and looks
19 cloudy. I drank the water when I first got here for about a week. I got a lot of
20 stomachaches. Some people drink it because they don't have money to buy
21 bottled water. A lot of people say the water made them feel bad when they
22 drank it.

23 N.A.A. Decl. ¶ 13.

24 Families also report inconsistent access to infant formula, baby food, safe options
25 for cleaning bottles, and access to bottled water for infant formula. *See, e.g.*, M.L.S. Decl.
26 ¶ 14 [Doc. # 1748-36] ("Our 2-month-old is taking formula here with the water from the
27 sink, and it is giving him diarrhea all the time. . . . [T]hey said we had to use the sink
28 water for formula. The guards said we would have to buy water bottles from the
commissary . . ."); Y.G.P. Decl. ¶ 9 [Doc. # 1779-17] ("One time, a guard refused to let
me have bottled water for her formula and said I would need to use the tap water.").

1 While there have been minor improvements over the last year, Defendants are still
2 not providing children with age-appropriate food.

3 **5. ICE Provides Poor Sleeping Conditions for Children**

4 Lack of sleep also remains a serious, issue rendering detention at Dilley unsafe for
5 children. Families report each site visit that children cannot sleep because ICE keeps the
6 lights on in living areas all night, guards are loud or conduct room checks in disruptive
7 ways, and bunk beds are uncomfortable. *See, e.g.,* M.P.O. Decl. ¶ 19 (“It is hard to sleep
8 here because the lights are on all night. We wake up many times throughout the night
9 because the lights never go off.”); L.R.V. Decl. ¶ 18 (“Between all the noise, the loud
10 guards, and the lights on – my children have had a hard time sleeping here. We are able
11 to turn off some of the lights, but it is still very difficult. During the night, they are also
12 checking on us every 40 minutes.”); L.R.P Decl. ¶ 18 (“The lights are on all night, you
13 cannot sleep, and the bed is hard.”); L.R.V. Decl. ¶ 18.

14 Some families report cruel treatment by guards in the night that terrifies children
15 and further disrupts sleep. One parent described the following incident:

16 It is difficult for my children to sleep here because the lights are on all night.
17 . . . A couple of nights ago, we all woke up when a bunch of ICE officers came
18 into the room at 3 a.m. They were checking for things, but I am not sure what
19 they were looking for. It was terrifying. When they saw that I woke up, they
20 left the room.

21 M.G.O. Decl. ¶ 36.

22 Another parent recounted the following:

23 One female guard liked to torment the families at night by jumping repeatedly
24 on an area of the metal hallway outside the rooms that made a loud booming
25 sound. She would hold on to a pole and jump with all her weight so that she
26 could make a very large sound. I saw how she did it. She would make sure to
27 jump on that area throughout the night to startle and awaken us. It went on for
28 a month off and on. I confronted her about it directly, but she said she didn’t
speak Spanish. I then went to a supervisor, but the behavior continued. Then
my son (who understands English) heard her talking in English to another
guard who was telling her to stop making that noise. She said: “What are those
Latinos going to do to me?”

L.R.V. Decl. ¶ 16.

1 Children are exhausted from lack of sleep, which is negatively affecting their
2 physical and mental health. Lack of sleep harms children's brain development and
3 undermines long-term physical and mental health. Welch Mar Decl. Attachs. C & D
4 [Doc. # 1748-2].

5 **6. Children Still Lack Access to Adequate Hygiene Products**

6 Over the past eight months, Defendants' reports to the Court have provided
7 inconsistent and contradictory descriptions of what hygiene items children actually
8 receive. Welch Decl. ¶ 34; JC Report at 8 [Doc. # 1802-1] (not listing soap or shampoo in
9 the list of "routine hygiene items"); *cf.* May ICE JC Rep. at 27 [Doc. # 1768-1] (stating
10 "[t]he standard hygiene kit includes soap [and] shampoo."); *see also* Mar. 13, 2026 ICE
11 Juv. Coord. Status Rep. at 16 [Doc. # 1736-1]; Dec. ICE JC Rep. at 29 [Doc. # 1692-4].

12 Hygiene products provided to children held at Dilley are inadequate and of poor
13 quality. The all-purpose foaming hand soap in the showers causes children's skin to get
14 dry and break out in rashes. *See, e.g.,* M.P.O. Decl. ¶ 13 ("He was using the hand soap in
15 the shower but I was worried because the soap was too harsh for his skin and his arms
16 were getting really dry."); L.R.V. Decl. ¶ 13 ("I have bought a toothbrush, toothpaste,
17 water and soap from the commissary. The toothbrush they gave us when we first arrived
18 fell apart after a couple uses and my son said the toothpaste was not good. The handwash
19 in the shower made my children's skin itchy."); L.R.P. Decl. ¶ 36 ("The soap here is for
20 hands, not for the body. . . . The only thing you can do is pay for better soap and
21 shampoo."); M.G.O. Decl. ¶ 32 ("When we first got here, they gave us a really small
22 shampoo bottle. When it ran out, I spent a week asking for more shampoo, but the staff
23 said they did not have any more. So, since then, we have had to buy it at the
24 commissary."); J.C.B. Decl. ¶¶ 60-61 ("I used the shampoo they gave us upon entry and
25 asked for more, and they said they don't have anymore. It lasted three days. The soap is
26 the hand soap from the bathroom. . . . and it's foam soap. You can't really wash your
27 body with foam.").

28 Defendants continue to detain children for weeks and months, while providing
them with inadequate hygiene products designed for short-term temporary use. Families

1 should not have to buy basic hygiene products for their children at the commissary
2 because the government has decided to hold them in custody for lengthy periods of time.
3 To comply with the FSA, every hygiene kit should include body soap, shampoo safe for
4 children or teenagers to use long-term, and regular toothbrushes that do not disintegrate
5 after a few uses, in addition to the other items provided. All hygiene items should be
6 replenished routinely at no cost. It is difficult to understand why this simple sanitation
7 and hygiene problem remains unresolved.

8 **7. Children Still Lack Access to Free Phone Calls to Family Members**

9 ICE continues to deny children free phone calls to non-detained family members
10 beyond their initial call upon entering Dilley. But class members have the explicit right to
11 speak to family members for free. FSA Ex. 1 ¶ A.11; *see also* Attach. 1 Notice of Rights,
12 Jan. 5, 2021 Order at 2 [Doc. # 1056-1].¹¹ It is unacceptable to deny children
13 communication with family for days, weeks, or months at a time. FSA ¶¶ 11, 12.A, 18.

14 The JC Report states that “[i]ndigent residents may request free domestic calls,
15 including legal calls, through Unit Management at any time,” yet class counsel have
16 never met with anyone at Dilley who made a free phone call to family beyond the initial
17 five-minute call. JC Report at 18 [Doc. # 1802-1]; Welch Decl. ¶ 26.

18 My son hasn’t been able to make any calls to family since we arrived here
19 because I didn’t have any money in my account. No one has ever told me that
20 my son could make free phone calls to his family. They gave my son and me
21 a phone card when we first arrived. My card was for five minutes and my
22 son’s card was for three minutes, I think. I used my card, but my son has not
23 been able to use his card. When we try to use it, the phone just cuts off.

24 M.P.O. Decl. ¶ 12; M.A.B.H. Decl. ¶ 31 (“We have to pay to call our family members
25 from here, so we only have been able to call my son’s family when there is money in the
26 commissary. I have not heard about free phone calls.”).

27 When we first got here, we could not make any calls to anyone because we
28 did not have money in our commissary account. I was allowed to make one

¹¹ The Notice of Rights was created pursuant to the September 18, 2020 Order at 2 [Doc. # 987]. The “Court approved the final language of the Notice of Rights.” Jan. 29, 2021 Order at 2 [Doc. # 1077].

1 call, but the person I called did not pick up. There is definitely no way to make
2 free calls to family. If you do not have money, you cannot call anyone.

3 M.G.O. Decl. ¶ 25.

4 Notwithstanding ICE's claims, Plaintiffs' evidence shows that free phone calls to
5 family members are not and have never been available to families at Dilley.

6 **8. Children Lack Access to Appropriate and Clean Clothing**

7 Appropriate, clean, and adequate quantities of clothing and shoes are essential to
8 ensuring safe and sanitary conditions for children. Defendants' Report states that
9 "[f]ollowing the May 29, 2026 Facility Administrator meeting, the facility modified
10 intake issuance so residents will begin receiving six sets of clothing at intake" and that
11 "[c]hildren receive two pairs of shoes and one pair of shower shoes, with replacement
12 shoes available for wet, muddy, damaged, ill-fitting, or unusable footwear." JC Report at
13 7-8 [Doc. # 1802-1]. Despite these assertions, during Plaintiffs' June site visit, Plaintiffs'
14 counsel heard repeated complaints regarding the lack of adequate clothing at Dilley.

15 M.P.O. Decl. ¶ 20 ("My son only has one pair of pants and two pairs of shorts. He has
16 one pair of shoes, and they won't let you wash them. No one has told us we could get
17 more clothing or shoes than we have."); L.R.P. Decl. ¶ 35 ("My sisters and I need more
18 clothes. We can only get three shirts, three pants, and one pair of shoes.").

19 [W]e have been waiting for new shoes for my daughter for more than a week.
20 . . . She could not wear them without getting her feet wet. When my son's
21 pants broke, I submitted a paper saying they were broken and requesting
22 replacements. But the staff said we were lying and that we had hidden the
23 pants in an effort to get more clothes. They searched our room to try to prove
24 we were just trying to get more clothes. Now my son only has one pair of
25 shorts that need to be washed every day. I also asked for a sweater for my
26 daughter because only my son and I got sweaters, but the staff said they do
27 not have any in her size, so she still does not have one.

28 M.G.O Decl. ¶¶ 33-35.

29 The ICE JC Annual Report does not identify when the new policy of issuing
30 children six sets of clothes will be implemented. If consistently carried out, the policy
31 would be a welcome improvement. However, the persistent reports throughout the past

1 year that even existing clothing policies – such as the requirement that children receive
2 two pairs of shoes – are not being followed demonstrate year-long ongoing violations of
3 the FSA by Defendants’ failing to ensure children are held in safe and sanitary
4 conditions.

5 **9. Children’s Education at Dilley Has Improved but Remains**
6 **Inadequate, and Recreation Remains Insufficient**

7 The JC Report acknowledges that the education program at Dilley has “issues” and
8 states it “will continue to be prioritized for enhancements.” JC Report at 14 [Doc. # 1802-
9 1]. The JC Report notes: “Observed issues include limited instructional time, attendance
10 controls for older students, computer monitoring, curriculum delivery, overreliance on
11 worksheets, inconsistent use of classroom materials for hands-on or project-based
12 learning, and incomplete special education infrastructure. The required Special Education
13 Team had not yet been formally established in the reviewed materials.” *Id.* at 16. The JC
14 Report states that “full performance [is] scheduled for July 15, 2026.” *Id.* at 24.

15 These “issues” are consistent with the concerns observed on our tours and shared
16 by class members and parents. Welch Decl. ¶¶ 36-39; Mukherjee Decl. ¶ 46. Over the
17 course of the past year, Plaintiffs have repeatedly raised the inadequacy of educational
18 services, especially for middle and high school youth, many of whom were attending
19 school in the U.S. for years before being apprehended. As a junior who was a cheerleader
20 with a 4.0 GPA noted: “I have been to the school here twice, but it’s mainly just drawing
21 so I decided not to go back. There’s not really teaching or learning. It’s not like my high
22 school where there were group projects, homework, and exams.” N.A.A. Decl. ¶ 17; *see*
23 L.R.V. Decl. ¶ 22 (“My younger kids are going to the school. My son went for a day and
24 found it too boring. My oldest daughter felt the same. The only reason the younger kids
25 go is because they are bored. They say they mainly just draw. Sometimes there will be
26 basic math”); J.C.M. Decl. ¶ 23 (“My daughter doesn’t want to go to the school
27 anymore because every day is the same. She says they just color to pass the time.”);
28 L.R.P. Decl. ¶ 34 (“The education is monotonous and boring here; I know all the material
already. It doesn’t work. I will only get Fs for grades now because I am not at my old

1 school.”); M.G.O. Decl. ¶ 45 (“[T]he school only gives them coloring, and the children
2 feel like they are not learning.”); J.C.B. Decl. ¶¶ 49-51 (“[T]hey just draw and play on the
3 computers. They don’t do math or teach [my son] English. The school is repetitive. My
4 son has done the same homework five times. . . . It’s a daycare really, not a school.”)

5 The ICE JC Annual Report presents a mythical account of recreational
6 opportunities at Dilley that bears little resemblance to Plaintiffs’ counsel’s observations
7 during site visits or to the experiences consistently described by class members. Welch
8 Decl. ¶¶ 41-43; JC Report at 17 [Doc. # 1802-1]. The JC Report states that “[a]ctivities
9 include bead bracelet making, jewelry box construction and decorating, birdhouse
10 building, yarn weaving, crocheting, canvas painting, journaling, sports and game
11 tournaments, relay races, hula hoop activities, tug-of-war, Zumba, karaoke, bingo, and
12 chalk art.” *Id.* at 17. This is inconsistent with families’ reports that their children are
13 bored and have little to do. J.C.M. Decl. ¶ 29 (“There is not enough recreation for my
14 daughter here. There are a few Legos; mostly they just let her draw. We have to buy more
15 colors at the store here. The guards just give them one or two to draw with.”); Welch
16 Decl. ¶¶ 41-43. One mother shared that children are not even allowed to play with a
17 rolled-up piece of paper in their rooms:

18 There is nothing for the kids to do in their rooms, which is hard because the
19 kids have to be in their room by 8 p.m. All they can do is just watch TV. There
20 are no toys in the rooms. One day, my son and the other kids living in our
21 room were playing with a ball that they made from rolling up paper. The boys
22 were just playing and having fun. As soon as the guard heard the boys
23 laughing, she came in and said they had to stop. . . . That’s how it is here.”

24 M.P.O. Decl. ¶¶ 17-18; *see* D.C. Decl. ¶ 33 (“Before detention, he was sleeping with a
25 stuffed animal, a bear, but not anymore obviously.”). Plaintiffs’ evidence demonstrates
26 that Defendants have failed to comply with the FSA over the course of the reporting year
27 by denying detained children adequate, age-appropriate, and varied educational and
28 recreational programming tailored to the needs and particular vulnerabilities of children
held in prolonged detention.

1 **III. CONCLUSION**

2 The ICE JC Annual Report once again portrays conditions at Dilley in a manner
3 fundamentally at odds with the extensive evidence provided by class members and their
4 families. Instead, Plaintiffs have documented a year of Defendants’ recalcitrant non-
5 compliance with the basic requirements for holding children in immigration detention. As
6 in prior intermediary reports, Defendants rely heavily on their grievance system and
7 written policies as proof of compliance. But this Court has long recognized that “[t]he
8 mere existence of those policies tells the Court nothing about whether those policies are
9 actually implemented, and the current record shows quite clearly that they were not.” July
10 24, 2015 Order at 18 [Doc. # 177]. The evidence before the Court once again
11 demonstrates the same disconnect between Defendants’ purported policies and their
12 ongoing violations of the FSA’s mandate to ensure conditions are safe and sanitary and
13 account for the particular vulnerability of the minors Defendants detain.

14 Dated: July 15, 2026

CENTER FOR HUMAN RIGHTS AND
CONSTITUTIONAL LAW

Carlos Holguín

Bardis Vakili

Sarah Kahn

NATIONAL CENTER FOR YOUTH LAW

Mishan Wroe

Diane de Gramont

Rebecca Wolozin

CHILDREN’S RIGHTS

Leecia Welch

Eleanor Roberts

/s/ Leecia Welch

Leecia Welch

Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2026, I caused a copy of Plaintiffs' Response to the July 1, 2026 ICE Juvenile Coordinator Annual Report to be served to all counsel through the Court's CM/ECF system.

Dated: July 15, 2026

/s/ Leecia Welch
Leecia Welch
Attorney for Plaintiffs

TABLE OF EXHIBITS

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Exhibit No.	Exhibit Description
1	Declaration of Leecia Welch, July 15, 2026 ("Welch Decl.")
2	Declaration of Avneet Chhabra, July 10, 2026 ("Chhabra Decl.")
3	Declaration of Elora Mukherjee, July 11, 2026 ("Mukherjee Decl.")
4	Declaration of Rodolfo Altillo, July 9, 2026 ("Altillo Decl.")
5	M.A.B.H. Declaration (Dilley), June 1, 2026 ("M.A.B.H. Decl.")
6	J.C.B. Declaration (Dilley), June 3, 2026 ("J.C.B. Decl.")
7	N.A.A. Declaration (Dilley), June 2, 2026 ("N.A.A. Decl.")
8	L.R.V. Declaration (Dilley), June 2, 2026 ("L.R.V. Decl.")
9	M.P.O Declaration (Dilley), June 1, 2026 ("M.P.O. Decl.")
10	L.R.P Declaration (Dilley), June 8, 2026 ("L.R.P. Decl.")
11	M.G.O. Declaration (Dilley), June 2, 2026 ("M.G.O. Decl.")
12	J.C.M. Declaration (Dilley), June 8, 2026 ("J.C.M. Decl.")
13	D.C. Declaration (Dilley), June 2, 2026 ("D.C. Decl.")

Previously Filed Declarations

Docket No.	Description
1575-5	Declaration of T.M., June 5, 2025 ("T.M. Decl.")
1575-6	Declaration of K.V.L., May 2, 2025 ("K.V.L. Decl.")

1575-13	Declaration of F.Y., May 1, 2025 (“F.Y. Decl.”)
1575-14	Declaration of M.M., May 2, 2025 (“M.M. Decl.”)
1575-15	Declaration of M.P.C., May 2, 2025 (“M.P.C. Decl.”)
1575-16	Declaration of A.T., May 2, 2025 (“A.T. Decl.”)
1575-27	Declaration of L.Q.A., May 2, 2025 (“L.Q.A. Decl.”)
1584-6	Declaration of L.J.H.G., May 5, 2025 (“L.J.H.G. Decl.”)
1584-8	Declaration of Y.F.A., May 1, 2025 (“Y.F.A. Decl.”)
1584-9	Declaration of C.M.Z., June 5, 2025 (“C.M.Z. Decl.”)
1584-11	Declaration of N.K.N.N., June 5, 2025 (“N.K.N.N. Decl.”)
1584-12	Declaration of S.L., May 2, 2025 (“S.L. Decl.”)
1656-2	Declaration of G.Z.B., July 28, 2025 (“G.Z.B. Decl.”)
1656-3	Declaration of R.F.Z., July 28, 2025 (“R.F.Z. Decl.”)
1656-4	Declaration of C.G.V., July 28, 2025 (“C.G.V. Decl.”)
1656-5	Declaration of C.H., July 28, 2025 (“C.H. Decl.”)
1656-6	Declaration of W.M.A., July 29, 2025 (“W.M.A. Decl.”)
1656-7	Declaration of E.Z.R., May 1, 2025 (“E.Z.R. Decl.”)
1656-8	Declaration of A.D.C., September 9, 2025 (“A.D.C. Decl.”)

1656-9	Declaration of A.T., June 4, 2025 (“A.T. Decl.”)
1656-10	Declaration of E.M., June 5, 2025 (“E.M. Decl.”)
1656-11	Declaration of E.R.R., May 2, 2025 (“E.R.R. Decl.”)
1656-12	Declaration of E.O.N.M., July 28, 2025 (“E.O.N.M. Decl.”)
1656-13	Declaration of I.C.B., July 28, 2025 (“I.C.B. Decl.”)
1656-14	Declaration of F.J.A., July 28, 2025 (“F.J.A. Decl.”)
1656-15	Declaration of K.M., July 28, 2025 (“K.M. Decl.”)
1656-16	Declaration of B.G.R., July 29, 2025 (“B.G.R. Decl.”)
1656-17	Declaration of M.O., July 29, 2025 (“M.O. Decl.”)
1706-4	Declaration of J.R.F., September 9, 2025 (“J.R.F. Decl.”)
1706-5	Declaration of Z.F., September 10, 2025 (“Z.F. Decl.”)
1706-6	Declaration of I.B., September 11, 2025 (“I.B. Decl.”)
1706-7	Declaration of N.V.S.M., November 18, 2025 (“N.V.S.M. Decl.”)
1706-8	Declaration of C.R.G., November 18, 2025 (“C.R.G. Decl.”)
1706-9	Declaration of A.K., November 19, 2025 (“A.K. Nov. Decl.”)
1706-10	Declaration of M.M.S., November 18, 2025 (“M.M.S. Nov. Decl.”)

1706-11	Declaration of M.R.P., September 11, 2025 (“M.R.P. Decl.”)
1706-12	Declaration of N.G.C., October 10, 2025 (“N.G.C. Decl.”)
1706-13	Declaration of L.R.L., October 9, 2025 (“L.R.L. Decl.”)
1706-14	Declaration of J.V.D.A., September 10, 2025 (“J.V.D.A. Decl.”)
1706-15	Declaration of K.M.L., September 10, 2025 (“K.M.L. Decl.”)
1706-16	Declaration of N.G., November 21, 2025 (“N.G. Decl.”)
1706-17	Declaration of K.V.L., October 9, 2025 (“K.V.L. Decl.”)
1706-18	Declaration of V.L.G., October 9, 2025 (“V.L.G. Decl.”)
1706-19	Declaration of N.C.G., September 11, 2025 (“N.C.G. Decl.”)
1706-20	Declaration of D.C.R.R., November 21, 2025 (“D.C.R.R. Nov. Decl.”)
1706-21	Declaration of S.M.G., October 9, 2025 (“S.M.G. Decl.”)
1706-22	Declaration of N.T.G., September 10, 2025 (“N.T.G. Decl.”)
1706-23	Declaration of Q.G., September 10, 2025 (“Q.G. Decl.”)
1706-24	Declaration of A.T.L., September 11, 2025 (“A.T.L. Decl.”)
1748-2	Declaration of Leecia Welch, March 20, 2026 (“Welch Mar. Decl.”)
1748-4	Declaration of C.C.A., February 12, 2026 (“C.C.A. Decl.”)

1748-5	Declaration of M.S.P., March 12, 2026 (“M.S.P. Decl.”)
1748-6	Declaration of M.M.S., January 15, 2026 (“M.M.S. Jan. Decl.”)
1748-7	Declaration of C.R.B., January 15, 2026 (“C.R.B. Jan. Decl.”)
1748-8	Declaration of N.P.V., March 11, 2026 (“N.P.V. Decl.”)
1748-9	Declaration of E.C.M., March 12, 2026 (“E.C.M. Decl.”)
1748-10	Declaration of M.T.H., March 11, 2026 (“M.T.H. Mar. Decl.”)
1748-11	Declaration of J.A., March 11, 2026 (“J.A. Decl.”)
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1748-13	Declaration of C.H.H., January 15, 2026 (“C.H.H. Decl.”)
1748-14	Declaration of D.P.C.S., January 14, 2026 (“D.P.C.S. Decl.”)
1748-15	Declaration of S.K., March 12, 2026 (“S.K. Decl.”)
1748-17	Declaration of N.C.C., February 12, 2026 (“N.C.C. Decl.”)
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1748-19	Declaration of M.B.O.D., January 14, 2026 (“M.B.O.D. Decl.”)
1748-20	Declaration of J.V.G., February 11, 2026 (“J.V.G. Decl.”)
1748-21	Declaration of Z.V., February 11, 2026 (“Z.V. Decl.”)
1748-22	Declaration of A.P., January 14, 2026 (“A.P. Decl.”)

1748-23	Declaration of Y.H.H., January 14, 2026 (“Y.H.H. Decl.”)
1748-24	Declaration of S.S., January 15, 2026 (“S.S. Decl.”)
1748-25	Declaration of A.K., January 14, 2026 (“A.K. Jan. Decl.”)
1748-26	Declaration of A.M.P., February 12, 2026 (“A.M.P. Decl.”)
1748-27	Declaration of N.M., January 14, 2026 (“N.M. Decl.”)
1748-28	Declaration of J.B.A., March 12, 2026 (“J.B.A. Decl.”)
1748-29	Declaration of D.R.R., January 15, 2026 (“D.R.R. Jan. Decl.”)
1748-30	Declaration of O.S., August 12, 2025 (“O.S. Aug. Decl.”)
1748-31	Declaration of L.T.P., January 14, 2026 (“L.T.P. Decl.”)
1748-32	Declaration of M.S.M., January 15, 2026 (“M.S.M. Decl.”)
1748-33	Declaration of N.S.R., March 12, 2026 (“N.S.R. Decl.”)
1748-34	Declaration of C.R.B., October 10, 2025 (“C.R.B. Oct. Decl.”)
1748-35	Declaration of K.P.L.R., November 18, 2025 (“K.P.L.R. Decl.”)
1748-36	Declaration of M.L.S., February 12, 2026 (“M.L.S. Decl.”)
1748-37	Declaration of M.P.P., February 11, 2026 (“M.P.P. Decl.”)
1764-4	Declaration of Lyndsey Marcelino-Schalkwyk, April 28, 2026 (“Marcelino Schalkwyk Decl.”)

1779-4	Declaration of C.G.C., April 22, 2026 (“C.G.C. Decl.”)
1779-5	Declaration of A.O., May 8, 2026 (“A.O. Decl.”)
1779-6	Declaration of M.T.H., April 22, 2026 (“M.T.H. Apr. Decl.”)
1779-7	Declaration of R.G.H., April 22, 2026 (“R.G.H. Decl.”)
1779-8	Declaration of S.D.C., March 11, 2026 (“S.D.C. Decl.”)
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1779-10	Declaration of R.R.M., April 23, 2026 (“R.R.M. Decl.”)
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1779-15	Declaration of W.L., March 12, 2026 (“W.L. Decl.”)
1779-16	Declaration of J.A.I., April 23, 2026 (“J.A.I. Decl.”)
1779-17	Declaration of Y.G.P., April 23, 2026 (“Y.G.P. Decl.”)
1779-18	Declaration of O.B., April 23, 2026 (“O.B. Decl.”)

EXHIBIT 1

CENTER FOR HUMAN RIGHTS & CONSTITUTIONAL LAW
Carlos R. Holguín (Cal. Bar No. 90754)
crholguin@centerforhumanrights.org
Bardis Vakili (Cal. Bar No. 247783)
bardis@centerforhumanrights.org
Sarah E. Kahn (Cal. Bar No. 341901)
sarah@centerforhumanrights.org
1505 E 17th St. Ste. 117
Santa Ana, CA 927051
Telephone: (909) 274-9057

Attorneys for Plaintiffs

Additional counsel listed on following page

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

Jenny Flores, *et al.*,

Plaintiffs,

v.

Todd Blanche, Acting Attorney General
of the United States, *et al.*,

Defendants.

No. CV 85-4544-DMG-AGRx

**DECLARATION OF LEECIA WELCH IN
SUPPORT OF PLAINTIFFS' RESPONSE
TO JULY 1, 2026 ICE JUVENILE
COORDINATOR ANNUAL REPORT**

Honorable Dolly M. Gee
Chief United States District Judge

1 NATIONAL CENTER FOR YOUTH LAW

2 Mishan Wroe (Cal. Bar No. 299296)

3 Diane de Gramont (Cal. Bar No. 324360)

4 428 13th Street, Floor 5

5 Oakland, CA 94612

6 Telephone: (510) 835-8098

7 Email: mwroe@youthlaw.org

8 NATIONAL CENTER FOR YOUTH LAW

9 Rebecca Wolozin (admitted *pro hac vice*)

10 2300 18th Street NW, P.O. Box 21156

11 Washington, DC 20009

12 Telephone: (202) 964-0406

13 Email: bwolozin@youthlaw.org

14 CHILDREN'S RIGHTS

15 Leecia Welch (Cal. Bar No. 208741)

16 2021 Fillmore Street

17 San Francisco, CA 94115

18 Telephone: (415) 602-5202

19 Email: lwelch@childrensrights.org

20 CHILDREN'S RIGHTS

21 Eleanor Roberts (admitted *pro hac vice*)

22 88 Pine Street, Suite 800

23 New York, NY 10005

24 Telephone: (212) 683-2210

25 Email: eroberts@childrensrights.org

DECLARATION OF LEECIA WELCH

I, Leecia Welch, declare as follows:

1. I am Chief Legal Counsel at Children’s Rights. I represent Plaintiffs in the above-titled action. If called to testify in this case, I would testify competently about these facts. This declaration supplements my previous declarations filed on September 15, 2025, December 8, 2025, March 20, 2026, and May 18, 2026.

Plaintiffs’ Site Visits and Meet and Confer Efforts

2. Plaintiffs’ counsel have visited the South Texas Family Detention Center (“Dilley”) 12 times since it re-opened in May 2025. I have attended all of these site visits. In 2025, we interviewed class members at Dilley six times: May 1-2, June 4-5, July 28-29, September 9-11, October 9-10, and November 18-19. In 2026, we have interviewed class members six times so far: January 14-15, February 11-12, March 11-12, April 22-23, June 1-2, and July 14-15. We have spoken to approximately 175 families detained at Dilley regarding ongoing violations of the *Flores* Settlement Agreement (“FSA”).

3. For more than a year, *Flores* counsel have repeatedly notified Defendants of the inhumane conditions and FSA violations at Dilley. Following each site visit, Plaintiffs informed Defendants of the violations reported by children and their parents. Plaintiffs sent detailed letters regarding conditions at Dilley on May 7, May 16, May 28, June 4, June 20, August 14, September 16, September 18, October 9, October 23, and November 25, 2025, and on January 22, February 19, April 9, April 28, and June 4, 2026. We also raised emergency time-sensitive concerns about particular children via email on June 6, June 17, July 30, August 5, October 15, and November 21, 2025, and on January 16, February 13, March 13, April 23, June 3, June 5, and June 9, 2026. The purpose of this ongoing correspondence is to provide Defendants timely notice of ongoing FSA violations, secure prompt relief for individual children, and improve conditions for all families detained at Dilley. The parties met and conferred five times in 2025 about the

Flores violations at Dilley identified in our correspondence on May 14, May 30, July 24, September 17, and October 6.

4. On December 15, 2025, the Court ordered the parties to engage in mediation. December 15, 2025 Order [Doc. # 1713].¹ Accordingly, the parties held mediation sessions on January 23, February 4, and March 2, 2026, and met briefly on March 10 and April 27, 2026. ICE allowed Dr. Paul Wise to conduct medical site visits at Dilley in March and April. On April 15, Plaintiffs provided a proposal to Defendants to remedy their failure to provide the required notice of *Flores* rights at Dilley. As of the date of this declaration, Defendants have not yet provided a response. On June 5, the parties reported their positions on the status of mediation to the Court. Plaintiffs' position was that the parties' mediation efforts were at an impasse due to Defendants' current position on certain issues and their lengthy delay in responding to urgent issues.

5. Plaintiffs have seen minimal improvements in the conditions at Dilley over the last 14 months. The concerns raised in our May 7, 2025 meet and confer letter are virtually identical to the concerns raised in our June 4, 2026 letter. Plaintiffs' June 4 letter documented continued prolonged detention, lack of access to information about class members' *Flores* rights, inadequate medical care, lack of access to child-friendly food and clean water, lack of adequate hygiene products, lack of adequate clothing, poor sleeping conditions, inadequate education, and mistreatment by Dilley staff.

6. During the June 2026 site visit, we learned about mistreatment by Dilley staff that included:

- staff preventing children and families from being able to sleep for weeks by stomping repeatedly on the metal walkways outside sleeping areas in the middle of the night to startle families because . . . “What are those Latinos going to do to me?” (L.R.V. Decl. ¶ 16);

¹ Previously filed documents, including declarations, include docket numbers.

- a male cleaning staff member entering the women’s bathroom without knocking when teenage girls were showering and then re-entering despite being aware that the girls were unclothed and in the bathroom by themselves (*id.* ¶ 17);
- staff responding to complaints from families about the food by saying: “Why are they complaining? If they were in their own countries, they would be eating shit” (*id.* ¶ 15);
- staff waking families in the middle of the night to search their rooms (M.G.O. Decl. ¶ 36);
- staff threatening children and families by saying that the staff would write and submit reports that would negatively affect their immigration cases and lengths of stay for walking to a different housing unit to talk to a friend (*id.* ¶¶ 40-41); and
- staff telling families they should feel happy to be at Dilley (N.A.A. Decl. ¶ 21).

7. During the June 2026 Dilley site visit, I personally witnessed CoreCivic staff interfere with a father’s attempt to share his written grievance (about CoreCivic cleaning staff entering the bathroom unannounced while his daughters were showering) with me following our interview. CoreCivic staff refused to allow him to return to the office where I was conducting legal interviews and told him he was not permitted to show me the grievance. The matter was elevated to a supervisor, who likewise attempted to prevent the father from discussing the grievance with me privately. Finally, and only after I insisted as class counsel, was the father permitted to meet with me and review the grievance in private. The father and his children have the right to communicate with class counsel and to share documents concerning children’s legal rights. CoreCivic staff’s attempt to obstruct his communication with me raises serious concerns about Defendants’ commitment to ensuring that families can safely report grievances.

Flores Violations at Dilley

8. Defendants' assertions of compliance with the FSA in the ICE Juv. Coord. Annual Rep. 2026 [Doc. # 1802-1] ("ICE JC Rep. 2026")² are once again refuted by extensive evidence provided by class members and their parents. As I have personally observed, and as class members and their families describe in their declarations, Dilley remains a highly restrictive, unlicensed detention facility. Ongoing FSA violations include inadequate medical care, lack of information about *Flores* rights and access to counsel, lack of access to healthy child-friendly food and safe drinking water, lack of clothing, inability of class members to sleep due to lights on in their living areas all night, lack of free calls to family members, and inadequate education and developmentally appropriate activities. I have personally observed how conditions at Dilley continue to inflict profound harm on children. Class members consistently describe feeling depressed and anxious, losing weight, becoming ill from the food, crying frequently, and struggling to sleep.

Prolonged Detention

9. Over the past year, I have reviewed Defendants' monthly census data, data submissions to the Court, and the census data provided to us at each site visit. These data points show beyond peradventure that thousands of children have been detained for more than 20 days since March 2025. In ICE's submissions to the Court covering only six months, the data indicated that nearly 1560 children were detained at Dilley for longer than 20 days. *See* Dec. 1, 2025 ICE Juv. Coord. Suppl. Report at 2 [Doc. # 1692-4] ("Dec. ICE JC Rep."); Pls.' Resp. to ICE JC Report at 8, Mar. 20, 2026 [Doc. # 1748]; May 4, 2026 ICE Juv. Coord. Rep. at 3, 5 [Doc. # 1768-1] ("May ICE JC Rep.").

² Since Dilley re-opened, Defendants have filed six JC Reports. If there is no identifying month or date before a citation of an ICE JC Report in this declaration, I am referring to the report filed on July 1, 2026.

10. Plaintiffs' site visits consistently confirm families are enduring extremely prolonged detention. During the March, April, and June 2026 site visits, alone, *Flores* counsel met with families who had been detained for 323 days (O.S. May Decl. ¶ 4 [Doc. # 1779-11]), 143 days (S.D.C. Decl. ¶ 4 [Doc. # 1779-8]), 135 days (A.O. Decl. ¶ 4 [Doc. # 1779-5]), 91 days (E.C.M. Decl. ¶ 4 [Doc. # 1779-14]), 90 days (C.G.C. Decl. ¶ 4 [Doc. # 1779-4]), 77 days (A.L.G. Decl. ¶ 3 [Doc. # 1779-12]), 76 days with 10 of those days spent in CBP (M.T.H. Apr. Decl. ¶ 4 [Doc. # 1779-6]), two months (W.L. Decl. ¶ 4 [Doc. # 1779-15]), and 50 days (J.A.I. Decl. ¶ 4 [Doc. # 1779-16]). During most site visits, the number of children experiencing exceptionally prolonged detention exceeded the number of families Plaintiffs' counsel were able to interview.

11. Even with the current reduced census at Dilley, far too many children remain in custody past 20 days. On our site visit in April, four class members had been detained for 320 days or more, one had been detained for 100 to 319 days, two had been detained for 75 to 99 days, six had been detained for 50 to 74 days, and 15 had been detained for 20 to 49 days. On our site visit in June, four class members had been detained for over 100 days, four had been detained for 50 to 74 days, and 25 had been detained for 20 to 49 days.

Inadequate Medical Care

12. Families have consistently reported that children at Dilley are unable to obtain timely, appropriate medical care. The concerns raised during site visits have been disturbingly consistent and include prolonged wait times to see physicians, dismissive treatment by medical staff who disregard or minimize serious symptoms, delays in receiving prescribed medications, routine administration of ibuprofen or Tylenol regardless of the underlying condition, difficulty obtaining referrals to outside specialists, and inadequate translation and interpretation during medical appointments.

1 13. Some of the most serious individual cases we have learned about from
2 families include:

- 3
4 • a two-month-old baby developed a respiratory infection after being put in isolation
5 with his 15-month-old sister with COVID and multiple other infections (M.L.S.
6 Decl. ¶¶ 16-19 [Doc. # 1748-36]);
- 7 • ICE denied treatment to a pregnant woman with Hepatitis B whose viral load was
8 so high she risked getting liver cancer and passing the disease to her baby (N.M.
9 Decl. ¶¶ 13-17 [Doc. # 1748-27]);
- 10 • a child with a serious tooth and gum infection received only a liquid diet for more
11 than 20 days while the underlying infection persisted (S.K. Decl. ¶¶ 21- 24 [Doc. #
12 1748-15]);
- 13 • a medical staff member told a child suffering in agony from appendicitis during a
14 medical exam to come back in three days (believing he was exaggerating his
15 symptoms), dangerously delaying his transfer to the emergency room (O.S. Aug.
16 Decl. ¶¶ 23-30 [Doc. # 1748-30]); and
- 17 • a child with Hirschsprung's disease was not provided the specialized treatment or
18 diet her condition required, resulting in the child going 34 days without a bowel
19 movement, and experiencing extreme pain, fevers, and vomiting (D.R.R. Jan. Decl.
20 ¶¶ 4-7 [Doc. # 1748-29]).

21 14. Families interviewed during the June 2026 site visit continued to report
22 serious deficiencies in medical care. One family described lengthy delays in seeing a
23 physician and receiving medication. J.C.B. Decl. ¶¶ 34-40. Another reported ongoing
24 stomach pain caused by the lack of appropriate food. M.A.B.H. Decl. ¶¶ 22-23. Another
25 family reported that their child was denied a special diet for a food allergy that repeatedly
26 caused painful skin irritation around her mouth. L.R.V. Decl. ¶ 12.

1 15. Children and parents I have met with over the past year have likewise
2 decried the lack of meaningful mental health services at Dilley. I have seen firsthand
3 several teens I have met with over the course of multiple months of site visits suffer from
4 deteriorating mental health. Teens have regularly described to me worsening symptoms
5 of anxiety and depression – and the futility of going to the “wellness check”
6 appointments. On every site visit, parents break down in tears in my interviews as they
7 describe their children’s worsening mental health and their worries about issues like
8 regression in developmental milestones, compulsive behaviors, refusal to eat, nail biting,
9 nightmares, and withdrawing from communication and play. These reports underscore
10 the need for meaningful mental health care, particularly for children subjected to
11 prolonged detention.

12 16. The JC Report portrays mental health services at Dilley in a manner starkly
13 inconsistent with my observations of class members and with the experiences reported by
14 class members and their families. *See* ICE JC Rep. 2026 at 10-11 [Doc. # 1802-1]. Over
15 the last year, families have consistently reported the absence of meaningful therapeutic
16 services to class counsel. No family that Plaintiffs’ counsel have interviewed has ever
17 reported participating in any wellness programming beyond brief check-ins. During my
18 12 site visits to Dilley, I have never observed Zumba, crochet, or any comparable
19 “therapeutic programming” during facility tours. *Id.* at 17. On the contrary, when I have
20 previously asked parents whether Dilley offered Zumba classes (which are regularly
21 touted on our tours of the facility), they laughed at the suggestion. The JC Report’s
22 reference to crochet is also surprising and confusing given Dilley’s strict restrictions that
23 prohibit sharp or metal objects, such as crochet hooks.

24
25 **Lack of Notice of Flores Rights**

26 17. Over the past year, no progress has been made regarding the need for
27 children at Dilley to be apprised of their *Flores* rights. There is still no legal orientation
28 program that includes a presentation of *Flores* rights for children and families at Dilley. I

1 have watched the 13-minute animated immigration law video shown at intake and it
2 makes no mention of *Flores*. Similarly, I have reviewed the CoreCivic Resident
3 Handbook, the I-770 form, and Exhibit 6 of the FSA. The CoreCivic Resident Handbook
4 does not mention *Flores*. The I-770 form only addresses the “right to use the telephone,”
5 “the right to be represented by a lawyer,” and the “right to a hearing before a judge.” Ex.
6 4, DHS Form I-770 (4/25) at 2 [Doc. # 1768-8]. Exhibit 6 of the FSA only addresses the
7 right to call a lawyer and seek judicial review “if you believe you have not been properly
8 placed or that you have been treated improperly.” See FSA Ex. 6. These materials do not
9 explain to families or children what children’s *Flores* rights are. Defendants’ insistence
10 that class members are informed of their *Flores* rights because children and families are
11 shown these materials is plainly inaccurate.

12 18. Many families my colleagues and I have interviewed have never heard of the
13 video and have no recollection of the handbook or the forms. Even if they remembered
14 them, taken collectively, the videos and documents simply do not address the vast
15 majority of children’s *Flores* rights.

16 19. ICE continues to bar RAICES from providing group Know Your Rights
17 presentations at Dilley. No parent or child has ever described having access to an in-
18 person explanation of their rights – *Flores* or otherwise – provided by a legal service
19 provider or lawyer.

20 20. To date, Plaintiffs’ counsel have not spoken with a single family at Dilley
21 who recalls learning about their child’s full *Flores* rights in a video, handbook, training,
22 or document provided by ICE or CoreCivic. Recently, families began reporting that they
23 have been asked to sign a form stating that children have the right to be released after 20
24 days. Multiple families (especially those detained for long periods) reported confusion
25 about this form because the ICE agent presenting it would also tell them that, in reality,
26 children could not be released from Dilley without their parents, and it was up to the
27 immigration judge to decide when to release the family. Families report they are not
28

1 given a copy of this form to refer to later, and Plaintiffs' counsel have not been able to
2 obtain a copy from Defendants.

3 21. As noted above, Plaintiffs attempted during mediation to address our
4 concerns about the lack of notice of *Flores* rights. Plaintiffs provided a proposal to
5 Defendants three months ago to address the lack of notice of *Flores* rights at Dilley. As
6 of the date of this declaration, we have never received a response.

7 22. Families consistently express distress and confusion regarding their rights
8 and belongings, the status of their immigration case, whether *Flores* exists or not, and
9 how to understand what is going on when information is not translated for them.
10 Families regularly express frustration about the lack of know your rights trainings or
11 accurate information about their children's *Flores* rights.

12 23. Compounding this lack of information about *Flores* rights, class members
13 also continue to face barriers to making free legal phone calls to counsel, including
14 *Flores* attorneys or other private lawyers. Often, the only way for them to reach
15 Plaintiffs' counsel or private attorneys is to wait for that attorney to schedule a legal visit
16 with them. Others report difficulties making free calls to the approved pro bono attorney
17 list, and instead paying for calls to organizations on the list, such as RAICES.

18 24. Families have also been reporting to us since January that their ability to
19 communicate with their lawyers over email has been curtailed. For a period of time,
20 families were outright prohibited from using Gmail or other independent email providers
21 and only permitted to use a platform called Proton that is monitored and sanctioned by
22 CoreCivic. Families complained that setting up Proton accounts was challenging; the
23 platform did not allow them to send attachments; and the platform limited the size of
24 emails to a small number of characters.

25 25. Defendants allege that families' access to Gmail was restored in March, but
26 many families we have interviewed continue to report that Gmail remains inaccessible.
27 For example, families report that their Gmail accounts are blocked because they cannot
28 provide two-factor authorization since they do not have access to their cell phones at

1 Dilley. Recently, some families reported that their Proton accounts were deleted without
2 warning – further hampering their ability to communicate with attorneys about their
3 immigration cases.

4
5 **Lack of Free Phone Calls to Family Members**

6 26. Although the JC Report states that “[i]ndigent residents may request free
7 domestic calls, including legal calls, through Unit Management at any time,” Plaintiffs’
8 counsel have yet to meet a family at Dilley who was informed that they could request free
9 calls to relatives beyond the initial call made using the five-minute phone card provided
10 at intake. ICE JC Annual Rep. at 18 [Doc. # 1802-1]. During my interviews, families
11 regularly report that they have no money to make phone calls or purchase basic
12 necessities from the commissary, including bottled water. These families consistently
13 express distress over their inability to communicate with relatives outside Dilley. If they
14 had been informed that additional free phone calls were available, one would reasonably
15 expect they would request and use them.

16
17 **Ongoing Concerns about Food and Water**

18 27. Families have consistently raised serious worries about the food at Dilley
19 since our first visit over a year ago. The fact remains that CoreCivic has never modified
20 the prison food offerings at Dilley to account for the dietary needs of children, especially
21 young children. Parents repeatedly tell us their children will not eat the food because it is
22 over-sauced or spicy, over-processed, and repetitive. Through my own monthly site
23 visits, I have personally observed that these problems worsen as detention continues.
24 Families I have interviewed across multiple site visits consistently report that the longer
25 their children remain at Dilley, the less they are willing to eat and the poorer their
26 nutrition becomes.

27 28. In June, several families again voiced frustration about the lack of special
28 diets and concerns about their children’s nutrition. It is unclear why children with food

1 intolerances, food allergies, and ongoing medical issues are denied special diets. Given
2 that only nine children have ever been afforded special diets, according to the logs
3 attached to the JC Report, despite dozens of families reporting that their children were
4 experiencing nutritional and medical food-related problems over the course of our twelve
5 visits, these frustrations seem well-founded. ICE Juv. Coord. Annual Rep. 2026 Exhibits
6 at 25 [Doc. # 1802-2]; *see, e.g.*, Attachment A to this declaration (detailing concerns
7 about food raised by 62 families).

8 29. For over a year, families have repeatedly reported that the food is making
9 their children sick. They repeatedly report children having bouts of diarrhea and that the
10 food is so bad they have to either not eat or run to the bathroom directly after eating.
11 Parents repeatedly report to us that they have to buy overpriced soups and noodles from
12 the commissary to meet their children's basic nutritional and caloric needs because their
13 children would otherwise go hungry. Families do not understand why popular food
14 available in the commissary, like ramen noodles, is not available for free in the cafeteria.

15 30. Families similarly continue to share that the water makes their stomachs hurt
16 and gives their children diarrhea. Most families we meet that have the resources to do so,
17 report that they buy water from the commissary, despite CoreCivic's assurances that the
18 tap water is safe.

19 31. On recent site visits, families again raised concerns that they are not allowed
20 to bring any food out of the cafeteria. Many families report that, due to early mealtimes,
21 their children are hungry after dinner around 8 or 9 p.m., and they can only give them
22 food purchased at the commissary at this time because snacks are locked up and no
23 longer available after 8 p.m. Children in families who cannot afford the commissary
24 food, go without.

25
26 **Poor Sleeping Conditions for Children**

27 32. On every site visit, families report that children cannot sleep because lights
28 are kept on in living areas throughout the night. This problem has persisted for more than

a year and continues to pose a serious risk to children's health and well-being. During my interviews and on the tours, teenagers and children often look tired, forlorn, or zoned out. Teenagers consistently describe feeling chronically exhausted, emotionally drained, and unable to concentrate. Parents report that their children are irritable, struggle to function during the day, and appear increasingly impacted by the cumulative effects of sleep deprivation. Many also express concern that prolonged sleep disruption is harming their children's development and overall health.

33. Families have increasingly reported that noise at night from guards has worsened, disrupting sleep throughout the night. Children have also increasingly reported that the bunk beds are extremely uncomfortable and hurting their backs.

Lack of Adequate Hygiene Products

34. Since Dilley reopened, class members have consistently reported that they do not receive adequate hygiene products, particularly soap and shampoo. Over the past eight months, Defendants' reports to the Court have provided inconsistent and contradictory descriptions of what hygiene items children actually receive.

- The December 2025 ICE JC Report relied on photographs of dispensers labeled "Citrus Fresh Foaming Handwash" as evidence that families had access to soap and shampoo for showering. Dec. ICE JC Rep. at 29 [Doc. # 1692-4].
- The March 2026 ICE JC Report stated that residents receive soap and shampoo upon intake and through routine distribution. Mar. 13, 2026 ICE Juv. Coord. Rep. at 16 [Doc. # 1736-1]. Yet the accompanying list of hygiene kit contents did not include either item. *Id.* at 54.
- The May 2026 ICE JC Report again stated that the standard hygiene kit includes soap and shampoo. May ICE JC Rep. at 27 [Doc. # 1768-1].
- By contrast, the 2026 Annual Report lists "routine hygiene items" that omit both soap and shampoo. Then it says "infants and children receive . . . tearless baby shampoo/body wash." ICE JC Annual Rep. at 8 [Doc. # 1802-1].

35. The 2026 ICE JC Annual Report does not explain these inconsistencies. Instead, it again points to the availability of all-purpose foaming hand soap in the showers. I have seen the foam soap in the showers, which is identical to the hand soap by the sinks. Families have repeatedly reported that the foaming hand soap leaves their children's skin dry, red, and irritated, and is not effective as a shampoo. During dozens of interviews, families have also consistently told me that they spend their own money at the commissary to purchase basic hygiene necessities such as soap, shampoo, and conditioner.

Lack of Adequate Education, Recreation, and Developmentally Appropriate Activities

36. I have observed the "school" and educational services available at Dilley on numerous tours of the facility over the past fourteen months and talked to dozens of children about their experiences. Prior to March 2026, education at Dilley was nothing more than a single classroom where children could spend one hour a day in combined age groups (e.g., 9th to 12th grade combined had one hour of classroom time per day). During our site visit tours, we would observe young children sitting quietly at tables with coloring sheets or maybe a math or English worksheet. We never observed older children in the classroom both because their timeslot was later in the day and because, by all accounts, very few teenagers ever went to the "school."

37. During the March 2026 tour, we saw an improvement in educational services for the younger children. Dilley expanded the school day to several hours with additional offerings (e.g., an art area and physical education) and divided children into three classrooms: Pre-K to 2nd grade, 3rd grade to 6th grade, and 7th grade to 12th grade. During our tours in March, April, and June, we observed additional art supplies, books, and materials for the two younger age group classrooms. However, we did not observe any of those materials actually being used. Children continued to be seated at small tables coloring or filling out worksheets. We did not observe evidence of a curriculum, educational lessons, or organized activities.

1 38. On our last three tours, there were a small number of tweens and teens in the
2 7th to 12th grade classroom. During our March tour, we only observed one child in the
3 7th to 12th grade classroom. During our April tour, we observed and spoke to the four
4 youth in that classroom, and they reported that they mainly spent their time working
5 individually on Khan Academy on the computers in the classroom. We again did not
6 observe any type of curriculum, lessons, or organized activities. During the June tour,
7 there were also only four or five youths in the 7th to 12th grade classroom, all of whom
8 were using the computers to do work on Khan Academy. I spoke briefly to some of the
9 youth and the teacher. He was friendly and shared that he had only recently started
10 working in the classroom and was just getting to know the youth.

11 39. The teenagers I have met with since March continue to report that the
12 offerings at Dilley are not even remotely like their U.S. middle schools or high schools.
13 They report there are no lessons, group projects, homework, or papers. Besides using the
14 computers for Khan Academy, they are mainly given worksheets that they find far below
15 their grade level. Most report the school has nothing to offer them academically, but they
16 do like being able to use the computers.

17 40. We have repeatedly raised concerns about the inadequacy of the educational
18 services at Dilley, especially for the older youth. Notably, the ICE JC Report echoes
19 many of the same concerns (*e.g.*, “limited instructional time,” “overreliance on
20 worksheets,” and “inconsistent use of classroom materials”). ICE JC Annual Rep. at 16
21 [Doc. # 1802-1].

22 41. The ICE JC Report portrays recreation at Dilley in a mythical fashion that
23 bears no resemblance to Plaintiffs’ counsel’s observations during repeated site visits nor
24 to the experiences consistently reported by class members. The ICE JC Report states that
25 “[a]ctivities include bead bracelet making, jewelry box construction and decorating,
26 birdhouse building, yarn weaving, crocheting, canvas painting, journaling, sports and
27 game tournaments, relay races, hula hoop activities, tug-of-war, Zumba, karaoke, bingo,
28 and chalk art.” *Id.* at 17.

1 42. Plaintiffs' counsel have never observed any of these activities taking place
2 during tours other than a few children occasionally playing soccer or throwing bean bags.
3 Moreover, activities like birdhouse building and jewelry box construction seem out of
4 sync with Dilley's restrictive policies. Based on my observations and understanding
5 from my visits, children are not permitted to keep personal items such as jewelry boxes or
6 birdhouses. Families have also repeatedly reported that staff confiscate children's
7 drawings and letters that depict personal experiences or express sadness, which would
8 likely be the focus of children's journals. To the extent the listed activities ever occur,
9 the facility's restrictions substantially diminish their developmental or therapeutic value.

10 43. Parents continue to report that toddlers and young children have little to do
11 during their detention and lack basic comfort items, such as stuffed animals and blankets.
12 The shortage of age-appropriate personal toys remains a particularly serious concern,
13 especially for young children and children on the autism spectrum. Defendants have not
14 explained why allowing small children to have basic comfort items, such as stuffed
15 animals, would create operational or security concerns at Dilley.

16
17 **Plaintiffs' Excerpts from Filed Dilley Declarations**

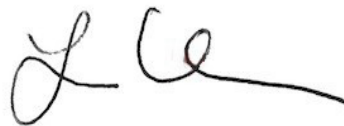
18 44. Over the past 14 months, Plaintiffs' counsel have filed with this Court 96
19 declarations of children and parents interviewed at Dilley. We are filing an additional
20 nine declarations from families in support of Plaintiffs' Response to the ICE JC Annual
21 Report. I have personally reviewed all of the filed declarations.

22 45. Attachment A to my declaration is a chart compiling quotations from these
23 filed declarations into 12 categories, listed here with the number of families who
24 described these *Flores* violations: time in custody (71 families experienced stays over 20
25 days); medical concerns (69 families); lack of know your rights trainings (59 families);
26 lack of appropriate and healthy food options (62 families); lack of safe drinking water (46
27 families); staff mistreatment (49 families); sleep disruptions (60 families); lack of
28 hygiene products (41 families); lack of clothing (36 families); no free phone calls to

1 family (50 families); limited access to counsel (48 families); and mental health issues (60
2 families). For each filed declaration that discusses one of these categories, Plaintiffs'
3 counsel identify relevant quotations and corresponding paragraph numbers, the docket
4 number of the filed declaration, the date the declaration was taken, the initials of the
5 declarant, whether the declarant was a parent or child, and the ages of children detained
6 at Dilley in that declarant's family.

7 46. The chart does not capture every concern raised by class members and their
8 parents during interviews. For example, it does not include recurring complaints about
9 inadequate educational services, insufficient recreational activities, or inadequate supplies
10 for infants and toddlers, even though these issues were regularly reported. Nor does the
11 absence of a particular concern from an individual declaration indicate that the declarant
12 did not experience or share that concern. Given the limited time available for each
13 interview, families often focused on the issues they considered most urgent.
14 Additionally, the categories overlap significantly, so some quotations that reference an
15 issue in one category (*e.g.*, sleep disruptions) while focused on another issue (*e.g.*, mental
16 health), may be listed only in the category that is the overriding concern. Accordingly,
17 the chart summarizes the FSA-related concerns that were raised most consistently over
18 the past 14 months.

19
20 I declare under penalty of perjury that the foregoing is true and correct. Executed on this
21 15th day of July, 2026 at Dilley, Texas.

22
23
24 

25 Leecia Welch
26
27
28

ATTACHMENT A

2025-26 Excerpts from Declarations of Families Detained at Dilley

(1) Time in Custody, (2) Medical Concerns, (3) Know Your Rights, (4) Appropriate and Healthy Food, (5) Safe Drinking Water, (6) Staff Treatment, (7) Sleep Disruptions, (8) Hygiene Products, (9) Clothing, (10) Lack of Free Phone Calls to Family, (11) Limited Access to Counsel, and (12) Mental Health

(1) TIME IN CUSTODY

Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1575-13	5/1/2025	F.Y.	Parent	1, a few mos.	6	"I was in CBP for one month. . . . I have been here [Dilley] 10 days."
1575-14	5/2/2025	M.M.	Child	15 (Declarant), 12, 10	22, 26	"We have been at Dilley 21 days. . . . I have been in immigration detentions for almost two months now."
1575-16	5/1/2025	A.T.	Child	11	5, 9	"I have been detained at the Dilley Facility for 23 days. . . . We were held by CBP at the O'Hare International Airport for five days"
1584-6	6/5/2025	L.J.H.G.	Parent	4	4, 6	"We stayed [in CBP] for four days. . . . We have been detained at Dilley for 28 days."
1584-11	6/5/2025	N.K.N.N.	Child	13 (Declarant), 11, 4	8	"After about four days [in CBP], immigration officers brought us here to the Dilley family detention center. We have been here for so long. It has been almost two months. I hate it here."
1656-2	7/28/2025	G.Z.B.	Parent	11, 5	4	"We have been detained at Dilley for 49 days."
1656-3	7/29/2025	R.F.Z.	Child	11 (Declarant), 5	4	"I have been detained for 53 days. I remember because we came to the U.S. on the 8th of June."
1656-4	7/28/2025	C.G.V.	Parent	6	5	"We have been at this facility for 40 days."
1656-5	7/28/2025	C.H.	Parent	6	4	"I have been detained at the Dilley for 77 days."
1656-6	7/29/2025	W.M.A.	Child	15	5	"I have been detained at this facility for more than 20 days."
1656-8	9/9/2025	A.D.C.	Parent	16, 9	5	"We have been detained at Dilley for 25 days."
1656-9	6/4/2025	A.T.	Parent	13, 11, 4	7, 13	"We were [in CBP] for four days. . . . We have been at this facility for about 53 days so far. We got here around the 18th of April, 2025."
1656-10	6/5/2025	E.M.	Parent	8, 10	5, 16	"We stayed [in CBP] for six days. . . . [W]e have been here for about 24 days."
1656-12	7/28/2025	E.O.N.M.	Child	13 (Declarant), 9	4	"I have been detained at the Dilley Facility for 53 days."
1656-13	7/28/2025	I.C.B.	Child	14 (Declarant), 7	5	"My family has been here for 54 days."
1656-15	7/28/2025	K.M.	Parent	6	4, 6, 41	"We got here to Dilley around May 4, 2025. . . . They detained us at the Otay Mesa port of entry for 18 days, until May 3, 2025. . . . But we are now in this facility for almost 90 days." (103 days including CBP detention)
1656-17	7/29/2025	M.O.	Parent	2	4	"I have been detained at the Dilley Facility for 42 days with my baby."
1706-4	9/9/2025	J.R.F.	Parent	5	4	"I have been detained at Dilley for 30 days."
1706-6	9/11/2025	I.B.	Parent	7, 2	5	"We have been here over a month, since August 6. It is now September 11." (36 days)
1706-7	11/18/2025	N.V.S.M.	Child	14	4	"I am here with my mom, and we have been at Dilley for 41 days."

(1) TIME IN CUSTODY

Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1706-8	11/18/2025	C.R.G.	Parent	14	4	"We have been detained at Dilley since September 23, 2025." (56 days)
1706-9	11/19/2025	A.K.	Parent	1	2, 4	"My husband, son, and I have been detained at Dilley for 52 days. . . . Prior to being detained here, we were at the San Ysidro Border Station for five days."
1706-10	11/18/2025	M.M.S.	Parent	9	4	"We have been detained at Dilley for 46 days."
1706-13	10/9/2025	L.R.L.	Parent	8, 12	3, 9, 12	"I have been detained at Dilley for 34 days. . . . We were in the Eagle Pass Facility for 2 days. . . . We were [in Uvalde CBP] for 3 days." (39 days including CBP detention)
1706-16	11/21/2025	N.G.	Parent	13, 11, 4	8	"We have been at the center for 45 days, and no one has cleaned the bedroom where we sleep."
1706-17	10/9/2025	K.V.L.	Parent	6	4	"I have been detained at Dilley for 23 days."
1706-21	10/9/2025	S.M.G.	Parent	1, 2	4	"We have been detained at Dilley for 31 days."
1706-22	9/10/2025	N.T.G.	Child	16	4	"I have been detained at Dilley for about 22 days."
1748-4	2/12/2026	C.C.A.	Parent	15, 9, 7	4	"I have been detained at Dilley for 49 days with my seven-year-old son, [], my nine-year-old daughter, [], my 15-year-old daughter, [], and my husband."
1748-5	3/12/2026	M.S.P.	Parent	14, 12	4	"We have been detained for 29 days in total."
1748-6	1/15/2026	M.M.S.	Parent	9	3	"My nine-year-old daughter, [], and I have now been at Dilley for about 113 days."
1748-7	1/15/2026	C.R.B.	Child	16	4	"We have been detained at Dilley for three months, and it's been awful."
1748-8	3/11/2026	N.P.V.	Parent	14, 11, 7	4	"We have been detained at Dilley for 53 days."
1748-9	3/12/2026	E.C.M.	Child	13	4	"I have been detained at Dilley for 86 days."
1748-10	3/11/2026	M.T.H.	Parent	6	4	"We have been detained at Dilley for 23 days, and before that we were in CBP detention for about 10 days."
1748-11	3/11/2026	J.A.	Child	17	4	"I have been detained at Dilley for almost four months."
1748-12	3/11/2026	T.M.	Parent	2	4	"I have been detained at Dilley for four months."
1748-13	1/15/2026	C.H.H.	Parent	13	4	"I have been detained for 105 days with my 13-year-old son."
1748-14	1/14/2026	D.P.C.S.	Parent	15	4	"Currently, I have been detained at Dilley for 87 days, but this is my second time at Dilley."
1748-15	3/12/2026	S.K.	Parent	2, 1, 10 mos.	4	"I have been detained at Dilley for 23 days. I am here with my three daughters and my husband."
1748-17	2/12/2026	N.C.C.	Parent	14, 13, 10	4	"We have been detained at Dilley for 126 days."
1748-18	2/12/2026	L.R.C.	Parent	15	4	"I have been detained at Dilley for 84 days with my 15-year-old daughter [] and my husband."
1748-19	1/14/2026	M.B.O.D.	Parent	17, 14	4	"I have been detained at Dilley for 74 days."
1748-20	2/11/2026	J.V.G.	Parent	4	4	"I have been detained at Dilley for 49 days with my wife and my four-year-daughter, []."
1748-21	2/11/2026	Z.V.	Child	17	4	"I have been detained at Dilley for 44 days with my mom and dad."
1748-22	1/14/2026	A.P.	Parent	14, 9	5	"We have been here for 113 days."
1748-23	1/14/2026	Y.H.H.	Parent	11	3	"I have now been here at Dilley with my eleven-year-old daughter for more than three months."
1748-24	1/15/2026	S.S.	Parent	11, 11	4	"I have been here for 80 days."

(1) TIME IN CUSTODY

Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1748-25	1/14/2026	A.K.	Parent	2	2	"I have now been detained at Dilley with my husband and two-year-old son for 108 days."
1748-26	2/12/2026	A.M.P.	Parent	9, 2	4	"We have been detained at Dilley for more than 125 days."
1748-27	1/14/2026	N.M.	Parent	3	5, 9	"We arrived at Dilley 97 days ago . . . [before Dilley] they kept us ten days in CBP detention in Texas."
1748-29	1/15/2026	D.R.R.	Parent	10	2	"I am from [my country of origin] and I am detained at Dilley with my 10-year-old daughter, and have been here for about 90 days."
1748-30	8/12/2025	O.S.	Child	15	4	"I have been detained at the Dilley Family Detention Center for 56 days."
1748-31	1/14/2026	L.T.P.	Parent	14, 15	5	"I have been detained at Dilley for 90 days."
1748-32	1/15/2026	M.S.M.	Parent	10, 5	4	"I have been detained at Dilley for 89 days."
1748-35	11/18/2025	K.P.L.R.	Parent	6	2	"I am 24 years old, and my daughter is 6. . . . [W]e are still at Dilley after 64 days."
1748-36	2/12/2025	M.L.S.	Parent	15 mos., 2 mos.	4	"We have been detained at Dilley for 21 days, after spending 3 days in CBP custody."
1748-37	2/11/2026	M.P.P.	Parent	7	4	"We have been detained at Dilley for 21 days."
1779-4	4/22/2026	C.G.C.	Child	13	4	"I have been detained at Dilley for 90 days."
1779-5	5/8/2026	A.O.	Parent	3	4	"I have been detained at Dilley for 135 days."
1779-6	4/22/2026	M.T.H.	Parent	6	4	"We have now been detained at Dilley for 66 days, and before that we were in CBP detention for about 10 days."
1779-7	4/22/2026	R.G.H.	Parent	10	4	"I have been detained at Dilley since March 7, 2026, almost 50 days."
1779-8	3/11/2026	S.D.C.	Child	15	4	"I have been detained at Dilley for 143 days this most recent time, and this is my second time being detained at Dilley."
1779-9	4/22/2026	G.S.	Child	12	5	"I have been detained at Dilley for 64 days."
1779-10	4/23/2026	R.R.M.	Parent	11	4	"I have been detained at Dilley since March 24, 2026, about 30 days."
1779-11	5/16/2026	O.S.	Child	16	4	"I was detained at Dilley for 323 days consecutively from June 3, 2025 to April 23, 2026."
1779-12	3/11/2026	A.L.G.	Parent	4	3	"I have been detained at Dilley for 77 days with my husband and my four-year-old daughter, []."
1779-14	4/23/2026	E.C.M.	Parent	13	4	"I have been detained at Dilley for 91 days with my son, [], who is 13 years old."
1779-15	3/12/2026	W.L.	Parent	7	4	"I have been detained at Dilley for two months. I am here with my seven-year-old daughter and my husband."
1779-16	4/23/2026	J.A.I.	Child	16 (Declarant), 12	4	"We have been detained at Dilley for about 50 days."
1779-17	4/23/2026	Y.G.P.	Parent	12, 15 mos.	4	"We have been detained at Dilley since March 31, 2026 [23 days]. We were previously here for 27 days in July"

Total Families Who Raised Complaints About Time in Custody: 71

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Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1575-5	6/5/2025	T.M.	Parent	Baby	28, 35	“I have spoken to seven or eight other women that also have bad urinary pain and think they have kidney infections as well. They don’t want to go to medical because they don’t want to sit and wait for hours with their children to get medication – instead, they are just buying painkillers at the Commissary to get through the day. There is often a long line at medical – called the pill line – to get medications, and it usually takes 30 to 60 minutes every time you go there, every day. One time I went to get Tylenol and had to wait in the pill line [for] two hours. It is very hard to stand and wait in the heat in line with a baby just to take medication. . . . It has been very difficult to access medical care for the baby. After we arrived, he developed a diaper rash. I have my own diaper rash cream in my bags that I arrived at Dilley with, but staff won’t let me get the cream out of those bags. I waited for four hours at the medical unit for the doctors to prescribe my baby diaper rash cream. However, the medical team only prescribed the cream for seven days. When it ran out and I asked for more at the pill line, the staff put a tiny amount in a wax paper cup and told me that I should save it because I don’t know how long we’ll be here. She told me that ‘a little bit goes a long way’ and that I ‘have to make it last.’ It’s a nightmare to have to beg for tiny bits of diaper cream to make sure that your baby’s bottom isn’t red and painful.”
1575-14	5/2/2025	M.M.	Child	15 (Declarant), 12, 10	26-27	“My father is diabetic. He also has a heart problem. I had a doctor’s appointment to treat my asthma in LA, but I have missed it. They allow me to use an inhaler but it is not helping. I have been in immigration detentions for almost two months now. We spoke to the doctor here and we go every day for medicine. There is some medical care here, but we need to get to a doctor outside this facility, for better long-term care.”
1575-15	5/2/2025	M.P.C.	Parent	9, 2	13	“When we were in the station, there was a mother in our room who had fallen from the border wall and been hospitalized for a few days. It hurt her a lot to walk when she got back from the hospital. The staff said that we—the families—could help her. The other mother in the room was pregnant so she couldn’t help her. So I helped the injured woman get into bed and go to the bathroom. One morning one of the staff members woke me up around 3 AM and told me to help the injured mother go to the bathroom.”
1575-27	5/2/2025	L.Q.A.	Parent	5	17-18	“My son has had a problem with his penis since he was born and needs a surgery. We were going to do this before we were detained. Since he’s been here, the restrooms are sometimes dirty and it is hard to ensure he has a thorough bath. He has been having trouble urinating and I am worried that his condition is getting worse. The doctors here told me my son needs vaccines, but they want to give him all of them. The last time we were at the doctor before coming here, they told me he only needs one booster - so I didn’t sign for him to get vaccines here because they don’t have the records of what he needs.”

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Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1584-9	6/5/2025	C.M.Z.	Parent	9, 6	8-9	“When we arrived here, they did a basic physical of my children but nothing more. I shared that my son has leukemia, but no one did anything. About four days ago, I noticed they put something about the cancer by his profile, but no one has reached out to me about anything related to his care. I am extremely upset because my son was supposed to have an appointment with the doctor today to see when he needs his next cancer treatment[t]. He started his treatment two years ago and is supposed to get about three more treatments. When we were in [my country of origin], he was getting a treatment about every 21 days. But when we got to California it took awhile to set an appointment for him. I am worried that my son needs his next cancer treatment urgently.”
1584-11	6/5/2025	N.K.N.N.	Child	13 (Declarant), 11, 4	14	“After I started having these terrible nightmares we went to mental health here to talk to a counselor. The counselor didn’t really help. She just said nightmares are normal. She told us just to pray together as a family and taught us a breathing exercise. Breathe in for three, breathe out for three. She also suggested I drink warm milk, but I like to drink milk cold. She never asked me if I had any thoughts about hurting myself. She didn’t ask if I had ever thought of ending my life. She did not ask much about why I was feeling so bad or having nightmares. She just said things that are like the things people embroider on pillows - breathe, pray. It didn’t help. I still have nightmares and it is hard to sleep.”
1584-12	5/2/2025	S.L.	Parent	9, 8, 4, 9 mos.	15, 23-24	“It has been very difficult because they insist that people take medication at 5 a.m. I have a thyroid condition and need medication for it. Each day for a week, they were waking me and my four kids up at 5 am and making all of us walk to the medical area so I could take my medication. We could then go back to bed, but by that point the kids were awake and they often could not fall back asleep. It was so hard, I started refusing my medication. After I did that, they finally agreed that they would leave a staff member there for five minutes at 5 a.m. while I walk to the medical window to get my medication. They aren’t doing that for other mothers and babies though - many mothers still have to get up at 5 am with their children. . . . Six or so days ago, my eight-year-old son, [name] broke his arm. . . . We rushed him over to the medical area. By the time we got there, he was quiet and seemed to be in shock by that point. The doctor said she didn’t think it was broken because he was not crying. My husband and I said he absolutely needed to go to the ER to get it x-rayed. The medical staff debated whether to take him to the ER for two hours as my son’s arm was getting more and more swollen. He was sitting in the waiting area with us - in shock and shivering. Finally, after repeatedly requesting to take him to the ER, they took me and [my son] in one of their vans. It wasn’t very far away - like fifteen minutes. At the ER, his arm was horribly swollen up and was awful even to look at. The doctor took one look and said he thought it was definitely broken. They took an x-ray and said the bone had snapped completely and then snapped back in place. Fortunately, he did not need surgery. They gave him a cast and said he needs to see a bone doctor in 4-6 weeks. When we came back to Dilley, the doctor sarcastically said[,] ‘it wasn’t broken, yes?’ and

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						we told her that it definitely was. My husband said he never wanted that doctor seeing any of our kids ever again. My oldest son, [name], has asthma. I repeatedly asked for an inhaler because he needs it before he runs around in the gym or sometimes his asthma just creeps up on him because of pollen or a change of weather. They initially said he needed to go to the medical area every time he needed to use an inhaler, and we could not take it with us. Then, after two asthma attacks that were really bad with us racing him to the medical area unable to breathe, one of the staff made a request for us to be able to take an inhaler with us, they finally agreed.”
1656-2	7/28/2025	G.Z.B.	Parent	11, 5	8	“On the third day after we arrived at Dilley, my five-year-old got a bite and they said it was a mosquito bite. But the next day, he was tired and had a fever. We went to the hospital, and they put my sons and I in a tiny isolation room. We stayed inside there for 9 days. They wanted us to stay for 14 days, but I told them it was not okay for all of us to be in such a small area for that long. They finally let us go when they didn’t find anything in the bloodwork. My son now has scars from all of the sores. He is so upset about all of it. The isolation was so hard on my kids - even the mental health doctor was concerned when he came by to speak with us.”
1656-4	7/28/2025	C.G.V.	Parent	6	9-11	“I have a condition called spondylodiscitis. I had a spinal operation in 2015. I take Tramadol. I have not been able to take Tramadol since being here, which has caused me to be in extreme pain. I can’t take the other pain medicines because of other medical conditions I have. The medical staff said I can’t get Tramadol here. They did offer me an injection that they said is similar to Tramadol, and after the first injection, I felt better for a short period. But the pain came back again. I didn’t get another injection for another week. That was the last time I got an injection, and that was 20 days ago. It hurts to walk. . . . I stay in my room the rest of the time. My daughter has to stay with me. . . . I had a dental appointment here on July 10 because I had a hurting tooth that needed to be taken out. They gave me anesthesia and started working on it. Blood was coming out of my mouth and my daughter was upset and crying because she didn’t know what was happening. But then they stopped and said they don’t have sufficient tools and that I need to come back in on July 28. I was so confused, and I had pain in my jaw because of the dental work. I can only chew on one side of my mouth, and my mouth feels very sensitive.”
1656-5	7/28/2025	C.H.	Parent	6	29-30	“My son fell and scratched his arms. We went to medical to get checked. They just gave him some cream. Currently he has a toothache and they have only given ibuprofen. They did not help him. They didn’t tell us what treatment they could give him. They said he had a cavity but they did not help him. It has been more than 20 days and they still haven’t told me how they will treat him.”
1656-8	9/9/2025	A.D.C.	Parent	16, 9	6, 9, 12	“My nine-year-old son is on the autism spectrum. . . . We have been telling the staff that being here is very hard for our son because of his condition. He is extremely sensitive to

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						smells, sounds and textures. There are no therapies or treatments for him here. We have gone to the doctor several times, but the options are very limited. . . . I have to wait in line or go to the pharmacy at 7 a.m., 1 p.m., and 7 p.m. to get one tablespoon of cream. He needs the cream to protect his skin from getting a rash.”
1656-10	6/5/2025	E.M.	Parent	8, 10	39, 41-42, 47-48	“The children have had colds here and have gotten runny noses and coughs. During one of the times [my son] was sick, he was having trouble breathing at night. His nose was extremely stuffy, and he would start choking when he was asleep on his back. I knew he needed a nasal decongestant. But when we went to the medical room, they just weighed him and took his blood pressure. They did not look at his throat or nose. They gave us an allergy pill, and when I told the medical staff that he needed something different like a decongestant, they refused. . . . The next day, we were able to go to the doctor, but the doctor just gave him an allergy pill and pain killers. They gave us some saline for his nose. It didn’t help. Now it is the second time that my kids are sick, and I don’t really see the point of going to the doctors if they are just going to give the wrong medication and won’t give the kids what they need. . . . When we go to the mental health people here, they just ask if everything is ok. We went to the psychologist because of my sons’ nightmares. Both of them were having so many nightmares and we were worried. The psychologist did not ask what the nightmares were about. She didn’t check if the boys were thinking about hurting themselves or if they had had thoughts about wanting to die. She just said the nightmares are normal. We see her once a week now, but the meetings just last a few minutes. It seems like she just needs to write a note that says we’re fine, that we ate well, and that we slept well. She just asks if the nightmares have gone away, but she doesn’t offer us any help. She just told us that the children should participate in activities here. She didn’t give any other advice. She said that what we are going through is normal for the situation we are in.”
1656-12	7/28/2025	E.O.N.M.	Child	13 (Declarant), 9	38-39	“My dad has a thyroid condition for which he needs to take medication. My mom thinks it is worse because of the food here. We have to get up at 5:15 am to go to the pill line. I did not want to get up that early, so my dad asked if he could take it at 7 am instead. The doctor said the condition was getting worse here. I see psychologist that I see every 8 days. She asks if I ate or slept and then tells me to come back.”
1656-13	7/28/2025	I.C.B.	Child	14 (Declarant), 7	9, 11	“My brother doesn’t eat anymore, so he needed PediaSure. My parents had to almost beg the medical staff to give him PediaSure. . . . There’s a psychologist here, but she doesn’t help. My parents are not allowed to express their feelings even though they are in the visit with us. The psychologist said she’s only here to talk to the children. When we talked about my brother crying at night, she just said not to worry, and that she can’t do anything.”
1656-15	7/28/2025	K.M.	Parent	6	38	“We get sick a lot here, I think because of the hot and cold. My daughter has a cough and runny nose. Every time she gets better, it seems like she gets sick again. We can go to the

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						doctors to check her, but they usually say to just drink water. It seems like they say everything is allergies and give us allergy medicine. Sometimes they tell us we can print out prayers.”
1706-4	9/9/2025	J.R.F.	Parent	5	20, 22	“My daughter got lice here. We’ve gone to the doctor twice now. We get the shampoo each time, but it’s not working. It’s already been 15 days, and she still has lice. The first time they left the shampoo in for 10 minutes, the second time for 30 minutes. It didn’t work either time. . . . She’s also become very anxious since coming here. She’s biting her nails a lot. We’ve seen the psychologist here, and I told her my daughter is anxious and biting her nails. She just said, ‘don’t do that’ and then they draw. She never offered my daughter medicine or anything to help with the anxiety.”
1706-5	9/10/2025	Z.F.	Parent	6	71	“We had a cough, but we were treated for it. We saw a nurse, but not a doctor. They gave us medicine, but the wait for medicine requires standing in a very long line in the sun, without shade. We wait sometimes about thirty minutes, but sometimes up to two hours in that line each time we need medicine. One of the medicines was prescribed three times a day, and we had to wait in the line three times a day to get our medicine. So we would wait several hours per day in the medicine line when we were taking medicine three times a day.”
1706-6	9/11/2025	I.B.	Parent	7, 2	34, 40	“My older son is suffering so much. He is only 7 years old. He is sensitive, but since being detained he cries constantly, he is volatile and emotional, we were so worried for him that we took him to the psychiatrist here who prescribed antidepressants and antipsychotics. I think a kid of his age should not be taking this type of medication. But since the doctor told us it could help, he has been taking it, but it hasn’t helped. He is still so unable to regulate his emotions that the psychiatrist increased his dosage. He keeps telling us he just wants to get out of here. . . . My toddler is losing weight very quickly. The doctors claim that he is a healthy weight but I know my child. He is tired all the time, he gets upset easily, I can see that he is hungry all the time. I can see that he is losing weight and I worry he is not getting vitamins or nutrients that he needs. He is becoming weaker each day.”
1706-7	11/18/2025	N.V.S.M.	Child	14	34-35, 37	“I was sick once and they sent me to medical. The staff said they’d give me ibuprofen, but when I got the pills they didn’t look familiar to me. My mom and I asked to consult the doctor about the pills, but we couldn’t talk to one. They were also giving me dirty water to take the pills. I’m always congested here. I am trying to get medicine, but what they give me just doesn’t work. I’m still congested and my throat hurts all the time. They don’t have what I need here. The allergy medicine does not work. . . . The therapist just asks the same questions: have you been eating, drinking, and sleeping? It’s always the same.”
1706-8	11/18/2025	C.R.G.	Parent	14	13-14	“After being here about a month, I got a horrible rash. The doctors first gave me a cream, but it made it worse. A psychologist told me it was probably related to anxiety and gave

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						me medication for anxiety. The rash is finally getting better. It is a problem that they don't have a doctor in the evening. They need someone here 24 hours a day."
1706-9	11/19/2025	A.K.	Parent	1	16	"We also went to the medical unit around October 24th because my son had a fever. They didn't really do anything, though, they only gave us Ibuprofen. We also had to stay in the medical unit from the 24th until the 27th. Finally, on the 27th we were able to see a pediatrician, a doctor. Before that, we kept seeing nurses only who continued repeating that he was fine. The pediatrician prescribed him antibiotics because he had an ear infection in both ears. We asked for tests of his chest and other follow up, but they did not do anything but give him the antibiotics. He did not get better. After seven days of antibiotics, his fever rose again. They did not do any other testing despite our repeated requests. We went back to medical three more times to bring down his temperature, and they kept saying everything was fine. The doctor said the infection had spread, though, and prescribed the same antibiotics again for him. We have not had good experiences here with the medical services."
1706-10	11/18/2025	M.M.S.	Parent	9	11-12	"We have been to the doctor four times to request a special diet for my daughter. They can see the request is in the computer, but the cafeteria is not making it for her. We have asked over and over. Before she got here, my daughter had a cast on her left foot. They took it off a bit early so she could make the trip, but she was supposed to return to the doctor for follow-up. The doctor was supposed to determine if the foot was healing properly. All they have been able to do here is bandage the foot and give her ibuprof[en]."
1706-12	10/10/2025	N.G.C.	Parent	5	12	"I have a lot of pain in my uterus and it is so hard to be here. When I arrived, I told the doctor that I have cysts on my uterus. I had gotten medication in Chicago to get rid of the cysts and was told if I didn't take the medicine, the cysts could tum into tumors. But since I arrived here, they will only give me birth control pills and pain medication. They are not giving me the medication I need for the cysts. I have been to the medical unit twice. The second time, I asked to speak to another doctor, but they told me that I should just take the birth control pills. I feel a lot of pain and heat around the area, and I am worried for my health. Every day and night, I have this pain. The doctor in Chicago has told me I need to be very careful because it could lead to paralysis or heart failure. I am so sad and worried."
1706-13	10/9/2025	L.R.L.	Parent	8, 12	28-29	"One girl in our room has lice, but the mom won't take her to medical, because she's nervous that if ICE finds out about the lice they won't let them leave here. We already did a report about this, but they haven't helped us. Because we are now afraid of getting lice."
1706-14	9/10/2025	J.V.D.A.	Parent	16, 11, 6	33	"Our daughter had an allergic reaction on her ankles on both feet. We went to the medical unit today and they gave her a little lick of cream. They said it could be a fungus or allergies, so they gave her 2 different creams. We have to go in the morning and at night to get the cream now."

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1706-16	11/21/2025	N.G.	Parent	13, 11, 4	12-13	“My daughter’s ears became clogged during our initial detention, and we asked if they would clear her ears. They told us they cannot perform that procedure because they do not have a medical license and offered to give her antihistamines instead. Once we were transferred to Dilley, a nurse practitioner eventually gave us some ear drops, which were very cold, and my daughter got a terrible earache. We had to give these drops to her outside, and my daughter was crying while we gave her the drops. The earache became inflamed, and they eventually prescribed very strong antibiotics, even though she is just a child. She would need prebiotics to be able to take the antibiotics safely and we were not given any. The biggest problem is that she’s started losing hearing in her ear, I fear that she will have partial hearing loss after being here. Low level personnel were the only ones to distribute medication to us. The nurse practitioner barely examined my daughter once.”
1706-17	10/9/2025	K.V.L.	Parent	6	22, 25-27	“We also had a medical issue with [my daughter]. While here, a staff member was mopping and accidentally hit her with the end of the mop in the cheek and eye. A little bit of blood left her eye. We went to medical. . . . The injury happened on a Sunday, but there is not a pediatrician here on Sundays. Medical said we’ll call you on Monday, the next day, when the pediatrician is here. No one called us Monday. They called us Tuesday. They said her eye is fine, but my daughter still says it bothers her sometimes. We are worried she will have long-term eye issues. The other day, she spilled a drink on herself and when we asked what happened, she said my eye isn’t working, I couldn’t see it. She sometimes [] tells us that it itches, hurt[s], or causes her vision to be blurry. We want another opinion and more medical services.”
1706-18	10/9/2025	V.L.G.	Parent	15, 9	5-6, 9-10	“[M]y 15-year-old son has ended up getting hurt with a broken foot because of the staff here. . . . When the workers started putting the nets away, one of the workers was pushing the heavy base of the net and it was too much weight for her. She dropped the metal part of the base suddenly and it landed on my son’s foot. It broke two of the bones. His foot started throbbing, and he felt a lot of pain right away. We went to the medical area, and they said they needed approval to take him to the hospital. We waited for about an hour before we went to the hospital. . . . They gave us a follow up appointment with an orthopedic specialist, but ICE has not approved that appointment, yet. . . . Another medical concern I have is with my son’s medicine for his epilepsy. When we were in [our home country], he was prescribed 600 mg of a medicine called Attemperator twice a day. At this facility, they are only giving him 500 mg twice a day of a different medication. I told the nurse that I was concerned about the dosage, but she said it should be fine. I am scared that he has been taking this medication since he was three, and I have been told that the dosage should not be lowered suddenly. I have no way of knowing if this lowered dosage is safe because we are not able to see a specialist here. To get my son’s medication, we have to wait in the pill line twice a day. The wait times vary. Sometimes it

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						takes 30 minutes, but sometimes the other families will let us go in front of them because my son is limping around in the boot.”
1706-19	9/11/2025	N.C.G.	Parent	14	8, 11, 18	“When we got here to Dilley, they asked us a lot of questions. I told them about my son’s injury and his difficulty walking. I explained his medical history and what medicines and treatments he had been receiving in [the country of origin]. But they haven’t given us anything that will help his pain here. I was afraid to ask for an appointment with a doctor after they didn’t say anything or do anything when I first told them. Because it’s better here than at the icebox in Nogales. That place was so horrible, and I just didn’t want to mess anything up here. . . . Here there are not good medical services. There was a pregnant woman who also fainted, and she also has a two-year-old. She fainted and we wanted to help her, but instead all the staff came and made a circle around her and her toddler so we couldn’t help them. But there was no one actually helping her or doing anything medical. Eventually they took her in an ambulance away from here. I think we are like two hours from real medical help. . . . My son has a meeting with the psychologist once a week. I thought the meetings with the psychologist would be like therapy, but they’re not. They just ask a few questions about what it’s like here.”
1706-20	11/21/2025	D.C.R.R.	Parent	10	3, 4-5, 8	“When we arrived at the detention center and were processed, I informed the staff that my daughter had been diagnosed with Hirschsprung’s disease, a condition in which her intestines do not function properly and struggle to move stool through her body. This condition requires a special diet; without it, she can go days without a bowel movement. . . . The detention center staff informed us that they would not provide any special care or diet until my daughter was evaluated by the medical staff. She was not able to see a doctor until our eighth day in detention. By that time, she had already gone ten days without a bowel movement. The doctor gave her laxatives, but I explained that this would not be enough; she also needed to follow a restricted diet. It took two more days for her to finally have a bowel movement, and she cried in pain the entire time. I was extremely worried because there was blood in her stool, and it was clear how much she was suffering. The entire wing became aware of her medical issue. About six days after her bowel movement, she ate fried food, which is not normally part of her regular diet. I avoid giving her fried food because I know her body cannot tolerate it, but sometimes it is our only option here. That night she experienced severe vomiting, which led to another medical visit. I pleaded with the doctor to request a special diet for her or to provide suppositories. However, he only adjusted her diet to exclude fried foods. . . . I truly worry that one day my daughter will face a medical emergency requiring immediate intervention, and they will be unwilling to assist her.”
1706-21	10/9/2025	S.M.G.	Parent	1, 2	5-6	“Our two-year-old daughter has had a fever and diarrhea for eleven days. We first took her to the medical area on Monday, September 29, because we were worried about her fever. We took her to medical a few more times, and each time they didn’t do anything.

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						The doctor just kept telling us that she was just sick and needed rest to get better. They did not take our concerns about her fever seriously. Then, this past Sunday, after she'd had a fever for six days, I requested to see a different doctor than the one we had been seeing. That doctor sent us to the hospital because it had been almost a week with a fever and my daughter looked very tired and unwell. At the hospital, they gave her an exam and diagnosed her with the flu. They gave us medication and Pedialyte."
1748-4	2/12/2026	C.C.A.	Parent	15, 9, 7	4, 9, 30, 33, 36	"My oldest daughter has autism . . . She needs to take a medicine that provides . . . oxygen to the brain. She also used to receive psychological and speech therapy, but she hasn't received any of that here. Her condition has gotten worse now that she's detained. . . [M]y youngest daughter had an earache here. Eventually, they prescribed her ibuprofen. But then they made me wait with her and my other two children in line for 1.5 hours to pick up the medicine. My son had a bad cold and [my daughter] felt sick, but they just made them stand in line outside. . . Last night, [my youngest daughter] had [a] fever, but because they have us locked down, they would not let her go to the medical area. They told me she could only get medical attention if she went with her dad, but they did not provide any way for us to let her dad know that she was sick and that he should take her because we were stuck in the room. . . This is all retaliation for us talking to reporters and to <i>Flores</i> counsel about what we have experienced here. . . [My oldest daughter] has been waking up at dawn crying. She has a lot of head pain, too, and is not getting medical attention."
1748-5	3/12/2026	M.S.P.	Parent	14, 12	21-23	"[My son] has had an allergy on his hands since our fourth day here. He never had an allergy like that before, but now as you can see, the back of his hands are red. . . My older child takes medication for anxiety and depression, but detention increases anxiety because there is no way to know what is going to happen to us, where we are going to go next, and if he will stay in the country. . . At times, we have to wait for a long time for the pills in a line, too."
1748-6	1/15/2026	M.M.S.	Parent	9	14, 16-17	"The medical care here is awful. For example, I was diagnosed with a urinary tract infection on October 9th. I was in pain for months. They gave me a generic treatment, and it did not work. I returned and returned to medical, and they finally gave me another treatment. They would not do more in-depth testing and just gave me another round of antibiotics. I went in for a third time, and they took a urinary sample but they lost it. They just gave me another round of antibiotics, and it still didn't work. Finally, I was in a lot of pain and a doctor saw me. He said I needed to go to the emergency room immediately because I was in pain and they had already given me so many rounds of antibiotics. I had been crying and crying and was in excruciating pain. . . I have also been extremely worried about [my daughter's] health. Each time she has fainted, the medical staff have downplayed it. Recently, they questioned whether she actually fainted because they couldn't see what happened on the cameras. They just gave her apple juice and a Tylenol."

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						They did not do bloodwork. They said maybe it is hormonal and she's about to get her period. She is nine. Most recently, [m]y daughter injured her arm here. She fell in the park one evening, and they only gave her an ice pack to put on the injury for the night. She was in a lot of pain and crying all night. The next day when she went to the medical unit, the pediatrician was very upset because staff had not even wrapped her hand. The doctor gave her a cast and they left it on for about a month. She was crying and in a lot of pain during the night for weeks, and it still hurts her."
1748-7	1/15/2026	C.R.B.	Child	16	5-7	"On the way to my room, I had a panic attack. I couldn't really move and felt like I was going to pass out. Someone called medical. They brought me to medical, but all they did was check my vitals and send me back to our living area. A few days ago, I had another medical emergency. I started hyperventilating. My body started to feel really heavy; my arms started tingling; and I felt like I couldn't move. My whole body felt weak. My heartbeat started racing. They took me to medical again, but they just told me to relax and took my vitals. Since I have been here, I have gotten sick seven times. People are sick all the time and medical does very little to help. They will just have a nurse take your vitals. You basically have to be dying to see a doctor at this place."
1748-8	3/11/2026	N.P.V.	Parent	14, 11, 7	19	"It was difficult during the protests because we kept getting put on lockdown in our rooms. They would make us stay in our rooms, and we were unable even to go to medical."
1748-9	3/12/2026	E.C.M.	Child	13	22	"I have seen newborn babies here with bronchitis because ICE does not provide enough medical care for people who are sick. When there were a lot of people here, I would see them line up for two hours to get medicine."
1748-10	3/11/2026	M.T.H.	Parent	6	11	"I've been concerned about my son's health here. He got an ear infection and at first, they just gave him ibuprofen. On the second visit, they gave him an antibiotic because his ear was really red. It was hard to get him to eat food with the antibiotic because he would vomit. He vomited twice. I asked for some fruit to eat with the antibiotic, but the doctor said to let him get hungry because if he was starving he will eventually eat the food."
1748-11	3/11/2026	J.A.	Child	17	9-10	"My sister hurt her knee playing soccer last year before we got here and it's been bothering her since we've been here, but they just give her ibuprofen and Tylenol when she goes to the doctor. It doesn't help. The doctors said if it gets worse to come back but they seem to just be waiting for it to be really, really bad and very swollen before they can take her to the hospital or do anything else. It feels like it doesn't really help to go to the doctor here. My sister who is in the adult section is having a very hard time because she can't see well. Her glasses prescription is old and needs to be updated but no one will take her to the right kind of doctor to fix it. This means she has headaches and can't see."
1748-12	3/11/2026	T.M.	Parent	2	10, 19	"We are no longer in isolation, but we are still struggling because we are having bad reactions to the medication. My son and I are having diarrhea and stomach problems because of the medication we are taking but the doctors will not change the medication. I

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						don't want to take the medication anymore because it's causing me so many problems but then they tell me I have to sign something to say I am refusing to take the medication and that scares me. . . . My experience with the medical staff has not been good because I feel like they are trying to force me to do things."
1748-13	1/15/2026	C.H.H.	Parent	13	23-24, 26-28	"The first time I went to medical because [my son] had [a] fever, they told me he was big enough to tolerate the fever, so they would not give him any medication. They said it would probably get worse. That night I had to stay up all night putting wet towels on his face. I did not sleep at all. Recently, everyone has been getting the flu, and a virus that causes vomiting. The medical annex is filled with people with the flu now, and I have heard it is out of space. . . . He also now has a bacterial wart growing on his hands. The doctors said that they will not give antibiotics, and the only medication they will give is Tylenol and water. When I had a gallbladder issue, they only gave me Tylenol and Pepto-Bismol. I had to wait a month for an ultrasound. They gave me a special diet for 15 days that allowed me to eat less fatty foods, but then took it away. The regular food gives me stomach pain still, but the nurse said she could not allow me to go on the diet again."
1748-14	1/14/2026	D.P.C.S.	Parent	15	29-31	"The medical care here is also terrible. Four days ago, they gave me an undercooked burger that was red in the middle. I did not want it, but I was hungry and ate it, and then I started throwing up. I asked to go to the doctor, but because I only speak Spanish the guards I asked just watched and laughed at me. When I finally found a staff member who spoke Spanish, who helped me go to the doctor, the doctor told me they would not see me until I had thrown up more than three times. The doctor would only give me acetaminophen. One week ago, my daughter had a fever. There are so many fevers and coughs going around in this season. Now, there is a really strong virus spreading here and many children are getting it. This morning, we went to the doctor early with my daughter to seek treatment for hives that have broken out on her face, to see if we could get more medicine, but when we got there the medical area was filled with children vomiting. Since we got here, my daughter has been breaking out in hives from the food here. The doctor gives her a cream called 'medicine five,' but for the past week, she has not gotten it because Dilley ran out of that cream. When we got to the medical area to ask for more, there were so many little ones vomiting. The medical people gave us masks and told us to come back later, because there was a sickness spreading."
1748-15	3/12/2026	S.K.	Parent	2, 1, 10 mos.	21-23, 26-27	"Also, my two-year-old has been having a severe medical issue. She has a swollen gum and an infected tooth, and has a fever anytime she isn't taking ibuprofen from this infection. This has been going on since we arrived at Dilley, over 20 days ago. The top of her tooth is green at the root. I think the nerve there has been hit or opened. Because of all the ibuprofen, I'm nervous her stomach is messed up. Her stool is a very dark color and has a distinct smell. . . . We have begged for this medical issue to be resolved, even talking to Congresspeople who visited the facility. All we've received so far is antibiotics,

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						but she finished those days ago and the fever and infection are still there. The dentist here told us they can't extract the tooth because of a pre-existing heart condition. That was 15 days ago. It's true that my daughter has a small hole in her heart, but that doesn't mean we can just leave her like this: not eating any solid foods, with a fever, and crying all the time. We want to see a specialist, a pediatric dentist immediately."
1748-17	2/12/2026	N.C.C.	Parent	14, 13, 10	12	"There was a one-year-old here who had a fever for about 20 days, and they finally took her to the hospital and she was there for 17 days. There is a two-year old girl who has had a cold for a really long time, and they won't give her any antibiotics. Last month, my 10-year-old daughter had a very high fever for 4 days. On the 4th day, I tried to take her to medical at 2 in the morning because I was worried. There wasn't a doctor, only a nurse. I put cold compresses on her to try to get the fever down. They did tests and didn't find COVID or flu, and they wouldn't give her any medications. I told them something was wrong with her and I thought she needed antibiotics- but they refused and said it was just a cold. I said that after five days of fever if they didn't give us antibiotics, I would call reporters. They finally agreed to give us antibiotics, and she started to get better after about two days."
1748-18	2/12/2026	L.R.C.	Parent	15	6-8	"When we got here, we brought a machine for my husband who suffers from sleep apnea, and they put him in the medical area with that machine. While here, he started to feel severe pressure in his head and behind his eyes. He started to lose his vision. He could only see floating dots in his eyes. When we went to the doctor after a lot of insisting, the doctor said that he needed an eye exam, but that it would take three to four months to get an appointment. [My daughter] started crying because she did not want her dad to go blind. It made her feel panicked. Each day his eyesight got worse, and when we finally saw a nurse in January, she said that there was no record in the system saying he had a visual problem. During that visit, the nurse was just laughing and not putting our information in. I got so angry because it was an urgent medical problem, and the translator got upset too, and interrupted and said she would submit testimony about the terrible treatment we were receiving Only then, did the nurse say, 'Oh, sorry, I now see this in the system.' I made a written complaint about the lack of medical attention after that. Only then did we get an appointment with an eye doctor. They scheduled it for three days later outside of Dilley. On January 10, 2026, they took him to get an exam and the eye doctor found out he had developed glaucoma. The doctor prescribed my husband eye drops and scheduled another exam. The doctor also prescribed dark lens glasses to protect his eyes. At the next exam the eye doctor said the eye drops were working and to continue with them. But my husband never received the dark lens glasses. After 30 days, the eye drops ran out, and they have not renewed that same medicine. They said they would give him something else, and when we tried to ask for the correct medicine prescribed by the doctor, they tried to get us to sign a paper saying we were refusing medical treatment. I

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						refused to sign because I was not refusing his medical treatment. I just wanted the correct medicine that had been working. The medical staff called the guards into the room to force us to sign it, but we kept refusing and saying we need the correct medicine. They still will not give us the correct medicine.”
1748-19	1/14/2026	M.B.O.D.	Parent	17, 14	9, 11-12, 28	“My son suffered from inadequate medical care when he was here. He had tooth pain and they took a molar out of his mouth, but they did not do the procedure well and eight days later they had to follow up with him to take the rest of the tooth out. . . . He then developed a persistent stomach pain on his right side, but the staff here would not take him to a doctor. . . . On December 22nd, my youngest daughter fainted. They did a finger prick test and said everything was fine. But then the[] next day, she fainted again coming out of the cafeteria. Previously, there was only one doctor but he is currently on vacation, so there is no doctor currently. I’ve submitted a grievance for my daughter’s medical issues to do more testing. But they just said she was depressed from being detained. Currently, there is a COVID-19 epidemic here but they only give out acetaminophen for it. When I had to go get medicine earlier this week for my daughter’s fever they gave us a mask, but everyone is still sick. . . . They got rid of the evening pill line this week as well. Now, we have to wait for them to knock on our doors at around 11 pm or midnight to get medicine.”
1748-20	2/11/2026	J.V.G.	Parent	4	31-34	“All the kids and adults caught a cough and diarrhea in my daughter’s room. When we went to the doctor, they just gave us allergy medicine and acetaminophen, though we tried to say that my daughter did not have allergies. Then we got way worse. Anytime we tried to get medicine because [my daughter] felt sick, they made us wait outside for two hours, even though it was so cold outside and [my daughter] felt sick, just to get the acetaminophen. After that, we started buying Advil in the commissary to protect our daughter from the cold. My daughter has been getting white spots on her face since she got here. She is constantly scratching her face, but when we went to the medical area about this, they did not do anything. Another time, my wife went to the doctor crying with tooth pain, but the doctor would not see her, and when I went to find her, I saw that they would not treat her or the people after her. My wife filed a grievance once to the doctor after that, asking to be seen for the molar pain. They made her wait four days before they talked to her, and when they called her she thought she would go to a dentist. But then the nurse just said the dentist will not see adults for any reason other than to pull teeth. So, since then, the nurse here gave her acetaminophen three times a day and she has just been taking medicine for over two weeks. There are two people here with measles who have been kept in the medical area, and the doctors here have been checking our temperatures. They have been offering the measles vaccine. This makes us scared, too, because the same place where they quarantine people with measles in the infirmary is where all the other

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						medical appointments are. So, for the past few weeks, we have avoided going to the medical area unless we are in incredible pain.”
1748-21	2/11/2026	Z.V.	Child	17	26-28	“Since the measles outbreak started, they have been taking our temperature, but they are not doing much else different. . . . We are always sick here. I am sorry we keep coughing during this interview. But they only ever give us Tylenol. They never give us antibiotics for our illnesses. My mom has a fever now, and they have been telling her it is just allergies and giving her allergy medicine. But it’s clear they are in denial about the sicknesses, because she does not have allergies. We have been sick five times since being here. That’s more times than I have been sick in the past ten years. A few weeks ago, a virus went around and many kids kept throwing up a few times a day, but [the] medical area only ever gave them Tylenol. Because my mom missed her scheduled heart surgery, she has not had treatment here. The times that we have asked for support, staff here have said that the most they could do would be to call an ambulance.”
1748-22	1/14/2026	A.P.	Parent	14, 9	8-15, 47, 50	“You’ll also notice my husband is limping. He has problems with his legs, muscle atrophy. He needs special treatment for it, like massages and physical therapy but they don’t provide that here. The lack of medical care even just for him has negatively impacted my daughters. He can’t play with them like he used to. . . . The girls are sick – everyone here is sick this week. There is something going around. They can’t eat lunch or they’ll throw up. In December, people started to get sick. It felt like the flu. I got very sick; I had an infection in my lungs. I have asthma, so I’m still recovering and getting treatment. They just stopped the antibiotics for me recently. Currently, almost all the children here at Dilley are sick with nausea and diarrhea. It already spread to the adults as well. People are vomiting all over the place, in the bedrooms, eating areas, and more. There is not a single room here where the kids are not sick. Last night, one of our friends was vomiting and feeling very ill. He asked for a doctor, and the doctor was only provided after he fainted. . . . We waited in a long line to get into the medical unit for the girls. Like usual, they suggested we drink more water and eat bananas, which they don’t have here. . . . In November, there was an incident where boiled vegetables were served with live worms. We received no specific explanations regarding the worms. Some families got sick from it though. One family was vomiting, and they were told if their daughter vomits more than 8 times, then they can go to medical. If she vomits less than that, then don’t. . . . For any illness, the only advice is to drink more water, which is undrinkable.”
1748-23	1/14/2026	Y.H.H.	Parent	11	5, 9	“My daughter has been sick for two weeks. I was upset with the medical department because even though her throat hurt and she has chills, they didn’t do anything for her. They just tell me she is fine even though she has a fever. The first time, they didn’t even give us any medication. We went a second time and they just gave her Tylenol. . . . There are many problems with the medical system here that I would want them to improve.

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						People are constantly complaining about the poor medical treatment their children receive.”
1748-24	1/15/2026	S.S.	Parent	11, 11	16, 28, 31-32, 35, 38, 40, 42-44, 47	“My son, [] has autism. We have very clear medical documentation of his diagnosis. The conditions in this detention center have severely negatively affected him. . . . We do see the psychologist sometimes, but it’s super brief. They ask how they kids are doing and if we’re getting what we need. We respond, and that’s it. That is the 5-minute conversation In addition to his autism, [my son] has severe dietary restrictions. We also have medical documentation of this. He has an intolerance and cannot eat anything with gluten, sugar, or lactose. . . . We have not been approved for a special diet here. . . . The psychologist sent us to the cafeteria to request this change and then the cafeteria sent us back to medical. It’s one big loop. . . . We did speak to the pediatrician about the issue of eating, but she said she couldn’t help us in any[]way. . . . Today, it’s been nine days since [my son] has been sick and having what we think are fevers. Initially, they offered some fever-reducing medication, Ibuprofen. [My son] took it. But now, we are telling them that it’s either a virus or a bacterial infection. We need antibiotics because Ibuprofen has not been helping for at least 7 days. We need something that can treat him, and the Ibuprofen isn’t working. They replied we have nothing to treat him with. That was their official response in the medical unit. . . . When we go to medical, the staff see that [my son] is crying and nervous. They see that our child is fairly alone here, that there aren’t a lot of other autistic children here. Is it really so difficult to pay some more attention to him and not make the child suffer? It seems like they do everything possible to make him suffer. As a result, we have had to leave the medical appointments early sometimes because [he] is so upset. . . . A lot of people are sick and people are continuing to get sick because we all stay in the same room, eat in the same cafeterias, and so on and so forth. . . . They just send everyone back to the same room where other people are staying when they are sick, so then obviously the whole room gets sick. Then it spreads to everyone else. We have seen kids throw up in the kitchen on the tables. It’s really scary to see that and to look around and see everyone be so sick. Another thing is that the medical center does not have enough capacity to see the number of children and adults they have here. . . . [T]he medical center at the facility lacks adequate care, and it is impossible to receive the necessary medical treatment there.”
1748-25	1/14/2026	A.K.	Parent	2	5-7, 9-13	“There is an epidemic going on here right now. Everyone is throwing up. Last night, I was throwing up the whole night. In the men’s building, my husband tells me it’s the same. Someone lost consciousness in the night because they fell down and fainted from being so sick. The facility hasn’t explained anything to us about the sickness going around. They are just bringing a lot of people here. Because of all the people, we think there are more germs. Because there are more people, getting medical help is also harder. They just give out electrolytes, that’s it. . . . Our son, [], got sick on January 3rd or 4th. He had fever of

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						almost 40 degrees Celsius (104 degrees Fahrenheit), and we waited for two hours to get medical help. He slept for 17 hours straight, and when we told medical that they just said to keep waiting. Finally, we were able to see a nurse, not even a doctor. The nurse didn't even look at his ears or listen to his heart or look at his throat. She just said she'd bring [i]buprofen. I asked if she would look at him and she said she couldn't see anything. She decided to call a doctor. A doctor came, Dr. []. She looked at his ears and said one of them had a complication and it was red. She said she'd prescribe him an antibiotic. We agreed to the antibiotic, but I also asked for a probiotic because otherwise my kid's stomach would get really upset. She said she couldn't do that, so we didn't get anything. When I started asking for the probiotic, she started yelling at us and said 'finish!' 'back!' and threw us out of her office. Then, the visit was over."
1748-26	2/12/2026	A.M.P.	Parent	9, 2	12-13	"My two-year-old has been sick since October. She has had a cold, vomiting, diarrhea, and respiratory issues for months. We have been to medical at least nine times. All they give her is Tylenol and allergy medicine. They have not done any testing to see what might actually be wrong with her. They keep telling me there is nothing they can do for her and that it is good for her to be sick so she can build immunity. I have been trying to help her breath easier with VapoRub and hot towels. They keep telling me there are no pediatricians. Last night, my two-year-old had a fever. I am really worried because she's been sick for four months and what if it becomes something worse because they are not paying attention to her? I am also worried because her belly button started to protrude just before we arrived in the U.S. Medical staff at Dilley looked at it and said it was fine. They said it will either go back to normal or stay protruded. They say either way is fine, but we worry that there could be a problem."
1748-27	1/14/2026	N.M.	Parent	3	13-17, 21-22	"Yesterday they took me to the doctor for an ultrasound. We drove about two hours to a hospital for this appointment, they told me I was about 32 weeks and 1 day pregnant and that I have a virus in my blood that needs treatment. They wanted to send me to another hospital that could treat me, but ICE took me back to Dilley instead. Because I am a high-risk pregnancy, they said they also cannot treat me here at Dilley, they have nothing for me. I have hepatitis B. The viral load is very high. The doctors told me I could pass it to my baby. They are not treating it, even the doctors know I should not be here. They are giving me only Tylenol, calcium, and vitamins. I asked for ointment for the pain because I cannot take too much Tylenol. I am in agony. I am exhausted, it is difficult to stand or walk. They said the viral load is so high it could cause liver cancer. They also told me without treatment, I could pass it to my unborn daughter. The doctor here at Dilley told me they were sending an email to an ICE supervisor asking them to release me so I can be treated. The doctor told me that they wrote repeatedly, but that ICE still has not responded. . . . The medical care and the food here is unacceptable for our daughter. There is a virus going around here. All the children and the staff have gotten it. When a child

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						gets it, they begin throwing up and become very weak. The kids are carried to the Dilley hospital when they are too sick. The adults, though, cannot be carried, and many times, an ambulance must come to the dorm area and drive them to the hospital. They prescribe only allergy medicine.”
1748-28	3/12/2026	J.B.A.	Parent	8	10, 11	“[M]y son was diagnosed with ADHD and we were in the process of getting treatment when we were arrested. . . . [T]he psychologist [in Dilley] told us that there was nothing they could do for him, and we should basically keep him inside of his room at all times. . . . As he was leaving the room, another child opened the door and it slammed into his nose. The door hit his nose extremely hard and there was a lot of blood. We took him to medical and they gave him ice. His nose bled for about three days. We reported the incident to ICE on the tablet and made a request to get released because of how poorly our son was doing.”
1748-29	1/15/2026	D.R.R.	Parent	10	4, 6-8	“My daughter, [] is 10 years old, and since she was a little girl she has suffered from Hirschsprung’s disease. That is a chronic intestinal condition that can put the affected person’s life at risk if it is not treated. It has been so hard being detained here because she has such a serious medical condition. The pediatrician, [] said that she needs to get out of here, because this is a dangerous medical condition [T]hey sent us to the Frio Hospital one time. . . but they sent us back here. . . . The food is the opposite diet of what she needs. She is forced to eat food that is processed, sugary, and with lots of condiments. They will not give her a special diet, and instead just tell her she should just take laxatives every day. But this actually conflicts with the medical forms I have from December where it said that she should not use laxatives so frequently. . . . It has been 34 days since she had a bowel movement, and during that time she has had a consistent fever. I am so scared because the people who work here do not recognize the risk she is facing to her health every day. They are not treating her here, and in any moment her stomach could explode and her fever could go up.”
1748-30	8/12/2025	O.S.	Child	15	11, 18-19, 23, 25-26, 30, 38-39, 46-47	“I woke one morning and I had extreme pain near my stomach. I never cry, but the pain was so bad I was crying the whole day. . . . I was so sick that they finally went and got a wheelchair to take me to the hospital. At this point I was throwing up. The wait outside the medical room was so long. . . . I was taken in to see the nurse. You can only see a doctor once you see a nurse. Only if you come back for a second appointment can you see a doctor. . . . She thought I was faking. A nurse passed us in the hallway and said, ‘You should send him to the hospital.’ . . . Immediately they realized I had appendicitis and that I needed emergency surgery. . . . For the first day after we came back I stayed in medical to recover, we had to remind the nurse to give antibiotics. The nurse forgot my antibiotics and when my mom reminded her, she said ‘It doesn’t matter when you take antibiotics.’ The day after my surgery, they wanted me to walk to the cafeteria to get food, to go to the pill line for medicine. I was taking antibiotics twice a day, they wanted me to walk all the

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						way there and then wait in that line. It can take two hours standing in the sun to get the medicine in this line. . . . Some people won't get their medicine because the [pill] line is so bad. My mom begged for a wheelchair. They finally said they would give me a wheelchair but my mom should push me. She is a very small person. She could not get the wheelchair up and down the chairs or ramp or push the wheelchair over the turf and rocks."
1748-31	1/14/2026	L.T.P.	Parent	14, 15	10-12	"The way staff have treated my sons here have made us very uncomfortable, too. One time, the psychologist questioned my younger son. It felt like he had to answer anything the psychologist asked because they are watching us here. Since then he has not wanted to go to the psychologist. I have been asking them to not make him see the psychologist, and made six requests for that, but they still try to make him speak with them. I am autistic and so is my youngest child, and they are not giving us our prescribed medications, even though we have to take them every morning and evening. I gave the doctor here our doctor's information and the names of our prescriptions, but the doctor here refused to look at it. Instead, they are giving us the same anti-anxiety medication that they give to children who cannot sleep. But it does not address my condition. . . . They haven't provided us other medical care either. My youngest son has broken out in hives over his whole body for three weeks, but the medical workers said it was just because of the water and that they cannot do anything."
1748-32	1/15/2026	M.S.M.	Parent	10, 5	14, 16	"There is also an epidemic that has broken out here, where so many children have stuffy noses, coughs, and high fevers, while the medical staff do not do anything but tell them they should drink water and should put cold presses on their heads. But so many more are falling sick. Still, the medical staff will only give one acetaminophen and kids can only get that meager medicine at certain times during a day, and need to wait in line for a long time to get that one pill. It is so hard for children to wait for three hours while sick. Also, they will not let any kids take the medicine without them watching. So, when kids get sick in the middle night they cannot get medicine. And then if people line up early with the hopes of getting medicine, staff tell them they are breaking the rules. . . . Our skin has been hurting from the soap in the bathrooms. . . . I also cannot get relief from the medical providers here, because when we bring up peeling skin, they tell us to drink water."
1748-33	3/12/2026	N.S.R.	Parent	5	4	"We are extremely concerned because our son has not been able to have a bowel movement since we arrived at Dilley. We have been giving him laxatives day and night, but yesterday was the first day my son was given a treatment. Last night he got an enema but he still was not able to poop."
1748-36	2/12/2025	M.L.S.	Parent	15 mos., 2 mos.	11-12, 14, 16-19	"We have heard about a measles outbreak from people who work here, but we have not been told who here has it or any other details. They haven't given us any more information. They told us they would give vaccines to unvaccinated children, but I have not seen them do that yet. Our older daughter has her vaccines, but our youngest is two

(2) MEDICAL CONCERNS

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						months old and does not. They are not providing any special treatment to our 2-month-old. He has had a cough for over a week, and when I go to the medical annex, the nurses say he is too little to give him any medicine. . . . When I went to the medical area to explain that my son had nonstop diarrhea from the water, the doctor put an order that the guards should give me four bottles of water a day for him. But many guards will not give me the water bottles when I ask. They say they have to check with the medical staff to confirm that I am not lying and there really is an order. . . . Two weeks ago, they took me and [my daughter] to a hospital in San Antonio because they thought she had contracted a serious case of COVID, because she had had a high fever for over a week and a runny nose and cough. At Dilley, they had only been giving her acetaminophen and said they could not give any other medicine. But when the doctor tested her in San Antonio, he found she had four bacterial infections, including food poisoning, a stomach infection, and a nose infection. They prescribed her amoxicillin. When we got back to Dilley from the hospital, they isolated me for three days with the two babies, and during that time [my two-month-old] developed the cough that he now has. They did not allow my husband to see me or the babies. . . . During the first three days they did not provide [my daughter] with any medicine, because they said they were waiting for the prescription to arrive. After three days, they said that [my daughter]’s temperature was down, and we could go back to our room. But it was really cold outside, and we had to wait in the pill line to get medicine for [my daughter]. [My daughter] had to wait in line with us outside, even though she still felt sick. Sometimes we have waited for three or four hours to see a nurse for our babies, but they do not give them anything other than acetaminophen or ibuprofen, no matter how sick they are.”
1779-5	5/8/2026	A.O.	Parent	3	12	“Now, I’m having medical problems too. A doctor here told me I have a UTI. I was prescribed antibiotics. I was taking them for two days when the doctor called and said, actually don’t take them anymore. The doctor said it’s actually bacteria with the kidneys or liver. I have never had these types of problems before. I have a lot of stomach pain as well here.”
1779-6	4/22/2026	M.T.H.	Parent	6	19	“A few days ago, my son fell on his wrist and it was swollen and painful. Medical was very dismissive and just gave him ice.”
1779-8	3/11/2026	S.D.C.	Child	15	19-20	“I have seen a lot of people who were sick with coughs and vomiting who the medical people turned away. They [were] told [they] did not need treatment. The nurses here only ever give Tylenol regardless of the type of sickness.”
1779-9	4/22/2026	G.S.	Child	12	25-39	“My mom has diabetes and rheumatoid arthritis. Once, they kept her in the medical annex for five days so they could test out new medicines on her. They would check her blood in the morning and at night. And one morning, it was 279. This is very bad. It’s dangerous. You could go into a coma. My dad argued with them to stop the medication, because she was getting so bad. Since 2018, he has been giving her medication and food and knows

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						how her disease works. They aren't giving her all the medicines she used to be on before here. At first, the food they were giving her was also all wrong. Now, they are giving her a special diet. She only got a special diet for the first time last week. My dad has been asking all the time for her to get this. My mom, sister, and I also need a vegetarian diet on Tuesdays and Thursdays for religious purposes, and the staff just say to eat off the salad bar. We are [religion], except my dad is Christian. My mom also has a back hernia that was never operated on. For nine days now, she can barely move her right leg. She's been trying to walk but it's getting worse. She has slept at medical for the last nine nights. So has my sister. We are able to visit them during the day. Today, the doctor came and finally saw her after she has been in medical for the past nine days. He saw her the first day she was in medical for this foot issue, and did not see her at all the other days until today. We asked them, 'Why aren't you referring her to a specialist?' Then the doctor got mad at my dad and said, 'You're going to tell me when to send her to a specialist? If you're going to talk to me like this, I'll tell security to not let you in anymore.' This all affects me because if we go back to [country of origin], my dad will get in trouble. He is not safe there. Then, who will take care of my mom? Me. I am nervous my mom could get worse. It's difficult to watch the staff here not help her. I get very mad, but I can't say much about it. A nurse is supposed to help you. They don't even clean the room she's in."
1779-11	5/16/2026	O.S.	Child	16	15-20	"My mom and my younger sister were suffering from medical neglect for many months there. Almost four to five months ago, my mom started to have slight discoloration on her face. . . . She brought up the issue to the CoreCivic medical staff several times. However, the doctor couldn't diagnose her and said he would refer her to a dermatologist. Since then, my mom asked both the ICE and CoreCivic supervisors to approve her medical appointment. She explained to them that the discoloration was spreading rapidly and that her sickness was getting worse. Until our release, she hadn't seen anyone, and no one ever followed up or cared about her issue. Further, she discovered a weird bump in her chest about three to four months ago. She was really worried about it and brought it up to the nurses and the doctor repeatedly. The nurses just gave her ibuprofen for her pain and ignored the issue. She went to them repeatedly, but every time they just gave her painkillers and didn't try to find out what was actually wrong with her. She explained to them multiple times that her family has a history of cancer, that her aunt has breast cancer, and that her grandma died from leukemia. She expressed how much stress it was causing her and how worried she was for her children. The doctor, after almost four or five visits, finally referred her to do a CT scan to find out what was wrong with her. He said it wasn't guaranteed that ICE would approve it, but that he wrote it down. She waited for almost a month for that referral to be approved and told ICE about it several times, yet nothing happened. She waited for so long until one day her pain got so severe she went to medical just asking them for painkillers. Her pain was so severe that she needed to be transported

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Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
						to the ER. It was only then that she finally got her CT scan and the other tests she needed. The ER doctor determined that she needs to be seen by more specialists, do an ultrasound, and complete other tests. When she came back to Dilley, though, no one followed up with her until she went to them again telling them about her pain and asking about her referrals from the ER. Until our release, nothing had been done for her yet, and she had been in pain that whole time. In addition, my five-year-old sister had 13 cavities in her teeth. At first, they didn't cause her pain, and the facility didn't have dental services. In November, the facility's dentist saw her and determined that she had 13 cavities. But since that time, he did nothing to stop these cavities from worsening or to treat them. Her pain got significantly worse over time, and by February, she would cry and scream for several hours if she wasn't on painkillers. So, she was kept on painkillers for two months straight. A five-year-old couldn't live without painkillers for two months, and instead of actually treating her and stopping the cavities, they just gave her more painkillers."
1779-12	3/11/2026	A.L.G.	Parent	4	9	"My whole head is inflamed. It feels like there is water in my ears, and they feel bad. I have pain that goes up my neck and into my teeth. I do not know what is causing it. But no matter what type of pain or sickness we have, whenever we go to medical, they give us ibuprofen. I wish there was some way to get a real diagnosis. My mom is a health director, and I know that it's not good to just take high doses of ibuprofen all the time."
1779-15	3/12/2026	W.L.	Parent	7	11	"When we were first here my daughter would get sick every two weeks or so. Now that there are fewer people here, she is not getting sick as often. They don't give her any vitamins here. We went to the medical building the first two times my daughter was sick, but it was useless. They only give out Tylenol or ibuprofen so it's not useful to go."
1779-16	4/23/2026	J.A.I.	Child	16 (Declarant), 12	9	"My mom especially has a rough time because she's not getting the medicine she needs for her food allergies and that causes a rash."

Total Families Who Raised Complaints About Medical Concerns: 69

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1575-13	5/1/2025	F.Y.	Parent	1, a few mos.	20	"They haven't told me anything about what is happening or what to do about my case."
1575-14	5/2/2025	M.M.	Child	15 (Declarant), 12, 10	22	"We want to know when we will be released. We have heard some rumors about families being released but no one has told us anything."
1575-16	5/1/2025	A.T.	Child	11	24, 40	"They told us nothing. We didn't know where we were, what the rules were, how long we would be here. . . . We heard that we were supposed to be released after 20 days because I am a minor but now it is 23 days and we have not been released."
1575-27	5/2/2025	L.Q.A.	Parent	5	8	"I'm upset because no one here is telling me anything. Talking to the <i>Flores</i> attorneys is the first time I have spoken to anyone. The people here tell me that they don't have any information."
1656-5	7/28/2025	C.H.	Parent	6	38	"I have not been told about my rights or about a case called <i>Flores</i> ."
1656-12	7/28/2025	E.O.N.M.	Child	13 (Declarant), 9	46	"No one has talked to us about <i>Flores</i> here, except the RAICES lawyers."
1656-15	7/28/2025	K.M.	Parent	6	41	"Nobody at CoreCivic or ICE has explained my <i>Flores</i> rights to me. One staff member told me I wouldn't be here longer than 20 days. But we are now in this facility for almost 90 days. Nobody has explained why we were not released like other families who were released after 20 days."
1656-17	7/29/2025	M.O.	Parent	2	32	"No one has spoken to me about my rights since being here. The immigration officers who were in New York told me that I would not be held more than 20 days, but it's been over 40 days."
1706-4	9/9/2025	J.R.F.	Parent	5	34	"When we arrived at Dilley, there was an orientation that was about four minutes long and a handout in English. Someone translated it. It didn't say anything about <i>Flores</i> . I only heard of <i>Flores</i> through RAICES."
1706-5	9/10/2025	Z.F.	Parent	6	51	"We have never had a presentation about our rights."
1706-6	9/11/2025	I.B.	Parent	7, 2	57	"No one here tells us anything, nothing about our rights or anything else. We were never told about the <i>Flores</i> Agreement."
1706-8	11/18/2025	C.R.G.	Parent	14	20	"No one has mentioned the <i>Flores</i> case to me, or that my son has rights under <i>Flores</i> ."
1706-10	11/18/2025	M.M.S.	Parent	9	19-20	"We have never been given a legal orientation or know your rights presentation. The only topic ICE has presented on is how to self deport. No one here has informed me of my daughter's rights under <i>Flores</i> ."
1706-11	9/11/2025	M.R.P.	Parent	8	56	"I never received a know-your-rights training."

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Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1706-12	10/10/2025	N.G.C.	Parent	5	17	“In the ten days that I have been here, no one has told me anything about how this system works or given us a know your rights training. I have not been explained anything about my daughter’s rights under <i>Flores</i> .”
1706-14	9/10/2025	J.V.D.A.	Parent	16, 11, 6	43	“We did not receive any Know Your Rights training.”
1706-15	9/10/2025	K.M.L.	Parent	6 mos.	33, 35-36	“I have not received any information about my rights or my baby’s rights here. . . . I have never heard the word <i>Flores</i> or about that before. I only heard from other detainees that we can’t be here for more than 20 days, I didn’t know about my child’s right to release. I would want to know more about how it works in practice. If she could be released to her father who lives here in the U.S. directly, then maybe I would do that.”
1706-16	11/21/2025	N.G.	Parent	13, 11, 4	4-5	“A group of us had a meeting with ICE and asked about the <i>Flores</i> rule and whether it could help us. Officers [at Dilley] and ICE supervisor [at Dilley] told us that this rule was revoked 21 days ago. They’ve lied to us so many times. They laugh at us and tell to call Trump when we ask about the rules. We were only given an instruction manual in Spanish about the rules for regular detention centers and not a family center. Eventually we were able to translate some of it into [our language]. Yesterday after that meeting we met with one of the officers and asked them why they are lying about the <i>Flores</i> rule no longer being in place. The ICE officer told us that management was telling them to say that to us. Yesterday we asked for documents about the <i>Flores</i> rule, the supervisor [at Dilley] disconnected the interpreter and told us he would not say anything, he told us if we wanted to know we should call Trump.”
1706-17	10/9/2025	K.V.L.	Parent	6	41	“We have not heard before about our daughter’s right to be released and stay in the U.S. without us. We thought we all couldn’t be here past 20 days, that’s what the people here say. RAICES would be the best organization to give this information out about children’s rights to release, definitely not an ICE agent.”
1706-19	9/11/2025	N.C.G.	Parent	14	14	“I learned about the <i>Flores</i> rules from a friend here. Friends say that children can’t stay for more than 21 days. But I know a little girl who is six years old who has been here for about 33 days. Another friend told me about <i>Flores</i> , and I think she learned about it from her lawyer. But no one here has explained the <i>Flores</i> rights to me for my child.”
1706-22	9/10/2025	N.T.G.	Child	16	14	“We have never received any ‘know your rights’ trainings or handouts about my rights under <i>Flores</i> .”
1706-23	9/10/2025	Q.G.	Parent	16	8-9, 11, 12	“I said I will accept leaving the country, but I wanted my son to stay and continue his case. They told me he didn’t have any rights, and they wanted us both to just accept being deported. But I wanted him to have the opportunity to stay, even if I have to go. And my son agreed, he wants to stay at least until he can finish his case. . . . As far as I can remember, we have never received a presentation of our rights. . . . I do not remember any of the staff or officers telling me that I had a right to request that my son be released from here without me . . . for the whole time I have been here.”

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1706-24	9/11/2025	A.T.L.	Parent	17	13	"No one here has told me about [my son]'s rights under <i>Flores</i> that I can remember."
1748-5	3/12/2026	M.S.P.	Parent	14, 12	26, 28-29	"Staff do not tell us things about our rights. For example, no one told us about <i>Flores</i> lawyers being here or talked to us about how our children have certain rights under <i>Flores</i> . No one who works here ever mentioned the word <i>Flores</i> , explained who [<i>Flores</i> counsel] were, or told us about any rights under <i>Flores</i> . I only heard about [<i>Flores</i> counsel] and <i>Flores</i> because my friend explained that there were <i>Flores</i> lawyers here to me after she spoke with you. . . . No one has ever said anything to me about any limit on the number of days that someone can be detained. We never received any information about my children's right to be released from Dilley without me."
1748-6	1/15/2026	M.M.S.	Parent	9	21-22	"We have still never been given a legal orientation or know your rights presentation during our three months here. I have heard they now play a video when you first arrive here, but ICE keeps telling families that <i>Flores</i> doesn't exist and is no longer in effect. ICE says <i>Flores</i> only applies in California. No one here ever informed me of my daughter's release rights under <i>Flores</i> ."
1748-7	1/15/2026	C.R.B.	Child	16	15	"Since we have been here, no one has told us about our rights. In three months, there hasn't been a know your rights presentation."
1748-8	3/11/2026	N.P.V.	Parent	14, 11, 7	12-13	"We never had an orientation about our rights here. We never saw any videos. . . . No one ever told us about the <i>Flores</i> case or any rights my children have."
1748-9	3/12/2026	E.C.M.	Child	13	14, 16	"I have only ever heard of <i>Flores</i> from my mom's friend who told us that <i>Flores</i> allows children to [be] release[d] after 20 days. . . . I have never been to a 'know your rights' training here or seen a video about my rights."
1748-10	3/11/2026	M.T.H.	Parent	6	14	"When we arrived, they told us about the dos and don'ts of being here and understanding the rules. I was not shown a video about our legal rights. I was not told about <i>Flores</i> by the staff here, but we have heard about the case from some families and that kids are not supposed to be here for over 21 days."
1748-11	3/11/2026	J.A.	Child	17	8	"No one has explained to me what my rights are here. The ICE officers have told us our lawyer isn't going to be able to do anything to help us, and we are just going to be deported. I don't remember watching a video or learning about my rights. When we first arrived there were videos on in the room we were sent to, but I didn't understand what it was talking about. I don't remember receiving any paper with a notice of my rights."
1748-12	3/11/2026	T.M.	Parent	2	13	"I don't remember them showing any videos about our rights. No one has ever talked to me about my son's rights as a child here."
1748-13	1/15/2026	C.H.H.	Parent	13	57	"No one who works here has ever mentioned <i>Flores</i> to me. They did say originally that we were only supposed to be here 21 days, but then agents said that rule changed."

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1748-14	1/14/2026	D.P.C.S.	Parent	15	17-18	“When we got to Dilley, no one ever told me anything about my rights or the rules. The only rights staff told us about was our right to sign [for] voluntary departure for \$1,000. They told us to raise our hands if we wanted to sign, but they did not do anything else to explain our rights. Instead, they sent us to our rooms if we did not agree. I have not seen any sort of videos since I got here that say anything about rights.”
1748-15	3/12/2026	S.K.	Parent	2, 1, 10 mos.	18	“We received no know-your-rights presentation upon arrival. Nobody has told us anything. We don’t remember seeing a video when we got here.”
1748-17	2/12/2026	N.C.C.	Parent	14, 13, 10	15	“We have never gotten an orientation here about our legal rights. They haven’t told us about our children’s rights under <i>Flores</i> or their right to a bond hearing.”
1748-18	2/12/2026	L.R.C.	Parent	15	25	“No one has ever given us any information about our daughter’s rights in detention. They showed us an animated video about the norms that we have to follow here, but the video never said that kids under 18 years get certain kinds of treatment or talked about rights at all.”
1748-19	1/14/2026	M.B.O.D.	Parent	17, 14	8	“They have not shown us a Know-Your-Rights video at Dilley. Instead, when we got here, ICE told us asylum does not exist and that they do not understand why we came for help when there is no help available.”
1748-20	2/11/2026	J.V.G.	Parent	4	18-20, 22	“We have never received any sort of know your rights training. The ICE officers who come every week are supposed to answer questions, but they just say we have to wait and do not give us information about our rights. No one has ever given us a know your rights paper either. I do not recognize the I-770 paper that you [<i>Flores</i> counsel] are showing me or the <i>Flores</i> Settlement Agreement Notice of Rights paper that you are showing me either. I have never seen one of those papers here. We never saw a video when we got here with any information about our rights. No one has ever told us about a video that we can watch either. . . . No one ever told us about our daughter’s right to be released from Dilley to a sponsor in the United States without us or shown us paperwork about that.”
1748-21	2/11/2026	Z.V.	Child	17	15-16, 17-19	“There was a video playing in the background about voluntary departure and deportation, but it did not let us know any of our rights in detention. I also think it might have been muted, because I do not remember any sound, but I remember seeing the information on the screen about self-deportation. I have not received any training about my rights either. I have never seen the I-770 form that you [<i>Flores</i> counsel] are showing me. . . . [W]e have never seen a video about our rights since being at Dilley. We have used the tablets to ask ICE agents questions. There is no information on the tablet about my rights that I know of. . . . No one who works at ICE has ever told me about <i>Flores</i> .”
1748-24	1/15/2026	S.S.	Parent	11, 11	69-72, 74	“We received no Know-Your-Rights training. I also remember very clearly the day we entered Dilley and no video at all was playing. All the staff and ICE officers here say <i>Flores</i> doesn’t work. It’s history now. It’s a story from back in the 1900s, it’s buried. . . . There was an ICE officer . . . and he was asked why we are being held here. The

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						questioner referenced <i>Flores</i> , and he said there is no <i>Flores</i> . To be precise, he said, 'It does not work. Forget about it. There are only the orders from Donald Trump.' This incident happened once around November 15th and again two weeks ago. It's happened twice. . . . No one has explained that our children have the right to be released without us."
1748-25	1/14/2026	A.K.	Parent	2	28, 52	"When it comes to <i>Flores</i> , they said <i>Flores</i> doesn't exist. . . . ICE officers regularly talk about the fact that <i>Flores</i> doesn't apply. They say, 'We'll keep you here as long as necessary.' They literally say this is the Trump administration's decision."
1748-26	2/12/2026	A.M.P.	Parent	9, 2	16	"We have never been given a know your rights orientation or told about our rights here. They never told us anything about <i>Flores</i> ."
1748-28	3/12/2026	J.B.A.	Parent	8	9	"Since we have been here, we have never received a training about our child's rights or learned about <i>Flores</i> . I have only gotten an orientation about what we are supposed to do and not do at this facility."
1748-31	1/14/2026	L.T.P.	Parent	14, 15	5	"We do not know whether we have any rights and we have been terrified the entire time we have been here."
1748-32	1/15/2026	M.S.M.	Parent	10, 5	32	"No one has ever mentioned <i>Flores</i> or talked to me about my children's right to be released."
1748-33	3/12/2026	N.S.R.	Parent	5	6	"When we first arrived here, they showed us a video about immigration rights, but it did not say anything about the rights of children in detention or mention <i>Flores</i> . I saw something about <i>Flores</i> on TV, but no one has talked to me about it here."
1748-34	10/10/2025	C.R.B.	Child	16	14	"Since we have been here, no one has told us about our rights. There hasn't been a know your rights presentation. The only time I heard about <i>Flores</i> was when we spoke to an attorney from RAICES a few days ago."
1748-36	2/12/2025	M.L.S.	Parent	15 mos., 2 mos.	21, 26	"No one has ever given us any information about our children's rights here. . . . The people who work here have never said the word <i>Flores</i> , and we have only heard it from other people here who have spoken about it a lot."
1748-37	2/11/2026	M.P.P.	Parent	7	15	"They haven't told me anything about <i>Flores</i> or my son's rights or anything about a right to a bond hearing."
1779-5	5/8/2026	A.O.	Parent	3	10	"No one has told me about any rights my son has here or any rights that are specific to him as a child. I don't remember being shown any video about my rights or my son's rights here."
1779-7	4/22/2026	R.G.H.	Parent	10	21-22	"When we arrived at Dilley, someone told us that the <i>Flores</i> law applied to us, but they didn't tell us what that meant. They tried to get me to sign a piece of paper that might have been about this. But it was in English and I didn't understand. No one has told me about my rights except my RAICES lawyer; she is the only one who has told me about [my child]'s <i>Flores</i> rights, that [my child] can't stay here longer than 20 days and that his <i>Flores</i> rights are being violated. I have never seen a video about our rights."

(3) KNOW YOUR RIGHTS

Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1779-8	3/11/2026	S.D.C.	Child	15	17	"I have never seen a video about my rights. I only ever found out about my rights when I looked them up in ChatGPT. But then the library took away access to ChatGPT, too, which I used to look up legal information and medical questions about how to treat my allergies."
1779-9	4/22/2026	G.S.	Child	12	14-18	"We never received a know your rights training. I have never heard of or seen an I-770 form. We remember the video playing when we first came in. There was someone talking on it, but we don't remember anything about it. Before meeting with you . . . [o]ur lawyer said we are going to do the parole request under <i>Flores</i> . We never heard it from anyone here though. We never knew we were only supposed to be here for 20 days. Some people have been here for 10 months, so that doesn't seem true. I have never received an individual release hearing."
1779-10	4/23/2026	R.R.M.	Parent	11	11	"No one told me about my or my daughter's legal rights until RAICES attorneys met with me after I had been here more than two weeks. I only heard about <i>Flores</i> from other people here after they saw me crying and told me about it and the 20 days and gave me the RAICES phone number. I never saw a video or got a form about my rights."
1779-11	5/16/2026	O.S.	Child	16	14	"We never heard the word ' <i>Flores</i> ' except from our lawyer. ICE never mentioned the <i>Flores</i> agreement to us. However, when we found out about it and asked them about it, they said our case was different."
1779-14	4/23/2026	E.C.M.	Parent	13	14	"During the orientation, I remember that they spoke to us about getting money for voluntary departure. I don't recall anyone mentioning anything about <i>Flores</i> or <i>Flores</i> rights."
1779-15	3/12/2026	W.L.	Parent	7	9	"No one has explained to us what our rights are here at Dilley or what rights our daughter has here. We were not shown any video about our daughter's rights here."
1779-16	4/23/2026	J.A.I.	Child	16 (Declarant), 12	17	"When we got here, they gave us an orientation about the rules and layout here. They didn't tell us about our rights. We learned about <i>Flores</i> from other residents."
1779-18	4/23/2026	O.B.	Parent	4	7-10	"No one has told me how long we will be at Dilley. No one has told us anything about our rights here at Dilley. We never saw a video and no one has told us about <i>Flores</i> . This is the first time I am hearing about <i>Flores</i> . No one has discussed my daughter's right to be released, and I don't want us to be separated."

Total Families Who Raised Complaints About Know Your Rights: 59

(4) APPROPRIATE AND HEALTHY FOOD

Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1575-5	6/5/2025	T.M.	Parent	Baby	21, 30	"I am not allowed to bring the stroller into the dining hall. That means that I have to hold my baby while I try to eat, which is very difficult, and means that I don't eat enough. . . . When we arrived at Dilley, the baby formula that was provided was different than what he had been used to. I have noticed that his poop has gotten darker and looser since we had to change his formula, but I don't have a choice in what formula to give him. If the Commissary sold formula, I would buy it myself, but the Commissary doesn't sell baby items."
1575-27	5/2/2025	L.Q.A.	Parent	5	11	"Most of the time I have to buy food from the commissary because my son won't eat the food. He hasn't eaten in the last four days."
1584-6	6/5/2025	L.J.H.G.	Parent	4	15	"My son is not really eating here. When he eats, it is mainly rice and beans. There is not children's food here; it is the same for everyone. It is hard to stay patient here with my son not eating well. I am a centered person, but this is really hard."
1584-8	5/1/2025	Y.F.A.	Parent	3	11	"They give the same food here to adults and kids. My son has only eaten 2 days out of the 19 days because he doesn't like the food. He will just have apples, juice or cookies. At first, they gave me formula. But after it was finished, they wouldn't give it to me anymore."
1584-9	6/5/2025	C.M.Z.	Parent	9, 6	10	"My daughter is not eating the food here. My son just eats a little bit."
1584-12	5/2/2025	S.L.	Parent	9, 8, 4, 9 mos.	18-19	"The food here is the same for all of us. I have told them the food is horrible. They need more kid-friendly food. The kids are hungry a lot because they don't really eat the food. They will just pick at things. Most days I have to get an extra slice of bread and put jam on it for my four-year-old because she will not eat the food. You can only buy them so many candies and crisps from the commissary. It's not healthy for them. For the first week, they would not give me a can of formula for the baby. I would have to ask for scoops of formula in a bottle each time. I would even have to ask for formula at 3 am. My baby has 5-6 bottles a day so this was really hard. Now they are finally giving me the formula in a can, but I have to keep it hidden by the sink because other mothers are not allowed to have cans. They told me that having a metal can is dangerous."
1656-3	7/29/2025	R.F.Z.	Child	11 (Declarant), 5	10	"I am starting to eat less of the food because it is very repetitive. It is the same, the same, the same. I also don't eat the food because sometimes it is too spicy."
1656-5	7/28/2025	C.H.	Parent	6	34	"He has no appetite because we are not familiar with the food. I do not know even what it is because there is no food like this where we are from. We eat just enough to survive."
1656-11	5/2/2025	E.R.R.	Parent	15, 11, 8	11	"My kids are not used to the food here so they aren't really eating much of it."
1656-12	7/28/2025	E.O.N.M.	Child	13 (Declarant), 9	15-16, 37-38	"The food here is the same every day, so when you smell it it's the same each time and it starts to smell really gross and make you not want to eat. My mom is diabetic and everything is with white rice, potatoes, and wheat. She doesn't have any options that are good for her with diabetes and its stressful. . . . Our stomachs hurt a lot at night. That's part of what keeps my mom up especially. My dad has a thyroid condition for which he needs to take medication. My mom thinks it is worse because of the food here."

(4) APPROPRIATE AND HEALTHY FOOD

Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1656-13	7/28/2025	I.C.B.	Child	14 (Declarant), 7	9	“My brother doesn’t eat anymore, so he needed PediaSure. My parents had to almost beg the medical staff to give him PediaSure. He doesn’t like the food served here and neither do I. Sometimes the food is too spicy or it has too many condiments. The chicken tastes like plastic. Someone I know here broke his tooth eating something here. The menu doesn’t change, so it’s something different every day but it’s repeated. If I don’t like the food that day, I usually just have bread and water and that’s it.”
1656-14	7/28/2025	F.J.A.	Parent	4	14	“My son doesn’t eat the food here. I have to buy him cereal from the commissary, because it is the only thing he’ll eat. In the evenings, sometimes he asks me for more to eat, but the only healthy snack available is apples. He won’t eat them anymore and asks for different things, and it breaks my heart I can’t give it to him.”
1656-15	7/28/2025	K.M.	Parent	6	39	“The food here is ok, but the problem is that the only fruit they give is apples. For instance, if someone wants a banana like my daughter, who loves bananas, we can’t have them. That [] gets especially hard because staff will sometimes eat near us and have things that the kids can’t have, and the children see it and ask us where they got it and why they can’t have it. It’s hard on the children.”
1706-4	9/9/2025	J.R.F.	Parent	5	19	“The food for her is too heavy. It’s spicy and heavy. She has lost weight from not eating.”
1706-6	9/11/2025	I.B.	Parent	7, 2	39-42	“My younger son does not eat the food here, he is hungry all the time. He will only accept breastmilk and it is not enough for him. He is growing. He is two and a half, and he needs to eat. I often worry that I will stop being able to produce breastmilk for him. I hardly sleep and I am anxious all the time, I don’t know what we would do. My toddler is losing weight very quickly. The doctors claim that he is a healthy weight but I know my child. He is tired all the time, he gets upset easily, I can see that he is hungry all the time. I can see that he is losing weight and I worry he is not getting vitamins or nutrients that he needs. He is becoming weaker each day. Sometimes he will eat a small amount of dry cereal that I can buy in the commissary. I try to take these to the cafeteria so that he can eat with us, but the officers prevent us from even bringing these small snacks back. I will try anything to help him eat but there is nothing I can do. We want to be free so that we can make food he is familiar with that he would be able to eat again. We are worried about his health, and about our older son who is deteriorating mentally.”
1706-7	11/18/25	N.V.S.M.	Child	14	39	“The food is so repetitive. We’ve never gotten sick from it, but another family said there were worms in the food. I have a bit of anxiety about the food now.”
1706-8	11/18/25	C.R.G.	Parent	14	8-9	“I am worried because my son is barely eating. He was a good eater before, but he does not like the food and has very little appetite. It’s just not good for kids to be locked up for this long, and he is eating less and less. Two days ago, there was big a scandal because one of the residents found worms in the broccoli. The man was trying to get signatures about the incident to try force changes here.”
1706-9	11/19/25	A.K.	Parent	1	13-15, 27	“Later, we asked for a special diet due to his stomach problems. They gave my son a special diet card only for 7 days. But the cafeteria would not give him the special diet for

(4) APPROPRIATE AND HEALTHY FOOD

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						3 more days after that, so we had to go back to the doctor and ask again for the special diet card. The special diet included fruits, but they were not fresh. They were just canned fruits. From October 10th-17th they allowed this diet for him. But otherwise, they have told us ‘no’ when we ask for it, even though other families have special diets here with fish, shrimp, and fresh fruit. We don’t get anything like that, and we don’t understand why. We get pasta with the sauce already pre-mixed in. My son needs at least plain pasta. We have to suck the sauce off of the noodles for him before he will eat it. It’s awful. It’s awful for my son, my husband, and also for me. It stresses me out so much. Food is a basic necessity. The food here is also too spicy. The kids won’t eat it – it has too many spices on it and too much salt and pepper. They need plain food. In general, he doesn’t eat. Every meal, there is forcing and screaming and making him eat. He is suffering, and it’s so terrible for us to watch him not eat. The only reason he isn’t losing a ton of weight is because he eats the cookies and juice. That’s it. . . . If I could change one thing here, it would be offering a child’s diet, turning the lights off at night, and providing at least some toys. This would help my son so much.”
1706-10	11/18/25	M.M.S.	Parent	9	10	“She is not eating enough. There isn’t enough protein here for her to eat. There isn’t yogurt; there isn’t cheese; there isn’t fresh fruits. One time my daughter fainted in the shower because she is not eating.”
1706-11	9/11/2025	M.R.P.	Parent	8	46-47	“The food here is better than where we were before, but it’s still not good. The kids don’t like the food. It has a lot of onions and strong flavors. It’s spicy too, and they need plain food. Things that would be good for them are natural juices, plain rice, fruit, soup, plain bread, and stuff without artificial flavors. She is eating more now than at the Rios place, but it’s unhealthy. It’s a response to anxiety. She is looking for anything to eat now constantly.”
1706-12	10/10/25	N.G.C.	Parent	5	13	“We don’t really eat the food that they offer here. I will buy my daughter the soup from the commissary, and she will sometimes eat the chicken and the eggs.”
1706-13	10/9/2025	L.R.L.	Parent	12, 8	30, 32-34	“The food here gives me acid reflux. . . . We have to buy in the store things like toothpaste, shampoo, deodorant, and noodles because my daughter won’t eat anything else. I don’t want her to lose weight. I have already spent \$160 since we’ve been here in the store.”
1706-16	11/21/2025	N.G.	Parent	13, 11, 4	15, 22, 24	“We were given wormy food and when someone spoke out about it and said that the children should get better food, he was taken in the middle of the night and threatened that he and his family would be separated. Officers told him that he would go to an adult detention center and his children would go to foster care. . . . Our children cannot eat spicy food, and we ask if we can buy food and they do not let us. The doctor tells us that our children are not losing weight because they are eating peanut butter. However, we know that they are not receiving any vitamins, or anything nutritious. . . . Children see the officers eating normal food and drinking Coke and eating McDonalds but aren’t given

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						adequate nutrition at all. Children get diarrhea, heartburn, stomach aches, and they give them food that literally has worms in it.”
1706-19	9/11/2025	N.C.G.	Parent	14	20	“Also, sometimes there are strange things in the food, and it seems like strange parts of an animal that shouldn’t be in the food. But many children do not eat the food here. It worries me when there are so many small children who are just not eating.”
1706-20	11/21/25	D.C.R.R.	Parent	10	6	“During the lunch hour, they serve various options, some of which are better suited for her condition [Hirschsprung’s disease]. However, when I try to get in those food lines, I am redirected to the regular line and told that the other options are sufficient for her.”
1748-5	3/12/2026	M.S.P.	Parent	14, 12	18-20	“The food here has been a really big problem. I am not sure if it is because I’m not used to it, but my 12-year-old and I spent three days vomiting and with fever after eating meat here. We could not eat for three days straight. We think the food that we ate caused it, because while I was vomiting it felt like the meat I had eaten caused it, and every time I thought of the meat here, it made me feel more nauseous. Even now, [my son] does not want to go to the cafeteria, because he worries the food will make him sick. He does not eat almost at all. My other child eats very few things, and says the rice, beans, and salad are the only thing[s] that are comfortable to eat. We often have to buy soups from the commissary because the children do not like the food in the cafeteria. We really wish we could have [specific food] here. There were so many delis with Hispanic food near where we lived, and my children were used to eating that food.”
1748-6	1/15/2026	M.M.S.	Parent	9	6-7	“My grievances about the food have to do with the fact that my daughter has been given the same food every day for months. There are few options, especially for a vegetarian. That is hard on children, especially when they have been here for months. It’s also hard because meals for Yellow are now only served from 6-7 am, 11-12 pm, and 4-5 pm. By 8 pm, the kids in Yellow are already starving. I also submitted grievances because they would not give my daughter a special diet. My daughter is a vegetarian – and they would not accept that she should be given a vegetarian meal without a religious reason. The only way we ultimately got a vegetarian diet was to get a note from our doctor in [country of origin] about my child’s allergies. Why are we putting children through something like all of this just for food? When you get here, you are already broken and they try to break you down even more by making it hard even to get food for your child. Even with a special diet, the only thing that is really ‘special’ is that she gets extra fruit and milk with the regular meal. Her only protein is from the eggs at breakfast and soy milk. My daughter has fainted twice and often feels dizzy because she is not eating well.”
1748-7	1/15/2026	C.R.B.	Child	16	12, 14	“A lot of things are even worse and more strict than when I arrived in October. For example, mealtimes are limited to one hour now when they used to be two hours. Families in Yellow are only allowed to go to the cafeteria for meals at 6-7 a.m., 11-12 p.m., and 4-5 p.m. I am never up in time for breakfast, and eating dinner at 4 pm is too early. Also, they changed the rules so that now all kids have to be with their parents most of the time – even

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						to get a snack or go to the telephones. Kids over 12 used to have more freedom. . . . The food here is always the same, and I am tired of it. I mainly just eat bread and coffee. There have been times when people have found worms in the food, and yesterday there was a dead fly in the bread. It was nasty. I definitely didn't eat bread that day. Even when there is a meal I like, they don't let you have more than a single portion. I end up being hungry by 1-2 pm and again by 6-7 pm. The snacks are also always the same – milk, apple juice, red apples and cookies or sometimes a granola bar. It is rarely a granola bar. We can buy things like Maruchan ramen and macaroni and cheese at the commissary, but it gets expensive and we can only buy food on Tuesdays.”
1748-9	3/12/2026	E.C.M.	Child	13	18-20, 22	“The food here is really bad, but whenever reporters or Congresspeople come they give us better food that they would never give us otherwise, like roast chicken, cakes, pizza, and ice cream. But that is just ICE hiding how it is the rest of the time to the outside world. Normally, they just give us the same meat with too many sauces on it every day. When they give us hamburgers, they are often raw inside. They have made me throw up before. I cannot really digest it. In the fridges here, there are cookies, and the kids eat them all the time to try to survive because the rest of the food is so bad. Even adults struggle with eating the food here. We never thought that adults would also have to only eat cookies. Other people eat just ramen to avoid the cafeteria foods that make them feel sick. My mom worries about it hurting me to eat too much ramen and cookies, but there is nothing else that does not feel gross. . . . I feel lucky that I have only suffered from vomiting and diarrhea from the food, because so many other kids have more intense issues.”
1748-11	3/11/2026	J.A.	Child	17	11	“We aren't used to the food here, so it hasn't been very good. We eat it because we are hungry and we need to eat but we don't like it. We buy our own food and water at the commissary because it tastes so much better. But that's very expensive.”
1748-12	3/11/2026	T.M.	Parent	2	14	“We don't like to eat the food here. We spend a lot of money to buy rice and spaghetti for our son at the commissary because that is the only thing he will eat. No one has offered my son any kind of baby or toddler food. I don't know if that's available for him. We also try and buy water at the commissary because the water here doesn't taste good.”
1748-13	1/15/2026	C.H.H.	Parent	13	22, 28-31	“The food is really bad here, and you can hear my stomach growling. [My son] is always sick from stomach pain and has a lot of diarrhea. He doesn't want to go to medical for it because we have to wait hours to be seen. So, one time I bought him Pepto- Bismol from [the] commissary to avoid medical visitation lines. . . . They gave me a special diet for 15 days that allowed me to eat less fatty foods, but then took it away. The regular food gives me stomach pain still, but the nurse said she could not allow me to go on the diet again. Now, my son only eats rice and beans. The food is too sweet and sometimes looks like dog food. Even the officers say that it looks really bad. There was one day that there were worms and mold in the broccoli. Sometimes there is also hair in the food. Our lunch is at 11 am and dinner is at 4 pm, so [my son] gets hungry later in the evening, and often we

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						have to go to [the] commissary to buy ramen or popcorn. We used to go every day, but now they have limited us to only going one day a week.”
1748-14	1/14/2026	D.P.C.S.	Parent	15	19, 27-28, 31, 37	“Recently, they changed our eating times, so some people can only eat lunch at 11 am or 12 pm, whereas before we could eat lunch during that whole block, and that is so hard for the children. . . . We have also had issues with the food. It is so hard to eat here, because they always put so many sauces on the chicken and other foods, often give us breaded fried chicken, and do not make accommodations for medical issues. I have a gallbladder disease, where I am not supposed to eat things that are so fatty, or else I get extremely intense stomach pain. But it is so hard to take everything off the chicken, so I can’t eat it. I understand that it would be so difficult to meet everyone’s food preferences, but the sauces here are so strong and gross that they hurt us. Some of the sauces truly look like vomit, and their smell makes the kids gag. Still, once a week, they give us plain roast chicken, and it makes everyone so happy. That is the only day the kids all eat, and often they want seconds. I wish they could give us simple food like that that everyone likes and is healthy every day. . . . Since we got here, my daughter has been breaking out in hives from the food here. . . . People also buy ramen at the commissary a lot. I think that’s the thing they sell the most, because so many people eat that when they are grossed out by the cafeteria.”
1748-15	3/12/2026	S.K.	Parent	2, 1, 10 mos.	24-25, 34-38	“[My daughter] looks thinner, is more tired, and is always lying down. We imagine this is because she can barely eat anything due to pain. She’s been on a liquid diet for more than 20 days. Every day she just eats these protein yogurts. Depending on the day, she receives two or three yogurts. She always gets one in the afternoon, and then one or two for dinner. But that is it, and she gets nothing for breakfast. She needs more vitamins. . . . Regarding the food here, it’s horrible. My two-year-old and one-year-old cannot even eat the food here, let alone my baby. All my kids here hate the food. It’s too salty. It’s inedible. The last three or four days they’ve improved the food. It’s because there have been people from Congress here and now <i>Flores</i> counsel is here. It would be great to have French fries, soup, puree, and pasta for the kids. We would also love to have bananas for the kids. They like bananas, and they’re soft. I have never seen Gerber baby food or pouches for the kids here. I want to give my one-year-old and two-year-old milk, but the staff make it very difficult. They don’t provide formula for anyone above one. There is milk though in the dining hall where we eat, which I try to give to my girls. But the staff . . . tell me to throw it away and po[u]r it in the sink – that the girls can’t have it. They told me they are going to write a report if I keep trying to get milk.”
1748-17	2/12/2026	N.C.C.	Parent	14, 13, 10	10	“The food here is very bad. Back in December, the salad had worms and we were told that it’s just normal. We know that some kids here have been vomiting up black from the food.”

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1748-18	2/12/2026	L.R.C.	Parent	15	21-24	“There are a lot of children and adults who have ongoing stomach sickness and are constantly vomiting and experiencing diarrhea. That health concern has affected everyone, but the staff has never taken any serious steps to respond. It seems like the food is what is making everyone sick. At times, the cafeteria has served undercooked chicken. They also sometimes serve food that they say is ground beef, but it tastes terrible. They also serve us rice that has grit and little rocks in it, and many people have hurt their teeth while chewing the rice. One time, they gave lettuce with worms to a family, and that made everyone scared to eat lettuce even though it was one of the few vegetables. On top of that, they let the beans sit out all day for weeks on end. Recently, they served fried shrimp, and all the kids started throwing up after eating them. Kids were vomiting on to the tables. So much of the food is dirty, left out too long, or undercooked that it is no wonder it makes kids sick. We keep asking the staff why babies have no option for soft food here. They only give babies adult food, and they do not give them fruit. Consequently, all the babies are getting thin because they can only really eat pieces of bread. The food makes the kids so sick that many families buy ramen from the commissary, even though they know it is unhealthy, because they know it will not make them sick. Now, we just eat bread, oatmeal, and coffee to stay safe. The staff also do not vary the menu, so the children get tired of eating the same thing because they do not have enough options.”
1748-19	1/14/2026	M.B.O.D.	Parent	17, 14	13-15	“The food here is terrible. We ask for food that is less spicy and with fewer condiments on it, but the staff say we cannot get a different diet because we don’t have a religious reason. Because they will not provide plain food, my youngest daughter only eats bread and coffee with milk. She has experienced persistent gastritis. In December, there were worms in the broccoli and chicken. A woman showed worms in the chicken to an official and made a grievance. The only items we can have for snacks are apple juice, apples, cookies, and milk. If the dorm runs out of snacks in the morning, which often happens, we have to wait until the night to get more snacks.”
1748-21	2/11/2026	Z.V.	Child	17	39	“The food here is usually fried chicken and fried fish. It is not good for us. At home we try to eat healthy food that we cook. We usually cook soups and salads, but here there is only a lettuce salad and 99% of the other food is high fat and fried. We eat it because we have no other option. We sometimes buy snacks from the commissary, but that is also junk food, so we try not to eat too much of it.”
1748-22	1/14/2026	A.P.	Parent	14, 9	38-40, 45-48	“I asked for dietary nutrition because my youngest daughter has allergy-related issues. After eating certain foods, her skin itches so badly that she scratches it until it bleeds. This happens after eating spicy or fried foods. We used to see a dermatologist and allergy specialist regarding this issue. The doctors recommended that she adjust her diet to avoid fatty, salty, sweet, and spicy foods. Not eating those is best for her. Also, when she eats these kinds of foods sometimes her face starts to turn red around her mouth and she scratches it until there are blisters there. Unfortunately, the food here is very fatty and

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						spicy all the time, causing [my daughter] to constantly be scratching her skin, leaving red marks. . . . There's no proper nutrition here. Almost all the food is spicy or fried in oil, like burgers and hot dogs. The only fresh vegetables are a mix of cabbage and lettuce, which aren't always fresh. Sometimes they're served moldy. If we show the staff the visible mold, they just take it out. Sometimes, people would bring the moldy cabbage to the staff, and they'd take it and eat it and say this is normal food. They'd just destroy the evidence so it wasn't brought anywhere else. In November, there was an incident where boiled vegetables were served with live worms. We received no specific explanations regarding the worms. Some families got sick from it though. One family was vomiting, and they were told if their daughter vomits more than 8 times, then they can go to medical. If she vomits less than that, then don't. There's also a lot of sugary food here, and the only drinks are two lemonades and coffee, but no tea. Tea is sold at the store for \$4.60 for 18 tea bags. My children aren't getting proper nutrition, and because of this, they're gaining weight, as they mostly eat bread and jam or cookies and milk."
1748-24	1/15/2026	S.S.	Parent	11, 11	31, 34, 37, 48-49	"In addition to his autism, [my son] has severe dietary restrictions. We also have medical documentation of this. He has an intolerance and cannot eat anything with gluten, sugar, or lactose. Obviously, this is very limiting. Eating sugar makes him anxious, nervous, and hyperactive. Dairy and gluten cause really bad intestinal problems for his stomach. . . . [A] lot of the regular food served here he cannot eat. It's really just the chicken breast he's eaten for the past 70ish days, sometimes rice and beans. He has been losing weight. . . . The medical staff seem to think the little chicken breast he eats every day is enough, but it's not. We are talking about making sure he has actual nutrients that don't contain gluten, lactose, or sugar. A chicken breast isn't providing him with all the nutrients he needs. The U.S. has so many available products that are gluten-free, lactose-free and such so we don't know why there isn't a menu for folks like [my son] who need a special diet. . . . Recently, a lot of the rules here have changed. For some reason now, the dining room is only open to a small number of people. Most of the families, including our family, have to eat in the gym. This is not a place intended to give out food. Our eating time has also been reduced. We're only given 1 hour for meals now."
1748-25	1/14/2026	A.K.	Parent	2	16-17, 19, 21-23, 36, 40-43	"Another rule changed and we are now getting our meals in the gym. We don't know why. They are not telling us anything. This has been going on for four days now. They've also decreased the mealtimes. Lunch used to be 11 a.m. to 1 p.m., but now it's just 1 hour. And, we have to stand in line 30 to 40 minutes out of that time just to get the food. . . . When we go the gym, we see 200 women leaving from their meal. Then, we get in and sit down right away after waiting in the line to eat. We eat there, and it's not clean at all. . . . The staff didn't even clean up after my roommate's child threw up in the gym while everyone was eating around it. . . . On November 19th, the last day we talked to Flores attorneys, we went to the kitchen for dinner. They served rice with meat, large chunks of

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						onions and peppers, and a spicy Mexican roll with cheese and salsa. Our [two-year-old] child refused to eat it again, and my husband, in tears, went to ask for other food for him. We saw that the halal menu included fish, oranges, and normal meatballs. We stood there asking for it for a long time and started arguing with the kitchen staff again. We had become so frustrated with the lack of proper baby food and were desperate for our son to eat. There was no translation nor interpretation provided to us during this conversation, and we don't speak English. . . . The facility also stopped giving us formula a while ago. We had to wean him off the remaining formula through tears. It was awful. . . . The lack of baby food is still a really big issue for [my son]. There is almost nothing here he eats and now he doesn't even have the formula. . . . No one ever told me there was Gerber baby food that was available here. One time, I noticed in the playroom that there was a box of that food. I asked the staff if they have this. They said yes, and that was after we had already been detained for 2 to 2.5 months. I was so infuriated. But they said they only had vegetable and meat flavors, and [my son] only likes the fruit Gerber food. They don't have that, so he doesn't eat it. Thus, [my son]'s eating is still the same. He almost doesn't eat anything at all. He might pick at something, but usually it's nothing. He's really fed up with everything they serve."
1748-26	2/12/2026	A.M.P.	Parent	9, 2	10	"My children won't eat the food because it has too many condiments and sauces; it hurts their stomachs. Even for us it is too harsh on our stomachs. My girls are used to having soups and more simple foods."
1748-27	1/14/2026	N.M.	Parent	3	21	"The medical care and the food here is unacceptable for our daughter."
1748-28	3/12/2026	J.B.A.	Parent	8	13	"Our son will sometimes eat the food but sometimes he will not. For him, the food is too spicy, and he rarely eats the meat because of the flavor or texture."
1748-29	1/15/2026	D.R.R.	Parent	10	6	"The food is the opposite diet of what she needs. She is forced to eat food that is processed, sugary, and with lots of condiments. They will not give her a special diet, and instead just tell her she should just take laxatives every day [for Hirschsprung's disease]. But this actually conflicts with the medical forms I have from December where it said that she should not use laxatives so frequently."
1748-30	8/12/2025	O.S.	Child	15	5-9	"When we first came to Dilley, we asked for halal food, we are Muslim and we can only eat halal food. They sent my mom to the chaplain to ask for the diet. He said they have no halal diet, but they have kosher. But he told us not to ask for the kosher diet, that the kosher food is a tin can of meat, it is basically dog food. He said that if we want to get these cans we are not allowed any sides, no salad and no rice. The salad and rice are halal, only the meat needs to be prepared separately, but they said that if we get the cans we cannot have the salad. We had to beg for two weeks before they even let us eat the salad and rice, and then they said we could live on just salad if we could not eat the tin cans of kosher meat. We are here for 56 days, my siblings are four years old, and they want us to live on only salad. One night, after a month, we begged at least to have chicken instead of

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						the canned meat. Chicken is not as bad as beef in our religion, but they often made beef, like hot dogs. They gave us finally a chicken breast, boiled, no seasoning, not even salt, my little siblings were so hungry but they couldn't eat it. Before dinner they were holding their stomachs they were so hungry, they had been eating very little, salads and sides, but then they couldn't eat this chicken. We tried everything but when they tried to eat it they were only able to take a few bites."
1748-32	1/15/2026	M.S.M.	Parent	10, 5	13	"The food here is so bad. My kids do not eat almost anything. I am trying to get them to eat, but they are not able to."
1748-33	3/12/2026	N.S.R.	Parent	5	9	"Ever since the day we were arrested at the ICE check-in, my son hasn't really been eating. He doesn't like the food here and he just won't eat it. The food has too many condiments and sauces for him, and it is not fresh. He will sometimes eat cereal. Because of his constipation, he gets a special diet, which just means he gets some fruit. But he is refusing to eat most of it. Most kids here do not get fresh fruit other than red apples."
1748-35	11/18/2025	K.P.L.R.	Parent	6	10-12	"There was a worm in the broccoli the other day. After that, I have not eaten any vegetables here. I am too afraid. The lettuce is bad too, it's in a bad state. There was a family from [country] that is organizing a complaint against the facility, because their kids got sick from it. They had to go to medical. The staff said the worms are normal here."
1748-36	2/12/2025	M.L.S.	Parent	15 mos., 2 mos.	13	"They provide me with diapers and milk when I ask, but I have to ask each day. They only give me four diapers at a time, so I have to keep going back to ask. The staff have not given us any baby food for our 15-month-old. She just has to eat the regular food in the cafeteria, so she barely eats anything."
1748-37	2/11/2026	M.P.P.	Parent	7	11	"I'm scared because my son is not really eating. He's just eating rice. It's rough because I can take whatever life gives me, but my son should not be here. He should be at school with his friends and eating the foods he likes."
1779-5	5/8/2026	A.O.	Parent	3	15, 16	"My son has not been eating well. Lots of people are getting sick, and I am always very worried my son will also get very sick. I went to the doctor many times because I was worried about my son not eating. The doctors weren't able to do anything. The last few weeks my son has been eating milk, juice, and apples. He doesn't eat much else. No one has offered me any toddler food or pouches for my son. . . . They have given us diapers and wipes for my son, but they haven't offered us any food that is more appropriate for a little kid."
1779-6	4/22/2026	M.T.H.	Parent	6	10, 19	"My son still does not eat well here. The food is too spicy and has too many condiments and sauces for him. Also, dinner is served at 5 p m., so by 8 p.m. he is hungry. We have to buy food for him to eat at the commissary. . . . About two weeks ago, my son had diarrhea and vomiting but it went a way pretty quickly. I think it was the food since he was sick for just one day. If it was a virus, it would have probably lasted longer."

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1779-7	4/22/2026	R.G.H.	Parent	10	19, 25	“The third biggest concern is the food. It’s all processed, frozen food. The only things they make here are the French fries. . . . Sometimes the food doesn’t sit well with my son; I have to buy him ramen.”
1779-9	4/22/2026	G.S.	Child	12	30-32, 40-42, 57	“Now, they are giving her [my mom] a special diet. She only got a special diet for the first time last week. My dad has been asking all the time for her to get this. My mom, sister, and I also need a vegetarian diet on Tuesdays and Thursdays for religious purposes, and the staff just say to eat off the salad bar. We are [religion], except my dad. . . . The food is really bad here. They reuse the food. For example, today if there are hotdogs, in two days there will be mini corndogs. It’s gross. If I could change the food here, I would want fresh food every day, and you could go eat any time you want. Right now, there are certain times to eat, and if you don’t go then you’ll starve. I miss [] foods, they don’t have any [country of origin] food here. My mom and aunt used to cook it for us. . . . My sister has a lot of stomach pain. We think it’s from the food, but we aren’t sure what it is. They are just giving her Ibuprofen and Tylenol.”
1779-10	4/23/2026	R.R.M.	Parent	11	8	“My daughter does not eat the food because she doesn’t like it; she only eats the salad. I only eat the salad because the other food makes me sick.”
1779-11	5/16/2026	O.S.	Child	16	21-25, 36	“The food at Dilley is one of the biggest issues for all the residents. Many times, people would stop eating for several days after finding mold or even worms in their food. I saw a real worm in the food before. My older sister once found a human fingernail in her food. The food was very greasy and very repetitive. I was eating the same things for the last 10 months. My younger sibling would sometimes skip all the meals in the day and eat nothing but the noodles that we would buy from the commissary. Even the commissary didn’t provide any healthy or good options. Everyone just ate noodles almost every day. Children had to watch as the officers and staff ate pizza, donuts, and outside food that the kids cried when they saw, but they didn’t care and ate in front of them cruelly. They would eat candy and lollipops in the middle of the recreation area, knowing that all the kids would do anything to get what they have but can’t. We were there for almost a year and were never asked about any food. Why wouldn’t you ask the family that’s been there the longest? The back of the cafeteria had a board that said they asked the residents what was our favorite food, and the answer would be something we had never been served before. Apparently, someone wrote ‘Thank you everything is great’ to a question asking ‘How can we better serve you?’ I have no clue who they were interviewing. . . . Babies, age three and under, don’t get any special or different food. I’ve heard it’s hard to get formula for them. Babies have a lot of needs, and if moms had more than one kid it was very difficult for them at Dilley.”
1779-12	3/11/2026	A.L.G.	Parent	4	10	“My daughter has lost her appetite over the months we have spent here. We are always trying to motivate her to eat, but each meal is harder than the last. It has gotten worse over time. At first, she would eat some food, but as the days go on, there are more and more

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						things she will not eat. Mealtime has become a struggle because she cries a lot and does not want to eat.”
1779-14	4/23/2026	E.C.M.	Parent	13	17, 19	“My son has gotten so bored with the food and he will only eat [a] limited number of things. The mealtimes are also challenging because breakfast and dinner are served so early. I need to buy snacks at the commissary because he is hungry in the evenings. We can only go to the commissary once a week so I have to plan ahead with buying food and water. The only fruit they give us is from cans. When my son sees some people with special diets getting fresh grapes, he really craves them. I told him that once we get out of here, he can have all the grapes he wants. . . . At the community meeting about a week ago, a different mother raised how hard it was for children not to get fresh fruit when they are seeing other people eat it who have special diets.”
1779-15	3/12/2026	W.L.	Parent	7	12-13	“Our daughter really doesn’t like the food here. It doesn’t taste good. The green beans here are especially gross and they have caused my daughter to throw up and have diarrhea. The cauliflower once had bugs in it and now everyone here is afraid to eat that and won’t accept it. The food is unhygienic here. Especially when we first arrived our stomachs hurt all the time after eating. Our daughter really only eats toast while here and she hasn’t been growing or gaining weight. We buy a lot of ramen at the commissary so that there is enough food our daughter will eat. There is an area near where we sleep where we can get snacks during the day and they often have apples but they are sometimes bruised and I’ve seen worms in them. Two different times, I’ve seen milk in the snack area that is spoiled.”
1779-16	4/23/2026	J.A.I.	Child	16 (Declarant), 12	9-10	“It is hard to be here – especially the food. I don’t go to breakfast because it is too early and it’s just the same thing every day. It’s also hard because they serve dinner very early. We have to buy food at the commissary because we’re hungry by 8 p m. My mom especially has a rough time because she’s not getting the medicine she needs for her food allergies and that causes a rash. We are tired of not having fresh fruit here. All we get is a couple kinds of canned fruit. It is frustrating because I know they have fresh fruit, but you can only get it if you have a special diet. There was a meeting recently with the guards, and we all asked for fresh fruit, but the guards said it was just for people with special diets. I don’t understand that.”
1779-18	4/23/2026	O.B.	Parent	4	15	“The food here and the food we normally eat are very different. We eat only chicken, French fries, and rice here. We cannot eat anything else, although we have tried. There are also apples, cookies, and milk that we can eat. Sometimes there are grapes or oranges, but not every day.”

Total Families Who Raised Complaints About Appropriate and Healthy Food: 62

(5) SAFE DRINKING WATER

Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1575-6	5/2/2025	K.V.L.	Parent	5	19	"Here at Dilley, we cannot drink the tap water. The tap water smells so horrible and it looks white and dirty. But you have to buy bottled water if you don't want to drink the tap water. [My son] hasn't drunk any water. He's only drinking things like juice at mealtimes. This interview, when I was given a free water, was the first time I've had water here and I've been here for six days."
1575-27	5/2/2025	L.Q.A.	Parent	5	11	"We also have to pay for bottled water. It costs about \$1.50 per bottle. The tap water does not smell good, and I don't trust it to drink. I don't even trust the ice."
1584-6	6/5/2025	L.J.H.G.	Parent	4	23	"We have been told that the water in the cafeteria is filtered and is okay, but the staff told us that the water in the living areas is not good. We are told we can fill up pitchers with water from the cafeteria and bring them to our living area if we want water."
1584-12	5/2/2025	S.L.	Parent	9, 8, 4, 9 mos.	20	"I have asked repeatedly for boiled or bottled water for my daughter's powdered baby formula, but they will not give it to me. They told me using tap water was fine, but now my baby is having horrible diarrhea. It has been going on for three days and it is so bad it leaks out of her clothes. I do not think I should have to buy water for my baby to have with formula, and some days the commissary is not even open. When I ask for bottled water for the baby, they tell me that other babies use tap water and we should be fine with that. But some babies' stomachs can't handle tap water and now it's making my baby girl sick."
1656-4	7/28/2025	C.G.V.	Parent	6	20	"We usually only drink water when we buy bottled water. I've heard that the water is safe to drink, but it smells bad and I'm worried my daughter could get sick from it. I don't think the water in the big containers is filtered because it smells the same as the water from the sink in the room."
1656-5	7/28/2025	C.H.	Parent	6	35-37	"There is no bottled water. There is a filter in one place. Only water with the filter is drinkable. Other water you cannot drink. The water with a filter is in the trailer where our room is but not in our room. They give us only very small paper cones to drink from. We cannot put them by our bed or take them outside."
1656-8	9/9/2025	A.D.C.	Parent	16, 9	19	"We are not allowed to have water bottles here. We can use the cups in the dining area or in the living area. One of the officers told me that it was not safe to drink the water in the living areas and we should use the water in the dining area."
1656-10	6/5/2025	E.M.	Parent	8, 10	27-28	"In the kitchen in the living areas there is a water filter on the tap and that is where we can get drinking water. But we do not have anything to put drinking water in if we want to have water outside or in the gym or even at night next to the children when they sleep. The cups they gave us do not have any tops, and also they are all the same color, so it is hard to know if someone else drank from it or if it is your water or someone else's. We tried to buy soda bottles at the store and then when they were empty use them for water. But some of the guards told us that was not allowed and made us throw them away. It's very hard to have to go to the kitchen in our living area every time we need water, because the living areas are quite a walk from the other common areas. The water they have in the

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						gym or medical area smells bad and also sometimes flows over the people's hands who are giving us the water when they press [the] button to dispense the water. We just don't trust that the water is cleanly dispensed and sometimes the water really smells bad. Maybe that is why so many people here are sick."
1656-11	5/2/2025	E.R.R.	Parent	15, 11, 8	11	"The water has a bad taste so we don't drink it. I only take a sip when I have my medication, but otherwise I don't. My kids just drink lemonade when we have the meals. We haven't had water since we got here."
1656-12	7/28/2025	E.O.N.M.	Child	13 (Declarant), 9	32-33	"We have all been feeling stomach aches, especially when we drink the water. A lot of people do not like to drink the water here because it is not good. We are only allowed to drink from the filtered water, and the staff tell us that we cannot drink the water from the sinks because it is bad. But even when we drink the filtered water we all get stomach aches. They sell water, too, but it is so expensive and we cannot afford it. We have never bought it because it is like \$1.25 for a bottle. There is a pitcher for 12 people in the room, and it is not enough, so we have to fill it up all the time. Also, when people have a water bottle and try to refill it, the staff take it away and say they cannot. My dad once went into an empty room that has a pitcher and tried to bring it back so we would have more to fill up because his thyroid condition was acting up and he felt sick. But the officials took it back, so we are only allowed one pitcher."
1656-13	7/28/2025	I.C.B.	Child	14 (Declarant), 7	10	"The tap water in the room tastes bad. I think a bottled water costs \$1.25. We usually just drink the water in the cafeteria. But you can only go in the cafeteria during certain times, like 7-8am, 12-1pm, and 5-6pm, so you can't get water from there outside of those times. And they don't let you bring in your water bottle to the cafeteria to fill it up with water to take with you."
1656-15	7/28/2025	K.M.	Parent	6	34	"We also have to buy water at commissary, because even though they say the water is filtered, it smells bad. One bottle of water costs about \$ 1.21."
1656-17	7/29/2025	M.O.	Parent	2	28	"The water here has a strong smell of bleach. I do not give it to the baby and she cannot drink it, so I buy a bottle of water to give to the baby. It costs \$1.21. Once she drinks the bottled water, I have to throw the bottle away. I try to drink the regular water myself because I do not have enough money to buy my own water. The staff tell us the kitchen water is filtered, so I drink from there and not the bedroom, but it tastes heavy. The staff here will not drink the water, but we do not have any other choice."
1706-4	9/9/2025	J.R.F.	Parent	5	24	"You can't drink the water here. The smell is bad, and it hurts our stomachs a lot. We have to buy it at the commissary if we have money. In the dining area, there is milk and juice, but there isn't water. The guards say, 'This is all that there is. If you don't like it, buy it at the store.'"
1706-7	11/18/2025	N.V.S.M.	Child	14	38	"The water tastes like chlorine here. They recently put filters in. The filters are just in the rooms. The water in the park, gym, and medical is not filtered. In the rooms, you can tell a difference though now."

(5) SAFE DRINKING WATER

Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1706-8	11/18/2025	C.R.G.	Parent	14	11	“We don’t drink the water here. The water in the room tasted dirty- so we now just drink the juice or buy Gatorade. They put filters on the sink about 15 days ago, but it still has the same bad taste.”
1706-9	11/19/2025	A.K.	Parent	1	12	“When we first arrived here, we were told we could drink the water. My son started drinking the water, and within a few days he got diarrhea. We went to the doctor on October 6th, and they said it would go away on its own. They said he could eat bananas and yogurt to get better, but we don’t have that here. We just have apples. We asked for a stool test, and they said it would take a week for the results. They told us the result of the stool test was very bad and that he had an infection. I think that because so many children got sick at the same time – there was probably a problem with the water. I also saw some mold in the water when I poured it for myself once.”
1706-10	11/18/2025	M.M.S.	Parent	9	24	“The water here tastes like Clorox. The sign above the sink says it is okay to drink the water and they have recently put filters on the faucets, but the water still does not taste right.”
1706-11	9/11/2025	M.R.P.	Parent	8	39	“They say the water is drinkable, but it’s not. We are all without drinking water. It has a fake smell, like perfume or lotion. Maybe it’s chlorine, I don’t know. If you drink it, your stomach hurts so badly. More than anything, I worry for the kids. If you don’t have money, you can’t buy bottled water from the store. Then, you just don’t drink water. There is drinking water in the kitchen where we have meals but that’s it. And you can’t bring the drinkable water out of that area with you.”
1706-18	10/9/2025	V.L.G.	Parent	15, 9	14	“I also buy bottled water at the commissary because the water in the sink tastes really bad.”
1706-22	9/10/2025	N.T.G.	Child	16	10	“I wish that we could have more water here. All that they have for drinking during the day is apple juice and milk. They tell us that the water from the tap isn’t good. Sometimes I drink the water from the sink but it makes my throat hurt and it makes me cough a lot.”
1748-5	3/12/2026	M.S.P.	Parent	14, 12	31	“The tap water here tastes like soap, even with the filter on. So, usually we try to get ice and let it melt so we have something to drink.”
1748-8	3/11/2026	N.P.V.	Parent	14, 11, 7	17	“The water here tastes like chlorine, so we just stick to the juices. We have used the water filter, but the water still has a bad taste. We tend not to buy anything from the commissary because we don’t have money.”
1748-9	3/12/2026	E.C.M.	Child	13	21	“They do not even give us clean water here. The only way to get clean water is to buy water bottles, and it costs \$30 to buy 24 bottles.”
1748-11	3/11/2026	J.A.	Child	17	11	“We buy our own food and water at the commissary because it tastes so much better. But that’s very expensive. The water here, even with the filters, still gives me and my sister stomach aches.”
1748-13	1/15/2026	C.H.H.	Parent	13	21	“At first, there were no filters on the water, and we just had to drink it. But now that they have put the filters in it helps. However, since they have not changed the filters, it is starting to taste bad again. That is so upsetting. And I cannot afford to buy the water

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						bottles. They are little and cost over \$1. Who can afford that for months on end to stay hydrated?"
1748-15	3/12/2026	S.K.	Parent	2, 1, 10 mos.	31-33	"Also, the water is not good for us here. . . . They give only the bottled water to the baby, so my other two girls don't get it. The poor quality of the water causes my older girls diarrhea. Today, all of a sudden, I asked for water and they gave me six bottles of water and I was shocked. That has never happened before. It's because [Flores counsel] are here. Initially, we were getting 3 bottles of water for the baby per day. Then, the supervisor said three bottles of water is way too much, so from then on, I have received one bottle of water in the morning and one in the evening."
1748-18	2/12/2026	L.R.C.	Parent	15	37-38	"Usually, staff do not let everyone have water bottles and the commissary charges \$32 for 24 bottles of water. But on the day that the congresspeople came, the staff gave the people who went to speak with her bottles of water so that they would seem like they had been treated well. So many people are spending all of their money on water and paying for minutes to make calls to their family."
1748-19	1/14/2026	M.B.O.D.	Parent	17, 14	16	"There are many areas where the water does not have a filter and looks dirty, including the lawyer visitation area, where the kids play, and in the medical area. I have seen sand come out of the tap in the water and I have gotten sick from the water."
1748-20	2/11/2026	J.V.G.	Parent	4	47	"Even though there were filters in some rooms, my daughter and wife stay in a room where the filter is broken, and the water comes out cloudy and tastes bad. Last time I had tap water, I got diarrhea and started vomiting and went to the medical area and they did not give me anything all night. After hours[, they] gave me acetaminophen. I could not eat anything, and then I went back to my room and kept vomiting and having diarrhea. We bought medicine at the commissary and I just kept taking it all week. I was sick for a whole week. Since then, we have had to buy water here to stay safe. You can buy 24 bottles for \$30."
1748-22	1/14/2026	A.P.	Parent	14, 9	49	"There's no proper clean water, even though there are filters in the rooms and kitchen. The water smells foul, and there's a white residue on the sink. All Dilley employees drink the bottled water they're given, but we have to buy it from the store; a half-liter bottle costs \$1.20."
1748-25	1/14/2026	A.K.	Parent	2	35	"They stopped giving our son bottled water. Even with filters, the tap water here still causes diarrhea."
1748-26	2/12/2026	A.M.P.	Parent	9, 2	10	"We are having to drink the water from the faucet because we can't afford to buy the bottled water from the commissary. Both of my daughters have gotten diarrhea from it."
1748-28	3/12/2026	J.B.A.	Parent	8	14	"We drink the water from the faucet, but we think the water has given our son diarrhea. The bottled water is \$30 for 24 bottles and we cannot afford that."
1748-31	1/14/2026	L.T.P.	Parent	15, 14	12	"My youngest son has broken out in hives over his whole body for three weeks, but the medical workers said it was just because of the water and that they cannot do anything."

(5) SAFE DRINKING WATER

Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1748-33	3/12/2026	N.S.R.	Parent	5	10	"I am drinking the water here because bottled water is so expensive at the commissary and we want to save all of our money to buy bottled water for our son. The water does not taste right to me, and because my son has serious problems with his stomach, we do not want him to drink it."
1748-35	11/18/2025	K.P.L.R.	Parent	6	7	"They did put Brita filters in the faucets in the bedrooms, but that just show[s] they didn't have them before. This is a recent thing. The ice still tastes better to me, but they did put the filter in."
1748-36	2/12/2025	M.L.S.	Parent	15 mos., 2 mos.	14	"Our 2-month-old is taking formula here with the water from the sink, and it is giving him diarrhea all the time. When we got here, they gave us three bottles of water for formula, but after that they said we had to use the sink water for formula. The guards said we would have to buy water bottles from the commissary if we need it."
1779-5	5/8/2026	A.O.	Parent	3	15	"I don't think the water is good here either. My son has had diarrhea here, and I think it's because of the water. I could buy water, but I don't have money to do that very often."
1779-6	4/22/2026	M.T.H.	Parent	6	10-11	"We also have to buy water. They recently brought down the cost of a pack of water from \$30 to \$9. About a month or so ago, a lot of the children became sick and were vomiting a lot. They told the parents the children needed to be drinking more water. The families complained and complained because they could not afford the water. The guards told us they were dropping the price of the water because of this but I don't know if that is true."
1779-7	4/22/2026	R.G.H.	Parent	10	16, 25	"About a month and a half ago, [my son] got a fungal infection on his face and his feet. He uses a cream every morning and night - sometimes it works and sometimes it doesn't work, but because of the water it comes back again. . . . Sometimes I have to buy water at the store because the water here is not good."
1779-9	4/22/2026	G.S.	Child	12	43	"They put filters on the water, but it still smells like chloride. It's very heavy. One time it caused us to throw up, but now we just drink bottled water. First it was 30 dollars per case, but now it's 10 dollars. A lot of people complained when Congress came, so they had to lower the price."
1779-10	4/23/2026	R.R.M.	Parent	11	9	"My daughter and I can't drink the water here because it makes us sick; our friends give us bottled water and we split a bottle between us."
1779-14	4/23/2026	E.C.M.	Parent	13	18-19	"Since the beginning, I have always bought bottled water for my son. I used to let the ice melt that they give us and drink that water. The tap water always tasted weird and made me feel a weird sensation when I would drink it, but I couldn't afford to buy it for both of us because it used to cost \$30 for a 24-pack. Then one day, I saw a bunch of white particles in the bottom of the cup of water from the melted ice - and I did not feel comfortable drinking the tap [water] anymore. They recently reduced the price of water to \$9 and now I have the 'luxury' of drinking clean water, too. At a community meeting about a month ago, a mother stated that it was very unkind not to give children water. The following week, they had lowered the price of the water. I do not know if it was connected."

(5) SAFE DRINKING WATER

Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1779-16	4/23/2026	J.A.I.	Child	16 (Declarant), 12	11	“When I first came to Dilley, I drank the water and it made my stomach hurt right away. I didn’t want to drink it after that. I would either melt the ice or drink bottled water. We now mainly drink the bottled water because they recently dropped the price.”
1779-18	4/23/2026	O.B.	Parent	4	16	“My daughter and I drink only bottled water, but I don’t have any money so one of the women who lives here gives it to me.”

Total Families Who Raised Complaints About Safe Drinking Water: 46

(6) STAFF TREATMENT

Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1575-5	6/5/2025	T.M.	Parent	Baby	18, 20, 21, 32, 38	“[Dilley] is a prison. There are a lot of rules here, and I am trying my best to follow the rules. It is very hard because the rules change all the time, and staff scream and yell at me if I ‘break’ a rule – even when I don’t know that such a rule existed. If I don’t know what the rules are, how am I supposed to follow them? If staff change a rule and don’t tell us, why are they screaming at me for not following it? It is so exhausting to try your best to follow what you think are the rules, only to be screamed at and made to feel stupid for making mistakes that you didn’t even know were mistakes. . . . One time we tried to sit at a table under the shade tarp, and a staff member blew a whistle at us and told us to move. . . . At first, the staff told me that I should ask a staff member to hold my baby while I eat, but when I ask, the staff tell me that they are too busy. This morning when I went to the dining hall for breakfast, the staff member at the entrance said that I had to leave my baby’s bottle of formula with her at the dining hall door because it was an open bottle of liquid, and people aren’t allowed to bring in open liquids to the dining hall. I didn’t understand that rule, because my baby is only three months old and he needs his formula. . . . The staff change the rules a lot. . . . It is especially hard for people that don’t speak English to understand what the rules are and what staff are telling them to do. . . . I wish that I could buy my own diapers, diaper cream, and baby wipes at the Commissary so that I didn’t have to beg for these items from staff or be stressed about having them when my baby needs them, but the Commissary doesn’t sell baby items.”
1584-6	6/5/2025	L.J.H.G.	Parent	4	12-13, 22	“Nobody will answer your questions here. I feel like we are just being sequestered without any information. The staff here call us inmates because it is like a prison. . . . Children are not allowed to have toys or crayons in their rooms here. Even when my son got crayons from another parent, the staff confiscated them from our room. When a girl got a doll from another family, the staff also took it. The staff even took the rocks the children in my room had collected from the grounds.”
1584-8	5/1/2025	Y.F.A.	Parent	3	19	“For me, this place feels like a family prison. There are guards here who treat you okay but many others don’t.”
1584-11	6/5/2025	N.K.N.N.	Child	13 (Declarant), 11, 4	15, 16-17	“Last week, they took us to the airport to deport us. . . . My mom would not get on the plane. . . . One officer told me I should try to get my mom to just stand up and get on the plane. She said something like, ‘Do you want to see your mom like this?’ Of course I don’t want to see my mom like this. My sisters and I were all crying and it was so scary. The officer threatened to separate us from her and send us to live with a foster family if she didn’t cooperate. The officer said she would go to prison, that she would be charged with a felony. My sisters and I heard all of it. I tried to tell my mom we should just get on the plane. I don’t want to be separated from her. We came here to be safe together as a family.”
1584-12	5/2/2025	S.L.	Parent	9, 8, 4, 9 mos.	22	“Some of the staff treat you like dogs. They will whistle at you when they want you to do things. One time they were whistling at my four-year-old in the cafeteria to move to a

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Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
						table instead of just walking over and asking her to move. My husband got upset and asked why she was treating [my daughter] like a dog. She didn't say anything. She put her head down and put her hands in her pocket and walked away."
1656-3	7/29/2025	R.F.Z.	Child	11 (Declarant), 5	11-12	"Sometimes I see kids who are sad. Most of the kids don't play because they are afraid. The officials are very strict at the gym. Right away if they do some small thing the officials will threaten them that they will get a report written on them. There was a little girl playing with a sandbag and she started shaking it. The officials started to scold at her about it even when she was not doing anything wrong."
1656-9	6/4/2025	A.T.	Parent	13, 11, 4	42	"We also share a room with a family who is really not friendly and my kids are really uncomfortable. She came in and made it clear she did not want to share the space with us. I let the supervisors know but they did not do anything about it. She is not happy sharing with us either but the officers will not move her even though she has also asked. She yells at my kids and is rude to us. I cannot even make our own small space in this place safe and comfortable for them. It is really hard for me and my kids that I cannot protect and provide for them the way I want to. It is not a good way to live."
1656-10	6/5/2025	E.M.	Parent	8, 10	21, 24-26	"One guard in particular comes into our room every 20 minutes and says exactly the same sentence. He wakes us up – it doesn't matter if my children are sleeping or I am sleeping. He comes in and says 'Hi my name is []. If you need anything contact me. I am checking that everything is ok with you.' Every 20 minutes. Now it just feels like a mockery, and he is just coming in to make it impossible for us to get any rest. . . . There is an air conditioner that blows hot exhaust air right outside the door of the men's bathroom where my older son is supposed to shower. I try to stand away from the hot air a little farther from the bathroom where there is fresher air, but if the guards see me they yell at me and tell me I have to stand right next to the door in the hot air blowing from the exhaust. When I shower, my children have to come and wait outside the bathroom door. They are supposed to stand still for 10 minutes. But they are two little boys and they cannot do that. They get scolded for touching anything or jumping or moving around. Once I tried to take a shower after they fell asleep at night just to have 10 minutes to take a calm shower. But a guard called me in the corridor and said I could not leave my children in the room even though they were sleeping."
1656-12	7/28/2025	E.O.N.M.	Child	13 (Declarant), 9	11, 29	"One woman said something mean to the little girl, and the family asked the staff if they could stay in another room. But the staff didn't pay any attention until they got in a physical altercation. Then they moved them. Whenever I need to go to the bathroom, I have to go with my dad, or else they will yell at us. The same thing happens to my sister and her mom. . . . We have had trouble with some officials who sometimes treat us badly, including the little kids. They sometimes speak badly to the parents or children, and my dad doesn't even like to talk to them because they are so aggressive. There was a small boy who accidentally hit a staff member with a ball he was playing with and the staff

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						member yelled ‘pendejo’ at him in front of the other parents. The boy was trying to apologize and started crying. Parents reported him and I have not seen him again. They should treat people better here because we are children. This isn’t a prison just for adults. My parents asked if they have trained them to be able to deal with children. They said yes, but the behavior we see concerns my parents.”
1656-16	7/29/2025	B.G.R.	Child	13	26	“The four days we were in the jail with no contact – my best friend sent me like 100 text messages. When I got here and asked to look at my phone to read through them, they said no.”
1656-17	7/29/2025	M.O.	Parent	2	19-22	“They have diapers and wipes and usually give me three at a time. But I have to ask for new ones each time I run out. My daughter takes a bottle and formula, but it was hard to get. At first all I could use was the milk in a paper box, and it wasn’t very good for her. When I asked for formula at first they did not give me anything and said no because it was only for 0-12 month old babies. Other people in the room were getting worried about my daughter crying and struggling to poop and intervened and asked a female guard who said she understood. She gave me formula, and now I can ask her for more when I need it. When I asked for a bottle for the formula they said they did not have any bottles. At first my daughter was only allowed a small cup. So, I had to ask the same guard who understood the formula for the bottle. I don’t have a way to get another bottle, so I use that one each time. There is hot water and soap that I can use to clean the bottle. When I first got here, I did not know how things worked. They have three shifts, morning, afternoon, and night. So, if you ask the morning person, and they are not too kind, they might not help you. Now I know that I should ask the next shift person because they might be more kind. Some staff will not help you but other staff will.”
1706-4	9/9/2025	J.R.F.	Parent	5	12	“When I ask anyone here why I’m here and when I can leave, they speak to me very rudely.”
1706-6	9/11/2025	I.B.	Parent	7,2	8-11, 22, 26, 55-56	“Once an official lied to us, they told us that we would be transferred to another facility. We told them we needed to contact to our lawyer. They said that they were transferring us along with two other [country of origin] families, but we knew that they were lying and that they would deport us if we left with them. We were immediately sure this was a trick and we refused to go with them. My husband was holding our older son. The officers began to shake and grab him and they pulled my son from his arms. They hurt my son when they yanked him from his father’s arms and he cried out. They tackled my husband, and then he refused to stand because he did not want to be deported. They grabbed him roughly and flipped him on his stomach and several of them piled on top of him. They handcuffed my husband, dragged him up, and forced him to a bus. . . . We watched the agents entering the bus, picking someone, dragging them off, as my sons cried. But for some reason they never took us and we stayed on the bus. At that time, they explained nothing to us. When the bus began moving again we did not know why we were left on

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						the bus or where they were taking us. . . . After this 36-hour drive, we were exhausted and hungry and traumatized from this experience. . . . The officers do not seem to talk with each other or to make accommodations. One young girl has autism and the family got permission finally to turn off the lights for her at night, but there is a different officer each shift and often they do not listen to or do not even know about this agreement that the administration approved. At one time an officer on duty in our trailer saw that the autistic girl, she is a teenager, was not wearing her clothes and this officer began telling other detained people, telling other ICE officers, telling everyone, and then everyone began to spread this like gossip. It is not right for an officer to share something private happening in a family's own room. I can only imagine what these parents feel, not just that their children are here, but that their daughter is exposed in this way."
1706-9	11/19/2025	A.K.	Parent	1	17-18, 28	"One some point, we could have two bottles of water a day for my son's baby formula for his bottle. But now they are telling me I can only have one bottle of water for formula per day. It depends on the supervisor, and I have to ask all the time for more bottled water. It's not given to me outright. Lately, the staff has been yelling at my son because there are single women living here. Anytime the single women go anywhere, they yell at us to HA[]LT and STOP. They yelled at my son and scared him. We weren't allowed to go to the library until the women had passed by, even though it was our time to go. In the same manner, no one is allowed in the dining hall until they leave. . . . The staff here have no education or training on how to interact with children. How can they work here and take care of kids without any past education or training?"
1706-10	11/18/2025	M.M.S.	Parent	9	18	"I have also submitted grievances about how the staff intimidate us. For example, staff will say that if ICE comes and sees our room is messy, they are going to make us cry. Other staff have discouraged us from submitting grievances saying those people 'come out last.' Another staff told a resident that if she didn't stop letting other residents use her email, they would take away her daughter."
1706-14	9/10/2025	J.V.D.A.	Parent	16, 11, 6	34	"They are playing psychological games with us here. We had a meeting with ICE recently, and there was a huge miscommunication. My husband was told he had an ICE appointment, but he wanted to go with all of us. While he was searching and searching for us, we were already at the appointment waiting for him. It was the guard's fault. The ICE agent started the questions without my husband present."
1706-16	11/21/2025	N.G.	Parent	13, 11, 4	14, 16-17, 23	"We are scared to ask for anything, because the officers start threatening us that they'll put us in different detention centers and put our children in foster care. . . . Our youngest child is very scared of the officers. When playing on the playground officers would come up to him and the other [] children and get close to their faces and start blowing a whistle and yelling at them. The officers did this until the children cried and ran away. After doing this they'll yell, 'what's wrong' and ask why they are scared. The detention center has so many little children who are intimidated and try to hide from the officers. . . . There

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						is absolutely no oversight here. There's no opportunity to fix the conditions, or food or anything, and the officers do whatever they want. Yesterday an officer was walking around with handcuffs and when asked he said that he needed handcuffs in case he got attacked. He walked with the handcuffs for about two hours and then said they were not needed anymore and put them away. . . . We are expecting to get in trouble after today's conversation [about poor food options] and giving our declaration will not go over well. But we have to say something because our family and other families are suffering. We are certain that they are listening to us, and that we will face repercussions. It feels like we [are] in fascist Germany, and it feels like they are going to put gas into the room and just let us die."
1706-17	10/9/2025	K.V.L.	Parent	6	22, 24	"While here, a staff member was mopping and accidentally hit her with the end of the mop in the cheek and eye. . . . The person mopping did it on accident, it was not intentional. I didn't want him to get in trouble, but I do want staff to be more careful, especially when working around little kids."
1706-18	10/9/2025	V.L.G.	Parent	15, 9	7-8	"I asked to see the video of the staff dropping the volleyball base on my son's foot, but the worker in charge said they would not let me. They said that would violate the privacy of others at the facility. This was different than what they told another resident when her son broke his finger playing basketball in the gym. In that case, they showed the video so she could understand what had happened. I think they don't want me to see the video because it would show that they were at fault and that the staff shouldn't have been pulling the heavy base on her own. Yesterday I entered a complaint in the tablet about what happened to my son's foot. The response from the tablet was that I should speak to a lawyer."
1706-21	10/9/2025	S.M.G.	Parent	2, 1	8	"Some staff will give me bottled water for my daughter's formula and some will not. My daughter drinks about 6 bottles per day. This morning, I was asking staff for bottled water for the baby's formula. The guard said I should use water from the faucet. The doctor was nearby, so I asked the doctor and she told the guard to give me the bottled water. But instead of giving me the entire bottle of water so that I could also use it for another bottle later, the guard poured the water into the baby's bottle and kept the rest of the water bottle. The same thing happened with this guard later in the day, and at that point the doctor ended up giving me a bottle of water. It is like that every day with having to ask for these simple things, like water, that my baby needs. It is very frustrating."
1748-4	2/12/2026	C.C.A.	Parent	15, 9, 7	13-17, 19-23, 32-33	"A few days ago, the officials here found out that I have spoken with reporters, and the staff have taken reprisal steps against my children and me. For the past couple of days, my children and I have been locked down in our room. They put us on lockdown after a staff member pushed my daughter and took all of her coloring materials away. This week, my young daughter wrote 'liberty' on a piece of paper. One of the officers found me in the laundry room and told me that I needed to come to the recreation area with that paper. When I went there, a man named Officer [] took the paper and ripped it up. He said you

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						cannot have papers that say this. Then, he threw it away. I told him I did not know that the children were not allowed to express themselves in writing. He told me that our family could have a report made against us for this. So, I apologized. Then I went to the laundry room to see if the clothes were ready. While I was there, Officer [] found me and told me I had to come with him to speak to the counselor. I asked him why. He said because you had a paper that said 'liberty' on it. I went with him, and the counselor asked, 'Who wrote this?' I told the counselor that my daughter wrote it. I asked her whether this was a crime. The counselor said no. But then she wrote out on a paper that we were not allowed to have protest papers, and asked me to sign it. She said this was a report against me. Next, the counselor asked if I had any other papers in my room that said the same thing. After she questioned me, I tried to go back to the room with my children. But, another officer who was a woman, told me I could not go into the room. . . . When I tried later to go back to my room, I saw there were 12 officials in the room. I started to feel worried, and asked what happened. I also asked if they were searching anywhere else. The staff said no, we are just searching your room. When we looked inside we saw that they had grabbed all of my children's coloring papers and were ripping them all up. Upon seeing them destroying the drawings, my older daughter, [] started getting upset. She went to the door and started yelling at the officers, saying that they should not destroy her favorite drawing of a telephone from outside the room. The officer turned to her, held it up, ripped it up and laughed in her face. [My daughter] went to open the door and said let go of my phone drawing. The official just pushed her. Then, I got in front of her and said do not push my daughter. I do not know the name of the first officer who pushed my daughter. But then, another officer in the room, Officer [] pushed me and my daughter. Then all of the male officers started pushing my daughter and me. They pushed [my daughter] in the chest and grabbed her arm and she now has pain and bruises on her arm, and you can see swelling. They pushed me in my chest, too, and it still hurts. It also hurts on my arms where they grabbed me. After they had already been push[ing] us around, one of the officers pulled out a camera and started to record us and laugh, as I yelled at them to let me go. But, there are cameras in the hallway though that should show the whole thing. [My daughter] started yelling and another mom came running. When the officials saw her running towards us, they let me and [my daughter] go. I hugged [my daughter] as she cried. Then the officers said a bunch of things in English while looking at us that we could not understand with no one translating. Then, they left. After that, I went to the counselor to look for support, and the counselor told me that they would revise the cameras, but did not do anything else. . . . They have also blocked me from using the tablet during the lockdown. One . . . morning, one of the officers let me use the tablet and I filed a grievance, but when they realized, they took it away from me again. This is all retaliation for us talking to reporters and to Flores counsel about what we have experienced here."

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1748-6	1/15/2026	M.M.S.	Parent	9	11, 13, 19	“The holidays at Dilley were awful. On Christmas, they told us they were going to have a special Christmas event for the children. They said they would put a good movie on, and they even had flyers at the gym about it. They had all the kids come into the gym and sit in the chairs. Then they put on a video clip of the Grinch movie. After a few minutes, someone came in the gym dressed like Santa. The children were excited and started to gather around him. Staff yelled at them all to sit down, and then the Santa just gave the children who were sitting a bag of chips. Then the staff took a picture of the kids with Santa, turned the video on for another few minutes, and told the kids the activity was over. It was humiliating and frustrating to be treated this way; it was worse than doing nothing actually. To have your child get nothing more than a bag of chips for Christmas - and to not be able to give your child even one toy because you’re stuck in this prison. It was horrible. My daughter was so sad around Christmas and kept blaming herself that we have been detained here for so long even though she did nothing wrong. She brought this up repeatedly. . . . Some of the guards are awful to the children. They are always screaming at kids for doing normal things like running at the park. If you’re at a park with kids, what do you expect they are going to do? . . . Dilley staff continue to discourage families from making grievances. Staff tell families that making complaints can impact your immigration case. Staff also tell families that they don’t need to make a complaint, they can just talk directly to staff. A lot of people think that is the correct way of doing things.”
1748-7	1/15/2026	C.R.B.	Child	16	5	“The first medical emergency happened after one of the Core Civic officers was yelling and being aggressive with me because I was sitting around with a couple groups of teenagers, including two teens that were touching hands. He singled me out to tell me that I should know better [than] to let that happen even though it wasn’t me holding hands and I was talking to kids in a different group. He made me so upset because he took my ID and said he was reporting me to the Captain. The staff tell you that getting reports like that can affect your immigration case. I was so upset that I started crying and went to find my mom. On the way to my room, I had a panic attack. I couldn’t really move and felt like I was going to pass out. Someone called medical. They brought me to medical, but all they did was check my vitals and send me back to our living area.”
1748-9	3/12/2026	E.C.M.	Child	13	4, 11-12, 25, 27	“ICE detained me with my mom and separated me from my dad. I feel so sad that I had to spend Christmas and New Year[’]s without my dad. It hurt so much to not be able to get a hug or be close to him on those days. Every day that I remain here is destroying my hope for my life. I miss everything about my life in Chicago because I do not have anything here. . . . It is depressing being here, especially on the holidays. I never imagined that they would separate me from my dad like they did, and I am so scared that they will separate me from my mom now. I feel so much anxiety and nerves that I have to use the bathroom every 5 minutes here. I keep wondering what is wrong with me. . . . The guards also

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						completely change how they act anytime an outside Congressperson or reporter comes. The guards start being kind to us and saying 'hi,' which is something they would never do when they are not being watched. . . . We have also seen staff provoke kids with autism. Today, a guard told a mom to keep better control of her child when he was having an episode. But they do not understand that children like that need treatment and cannot just be controlled."
1748-10	3/11/2026	M.T.H.	Parent	6	13	"I have seen the guards being very rude with children sometimes. Some of the staff just have no business working with children."
1748-11	3/11/2026	J.A.	Child	17	15	"Sometimes the staff here are rude to us. We try not to communicate with the staff too much because it doesn't seem to help anything. Some people are nice though. We speak enough English that it's not hard for us to communicate with the staff but for other families who are here that don't speak English or Spanish it is very hard."
1748-12	3/11/2026	T.M.	Parent	2	20-21	"When we have complaints there are people we can talk to who always listen and are very nice, but it doesn't seem like things actually change. We've had a hard time communicating with staff because we don't speak English or Spanish. They give us a phone or a tablet to try and translate sometimes but they don't always have that available and then it's nearly impossible to communicate."
1748-13	1/15/2026	C.H.H.	Parent	13	38, 45-46	"Every time we write grievances, we are afraid they are going to retaliate against us. I wrote a grievance for the computers about the change in access to email, and I also helped a roommate write a grievance about medical issues. But they never answer the grievances. One time, they moved me to a new counselor and location in the facility. There are four counselors per color in different hallways, and they are in charge of bringing clothes and ICE information. When I asked to get moved back to see my old counselor, the officer said they moved me because I would not shut up enough. . . . The agents are way ruder than before, too. Especially if they decide they do not like you, they will be mean. I used to have one agent who used to explain things to me, but now I cannot see the same agent. Now, they will only let us talk to agents one day a week. They now sort us by the color of the area we live in rather than by individual agent. So now, I can only see who is there on Thursdays, and it is not the same person. Yesterday, one officer was complaining about us in English to the man checking IDs at lunch, saying, '[T]his is not a cafeteria, why are people getting up to get water and juice, they should just sit their asses down.' She did not know that I understood, but many of the kids heard her, too. They treat us like animals and do not even like working here. I have heard other agents say rude things while they think we do not understand, too."
1748-14	1/14/2026	D.P.C.S.	Parent	15	14, 22-26	"While I was there [Dilley], I told staff that I had to go to court and try to reunite with my daughter, and the staff said that they would send me to a shelter where I could pursue my case. But they tricked me. Instead, they put me and [my other daughter] in a car and drove us 13 hours to an airport. There, they put me on the plane even though I did not have my

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						one-year-old daughter with me. I was so distraught and I felt impotent because I thought I was going to court to try to reunite with her, but realized I had no power. . . . I have made some complaints since being here about the rule changes, but they just take the complaints and do not give us any response. For example, [I] complained about them taking away our access to email and decreasing our access to the library, but no one responded. . . . There are some people who work here who are really racist and will laugh at the kids' pain. I do not know what is wrong with them. There are some others who actually follow the rules and treat us in a more tolerable manner. People are also scared to report anything, because they are scared they will get a report in their file against them. We worry that will prejudice our immigration cases. We have seen the officers make false reports against people, too. There was another woman incarcerated here who an officer accused of hitting her, even though all of us who were there at the time saw that she did not. Since we all saw that she did not, we asked to see the video after the accusation, and they would not show us. But this accusation made us scared about the officers retaliating against us. I have seen some agents come to visit our block every once in a while. They tell us if we have a complaint that we can have a meeting with a [name]. They do not tell us his full name. Some women do go to bring complaints."
1748-15	3/12/2026	S.K.	Parent	2, 1, 10 mos.	38, 46, 50-52	"But the staff have started to discriminate against me. I don't understand why. They tell me to throw [milk] away and po[u]r it in the sink – that the girls can't have it. They told me they are going to write a report if I keep trying to get milk. To clarify, this is the milk in the dining hall that everyone is allowed to drink. The staff are telling me specifically that I cannot have the milk, that my kids can't. I have no clue why they're doing that to me. That's the attitude towards the [people from my country of origin] here. . . . They put a lot of pressure on us to not talk with you [Flores counsel]. Once you leave, I think they will be very rude to us. The staff started being very rude to me after I talked with [Congressman] Castro on Monday. They corrected every little thing I did and said they'll write a report against me. . . . Yesterday, for example, when I was talking with you some officers said they would watch two of my kids who were asleep finally after being up all night. Then, they said they would write a report against me once they realized I was going to talk to Flores counsel. They said that is where people go to complain against them. At night time yesterday, I put a blanket on the floor of our bedroom so the kids could crawl on top of it because the room was very dirty. The ICE officers told us to remove the blanket, that it's not a big deal if it's dirty. And they threw out all the baby bottles for each kid. I had one bottle per kid. I am going to tell the ICE officers I was just talking to you about getting an asylum attorney for my family, because I am scared. I am so scared of retaliation here."
1748-17	2/12/2026	N.C.C.	Parent	14, 13, 10	17	"About two weeks ago, Core Civic did a search of our room and took everything we had in our room. They took my daughter's hair styling products, our toothbrushes, and

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						toothpaste that we bought in the commissary and they took some stomach medicine. We were very upset when that happened. They told me to make a list of what was taken and they would replace the items, but they have not done that. They even tore up letters that I had written to the pastor here, including a letter with one of my prayers. They threw the ripped up pieces of paper in the trash. They even threw away a drawing my daughter had made of Bratz dolls.”
1748-18	2/12/2026	L.R.C.	Parent	15	31, 40	“We have used the tablets to make complaints. About a month ago, we were in line for the computer and we had lined up at 6 am so we could get some time on the internet. But the library staff person was only letting some people she liked use the computers. I asked her why she was not letting most of the people in line use the computer, and she told me to shut up and she would not do anything. When my husband tried to ask again, she told him to give her our ID cards . . . and said she would submit a report against us for causing trouble. She tried to grab the card from my husband, and he put his hands behind his back and told her not to touch him. Afterwards, I made a complaint on the tablet. But that woman just blocked our time in the internet and retaliated against our complaint. . . . The guards here treat many of the kids in ways that parents would never let other people treat their kids if they had a choice. Two days ago, an autistic girl wrote ‘liberty’ on her papers and the guard took the paper and ripped it up and pushed her. Any mom would react by defending her daughter in that situation. The mother got in front of the girl and said that the officer should not attack the girl. But the officer then said the mom was aggressive. So, they charged the mom and have put her and the children in isolation with constant security. She told them to look at the video from the camera to see the officer pushed the daughter. The staff ignored her. They treat us like our voice does not matter and like they are the only ones anyone should listen to. This makes us all know that we have no rights here. We all are so scared because we now know we would get in trouble and get charged with things if we ever tried to stop officers from abusing our children. People have no way to protect their children here. It’s terrifying.”
1748-19	1/14/2026	M.B.O.D.	Parent	17, 14	21-22, 25-26	“Since being here, I have written out grievances and gotten them notarized, but despite making so many grievances they all disappear. One mom told me she saw staff rip them up. I believe it, because nothing ever comes of them. A lot of us have submitted notarized grievances but still don’t get responses. Even when I’ve submitted grievances to ICE officers, they have rarely responded. One ICE official [] yelled at my daughter one day and I told her to stop yelling at my child. That official later falsely accused me of hitting her. I asked for the video footage to show that I had done no such thing, but was denied. So, then I submitted a grievance about the false accusation because I am not a violent person and did not hit her. I got a response to that grievance in my favor. . . . On Christmas they treated us so cruelly. They brought an ICE official in a Santa Claus outfit here, but he brought no toys or sweets, and the kids all did not understand why Santa did

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						not bring them anything. Young children went up to hug Santa, but he would push them away. It was so cruel. They clearly did it as a photo opportunity to use us to pretend they were treating us humanely. It left the kids all upset. On January 9, 2026, staff started yelling at us in the morning to go to our rooms and then locked us all in our rooms without any explanation. They did not tell us when we would be allowed to leave. We did not know what to do or how long this would last, and we were not allowed to the library to tell our attorneys what was happening. People started panicking and the children all started crying. It was terrifying to be locked in our rooms for over four hours without any information.”
1748-20	2/11/2026	J.V.G.	Parent	4	48	“There have also been some officers who have treated our daughter awfully and said they will use force against her.”
1748-21	2/11/2026	Z.V.	Child	17	42-43	“The officers are sometimes rude to [declarant’s country of origin] families because they do not understand them as well as they might understand families that speak Spanish. There was a family from [a non-Spanish speaking country] here, where the wife was pregnant, and they separated the dad and sent him to another facility from his wife and daughter.”
1748-25	1/14/2026	A.K.	Parent	2	18, 24-28, 48-49	“Keep in mind that we have to hold our child in our arms the whole time. He’s 2 years old. Staff don’t allow kids to walk around that area during mealtime. They start raising their voices and yelling if kids are walking around, which doesn’t help at all. We really struggle to hold [my son] for 30 minutes while we wait in line. . . . Then [after asking for child to eat foods only available on the halal menu] one of the supervisors yelled at us, snatched my husband’s ID, and took a photo. We went and sat down to eat, and my child only ate the canned peaches they gave him. That night at 11 p m., the reception staff called my husband, and they spoke with him through an interpreter. They said that if we behaved like that again and asked for normal food for our child, we would be separated into single detention centers, and our child would be taken to a foster family. At that time, our child had barely eaten anything in 53 days, and they started putting psychological pressure on us and threatening to separate our family. She also told us not to talk much about Muslims and their Halal menu, since ‘everyone is equal here and there is no discrimination.’ We were shocked and s[ca]red. They also told my husband, ‘tell your wife not to open her mouth about Muslims and their menu again.’ My husband said ‘you’re threatening me’ and they said ‘no, we’re warning you.’ When it comes to <i>Flores</i> , they said <i>Flores</i> doesn’t exist. . . . I also can’t remain silent about the terrible treatment of children at the Dilley Immigration Processing Center over the holidays. What happened on Christmas Day can only be described as an atrocity. A man dressed as Santa Claus entered the playroom, followed by a cart full of chips and sweets. The children, already in a difficult situation at the center, were overjoyed. They dropped everything, ran up to him, begged for candy, and wanted to take pictures. Some children even cried and begged him

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						to give them freedom. Santa himself acted very indifferent: he lifted his beard, drank water, and simply sat there. The center's director spent the entire time actively photographing the children next to Santa and the cart of food—apparently for some kind of 'holiday' report. When the photo shoot was over, management simply said, 'These chips aren't for you.' The cart and the food were simply turned around and carted out of the room right in front of the children. They gave them absolutely nothing—not a single piece of candy. The children simply sat down to watch cartoons, as if nothing had happened. The children were left in complete shock and in tears. They were simply used as decorations for pretty photos, and then their hope for a holiday was taken away. It's cruel and cynical."
1748-26	2/12/2026	A.M.P.	Parent	9, 2	9, 14, 18	"The staff here are always threatening children with reports. For example, they say if my older daughter goes in the playground area with her little sister, they will make a report. They say the reports will hurt our immigration case. They are just children who want to play together. Why is that wrong? I am right there with them. . . . They will usually give me 4-5 diapers a day for my daughter – but there have been issues with access with some staff. One staff would only give me one diaper for the day. I said to her, 'So do you just need one pad per day when you're on your period?'" The staff said I was being rude. Another time I asked for diapers and they said they didn't have any that day and I should just 'figure it out.' . . . Some families did a protest a few weeks ago. After the protest, the staff started searching our rooms. My two-year-old had some crayons that another family had given her. Core Civic staff confiscated her crayons and threw them away. She was crying. They said they were throwing away the crayons for our security and so the children would not write more letters about the conditions at Dilley."
1748-31	1/14/2026	L.T.P.	Parent	14, 15	8-10	"Although they have treated us monstrously here, I have been afraid to make reports about the conditions. One time another woman who stays in my room made a written report about the bathrooms being unsanitary. The bathrooms here are disgusting and need more cleaning. However, a staff member came into the room and yelled at us, saying that we should not make written reports. We all felt very threatened by her. She said that we should only talk to staff if there is an issue so they can resolve it. But they do not resolve the issues we bring up. Now, I am scared to make any kind of report, because I do not want to get in trouble and have my stay here be harder than it already is. The way staff have treated my sons here have made us very uncomfortable, too. One time, the psychologist questioned my younger son. It felt like he had to answer anything the psychologist asked because they are watching us here. Since then he has not wanted to go to the psychologist. I have been asking them to not make him see the psychologist, and made six requests for that, but they still try to make him speak with them."
1748-32	1/15/2026	M.S.M.	Parent	10, 5	21, 25-26	"I have not made any complaints since being here, because I know so many people who have made them and gotten no response. I know that making a complaint will hurt my

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						process. The staff will create problems for me and make my children stay here longer if I file grievances. I think everyone who is not making grievances is scared about retaliation from officers making fake accusations to get them in trouble. . . . There have been lots of problems with agents who yell at children all day not to run, but they are kids, and of course they will run. The staff also have whistles that they whistle at the children, but the children are so little, they do not understand. It is stressful having other adults constantly scolding my children and making them feel bad. We are all worried people will make reports against us that will affect our cases negatively every time our children struggle to follow the rules. The children get scared at times because sometimes the staff say you cannot go somewhere and they do not understand why.”
1748-36	2/12/2025	M.L.S.	Parent	15 mos., 2 mos.	14, 41, 43	“When I went to the medical area to explain that my son had nonstop diarrhea from the water, the doctor put an order that the guards should give me four bottles of water a day for him. But many guards will not give me the water bottles when I ask. They say they have to check with the medical staff to confirm that I am not lying and there really is an order. They always seem angry about it, and it means [my child] has to wait to eat. . . . There are some people who work here who are helpful, but others are so angry all the time. It is so hard to ask for things from them, because they make faces and do not help. They just do whatever they want. . . . A little while ago, we saw a guard push a girl with a disability and take her drawings from her. They have forced that child to stay in her room for days and are not letting her or her siblings or her mom see their father at all.”
1779-6	4/22/2026	M.T.H.	Parent	6	9	“There are so many restrictions, and the guards are so rude – a child is yelled at even if he spills some milk. Sometimes my son will just burst from all of his emotions and start crying.”
1779-7	4/22/2026	R.G.H.	Parent	10	18	“Treatment of kids is a big concern. No one here is qualified to work with children -they treat the children like adults. CoreCivic does not speak nicely to the kids; they yell directly at the kids instead of going to the parents first.”
1779-8	3/11/2026	S.D.C.	Child	15	12-14	“Two days ago, the staff did something scary. About 5 officers with ICE badges and about 10 staff from CoreCivic came into the hallway between the rooms where we sleep around 9 p m. It was dark outside, and they started covering our windows by standing in front of them. We were not allowed to leave our room, so we tried to look out the window to see what was happening. We saw they brought chains and shackles into the room across from us. They grabbed this woman from that room and she and her daughter started crying. She had a pending appeal in her immigration case and was waiting for her response from the court and started saying her case was not over and that they could not deport her at this point. But then, they chained her right there. Her 10-year-old cried harder as she watched her mom be shackled. The officers just took them away and put them in a car. It made us all so scared. This was so different than when other people leave. The children in that room came over to ours afterwards and we were in shock. The girl who was in the bunk

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						next to that family said she felt so awful that she had to watch and could not do anything to help. Now we are all feeling so scared that this will happen to us. We now feel like the people who work here are capable of doing anything to us. The lack of dignity and respect that the staff showed that night really shocked me. I do not know why they had to remove her like that. That woman did not do anything bad that made her deserve that treatment or to be made a spectacle in front of so many families. It seemed like they were trying to embarrass her and make us all scared. Why could they not just call a meeting with her and talk to her? It also makes us all fearful, because we have our own cases pending, and what happens if officers decide to chain us, too? I won't have any way to defend myself."
1779-9	4/22/2026	G.S.	Child	12	48-49	"Sometimes my parents have a tough time communicating with staff, because they don't speak a lot of English. They talk to me or my sister because we know English better than them. One time ICE told my dad to get lost. My dad was just trying to ask if there was an appeal in our file. The ICE officer lost his mind a bit at us."
1779-10	4/23/2026	R.R.M.	Parent	11	17	"CoreCivic staff yell at my daughter whenever she doesn't stay near me."
1779-11	5/16/2026	O.S.	Child	16	30, 33-34	"I want to say a few things about the staff at Dilley. First, when my older sister turned 18 and was separated from us, my mom begged ICE to bring her back or to at least allow us daily visitation at the beginning. One of the ICE agents then threatened her and said, 'If you keep arguing, we will ship your daughter to another facility that is 200 miles away and you will only get to have a call with her once every two weeks.' . . . Second, there was one time an officer was yelling at my younger siblings for fighting over the PlayStation. My mom said, 'You shouldn't yell at them like that.' The officer said, 'It's a privilege, not a right, and we'll take it away if we want to.' The officer then said, 'You have no rights here except a place to sleep, medical attention, and food.' Third, many of the staff in the cafeteria were very racist towards me and my family. They would serve less food to the people who were not Latino, or they would refuse to give us more servings even though the rules said you could get more. Sometimes, they'd tell my younger brother you can't have more food but then they would give more food to another kid."
1779-12	3/11/2026	A.L.G.	Parent	4	22	"The facility also took away our access [to] ChatGPT after they noticed people printing information about how to ask for information and make grievances. The staff are just trying to stop us from having access to tools to advocate for ourselves."
1779-15	3/12/2026	W.L.	Parent	7	10, 16-17	"Our daughter went [to the school at Dilley] for one day and the teacher told her that if she can't speak English, she shouldn't speak at all. . . . I asked her to go back and try again but she cried and said she is scared. . . . It's been difficult for us to communicate with the staff because we don't speak English. If something really important is happening, they'll find an interpreter but it's not something that is usually available. The people who speak Spanish are treated much better here. Our daughter has been bullied here, and the staff don't do enough to intervene or help."

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1779-17	4/23/2026	Y.G.P.	Parent	12, 15 mos.	9-10	“One time, a guard refused to let me have bottled water for [my 15-month-old daughter's] formula and said I would need to use the tap water. I reported her – and the next day the supervisor put a piece of paper on the wall in our room saying we were entitled to six bottles of water per day for the baby. Things have been okay since then. I think that guard just doesn’t like me because there always seems to be an issue with her. Another time, the same guard would not let me put our stroller inside even though my baby is allergic to cats and the cats were getting inside the stroller at night causing my daughter to have bad allergic reactions. I went to medical to explain what was going on. I don’t know who they talked to but after that they ensured I had permission to bring the stroller in every night.”
Total Families Who Raised Complaints About Staff Treatment: 49						

(7) SLEEP DISRUPTIONS

Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1575-5	6/5/2025	T.M.	Parent	Baby	24, 25	"My room has twelve bunk beds in it. . . . I have my baby sleep with me in my bed to make sure that he is safe, which means that I usually don't sleep very well and am exhausted during the day. We aren't allowed to turn off the lights in our room when we sleep, which makes it very difficult to sleep at night for both me and the baby. There is a big fluorescent light that shines directly on our bed, and I can't switch it off."
1575-13	5/1/2025	F.Y.	Parent	1, a few mos.	19	"We are three families in a room."
1575-16	5/1/2025	A.T.	Child	11	32, 34, 44	"We had insomnia. My mom didn't sleep for days. . . . How could we have explained our situation when we hadn't slept, we didn't know what to do, we didn't understand the system, we did not even know there was internet in the library, and we had no one to answer our questions? . . . The sleeping area is fine and we are able to turn off the lights in the immediate area, but we cannot turn off all the lights in the common areas for safety."
1575-27	5/2/2025	L.Q.A.	Parent	5	10	"My son and I share a room with two other families. There are three moms and three kids. They do not let us turn the lights off at night. If I turn off the lights, the guards turn them back on. It really bothers my vision and it makes it hard for my son to sleep. We are right in front of the light, and I try to put a handkerchief over it, but the guards say I can't do that. They also are coming in and out all night and they are not careful with the door. It just slams over and over."
1584-6	6/5/2025	L.J.H.G.	Parent	4	16-17	"We live in a trailer with three other families. We are okay with the families in our trailer, but I have heard of other families in other trailers having a lot of issues with getting along. They do not let us turn off the lights during the night. If you do turn off the lights, the staff get mad and there are conflicts. When they do their checks throughout the night, they often let the door slam and have their radios blaring. Some are careful, but many are not and they wake us up when the door slams."
1584-8	5/1/2025	Y.F.A.	Parent	3	9-10	"Until this morning, we were staying in a room with 12 people. There have been several families that have come and gone since we arrived. There are 6 bunk beds and they have mainly been full. It is hard to sleep at night because they don't turn off the lights. If I turn off the light, the guards here just turn them back on. They are constantly coming in the room at all hours of the night. My son and I are not able to sleep."
1584-12	5/2/2025	S.L.	Parent	9, 8, 4, 9 mos.	14	"They make us keep all the lights on all night. Staff are coming in and out all the time to check things. They always let the door slam throughout the night and they're never quiet. They also come in at 5 a.m. to wake people up to take their medication. Then they come in at 6 a.m. to wake everyone up for breakfast. Our kids were so tired all the time, we started buying cereal for them from the commissary so they could skip breakfast and sleep longer."
1656-5	7/28/2025	C.H.	Parent	6	19-21	"They come in and out of the room without knocking. Some are polite, but others barge in without warning us that they are entering. They do not turn off the lights at night. It is difficult for my son to sleep because of the lights and because it is loud at night. The staff talk on very loud walkie talkies throughout the night."

(7) SLEEP DISRUPTIONS

Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1656-8	9/9/2025	A.D.C.	Parent	16, 9	16-17	“It has also been hard because my daughter and wife have been living in a trailer with two other families. Our daughter has been trying to be strong and adapt to the situation, but it is hard to do things like share a bathroom with strangers or be constantly monitored by staff. She has no privacy or freedom, and it has been a shock for her. Sleeping is also difficult for her. She is in the upper bunk and the lights are on all night, so it really disrupts her sleep. Even with an eye mask, she still sees the light and cannot get good sleep. My son and I wake up several times during the night. The light is the biggest issue for my son. He doesn’t like the light on when he sleeps and he constantly turns it off because he doesn’t understand. Then I have to turn it back on because staff won’t allow it. It is also loud because staff are talking on their radios throughout the night, which wakes us up.”
1656-10	6/5/2025	E.M.	Parent	8, 10	21, 22	“It is impossible to get good rest here. The guards check on you every 20 minutes. . . . There are also staff and guards walking around at all hours. At night they are singing loudly or their radios are going off and it is hard to sleep. They will come in and wake people up if they see through the windows that there is something hanging on the bed, or if something [looks] out of place. We are all so exhausted all the time.”
1656-12	7/28/2025	E.O.N.M.	Child	13 (Declarant), 9	13-14	“It’s hard to sleep because the lights are always on. If you put a blanket over your face in bed to not see the light, the staff will come in the night and pull it off. I don’t know why, but the officers come in all throughout the night and slam the door. They don’t speak, but the slamming doors and loud walk-talkies keep us up. The ones outside in the hall watching also talk and laugh loudly and that makes it hard to sleep. If you need to use the bathroom at night you need to go outside. Since I cannot be allowed alone at night, if my dad has to go, I have to get up and if I have to go, he has to get up.”
1656-13	7/28/2025	I.C.B.	Child	14 (Declarant), 7	6	“The lights are on at night. At first, it was very hard to sleep because of the lights, combined with the fact that I didn’t want to be here. Also, when the guards are outside of the rooms at night, their radios are very loud and you can hear everything.”
1656-14	7/28/2025	F.J.A.	Parent	4	16	“We live in a dormitory area now with bunk beds. But my little boy prefers to sleep on the floor, because the beds are not comfortable.”
1656-15	7/28/2025	K.M.	Parent	6	32	“The rooms we are in have 12 bunk beds, divided into two separated areas. There is also a common area running the length of the room. Right now, there are only 4 of 12 beds occupied, but we’ve been here when they are all occupied. They do not turn the lights off at night here. They leave two lights on in the common room to try to dim the room. But they give eye masks to sleep, which can help. Some nights, the officers aren’t loud as they walk through the halls. Other officers keep their walkie-talkies loud, slam doors, and make lots of noise.”
1656-17	7/29/2025	M.O.	Parent	2	18	“There are times we cannot sleep because of the lights being on. The staff say they must always stay on, but because of this we are not really sleeping. The staff will come in and

(7) SLEEP DISRUPTIONS

Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
						out and slam doors. This is especially loud around 6 am. They often will come in if the child is still awake at night and ask why the child is up.”
1706-5	9/10/2025	Z.F.	Parent	6	67, 69	“Two of the lights must be on in our room at all times, including nights. Sometimes the guards will knock to warn us they are coming in, but we cannot just say no, please don’t enter, so there is no real privacy. . . . They come to check the AC, check the room, or tell us that someone needs to go somewhere.”
1706-7	11/18/2025	N.V.S.M.	Child	14	20-23	“In the room we live in here, there can be 12 people total. There is a woman in our room who screams at us, says bad things about us, and puts the TV volume on high. She was mad that we just wanted to stay by ourselves and not socialize that much. It’s always around 11 or 12 at night, and the people in our room start yelling this song. Our room now has 12 people in it. It’s totally packed. We talked to the therapist and guards about moving rooms, and they said we can’t move. It’s very uncomfortable. We can’t sleep. The TV is on high volume all the time.”
1706-8	11/18/2025	C.R.G.	Parent	14	10	“We are living in a room with five moms and five kids. There were six families, but one family left recently. It is hard to sleep in there. One neighbor snores a lot, and my back is hurting from the bunk bed. My son falls asleep at about 1 am and sleeps until 11 am. I don’t wake him up for breakfast anymore because he wasn’t eating it anyway and he was exhausted.”
1706-9	11/19/2025	A.K.	Parent	1	23	“The lights are on all night here. My son cries all night almost every night because it is so hard for him to sleep with the lights on. This has been going on for two months straight. I tried to hang a towel up to hide the light from my son, but the supervisors immediately tore it down and threw it away. They said I couldn’t do that.”
1706-10	11/18/2025	M.M.S.	Parent	9	22	“We live in a room with four other families - 4 mothers and 4 daughters. The children often can’t fall asleep before 3 am because people are crying or upset. There is always something happening or people getting bad news. They only allow us to dim the lights a little bit, so it is light all night long and there is constant noise and disruptions.”
1706-11	9/11/2025	M.R.P.	Parent	8	35-36, 38	“I sleep with my daughter and 3 other families who have kids. They have 2 kids, 2 kids, and 1 kid. It’s a lot in one room. And they are all small children. They cry a lot during the night. One girl is 3-years-old and they don’t give her a bottle for milk so she cries all night. She can have milk, but it’s from a carton like the ones we drink out of at lunchtime. There is no privacy in the room. . . . The lights are on all night and day. The guards walk outside and every time they pass there is a boom sound of their shoes on the floor. This is happening all night.”
1706-14	9/10/2025	J.V.D.A.	Parent	16, 11, 6	28-30	“The lights are on all the time and the guards’ radios are so loud. If they are just walking, we can hear them. It’s impossible to sleep here. They also have cameras everywhere, so why do they need to enter the rooms? And why do the lights have to stay on?”
1706-15	10/10/2025	K.M.L.	Parent	6 mos.	19-20	“We are sharing our room with 6 other moms and their kids. The guards wake us up every day at 5 a.m. Some of the lights are on all the time.”

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1706-16	11/21/2025	N.G.	Parent	13, 11, 4	7, 10	"We've tried to find a manual and have asked why adults and children have to sleep with the lights on. They keep the temperature very low, and adults and children are constantly sick and are unable to get better. Every room and even in the showers the rooms are kept very cold for both adults and children. . . . Sometimes the officers will turn on their walkie talkies near the children's rooms at 2 or 3 in the morning. Sometimes they'll walk into the room and talk loudly on their walkie talkies for no reason."
1748-5	3/12/2026	M.S.P.	Parent	14, 12	24	"Having the lights on all night makes it hard to sleep, too. We are not allowed to put towels up to block the light. They gave us eye masks, but we are not used to wearing them and the first time the children tried to, they could not sleep with them on. They still cannot use them. It helps block the light, but it makes it impossible to sleep. We also struggle to sleep, because our beds are right next to the common room, and the guards spend time in that room at night speaking loudly and opening and slamming the door. We wake up a lot at night."
1748-7	1/15/2026	C.R.B.	Child	16	8	"Sleeping here continues to be really difficult. They keep the lights on all night, and it really affects us. I have also started having back pain from the thin mattress on my bunk bed. My back has been hurting for 3 or 4 days."
1748-8	3/11/2026	N.P.V.	Parent	14, 11, 7	16	"Sleeping is very hard because the lights are on all night. We have never been given eye masks for sleeping, and I am seeing one for the first time during this interview. If someone turns off the light at night, the guards will do a disciplinary report. It is also stressful just thinking about our case and not knowing what is going to happen."
1748-9	3/12/2026	E.C.M.	Child	13	23	"Sleeping is so hard here. As more weeks go on, it becomes even more difficult. In my case, I cannot get myself to fall asleep until 2 am, but then I have to wake up at 6 am. I feel like I almost do not sleep. It is so hard to sleep with the lights on. I close my eyes and feel like I can still see as much light as when they are open. It feels like the light is hitting me. I also cannot sleep with the eye mask on because it makes me feel like I cannot breathe."
1748-11	3/11/2026	J.A.	Child	17	12	"It's hard to sleep here because of the loud air conditioning unit and because lights are on and people are always opening the door while we are trying to sleep. It's also hard to sleep when I have so much going on in my mind and because I know I am in detention."
1748-12	3/11/2026	T.M.	Parent	2	16	"My son doesn't sleep enough at night here. He usually sleeps about 3 hours and then gets up for several hours before going back to bed eventually. It's hard for him to sleep because there is always a lot of noise from machines around. We are all struggling to sleep here."
1748-13	1/15/2026	C.H.H.	Parent	13	33	"They also wake us up really early to call for individuals, and then it can interrupt sleep for all of us."
1748-14	1/14/2026	D.P.C.S.	Parent	15	38	"Sleeping is hard here, too. It's not just the lights being on all night. There is one woman in my sleeping area who snores so much we could not sleep. Everyone got a headache."

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Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
						But they would not let us sleep in a different room. When we complained, they responded that staff cannot get involved in that sort of thing.”
1748-15	3/12/2026	S.K.	Parent	2, 1, 10 mos.	43	“My kids have lots of trouble sleeping because of the lights. I tried to hang something up, a blanket, to cover their eyes but the officers said you can’t do that.”
1748-17	2/12/2026	N.C.C.	Parent	14, 13, 10	13	“One of the things that is most difficult is that the light in the room is on all night. It is horrible for all of us – and especially for me because I suffer from migraines. Sometimes we try to change beds because one bed has the most light. My ten-year-old gets headaches, too, and the lights make it worse for her. There are eye masks, but they hurt our heads because they are so tight. When we tried using them, we would wake up with headaches from how tight they felt.”
1748-19	1/14/2026	M.B.O.D.	Parent	17, 14	18	“The rooms where we live smell terrible because kids sometimes wet themselves on the carpet. The lights are always on and cannot be turned off. This is really hard because it means my daughter cannot get relief even when she has a headache.”
1748-20	2/11/2026	J.V.G.	Parent	4	41-42	“My daughter cannot sleep well here. The lights are on all night, and even though they turn off a couple of lights on the beds, they leave the rest of the lights on. Then the officers do a count with radios on at midnight and dawn, and the children always wake up and feel scared. My daughter and wife sleep in a room with six families all from different countries. There is also a lot of dust that falls from the ceiling onto the top bunk of the bunk[]bed, so my wife and daughter sleep together on [the] bottom bunk. My wife wakes up with back pain daily.”
1748-21	2/11/2026	Z.V.	Child	17	33-35	“It is hard to sleep here because the lights are on 24/7. Even if you want to try to cover your eyes with a towel, they come and take it off. They say that it’s because they need to see you. But I don’t think a towel over my eyes stops them from seeing me. We have forgotten how to sleep through the night, without waking up every 2-3 hours. This is bad for our brains, because we cannot produce melatonin we need from uninterrupted sleep. There were 12 people in my room until yesterday, and now there are 10 people. All the other families watch TV in Spanish, but since I do not understand Spanish, I do not watch TV. The guards come into our room two or three times each night, once around early night, once at midnight, and then again in the early morning to make sure people do not run away. It wakes me up each night.”
1748-22	1/14/2026	A.P.	Parent	14, 9	24-27	“The lights are constantly on in the rooms, causing disorientation and preventing proper sleep. The children have difficulty falling asleep and wake up several times during the night. Also, because the lights are constantly on, biological processes are disrupted, such as the production of the hormone melatonin, produced during sleep in complete darkness, which is necessary for growth hormones. The rooms are very cold. The children sleep in as many clothes as possible, but there are no warm blankets. The air conditioner is very loud, which also wakes the children up.”
1748-23	1/14/2026	Y.H.H.	Parent	11	6	“It is still so hard to sleep here. My daughter doesn’t sleep well and is sad all the time.”

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1748-24	1/15/2026	S.S.	Parent	11, 11	46-47	“Further, the overheads lights are on 24/7 in this facility and the indoor temperature is always freezing. This is really intolerable for [my son's] sensory needs. His sleep patterns have been disrupted. He struggles to fall asleep and frequently wakes up throughout the night. Our daughter, too, struggles from the lights being on all the time and the air conditioner. These conditions have led to persistent colds, requiring frequent medical attention. However, the medical center at the facility lacks adequate care, and it is impossible to receive the necessary medical treatment there.”
1748-26	2/12/2026	A.M.P.	Parent	9, 2	11	“It is very hard to sleep with the lights on all night. Sometimes we try to cover the lights with a handkerchief, but they take them away. The girls will try to sleep in my bed because they are sad. My older daughter cries every night for her Dad and because she wants to leave. My two-year old[] cries out for her Dad every night when he leaves. They blow a whistle at 8 pm for the Dads to leave for their area, and my daughter starts yelling ‘Papito, Papito – please don’t go! Please stay with us!’”
1748-28	3/12/2026	J.B.A.	Parent	8	15	“Sleeping has been hard for my son. He has trouble going to sleep at night and he will often wake up in the middle of the night. He has to sleep with his mom every night, which he didn’t do at home. He wants the lights to be turned off at night, but they will not allow it even though he and his mom are by themselves in the room.”
1748-30	8/12/2025	O.S.	Child	15	10	“They never turn the lights off. There are ten lights in the room, some are above our bed. We are not allowed to use the light switch. They don’t shut the lights off, they always leave at least half on, it gives us a headache and we cannot sleep. The officers will barge in and turn on the lights, not even warn us they are doing this.”
1748-32	1/15/2026	M.S.M.	Parent	10, 5	23-24	“The mattresses are really thin and directly on top of iron slats, which means our backs hurt a lot. We have to sleep with the lights on, and the kids cannot wear eye-masks so they just do their best to cover their eyes with their arms while they sleep. Anytime the officers want to come into our room, they knock as they [are] entering, so you cannot really tell them to wait.”
1748-34	10/10/2025	C.R.B.	Child	16	9	“We are living in a room with five other families. All six bunk beds are filled. It is difficult to be in an area with so many people. The lights are on all night. In the mornings, some staff will knock and it’s okay, but other staff will come in yelling really loudly and scare everyone.”
1748-36	2/12/2025	M.L.S.	Parent	15 mos., 2 mos.	38	“I cannot really sleep because I am caring for my two babies all night. There are four other families in the same room as me. It can be troublesome trying to get sleep in a room with so many children waking up and crying throughout the night. The lights are on all night, and it is really hard to sleep even with the eye mask. I have never slept with an eye mask before and it feels uncomfortable.”
1748-37	2/11/2026	M.P.P.	Parent	7	14	“It is hard to sleep with the lights on all night. [My son is] constantly trying to find a good position with the blanket or to turn away so that the light doesn’t bother him as much.”

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Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1779-4	4/22/2026	C.G.C.	Child	13	9, 19	"It's hard to sleep here because the lights are on all night and the bed is uncomfortable. My back hurts a lot from the bed because the mattress is so thin. My back never used to hurt at home. I wake up a lot at night here. . . . If I could change one thing here, it would be to turn off the lights at night."
1779-5	5/8/2026	A.O.	Parent	3	14	"My son has a very hard time sleeping here. I try to get him to sleep around 8 p.m. but he often can't fall asleep until midnight or 1a m. I am not sure why he is having trouble sleeping; maybe because there is a lot of stress here. We've also switched rooms and now we are in a new space with new people. That probably is making it harder for him to sleep too."
1779-6	4/22/2026	M.T.H.	Parent	6	13	"My son was not sleeping well at all because the lights are on all night. The night shift guards for our area will now allow me to put a towel over the bunk bed so that the light doesn't go through the area where my son is sleeping. This has helped him a lot but they really should just turn off the lights at night so all the children can sleep."
1779-7	4/22/2026	R.G.H.	Parent	10	26	"My son is not comfortable because the bed is hard; the metal sticks in his back. The lights are on all night. We have bad sleep here; the lights hit our eyes all night. We feel like caged chickens in an incubator."
1779-8	3/11/2026	S.D.C.	Child	15	11	"Having to sleep with the lights on all the time for months has made me so tired. I do not know what it means to have a pleasant night of sleep anymore. Even when we finally fall asleep with the lights on late at night, they knock loudly on the door at 6 a.m. every morning and call our names, which wakes us back up."
1779-9	4/22/2026	G.S.	Child	12	44	"I can't sleep well here. Back at home, I like to sleep in darkness. It's not dark here. You can't put something up like a towel to block the light. Sometimes there are noises at night too from staff. We don't feel comfortable using the eye masks."
1779-10	4/23/2026	R.R.M.	Parent	11	14	"The beds are too hard and hurt our backs and necks. We wake up sore all over our bodies. I get a headache from the lights. My daughter sleeps on the top bunk and moves around a lot because she has trouble falling asleep because of the lights."
1779-11	5/16/2026	O.S.	Child	16	26-27	"The lights were so bright throughout the whole day. They were barely dimmed during the night, and at 8 a m. an officer would come and turn on the lights right over your head even if you were sleeping. The officers had no consideration whatsoever and would report you or yell at you if you just tried to dim the lights throughout the day for a nap or if you were tired. It was very hard to sleep throughout the night when at any moment people could walk into your room and wake you up at any time. The eye masks were made of a bad and irritating material. They were kid-sized and didn't fit me or any adults."
1779-12	3/11/2026	A.L.G.	Parent	4	6-7	"It is also hard for [my daughter] to sleep because the lights stay on all night. We are not allowed to cover our heads with towels to block it out, and when we try to the guards bang the doors open with their radios on loud and wake everyone up. They come in and out of the room a lot and it always wakes her up. We also wake up with back pain here, because

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						the mattresses are so thin. My daughter sleeps on top of me trying to be more comfortable.”
1779-14	4/23/2026	E.C.M.	Parent	13	16	“It is very hard to sleep with the lights on all night. It’s harder for my son because he has to sleep on the top bunk. The officers will not let parents sleep on the top bunk so I am not able to switch places with him. There is a small difference in the light when some are turned off, but it is still too bright and doesn’t help. They offer eye masks but they are so tight and uncomfortable. They would leave marks on my son’s face and he didn’t want to wear them. My son also complains a lot about having back pain from the bunk beds.”
1779-15	3/12/2026	W.L.	Parent	7	14	“It’s hard for our daughter to sleep here because the lights are always on. She can’t sleep for long periods of time because the lights are on and people are coming in and out of the room to inspect. It’s as though she’s always only half asleep. They gave us an eye mask, but our daughter doesn’t like to wear it because it’s really uncomfortable. And even with the eye mask, there are still people coming in and out of the room at different times.”
1779-16	4/23/2026	J.A.I.	Child	16 (Declarant), 12	13	“It is hard to sleep with the lights kept on all night. They will turn off some lights, but the others are always on. Even after two months, I’m not used to it and it is still really hard to sleep. I tried to wear the eye mask, but it was too tight and I couldn’t sleep.”
1779-18	4/23/2026	O.B.	Parent	4	21	“The stress is so bad I can’t sleep.”
Total Families Who Raised Complaints About Sleep Disruptions: 60						

(8) HYGIENE PRODUCTS

Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1656-4	7/28/2025	C.G.V.	Parent	6	19	"Since I got here, they also raised the prices on items for people detained here to purchase. I have to buy shampoo and body soap for my daughter because the soap in the showers is just hand soap and it irritates her skin. I can say it's hand soap because it's the same soap that's everywhere else in this place. There's no shampoo in the showers."
1656-6	7/29/2025	W.M.A.	Child	15	9	"I buy a lot of things from the commissary like Maruchan, popcorn, and soap and shampoo. I have to buy soap and shampoo because the soap that's in the showers is the same hand soap that is at the sink, and it stings my skin."
1656-8	9/9/2025	A.D.C.	Parent	16, 9	15	"We have to buy hygiene items for our children at the store. We have to buy shampoo, toothpaste, toothbrushes, and deodorant."
1656-12	7/28/2025	E.O.N.M.	Child	13 (Declarant), 9	34	"We did not have very much cash when we got here, and we have had to spend it on the commissary soap, because the soap in the showers has given us an allergic reaction. It is the same as the hand soap in the showers and there is no shampoo. But because our body is more fragile than our hands it makes us really itchy and covered in hives. When we use the soap from the commissary our skin is fine, and same with others, but people who use the soap in the shower have those hives. The shampoo costs \$4 and the soap costs \$3."
1656-15	7/28/2025	K.M.	Parent	6	34	"A lot of people here have gotten rashes from the soap. But if you want to use a better soap or shampoo, you have to buy it."
1656-16	7/29/2025	B.G.R.	Child	13	22, 24	"We had some money when we came here. We have to spend our money just to have phone calls, deodorant, shampoo, snacks, and essentials. . . . When we first got here, we had to use hand soap to clean ourselves because that is all they have in the shower. We had to buy regular soap. We also had to buy a toothbrush because the one they give you here is not normal and breaks easily. It makes me sad for families who didn't bring money because they aren't able to buy the normal essentials."
1706-4	9/9/2025	J.R.F.	Parent	5	25, 30	"When we entered Dilley, they gave us lotion and shampoo. They also gave us a travel pack of toothpaste and a toothbrush. But we finished what they gave us after about eight days. You have to buy it after that if you want more. If you don't buy it from the commissary, there is nothing. All they have here is hand sanitizer. . . . The commissary doesn't have good food, it's just junk food like cookies, chips, and soda. We buy shampoo from the store."
1706-5	9/10/2025	Z.F.	Parent	6	68	"We can use the showers, but the soap they give us for hair and shower gel is very bad, like hand soap. We have to buy shampoo and soap from the commissary."
1706-7	11/18/2025	N.V.S.M.	Child	14	40-42	"In the bathrooms, there is hand soap and that is it. We have to buy shampoo from the store. Also, we buy toothbrush and toothpaste and more. The only thing we don't pay for is toilet paper. Our skin is very dry from the soap here. Our hair also is dry. We also buy razors from the store, but you can only use them one time."

(8) HYGIENE PRODUCTS

Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1706-8	11/18/2025	C.R.G.	Parent	14	17	"We have to buy hygiene products at the commissary. The products they gave us in the beginning were very hard on our skin, but we had to wait for my sister to put money in our account before we could buy other products. There is only hand soap in the showers, and it is harsh with a lot of chemicals. They should be giving children different soap for their skin. A lot of people here have skin allergies, and it could be the soap or it could be that they are giving people used clothes to wear."
1706-10	11/18/2025	M.M.S.	Parent	9	23	"We have to buy hygiene products from the commissary. Sometimes they run out of items. Last week we went without shampoo for five days because they had run out. In the shower, there is disinfectant hand wash, but we are not going to use it on our bodies or our hair."
1706-11	9/11/2025	M.R.P.	Parent	8	48-49	"When we arrived here, they gave us hygienic things to last one day. If you want more, you have to buy it. We buy toothbrushes, hair cream, lotion, shampoo, body soap, and other food and drink products. In the showers here there is just hand sanitizer. They want us to use this to wash our clothes, the plates, and our bodies. It's 'multi-use' apparently!"
1706-15	10/10/2025	K.M.L.	Parent	6 mos.	28	"They gave us a small amount of toiletries when we entered. When we ran out we had to buy more from the commissary."
1706-18	10/9/2025	V.L.G.	Parent	15, 9	13	"When you arrive here, they give children deodorant, tooth paste/tooth brush (that break immediately), lotion, and a brush. They don't give shampoo or soap. There is hand soap dispensers in the shower to use on your body and hair unless you have money to buy other products in the commissary. I am having to buy my children basics like toothbrushes, shampoo, bar soap, and deodorant."
1706-19	9/11/2025	N.C.G.	Parent	14	13	"It is so hard to be in good health here. So many children and parents have skin reactions and allergies. The soap is harsh and makes people get rashes. My son and I both had skin irritation using that soap."
1706-21	10/9/2025	S.M.G.	Parent	2, 1	10	"At the commissary, we have to buy deodorant, soap and shampoo. We did not like using the hand soap they have in the showers on our babies' skin, and the deodorant does not work."
1706-22	9/10/2025	N.T.G.	Child	16	15	"We have to buy soap, shampoo, deodorant, and toothbrushes here. The deodorant they gave us does not work at all and the toothbrushes fall apart."
1748-5	3/12/2026	M.S.P.	Parent	14, 12	32	"When we take showers there is one soap that we use, and it is the same as our hand soap. We have to use [it] for our body and hair. It leaves our hair and skin feeling really dry."
1748-7	1/15/2026	C.R.B.	Child	16	9	"We still have to buy soap, shampoo, conditioner, toothpaste, and deodorant in the commissary. It's tough though because they now limit our access to the commissary to one day a week. Yellow can only go to the commissary on Tuesdays. I think this is because there are so many people here that the lines to get in the commissary were long and people were waiting for hours."

(8) HYGIENE PRODUCTS

Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1748-11	3/11/2026	J.A.	Child	17	20	“They gave us hand wash to wash our bodies and it irritated our skin so we buy our own soap in the commissary and that has helped us avoid skin issues. I think the water is also irritating our skin but there is nothing I can do about that.”
1748-12	3/11/2026	T.M.	Parent	2	15	“We are given soap and shampoo but it’s not baby soap or specialized for him.”
1748-14	1/14/2026	D.P.C.S.	Parent	15	32, 36	“[My daughter] has really delicate skin, and she also breaks out from the soap we use on the clothes for the washing machine. It is so challenging because kids are not all the same, and some have more delicate skin than others, and it bothers them that there are not alternatives. . . . I need to spend money in the commissary so that I can have shampoo, conditioner, and deodorant. They only give us hand soap which does not work to clean our hair.”
1748-15	3/12/2026	S.K.	Parent	2, 1, 10 mos.	42	“I asked the officers here for shampoo for the kids and they told me to use the soap in the bathroom, so I have not received any tear-free shampoo.”
1748-19	1/14/2026	M.B.O.D.	Parent	17, 14	17	“The soap they have here hurts our skin and hair and make[s] us break out in hives. It is making my and my daughter’s hair fall out in big clumps.”
1748-20	2/11/2026	J.V.G.	Parent	4	44-46	“[My daughter] got a tiny bottle of shampoo for children when we first got here but they will no longer refill it. After the protest they said that they no longer had tear-free shampoo. The shampoo we buy in the commissary is \$6. The toothbrushes they give out are such bad quality too. So, we started having to buy in the commissary to clean my daughter’s teeth and wash [her] hair. The soap in the bathrooms does not really work either, and the toilets are not clean There are so many people using them that there are days the bathrooms run out of soap and toilet paper. So, we have to buy soap to even use the bathroom.”
1748-21	2/11/2026	Z.V.	Child	17	20, 40-41	“The officers have used false fire alarms to make us leave our rooms so they can search them. During these sweeps, we spend about an hour outside while they search our beds and closets randomly. Last time they did it, they threw away my basic coloring papers. They also took my hand cream and shampoo that I had bought at the commissary. This made me upset because I can only go once a week to [the] commissary to buy shampoo. . . . The soap in the bathroom smells weird and sour, and it is not foamy. I do not use the soap here for my hair, and I buy shampoo, conditioner, and a toothbrush. If the security guards are kind they will give us toothpaste, but often they say they do not have any toothpaste, so we have to buy it. There has also been an issue with the laundry not having detergent for months. When we ask for detergent, they say we can use the hand soap from the bathroom, even though we have no way to take the hand soap out of the containers. All of the washing machines smell like mold, so when we try to wash our clothes, we just rinse them in moldy smelling water.”

(8) HYGIENE PRODUCTS

Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1748-22	1/14/2026	A.P.	Parent	14, 9	54	"The poor-quality soap in the showers, combined with the poor-quality water, causes itching and damages hair. Shampoo, hair conditioner, soap, and antiperspirants of any reasonable quality are only available at the store. Prices range from \$2.60 to \$15."
1748-24	1/15/2026	S.S.	Parent	11, 11	50	"No one cleans the places here thoroughly. No one is cleaning the water coolers and no one cleans the gym that is used for mealtimes. They are not particularly good at cleaning anything here. The conditions are unsanitary."
1748-25	1/14/2026	A.K.	Parent	2	46-47	"We sometimes have gotten the tear-free baby shampoo but sometimes not. At one point we got it, but at another point they said there is no shampoo like that here and that we had to go buy it at the store. They have also said that to us before about formula. A lot of the kids have fleas in their hair here, our son included."
1748-32	1/15/2026	M.S.M.	Parent	10, 5	16	"Our skin has been hurting from the soap in the bathrooms. The[re] is only one soap that we have for our hands, hair, and body, but when we complain the staff just say to buy it in the commissary. But we do not have money for that and when people have money they try to use it to call their family. I also cannot get relief from the medical providers here, because when we bring up peeling skin, they tell us to drink water."
1748-33	3/12/2026	N.S.R.	Parent	5	12	"We buy soap, shampoo, and conditioner at the commissary because the hand soap they have in the shower is too harsh for my son's skin. I have never been told that we could get soap for our children's sensitive skin. We also buy soap and cream at the commissary; it's like a business in here. They sell everything in here and everything is expensive."
1748-34	10/10/2025	C.R.B.	Child	16	10	"We buy soap, shampoo and conditioner in the commissary. The only thing in the showers is handwash."
1748-36	2/12/2025	M.L.S.	Parent	15 mos., 2 mos.	15	"We have to use the same soap for our children as for ourselves. There is no soft soap for babies."
1779-5	5/8/2026	A.O.	Parent	3	16	"The only soap that is available is the same soap that is used to wash hands or do dishes. They have never offered me any different soap for my son either."
1779-7	4/22/2026	R.G.H.	Parent	10	14-15	"Dilley does not have the kind of conditions that any family should be in. Hygiene is a big problem - it's not adequate. My son doesn't have any soap or shampoo; I have to buy all of it. He can only use the liquid hand soap."
1779-9	4/22/2026	G.S.	Child	12	23-24	"We haven't gotten any shampoo. They said those are only for babies. If we want shampoo, we have to buy it at the store. We are not getting floss. We are getting very cheap toothbrushes and toothpaste. You can buy better stuff at the store. The toothbrushes are really small."
1779-10	4/23/2026	R.R.M.	Parent	11	21	"We can only get shampoo if we buy it. We only got soap when my friend left it for us; otherwise, we only get soap if I go around asking for it."

(8) HYGIENE PRODUCTS

Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1779-11	5/16/2026	O.S.	Child	16	11-12	“The handbook said there was a hygiene kit, but we never got any of that. We asked them about conditioners and sunscreen, but we had to buy all these things from the commissary. There was all-purpose hand soap in the bathroom. It caused rashes for a lot of people. My mom couldn’t use it, because it would cause redness. We were supposed to wash our hair and body with that.”
1779-14	4/23/2026	E.C.M.	Parent	13	20	“They gave us some hygiene products when we first got here – a toothbrush that broke after the first use, a small tube of transparent toothpaste, a tiny lotion, a deodorant that was not adequate. They did not give us shampoo or soap – they just expect us to use the hand soap in the showers. We buy shampoo, soap, toothpaste, toothbrushes, and deodorant at the commissary. We ask to be able to buy wipes to use, but they do not sell them.”
1779-16	4/23/2026	J.A.I.	Child	16 (Declarant), 12	14	“When we first got here, they gave us lotion, toothpaste, deodorant, and a tooth brush. The toothpaste didn’t work; the toothbrush fell apart quickly; and the deodorant was strange and also didn’t work. The hygiene kit doesn’t include soap or shampoo. They said we should use the hand wash in the shower, but my mom used it and it caused little spots on her arms. Now we buy soap, shampoo, toothpaste, deodorant, and toothbrushes from the commissary, in addition to food [and] water.”
1779-18	4/23/2026	O.B.	Parent	4	17	“We have received only one very small bottle of shampoo since arriving here. We have not gotten any soap. We only have the liquid soap in the bathrooms. My daughter’s skin is getting dry and flaky and so is mine.”

Total Families Who Raised Complaints About Hygiene Products: 41

(9) CLOTHING

Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1575-5	6/5/2025	T.M.	Parent	Baby	34	"My baby was given three outfits when we arrived at Dilley – three babygros (long-sleeve onesies) and one babyvest (short-sleeve onesie). One of the babygros was ruined soon after we arrived at Dilley because he had an explosive poop from the new formula. I asked for another babygro for my baby a few days ago, but staff have not given me one. I have to wash a babygro in the laundry every night to make sure that he has a new one for the next day. Like all babies, he spits up and gets messy, and it's stressful to have only two pieces of clothing for him."
1584-6	6/5/2025	L.J.H.G.	Parent	4	19	"My son does not have enough clothes here. We were just given three sets of sweatpants and sweatshirts. He has no t-shirts and only one pair of shorts."
1584-8	5/1/2025	Y.F.A.	Parent	3	16	"They give us 3 sets of clothing, which means I have to wash our clothes every other day. They give my son diapers, but they only give three or four at a time so I am constantly asking for more."
1584-12	5/2/2025	S.L.	Parent	9, 8, 4, 9 mos.	28	"It is so hot here my kids cry and get dizzy. We don't have enough clothes for the hot weather. We only have one pair of shorts each for the boys and it's too hot for the track suits they gave us. I put in a request 4 or 5 days ago for my baby to get clothes that fit, but I still haven't gotten them and so I am having to roll up the sleeves of the clothes for my four year old. I also don't have clothes for my older son that fit. You have to keep asking over and over for clothes."
1656-4	7/28/2025	C.G.V.	Parent	6	21	"There's an orientation video on the computers that we've watched about what we should receive here, and it's not followed. For example, the video says we should receive six pairs of pants and I usually only have two."
1656-5	7/28/2025	C.H.	Parent	6	23-25	"It is cold in the room where we sleep. We get blankets but they took our sweaters away. We had them before, but about two weeks [ago] a staff member came to the room and asked me to open my closet. When I opened the closet the[y] took our clothes, leaving only two T-shirts, two pairs of pants, and two pairs of boxers. For my son they only left him with two T-shirts, three pants and two boxers. We can use the laundry when we need to. We have to wash every day because we have only two outfits to wear. My son and I only get sweatpants, we cannot wear shorts even though it gets very hot."
1656-8	9/9/2025	A.D.C.	Parent	16, 9	9	"We have gone to the doctor several times, but the options are very limited. For example, since arriving here, our son started refusing to use the bathroom because of how strong the smells are – the cleaning chemicals and other smells. When he would go in the restroom, he would throw up. Because he would not want to go in there, he would hold it and hold it, and then eventually he would pee his pants. Some days, I would need to change his clothes five or six times. I needed to ask for extra T-shirts and pants because I needed to change his clothes so many times a day and wash them every day. I still need to change his clothes 3 or 4 times sometimes. I am washing clothes every day."
1656-10	6/5/2025	E.M.	Parent	8, 10	17	"When we arrived they gave each of my sons three t-shirts and three pairs of long pants which are very hot, so they don't wear them. They each have five pairs of underwear and

(9) CLOTHING

Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
						socks, and one pair of shorts. One had a rain jacket and the other didn't, so I gave him mine. They also each have a baseball hat. One person who was here for about 21 days, had been asking for new pants for their child. The staff did not bring the new pants to the room until the day after the family had been released and were not there anymore."
1656-11	5/2/2025	E.R.R.	Parent	15, 11, 8	14	"My kids have three sets of clothes, but they don't have any shorts. I requested more clothes for them about four days ago, but we haven't gotten them."
1656-12	7/28/2025	E.O.N.M.	Child	13 (Declarant), 9	20	"We ask them to [adjust] the AC so it is not so cold, but they said that no, and it is ICE rules that it be cold, so we feel cold all the time in there. We only get two pants, three shirts, one sweater, and then you have to wash them every day, but then things get lost in the machine. If a shirt gets lost you have to request a new one but when that happened to my dad, it took 15 days from the request to get a new one. My mom's shoes broke three days ago, so that the bottom no longer works. She asked for new ones, but they haven't given them."
1706-4	9/9/2025	J.R.F.	Parent	5	28-29	"For clothes, they gave us just two shirts and two pants. They say this is all there is. The size is not right for my daughter; it's too big for her. Basically every time we shower, we have to wash our clothes too. Most of the time there is no soap in the washing machine to wash the clothes; it just washes with water. Sometimes we put shampoo in there if we have any."
1706-6	9/11/2025	I.B.	Parent	7,2	53-54	"Our son was given shoes two sizes too big. We asked for proper size but it takes weeks to get these replaced. The same happened to me, I was given the wrong size of shoes, I asked for shoes in my size but it took weeks. The same is true even for a t shirt. We ask for a t shirt and it takes a very long time to get one, although we know they have piles of them in storage, they just do not give them to us."
1706-7	11/18/2025	N.V.S.M.	Child	14	25-26	"It's about 3 outfits per person, but too many people are trying to wash their clothes at the same time. People accidentally steal your stuff or confuse it. The underwear burns or breaks, and they won't give you more unless it's totally ripped up. You have to fill out a form and then it takes a while for the clothes to actually get to you. About one week. There is soap in the laundry room, but it's a very small amount."
1706-9	11/19/2025	A.K.	Parent	1	24	"It is also very cold in the room most nights because of the air conditioning, and he doesn't have enough clothes. A while ago, I asked for socks. It took them a whole week to give me the socks."
1706-11	9/11/2025	M.R.P.	Parent	8	40-41	"My daughter just has two shirts and two pants, but one of the shirts is for sleeping. I wash her clothes everyday. She has no shorts, even though it's very hot here. The washing machine has a button for soap. You can push it, but we see it doesn't come out. It's supposed to be self-dispensing, but it doesn't work. We tell the guards, and they say you have to push the button. If you get to show them it doesn't come out, sometimes they'll give you some soap and throw it in there but it's not a lot."

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Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1706-12	10/10/2025	N.G.C.	Parent	5	15	“When we arrived, they gave my daughter two changes of clothes. I have to wash the clothes every day after we bathe. I asked for sandals for my daughter, and I am waiting for an answer.”
1706-15	10/10/2025	K.M.L.	Parent	6 mos.	22-23	“Every day, I have to wash my clothes, because we only have two outfits. For my baby, I have four outfits. For the diapers, we get 3 to 4 at a time.”
1706-16	11/21/2025	N.G.	Parent	13, 11, 4	20-21	“At first, they didn’t have my wife’s or daughter’s shoe size, and the shoes they give us break very easily. The quality of clothes is very poor and very itchy, which creates a lot of allergies. We have to wear the same clothes we wore during the whole day again at night to sleep in. Only our youngest son is allowed to wear pajamas at night, the rest of us have to sleep in the same clothes that we wore outside. We’re not allowed to wear the clothes we brought. We have to wear uniforms that give us allergies.”
1706-18	10/9/2025	V.L.G.	Parent	15, 9	11-12	“We only have two changes of clothes. This means we have to wash clothes every day. . . . [T]he washer soap doesn’t really foam up and the clothes still smell after washing. I end up washing our underwear with soap in the shower because the soap for the washer doesn’t really work. I’ve tried several washers and they don’t seem to work. Our underwear areas have had skin problems, and my younger son got a fungal infection. When I took him to medical, they said that infections like this were common here because of the material of the clothes we are given.”
1706-19	9/11/2025	N.C.G.	Parent	14	16	“Normally it takes a long time to get something if you request it, like if you need a new shirt or something.”
1748-11	3/11/2026	J.A.	Child	17	19	“We have three changes of clothes but it’s not very much and it’s hard to get new clothes if we want something new. My mom says it is easier to not complain and avoid the stress of trying to get new things.”
1748-12	3/11/2026	T.M.	Parent	2	22	“We don’t have enough clothes especially because of how much time we’ve spent here. For example, I need more socks for my son, but when I go to ask for them, I am told we already have enough. It’s not true – we now only have one good pair of socks for him.”
1748-19	1/14/2026	M.B.O.D.	Parent	17, 14	19	“It has been so cold here recently and our clothes are not warm enough. They give us gloves but they’re not made for the cold. My fingers get purple.”
1748-21	2/11/2026	Z.V.	Child	17	36	“When it got cold here, I needed a beanie and gloves, but it took two to three weeks for them to provide those items, so by the time I got them, it was not as cold anymore. I also need new shoes, because after about 20 days they break. They did not give shoes to my mom when it was raining, even though her shoes were cracked and her socks were wet. They said that the shoes were not cracked enough to change. That made me really angry.”
1748-22	1/14/2026	A.P.	Parent	14, 9	53	“The clothes and shoes they give out are of very poor quality. The sneakers are so bad that they last only a week. The soles crack, allowing water and dirt to pass through; replacement requests take weeks.”
1748-23	1/14/2026	Y.H.H.	Parent	11	10	“The kids also don’t get enough clothes here. I have asked many times for new shoes for my daughter because the soles are broken, but the lady has told me that they don’t have

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Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
						any in her size. They keep asking me to fill out a form. I have filled out the form and given it to them two times and still haven't gotten any shoes. I have also asked for a second sweater because my daughter was only given a white one, and it is hard to keep it clean after three months. Each time, the lady says they don't have any more without even checking. I finally got a sweatshirt from a family who was leaving. I haven't done a grievance on this because I don't know how to use the system."
1748-32	1/15/2026	M.S.M.	Parent	10, 5	27	"The shoes here break within one week even when we just walk around in them. Right now, there are not enough shoes to give children new shoes when they break. If the kids' clothes rip, we do not get new ones right away either. The three pairs of clothes and one shoe pair they give us is not enough, because on top of the items getting worn down, the children often get dirty. So, we have to do laundry every day. And when it rains, since we only have one shoe pair, we just have to walk around with wet shoes."
1748-34	10/10/2025	C.R.B.	Child	16	8	"When we arrived, they gave me two shirts, two shorts, one pair of sweatpants and a pair of shoes. We have to wash our clothes almost every day. Often there is not detergent, and we have to ask again and again. Some of the kids in my living area have asked for more clothes or shoes and it takes a long time to get them."
1748-36	2/12/2025	M.L.S.	Parent	15 mos., 2 mos.	39	"It is hard to wash clothes here, because there are only seven washing machines for everyone, and it is not enough for us all to do laundry as much as we need."
1779-6	4/22/2026	M.T.H.	Parent	6	17-18	"The process to get more clothes is complicated. You have to make a written request and explain why you need more clothes. Then they go to your room and check your clothes to see if the reason you gave was true. It can take days for them to check the clothes in your room. It's also hard because children are only allowed to have one pair of shoes—even when it is raining a lot and their shoes are really soggy. For two weeks, I had been asking for new shoes for my son because the soles were broken. I had been waiting and waiting, but then the day a senator came to Dilley—I was suddenly able to get the new shoes. I notice that things families have been asking for often happen around the time the politicians visit."
1779-7	4/22/2026	R.G.H.	Parent	10	17	"He only has one pair of shoes and has to wear them when they are wet after it rains."
1779-8	3/11/2026	S.D.C.	Child	15	18	"I have very sensitive skin, and the borders of the laundry machines, which are always dirty, give me rashes and hives. My skin feels so itchy, and sometimes it is red. The feeling does not go away. Sometimes when I do the laundry, the clothes all come out stained, and it makes me think there are bacteria all over everything."
1779-11	5/16/2026	O.S.	Child	16	11-12, 46-47	"Access to clothes and shoes was determined by staff. Whoever we were with at first did not give us access to new clothes, but then our second officer was better. The first officer said we were only allowed one shirt, one pair of pants, one pair of pajamas, and a sweater. Because of this, we were washing our clothes every day. If my five-year-old siblings spilled something, that was it for the day because you couldn't wear your pajamas outside the bedrooms. If you asked for more clothes, you had to show staff it was ripped. That

(9) CLOTHING

Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
						treatment lasted our first six months there. You could only have one pair of shoes. For me, I'm a size 12, so if my shoes broke or something it would take almost a week to get a new pair. There was a whole week I had to walk around in slides. When we changed units and officers, it was a bit better."
1779-15	3/12/2026	W.L.	Parent	7	19	"It's very difficult to get different clothes and switch clothing sizes. Our daughter wasn't given the right size of clothing at first and we had to fill out a form and then wait a week to get clothes that fit her. Shoes are the hardest part. The shoes break every couple of weeks and when it rains they fall apart. If you need new shoes or need to change the size of shoes it takes a very long time."
1779-16	4/23/2026	J.A.I.	Child	16 (Declarant), 12	12	"They do not give kids enough clothes. They just give you three t-shirts and three pants or shorts. So - if you want a pair of pants, you can only have two pairs of shorts. My mom and I are washing clothes every other day because we don't have enough clothes otherwise."
1779-18	4/23/2026	O.B.	Parent	4	20	"We have only one pair of shoes each, and I have only one sweater."

Total Families Who Raised Complaints About Clothing: 36

(10) LACK OF FREE PHONE CALLS TO FAMILY

Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1575-5	6/5/2025	T.M.	Parent	Baby	24	"I have been able to use the phone in my room to call family in [my country of origin], but it is very expensive. I made two three-minute calls and the total was about seven dollars. At first, staff gave me the wrong country code for [my country of origin], so I wasn't able to place calls for a week, but then staff gave me the correct country code. The phone in my husband's room does not work, and the phones in the phone room on his unit do not work, and they haven't worked since we arrived."
1575-6	5/2/2025	K.V.L.	Parent	5	17	"I've been here for six days and was able to make my first phone call at Dilley the day before yesterday. At first, I asked for a call and the staff said 'Do you have money?' I said no. They said 'How do you think you're going to call?' The staff keep repeating: 'If you don't have money, you're not going to have calls.' I don't know how I could get money on my account if I can't call anyone to ask them to put money on it."
1575-14	5/2/2025	M.M.	Child	15 (Declarant), 12, 10	24	"When we first got here, we got one call for five minutes. After that, we have to pay for each phone call. We are lucky because our family gave us money for calls."
1575-27	5/2/2025	L.Q.A.	Parent	5	19	"My son is allowed to call family, but we have to pay for all of his phone calls. I don't know exactly how much it costs per call, but a \$50 card lasts about five days. He has used the tablet for FaceTiming and it costs \$3 for 15 minutes."
1584-6	6/5/2025	L.J.H.G.	Parent	4	24	"My son has to pay for phone calls to our family. He will talk to his grandmother when I am on the phone with her, and it is very expensive. We have to use a prepaid card. I don't know exactly how much it costs to call my mom in [my country of origin], but every time I talk to her- I talk for a little and the balance goes down a lot."
1584-8	5/1/2025	Y.F.A.	Parent	3	17	"For my son to talk to his Dad, we have to pay for it. I have heard they have FaceTime video and I think it costs about \$3 for ten to fifteen minutes, but we have not used it."
1584-9	6/5/2025	C.M.Z.	Parent	9, 6	12	"When we got here, we were given a coupon for 3 minutes each to use the phone. After that, my children and I have to pay to use the phone to call family."
1584-12	5/2/2025	S.L.	Parent	9, 8, 4, 9 mos.	29	"To call family members, you have to pay. My children could only talk to family if they pay for it."
1656-4	7/28/2025	C.G.V.	Parent	6	18	"Everything costs money here. It costs \$1.35 or \$1.75 a minute to call a mobile phone in [my country of origin]. I've heard there are video calls, but my mom hasn't been able to figure out how to set it up."
1656-5	7/28/2025	C.H.	Parent	6	17-18	"We must pay to use the phone. The calls are very expensive, especially international calls. There is a phone in the room but we have to pay to use it. Even if we do not have money we cannot get a free phone call. The calls are very expensive."
1656-6	7/29/2025	W.M.A.	Child	15	10	"I have to pay for phone calls to my family. I received a free phone call the day I arrived, but that was it. There are no more free calls."
1656-7	5/1/2025	E.Z.R.	Child	16	7	"The staff doesn't really talk to us here. I have talked to my family members by phone, but you have to pay for phone calls. I haven't talked to any of my friends. I miss them a lot."

(10) LACK OF FREE PHONE CALLS TO FAMILY

Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1656-11	5/2/2025	E.R.R.	Parent	15, 11, 8	10	"If my children want to use the phone, we have to pay for it. Yesterday was the first time we were able to make a phone call because of the cost."
1656-12	7/28/2025	E.O.N.M.	Child	13 (Declarant), 9	41-43	"We cannot make calls here much because we do not have money. My grandma said to stop calling because we cannot afford it. They say it costs about \$10 cents a minute, but it costs way more than that. My mom called a friend who lives in the United States and it was \$5 for a couple calls to her. It's way more if it's abroad, you can spend \$5 in a quick call. The tablet calls are even more, so we have never done it because we cannot afford it. We are not allowed to make a free call to our family. We were only allowed to make a free call for five minutes one time when we got here. It is a lie if they say we can make free calls to our family because we have not been allowed. Also, it costs money to send a message on the tablet. My mom does not have any money in her account so we have been trying to ask questions to ICE through the tablet and it says [the message] cannot send because of the [lack of] money. It just shows that \$0.00 and prevents it. Anyone saying that is free is lying."
1656-13	7/28/2025	I.C.B.	Child	14 (Declarant), 7	16	"I wish I could use my phone. It's been two months since I've used it. I talk to my uncle in the United States on the phones here sometimes. It's expensive to call to [my country of origin], something like \$5 or \$8 per minute—I'm not sure. We haven't done video calls, but I know those also cost money."
1656-15	7/28/2025	K.M.	Parent	6	40	"Landline phones are available, but the connection is expensive. Right now I can't recall how much it costs. When you make a call, they tell you the balance on your account, but not at the end, so you can't know until you make another call. But I do know it's not cheap."
1656-16	7/29/2025	B.G.R.	Child	13	23	"When we call my family, like my grandmother, we have to pay to talk to them. We need money in our account to make the call. Another woman in our room has no money and my mom is letting her use some of her minutes. It is really sad because that woman doesn't have anything or any money. She is feeling very sad."
1656-17	7/29/2025	M.O.	Parent	2	29	"There is a landline here that you can use from 8 am to 9 pm. It costs some money for local calls but if you call internationally it is a \$1 per minute. I am charged for all calls to my family, except for the first five minutes I got when I first got here. I think that if anyone said we can call family for free, they probably were referring to that one-time free family call. There are no other free calls."
1706-4	9/9/2025	J.R.F.	Parent	5	31-32	"I never touch the phone here without having money. . . . If a friend or someone else who isn't a lawyer calls me and leaves a message for me here, they don't tell me."
1706-5	9/10/2025	Z.F.	Parent	6	53-54	"We have to pay to use the phones It is very expensive to call internationally, it is a dollar every two minutes. We have called my wife, but it is so expensive we cannot talk as much as we want to. My son has been away from his mom and brother for too long, he is forgetting what it's like to have the family near and to be social."
1706-7	11/18/2025	N.V.S.M.	Child	14	45	"We have to pay for all the calls to family members."

(10) LACK OF FREE PHONE CALLS TO FAMILY

Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1706-8	11/18/2025	C.R.G.	Parent	14	19	"My son is not able to make any free phone calls to family members. They gave us a card for 3 minutes when we first arrived, but that is all."
1706-10	11/18/2025	M.M.S.	Parent	9	25	"My daughter is not permitted to make free phone calls to family members. There are signs that say that calls cost seven cents per minute, but you have to look at the fine print that there is a 23% surcharge."
1706-11	9/11/2025	M.R.P.	Parent	8	53	"When I call my family, it's not free."
1706-12	10/10/2025	N.G.C.	Parent	5	18	"We are able to use the phones here, but I don't have money for calls. My daughter is not given free phone calls."
1706-13	10/9/2025	L.R.L.	Parent	12, 8	38	"The phone calls here aren't free."
1706-15	10/10/2025	K.M.L.	Parent	6 mos.	31	"My family has to put money on my card to make phone calls to them."
1748-5	3/12/2026	M.S.P.	Parent	14, 12	33	"When we first got here, they gave us a free phone call during intake, but now we have to pay for calls. We were never allowed to make another free call to our family members. So, my children's grandmother puts money [i]n our account. We have to balance having enough time for them to speak with her without spending all of our money."
1748-6	1/15/2026	M.M.S.	Parent	9	20	"My daughter has never been given free calls to our family. We spend about \$100 weekly on phone calls."
1748-7	1/15/2026	C.R.B.	Child	16	13	"We have to pay for my calls to my sisters. It used to be that I could email my sisters, but they recently changed the system and I think you have to pay a monthly fee to be able to use the new email system. I'm not sure how to use it."
1748-9	3/12/2026	E.C.M.	Child	13	24	"I have to pay to call my dad. There are times when we have faceted my dad and tried to explain what is happening and ICE cut the signal, like when we tried to tell my dad that they had locked us in our rooms because the Congresspeople had come. This happened another time when we had a call with a reporter as well. I think they do not want us to share critical things about our experience here and interfere with these calls."
1748-11	3/11/2026	J.A.	Child	17	13	"We are able to call my uncle and we have video calls with him but they are expensive and we have to pay for them. We don't have to pay to talk to our lawyer if he makes an appointment to talk to us but if we just want to pick up the phone and call him that will cost us money."
1748-12	3/11/2026	T.M.	Parent	2	17-18	"It costs us money to use the phones, even to call our attorney, but if our attorney makes an appointment to talk to us then it is free for us to talk to him. It is very frustrating that we are spending so much money to make phone calls and buy food at the commissary. We spend about \$100 per week buying things we need."
1748-13	1/15/2026	C.H.H.	Parent	13	52	"When we call family members in [my country of origin] it costs \$0.35 per minute, while Colombia is \$1 per minute, and calling people at home in Texas is \$0.17 per minute. I call family in [my country of origin] once per week because it is so expensive, but I try to call my 16-year-old once per day because I am so scared for him. All the calls to family cost money and no one has ever said there is any way to call family for free."

(10) LACK OF FREE PHONE CALLS TO FAMILY

Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1748-14	1/14/2026	D.P.C.S.	Parent	15	6-9	“Currently, my baby is with her half-sister in the United States. For much of the time we have been here, my daughter’s half-sister kept me updated about her through photos and videos. That is how I saw my daughter taking her first steps. But this week they took away our Gmail access and my 15-year-old daughter and I will not be able to see photos or videos of my baby daughter anymore. Now, they say we can only use Proton Mail, which I have never heard of before. I think it allows ICE to see what everyone writes and will not allow us to share videos. The only option we have now is to spend money to call our family, but if we spend all of our commissary money on calls too quickly then we cannot keep in contact with our family. So, we are rationing minutes so we can keep communicating with them.”
1748-18	2/12/2026	L.R.C.	Parent	15	34, 38	“Anytime we want to call our family members we have to pay money to place the call. . . . So many people are spending all of their money on water and paying for minutes to make calls to their family.”
1748-19	1/14/2026	M.B.O.D.	Parent	17, 14	29	“If we want to call . . . our family members, we have to pay. I have asked and the staff have said that there’s no other way to make calls.”
1748-20	2/11/2026	J.V.G.	Parent	4	40	“When we first got here, we had access to Gmail and we used it to communicate with our family, but around the time of the protest, they blocked it. We cannot use Proton Mail either, even though that’s supposed to be the new option, because you have to pay after the first 5 messages[,] which all have limited characters[,] to use it. Making a phone call with our money is a better use of funds to communicate with family.”
1748-21	2/11/2026	Z.V.	Child	17	22-23, 25	“We have to pay for phone calls here and the phones do not always work. It is too hard for me to make the phone work in my area. For some reason, it works from my dad’s side, but not mine. We do not know what the problem is, but because of this our dad has to make any calls. Early on, we tried to request calls to my brother while he was in Alligator Alcatraz, but they did not grant us access. He has gotten out, but because of the phone issues I have been having, my dad is able to talk to my brother, but my mom and I cannot. It costs about \$0.10 per minute to make a call with taxes. There is no way to make free phone calls to family members, except for the original 5-minute call when we were first detained. . . . For families without any money, the kids cannot call any family members.”
1748-24	1/15/2026	S.S.	Parent	11, 11	65	“You have to pay for every phone call here, whether it’s to an attorney or not.”
1748-30	8/12/2025	O.S.	Child	15	31-32, 34-35	“We got moved to San Antonio and I had surgery there immediately. I wanted to tell my sister that I was ok and what was happening. My mom begged to call my sister because we knew shew as scared. She didn’t know whether [we were] ok and we had been away now for many hours. She was trying to care for our little siblings and keep them calm all while not knowing where we were or if we were ok. . . . Until that night they didn’t tell my sister anything, they wouldn’t let us call so she would know what happened. At 9:30, after five hours, they gave us one minute to talk to her. My mom could barely say anything because she was rushed off the phone immediately.”

(10) LACK OF FREE PHONE CALLS TO FAMILY

Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1748-32	1/15/2026	M.S.M.	Parent	10, 5	4-5	"My mom and dad are also detained in another facility. I have not been able to talk to them at all since being here. I heard that you could request a call every fifteen days to another facility where family members are held, but I am scared to do it because they record everything and have people listen in to your conversations. When we were first arrested, they confiscated my cell phone at the border, but now I have no way to communicate with family if I am sent somewhere. I asked ICE for it, and they said I will not get it back."
1748-35	11/18/2025	K.P.L.R.	Parent	6	8	"My family finally figured out how to put money on my phone, so I can now make phone calls, but they are not free."
1779-4	4/22/2026	C.G.C.	Child	13	17	"I talk to my stepdad and siblings on the phone every day. I don't know how much it costs, but I know we have to pay for the calls and it adds up."
1779-7	4/22/2026	R.G.H.	Parent	10	27	"I can't call my family because they are not in this country and it costs too much. I have to pay to call anyone I know here. The only time it's free to call is when you first get here, and that's only for five minutes."
1779-9	4/22/2026	G.S.	Child	12	46	"I can't talk to my friends because I don't know any of their phone numbers. It's pretty expensive to talk on the phone. If you don't have money here and you're about to be deported, you're screwed. You're probably starving from the food here and you can't tell anyone where you are going."
1779-11	5/16/2026	O.S.	Child	16	28	"We were always paying for the phone. No one ever told us anything about free calls to our family or even to our attorney. Many people that didn't have money would go for weeks or even months without communicating with their families. It was one of the most taxing things for people there. Some people paid more than \$500 just for phone calls to be able to stay in touch with their loved ones."
1779-14	4/23/2026	E.C.M.	Parent	13	21	"My son talks to his stepfather and siblings every day. When we got here, we were given \$5 each for a call, but after that children have to pay for calls to family. . . . We end up spending \$26-30 every two days on phone calls to my children. . . ."
1779-15	3/12/2026	W.L.	Parent	7	15	"We have access to phones here but it's too expensive for us to make phone calls. It costs too much money for us to be able to actually use the phones."
1779-18	4/23/2026	O.B.	Parent	4	18	"The phone in my room does not work, even though it worked when we first arrived."
Total Families Who Raised Complaints About Lack of Free Phone Calls to Family: 50						

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Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1575-5	6/5/2025	T.M.	Parent	Baby	16-17	“My husband and I want to have an asylum interview to be able to tell our story, but we don’t know when we’ll be able to get an interview. When we first arrived here almost two weeks ago, I messaged ICE on the tablets and asked for an interview, but they have not responded to me. My husband messaged ICE on the tablets as well, and after he messaged them a few times, he finally got a response yesterday that said that they will schedule an interview. We still don’t know when that interview will be. We want to follow the rules and do everything the right way, but that’s impossible when no one tells you what the right way is. We have not received a list of available free legal counsel. We saw a flyer with pro bono legal services numbers on it, and we have called, but no one has picked up.”
1575-13	5/1/2025	F.Y.	Parent	1, a few mos.	20-21	“I have not been able to call a lawyer since I arrived here. They haven’t told me anything about what is happening or what to do about my case. The telephone here costs money and I did not come with money. I don’t know whether we can make any calls for free.”
1575-16	5/1/2025	A.T.	Child	11	33-35, 41-42, 49	“We got the [credible fear] interview on April 14. We had had no opportunity to call a lawyer, we did not know that any legal service providers could help us and did not know any contact information for a lawyer, and we did not have an account to use the phones. We wanted a lawyer at our interview but they did not allow us to contact a lawyer. How could we have explained our situation when we hadn’t slept, we didn’t know what to do, we didn’t understand the system, we did not even know there was internet in the library, and we had no one to answer our questions? After the interview response, they gave us a PIN number and told us we could use it for phone calls, but they didn’t tell us how to call or where there were phones. They gave me a PIN number but did not give my mom a working number. . . . My mom wrote to ICE on the library computer explaining that we need more information about this process and what will happen and they did not respond. Once we were able to access to the computers in the library, we searched for information about asylum ourselves, trying to understand what was happening. . . . The thing we want most is to be informed about our situation, the process, [and] how to get in contact with a lawyer.”
1575-13	5/1/2025	F.Y.	Parent	1, a few mos.	20-21	“I have not been able to call a lawyer since I arrived here. They haven’t told me anything about what is happening or what to do about my case.. The telephone here costs money and I did not come with money. I don’t know whether we can make any calls for free.”
1575-27	5/2/2025	L.Q.A.	Parent	5	8-9	“I’m upset because no one here is telling me anything. Talking to the <i>Flores</i> attorneys is the first time I have spoken to anyone. The people here tell me that they don’t have any information. They have not given me a list of free lawyers for my son. I signed up to talk to attorneys on a sheet of paper, but that was about six days ago and I have not heard anything, yet. One of my family members has my immigration paperwork, and they could send it to me if I knew what was going on.”

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Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1584-8	5/1/2025	Y.F.A.	Parent	3	18	“My son has never been given a list of free legal counsel. I have not seen a list of legal counsel on the wall, but I got a number for lawyers from another resident.”
1584-12	5/2/2025	S.L.	Parent	9, 8, 4, 9 mos.	30	“It is very hard to get ahold of a lawyer here for children or anyone. There are numbers for lawyers on a list on the wall here, but none of the numbers work. I have tried to call all of the numbers on the list and none of them worked anymore. I told one staff that the numbers don’t work and she said, ‘I don’t know if we are offering free lawyers anymore.’”
1656-5	7/28/2025	C.H.	Parent	6	46-48	“We can only email immigration officers, we are not able to email anyone else. We have a tablet. I tried to send an email to another person but the tablet did not allow me, it did not go through to the person. The interview was about a month ago and still nothing has happened. We just want a lawyer to help us, we need to get out of here.”
1656-9	6/4/2025	A.T.	Parent	13, 11, 4	20-21	“When we came, there were no posters on the walls, and they didn’t give me any help to find a lawyer. Most of the useful sites on the internet are blocked. I spoke to a few lawyers that I was not sure could really help me. Later, one of the residents gave the information for RAICES. I was finally able to call them, but it was only after I got a negative result. They had that list of lawyers, but they never gave it to me.”
1656-11	5/2/2025	E.R.R.	Parent	15, 11, 8	9, 16	“They gave us a book with information about the facility when we arrived at Dilley. I asked a guard for information to call a lawyer, but the guard said that getting a lawyer would be a waste of my money. We haven’t been given a list of available free legal counsel for my children. . . . My main worry is that they don’t let us know any information. It is scary not knowing what is going to happen next.”
1656-12	7/28/2025	E.O.N.M.	Child	13 (Declarant), 9	7, 43-45	“No one said anything about why we are still here or how long we will be here. Without that information, we feel hopeless. There is no case manager. . . . My dad was able to send the message when he had \$1.00 to ask the status of his case and if we would we get deported soon because we are suffering so much in detention. The response that he got is that they are waiting for the response from the judge. No one is allowed to visit us here. We received the page that had the number of various legal organizations and got in contact with RAICES. We have not been able to call our lawyers for free, because we have no money and cannot call RAICES. When my dad called them, it cost money. When we say to the officers we want to call RAICES, they don’t let us.”
1656-17	7/29/2025	M.O.	Parent	2	31, 33	“I saw that there is a list of legal services. I have never been able to get my calls to [go] through to them. There are six numbers that I dialed but no one picked up. I tried to call them with the free five minutes I got when I first arrived here. Once you finish that, you have to pay [] for legal calls with your own money. . . . Since getting to Dilley I have spoken with an ICE agent on the phone, who asked me what happened in my country, and did a Convention Against Torture interview. They told me during the interview I could have a lawyer, but did not tell me before it started, so I did not know until I was doing the

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						interview. Afterwards, they said I am on the list of people to deport. Now they keep telling me to wait but never give me a date that I will be deported.”
1706-4	9/9/2025	J.R.F.	Parent	5	31	“I called RAICES and I’m not sure if I was charged. I know they’re pro bono, but I don’t think the calls to them are free.”
1706-5	9/10/2025	Z.F.	Parent	6	28-30, 49, 52	“Another family agreed to sign, but I refused and repeated that we need asylum. I knew that we have a right to ask for asylum. She fought with me, saying there is no asylum, but eventually they gave me a date for our interview. Two days later we received a credible fear interview. It was very short. We had not spoken to a lawyer yet and we could not have a lawyer present with us. Only after the interview was I able to find a lawyer. Less than a week later, our lawyer told us we had failed the interview. I asked for any other options and the lawyer told us that unfortunately, we were out of options. . . . We have been able to speak with RAICES lawyers but there is no other lawyer that comes here. It is extremely difficult to get a different lawyer. If we leave a message we will not get a call back. I don’t know how they would be able to contact us from outside, but most people cannot get in contact with their lawyer even if they have one. The only free legal service is RAICES. . . . Only when we are able to speak to a RAICES lawyer do we learn anything about our rights. No one here would talk to us about something like that.”
1706-9	11/19/25	A.K.	Parent	1	7-9	“We have very little time or ability to prepare for our trial on December 18th while we are detained here. The computer time on the library here is very limited, and the important legal websites are mainly blocked. All of the information that we have in order to show we were persecuted in [our country of origin] is on our computers and phones, but we don’t have access to them. One day, we asked for our phones and computers to get this information, and they showed us a sealed see-through package with our technical devices in it. They said is this enough? They wouldn’t let us open the package. Obviously, both the computers and phones were dead, and they wouldn’t let us bring them out to charge them. It was such a joke. Also, to even use the computers here, you have to wait in line for about one hour. Which we have to do to prepare for our case, but it’s really hard to do so with our son.”
1706-10	11/18/2025	M.M.S.	Parent	9	17	“I have submitted grievance after grievance here. I have requested more access to the computers and to legal resources online. For example, one of the computers has old software on the law that is very outdated, and it is in English without any way to use Google translate. We are expected to prepare our legal cases here but not given access to these resources.”
1706-11	9/11/2025	M.R.P.	Parent	8	37, 55, 59-60	“Sometimes I think ICE works very fast to deport us so we can’t contact an attorney first. . . . I didn’t receive a list of free legal counsel, I just talked to other people and they told me about RAICES. It’s word of mouth. Another resident gave me their number. . . . You can talk to someone about your immigration case here just on the tablets, but ICE doesn’t respond. They just told me my case was processed for credible fear, but I never received

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Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
						any interview. I then asked about my partner, where he was and if I could speak to him and they never responded. The only thing I've heard about voluntary departure is that you get \$1,000 dollars but that's it."
1706-12	10/10/2025	N.G.C.	Parent	5	10-11	"Since I have arrived here, they have not told me anything about my case. I went to the library to try to find out about my court date online. It said on the website that my court date is on October 28, 2025, so I think I have to stay here at least until then. I learned about the lawyers at RAICES from one of the residents. I have been crying and crying. They gave me the number and helped me call them."
1706-13	10/9/2025	L.R.L.	Parent	12, 8	39-40	"We have not heard of an individual release hearing or had a chance to explain why we shouldn't be here anymore. An ICE agent told me if I don't find a lawyer, I'll be deported and lose my kid."
1706-14	9/10/2025	J.V.D.A.	Parent	16, 11, 6	36	"There is also not e-mail on the computers in the library. We needed to get a copy of our asylum paperwork which is in our house, but we were having trouble contacting anyone to go get it."
1706-15	10/10/2025	K.M.L.	Parent	6 mos.	29-30	"I have never heard of a case manager. No one is in charge of my case here. I sent a message to ICE on the tablets, but they never answered me. That was four days ago."
1706-16	11/21/2025	N.G.	Parent	13, 11, 4	27	"90% of websites are blocked, and we only have one hour of computer access. We don't have anything we can use to defend our rights. We cannot follow the rules as we do not know them."
1706-19	9/11/2025	N.C.G.	Parent	14	15	"After we passed our CFI, I thought I should find a lawyer or talk to the lawyers who come here from RAICES, so they could help with the next step. But the ICE officer told me I didn't need a lawyer, and anyway I have not been able to put any money on my phone account because of a problem with my CoreCivic ID number."
1706-22	9/10/2025	N.T.G.	Child	16	13	"We were never given a list of available free lawyers. My mom ended up finding out about RAICES from other families living here."
1706-23	9/10/2025	Q.G.	Parent	16	13	"Until this moment providing this declaration, I did not know that I had the right to make a free call to my son's lawyer. I just learned from other families detained here that I could have a meeting with a lawyer from RAICES. I did not know they would let me call my son's lawyer directly. I do not remember the staff or officers ever[] telling me I had that right or explaining how to make a legal call to my son's lawyer."
1706-24	9/11/2025	A.T.L.	Parent	17	11	"We still don't know why we were detained when we both have applications pending for status and [my son] even had a court date scheduled. He missed his court date because we were detained. We both have lawyers in El Paso, but we haven't been able to communicate with them while we have been detained. We only have been able to talk to my partner, who tells us information and communicates with our lawyers."
1748-4	2/12/2026	C.C.A.	Parent	15, 9, 7	10	"We have also been prohibited from sending emails in recent weeks. We have not heard anything about a new way to send emails."

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1748-5	3/12/2026	M.S.P.	Parent	14, 12	35, 37-38	“The only way I can talk with my lawyer is by calling him with money on my account. I tried to use Gmail before, but it did not work. The people in the library said we would be able to use it, but we could not. . . . We never learned how to use the grievance system here. I think someone told us that we could write to our ICE official [o]n the tablet and ask about the balance of money [i]n our account, but I do not really know about anything else we can do with them. I used the tablet once to ask the official about a court date that they told me I was going to have. It is so frustrating being here without knowing anything.”
1748-6	1/15/2026	M.M.S.	Parent	9	12	“We are no longer allowed to use Gmail to send email. They started using a new system called Proton, but they limit the number of characters per email to 150 characters and they now cap the number of emails we can send. This is the only way we can write to our lawyers, for example, and it means we have to write a series of many emails in our limited twenty minutes per day. It is also nearly impossible to do any work on our cases or appeals from inside here because we don’t have access to Google translator.”
1748-8	3/11/2026	N.P.V.	Parent	14, 11, 7	14	“I am very upset because it has been extremely hard to get any information about my case. At court yesterday, a lawyer showed up that I had not even been able to meet. The lawyer said that no one from Dilley had given him any information about my case and he had not been able to reach out to me. The judge said that I needed to come back again today after speaking to my family and the lawyer. At court today, they told me that I needed to decide if I wanted to continue my case. I have a sponsor in New York, and I told the judge that I do want to go back there.”
1748-13	1/15/2026	C.H.H.	Parent	13	40-43, 53	“One of the librarians told all of us who live in the Brown and Green areas that the reason they are preventing us from using Gmail, ChatGPT, and Google, is because we are contacting organizations for help and we should not do that. The organizations I had been looking up were legal organizations, and that’s how I got information about who the <i>Flores</i> lawyers were. We did try to reach out to some other organizations, but she said that ICE needed to block Gmail to stop us from doing that. Gmail is the email that so many of us use to contact our attorneys and family members and many of us keep important immigration documents and correspondence in Gmail as well. They have also restricted websites, which is interfering with our legal cases. Working on my case was the only way I could calm myself, so now I feel really stressed. They told us we could use Proton Mail, but then they blocked it. I made 10 different Proton [M]ail addresses to try to send emails, but it doesn’t work. I talked to a staff member, who sent an email to supervisors saying we need to get Gmail back since Proton doesn’t work. She then told me that ICE responded that they would not allow it. So, the staff then said that they were going to try something called Atomic Mail, but we do not have access to that yet. This has prevented us from filing any documents. Now my son says he is concerned because that was our only outlet, and they have taken away our only benefit. It is so hard because there are so many people

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Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
						who want to use the computer for their immigration cases and to communicate with family, and we already had to wait in line for hours to do that. But now we cannot even work on our cases. . . . The only numbers we can call for free are the pre-programmed pro bono contacts on a specific list, but any other pro bono contacts not on that list cannot be called for free.”
1748-14	1/14/2026	D.P.C.S.	Parent	15	42-43	“Although I have already been through the credible fear interview and passed, they continue to force me to stay here. I have a hearing in February for my asylum claims, but it is too expensive for me to get a lawyer. I keep getting paperwork that I do not understand because it is always in English, and the staff here will not let us know what exactly it says. They gave me paperwork yesterday that I think said I have to stay detained, but they did not read it in Spanish or let me know exactly what it said. For people detained at the border, once we have been here for 60 days they give us this sort of paperwork and then again at 90 days. They have also asked me to sign and finger print papers that I thought were about the rules of the facility, but I think now that they are not. But they have never translated these papers for us to understand them.”
1748-18	2/12/2026	L.R.C.	Parent	15	27-28	“I have filled out so many forms requesting my belongings and release, that the woman in the library stopped helping me and will not let us print things. She will not let most people make copies anymore. They also do not respect attorney-client privilege in the library. They read all our messages with our attorneys and when we ask them to send materials to lawyers, the staff say they cannot do that. But, we have no mail system or other way to have privileged communications. They also took away our access to Gmail and Google two months ago, which has made it impossible to obtain our records. They now only let us use Proton Mail. But that system says the staff read everything, even though it is the only way we can send messages to our attorney. This essentially means they violate our rights [to] client-attorney privilege because there is no way to communicate in writing confidentially. I am so worried about how often the library staff violate our attorney[-]client privilege by reading anything our lawyers send us and not allowing private written communications.”
1748-19	1/14/2026	M.B.O.D.	Parent	17, 14	27, 29	“Since then [the January 9, 2026 lockdown], they’ve taken away our access to YouTube, Google, and Gmail. For emails, we were told to use Proton Mail instead under the supervision of ICE. EOIR has been blocked, too, which is where we check our immigration case information. We can’t print any documents anymore. I have asked them to print <i>Flores</i> -related documents for me to send to <i>Flores</i> lawyers, and the librarian just said no. I also think they have been blocking emails to the <i>Flores</i> attorneys because the ones that I sent do not deliver from my email address but they deliver if my sister sends them. They have not explained why they have made this change, though one staff member said these are orders from the head of ICE. . . . They have a list of lawyers we can call for free but those phone lines are often busy or not available. If we want to call <i>Flores</i>

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						lawyers, other lawyers who [are] not on that list, or our family members, we have to pay. I have asked and the staff have said that there's no other way to make calls."
1748-20	2/11/2026	J.V.G.	Parent	4	13, 21	"When we first got here, we got one free call to tell our family we were here. After that, it took two days for the money our family sent to show up in our account. Only then could we call our lawyer. And when we did, we found out our lawyer had filed an appeal, and the officials were lying about us not having appeals. We have never been allowed to call our lawyer for free. . . . They gave us a paper with a couple of phone numbers for RAICES, and there is a recording that says if you want to do a pro bono call to lawyers on the list here that you can mark 6, but we have never been able to make it work. It also does not allow us to call <i>Flores</i> attorneys or our own immigration attorney for free. I use the minutes I pay for each time I call <i>Flores</i> attorneys or my attorney."
1748-21	2/11/2026	Z.V.	Child	17	24	"I cannot call my lawyer for free either. I have to pay to call him on his cell phone. I have never heard anyone tell me I should be able to call my lawyers for free."
1748-22	1/14/2026	A.P.	Parent	14, 9	31-36	"Access to internet resources is also limited. The rules used to be that you could borrow a computer for one hour a day. The library has only 23 computers, 4 of which are out of order, but there are a lot of people who want [to use] them. Adults need computers for court preparation, filling out forms, and email correspondence, and children also want to surf the internet. Now, though, we can't use anything at all on the computers. Nothing works. Everything is blocked. I can't even look at the website where you can see the judicial system and see the date of our trial. Proton Mail is also not successful. We signed up for the Proton email account and we were able to log[in there twice, but on the third occasion it was already blocked. The staff just said that due to internal regulations, there are new rules we all have to follow regarding the computers. They told us that starting this past Monday, January 12th, there would be no Gmail, but the facility-wide notices said Proton Mail will still work. But Proton doesn't even work. YouTube and some websites with games for the children now also don't work. Google doesn't even work. If we type 'New York' in the search bar, the computer says there is no New York. Staff said these new regulations are so that we can all work on our immigration cases. Of course, it's only harmful to our cases."
1748-23	1/14/2026	Y.H.H.	Parent	11	11	"Families are upset because they took away access [to websites] on computers, like to Google. That makes it harder for people to work on their cases. They also shortened the amount of time we can use the Internet to twenty minutes."
1748-24	1/15/2026	S.S.	Parent	11, 11	57-58, 60, 62-65	"I wrote a grievance on behalf of our family about the email ban. On Monday, Jan 12th the ban started. I don't know who introduced this rule, probably management. They have restricted everyone's use of the internet. We can't use email now anymore, like Gmail and Yahoo[, and Google is also restricted. As of this past Monday, they say you can only open emails if you have a Proton account, but this is a blatant lie. No one can sign up for Proton Mail here. Even if you have a Proton account somehow, you can only send

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						messages but you can't send PDFs and other files. It's really limited. They've completely restricted our ability to prepare for our legal case. The accounts also get shut down in 2 to 3 days anyway. . . . No explanations have been given by CoreCivic or ICE on why email has been cut off. A lot of the [declarant's country of origin] families here, ours included, know how to use AI, Google, and such. Because of that, we've been able to find a way to turn to organizations like Children's Rights, Human Rights, and more. And I think the facility is mad about this. We started preparing letters in real terms, like real complaints and sending them to you and others. When the facility found out that we were getting information and sending it out, they decided to ban it. . . . Before the email and [G]oogle ban happened on January 12th, human rights organizations' websites were already blocked. If you searched RAICES or Children's Rights, when you tried to click the page a window would pop up that says this is an incorrect site address. Now, there's no Google services at all. We received a list of free potential attorneys when we arrived, but none of the phone numbers worked. We weren't able to get through to any. You have to pay for every phone call here, whether it's to an attorney or not. Even to RAICES, we have to pay."
1748-25	1/14/2026	A.K.	Parent	2	50	"When we've had an attorney request that we get access to our phones, they still do not let us charge them or have access to the internet to be able to get information from our devices. Twice an attorney has requested this for us, and twice the same thing has happened."
1748-30	8/12/2025	O.S.	Child	15	33	"My mom even asked if she could at least call her lawyer [after my emergency surgery] and they refused. They said they didn't want anyone to know our location."
1748-32	1/15/2026	M.S.M.	Parent	10, 5	17, 31	"The facility has also decreased our access to email here this week, and now we cannot contact people on Gmail, which was how I contacted people. I think they took it away from us because too many people were emailing <i>Flores</i> and other lawyers. They say we can only use Proton but Proton does not allow you to email just anyone; if the recipient does not have a Proton email, the email is blocked. So, we cannot get our emails out. They also limit the emails to 150 characters, and I think they read them, too. . . . I have a lawyer but I do not get to make free calls to him. I have to use my money if I want to call him."
1748-36	2/12/2025	M.L.S.	Parent	15 mos., 2 mos.	28	"We never received information about how to call lawyers or how to call people for free. I only learned how to call <i>Flores</i> attorneys, because other people detained here gave me your information. I used my money to pay for that call, because I do not know how to make calls any other way."
1779-7	4/22/2026	R.G.H.	Parent	10	28-29	"I got a list to call, but no one answered. To get through, you would need to be on the phone all day calling. Use of email here is very limited; I can't use Gmail. I can only receive emails from my lawyer and I have to call her back on the phone."
1779-8	3/11/2026	S.D.C.	Child	15	16-17, 21	"There is still no way to communicate with people via our Gmail emails, and we cannot use Google to look up information about how to do immigration appeals. . . . I only ever

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						found out about my rights when I looked them up in ChatGPT. But then the library took away access to ChatGPT, too, which I used to look up legal information and medical questions about how to treat my allergies. . . . I haven't been able to make any free pro bono calls here by using the system where you are supposed to mark 6. I saw a woman try it recently, and it did not work."
1779-11	5/16/2026	O.S.	Child	16	29, 43	"We saw some numbers for lawyers posted at Dilley when we arrived, but no one explained what they were for or how we could reach them. Many of the numbers weren't up to date and didn't work. They never gave us any advice concerning the lawyers. . . . Everyone struggled to send anything via email, even to their lawyers. Gmail was blocked for several months up until our release, and you were unable to make Proton emails without verifying through Gmail. The proton email storage is very limited, and for people who have been there for a long time, it's hard to send and receive things with such a small storage space. I asked why they blocked Gmail, and they said that's just policy. I think this was because everyone was trying to talk to reporters. Until the day I left, there was still no Gmail access."
1779-12	3/11/2026	A.L.G.	Parent	4	20	"We still do not have access to Gmail here to contact our lawyers. Yesterday, someone new to Dilley asked the library how to email his lawyers, and the people in the library said he could not use Gmail and would have to use Proton. But people have to pay for Proton, so we cannot really use it."
1779-18	4/23/2026	O.B.	Parent	4	12-14	"I have not contacted lawyers because I thought I have to pay. This is the first time I am hearing I don't have to pay for calling lawyers. I can't understand anything here – no one has explained anything to me in French. There does not seem to be anyone here besides me who speaks French. My daughter speaks only [language]. I have not had a translator or interpreter since we arrived here."
Total Families Who Raised Complaints About Limited Access to Counsel: 48						

(12) MENTAL HEALTH

Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1575-5	6/5/2025	T.M.	Parent	Baby	39	"It is scary, exhausting, and overwhelming to be refused the basic things that I need to care for my baby. Like all mothers, all I want is for my baby to be safe and healthy – but in this place, that feels impossible."
1575-16	5/1/2025	A.T.	Child	11	27-28, 30-31, 49	"Around 5pm staff came and woke my mom and told her that my father had had an incident. They took my mom to him. She told me later that he tried to commit suicide. My mom asked him why he did this. He said he was so exhausted and confused and paranoid, he thought we were permanently separated from him and he believed our family had been deported back to [our country of origin] and he gave up. . . . I knew something had happened to my dad but at the time I didn't know what. I was worried for him and worried about my mom. I tried to comfort her when she cried telling me about what happened to my dad, but I am so shocked and scared too. . . . We are terrified that they will deport us and we feel like we have no voice or hope."
1575-27	5/2/2025	L.Q.A.	Parent	5	20	"I don't really know how my son is doing, but I am worried about it because yesterday he said he doesn't believe in God anymore because he prays to him but we still haven't been able to get out of here."
1584-6	6/5/2025	L.J.H.G.	Parent	4	8	"It has been very stressful to be here, and my skin has broken out from the stress. I have also been having hair loss and hives. I have been experiencing constipation, as well."
1584-8	5/1/2025	Y.F.A.	Parent	3	11, 19	"With the lack of sleep and anxiety, my son is throwing himself against the floor and getting bruises. He wants to leave so badly that he is having these reactions. . . . I am worried because my son won't eat and keeps throwing himself against the ground. I feel bad, too."
1584-11	6/5/2025	N.K.N.N.	Child	13 (Declarant), 11, 4	19	"I'm not really hungry that much any more. I eat less than before. I feel really sad and angry all the time. I don't want to die here. And I don't want to live here either."
1584-12	5/2/2025	S.L.	Parent	9, 8, 4, 9 mos.	16, 26	"The kids are feeling exhausted and being locked away is really started to get to them. They are used to having a routine - going to school, sports and movies, and maybe going out for food on the weekends. They aren't used to being isolated like this. You aren't even allowed to socialize with anyone who isn't in your room. . . . I have been worried about my husband's mental health. He has been having suicidal thoughts. He stopped taking his medication because they were making him wake up at 5 am to take the medications. He suffers from bad panic attacks. I told the nurse that he was going to get really upset from waking up at 5 every day. It is really hard for him to be separated from his children for so much of the day."
1656-4	7/28/2025	C.G.V.	Parent	6	13, 17	"My daughter is suffering here. She wakes up in the middle of the night from nightmares, and she cries at night. . . . I am feeling anxiety and depression from being here for so long. I've chewed on all my nails."
1656-7	5/1/2025	E.Z.R.	Child	16	8	"I don't eat a lot here and I've lost weight since being at this center. I usually do not want to eat because I feel so much anxiety."

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Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1656-8	9/9/2025	A.D.C.	Parent	16, 9	23	“It is so difficult for my son to be here, and his behaviors have really been regressing and going back to previous behaviors like when he was a small boy. The need to wear diapers is just one example. We have also seen an increase in tantrums, yelling and having episodes when he does not get what he wants. This morning as we were waiting to speak with <i>Flores</i> counsel, he was yelling and throwing the apple sauce because he was upset about having to leave the library. These are behaviors we haven’t seen for a long time. He always is saying: ‘When are we going to get out of Core Civic. I want to go out of Core Civic. Let’s take a plane. Let’s take a plane.’ He reads the signs and that is what he calls it here. He says he wants to go home – he just keeps saying that. Sometimes, we will just be sitting on the couch and all of a sudden, he will start weeping and say: ‘Daddy, let’s go home. I want to get out of here.’ I have to embrace him and hug him and say ‘Soon. Soon.’”
1656-9	6/4/2025	A.T.	Parent	13, 11, 4	32, 34-36	“Now my kids are not able to sleep. We have been here too long. They usually are not kids who worry a lot but they are so worried now. [My daughter] used to sleep on her own before we got here. Now she can’t sleep on her own and she sleeps with me in my bed. She says she is scared and she misses her dad. . . . [My daughter] was having nightmares and is having trouble sleeping. She has been having nightmares for a while. She is really worried about me being arrested and that she and her sisters will have to go to live with another family. [My other daughter] is a very outgoing person, full of life. She’s the one that plays and tries to cheer everyone up. But she is struggling as well, mostly with sleep. She will entertain her little sister. She says she can’t sleep. All of my children have been eating less lately. I want them to eat and I encourage them to eat. But they have been having smaller and smaller portions.”
1656-10	6/5/2025	E.M.	Parent	8, 10	44-46, 49	“[My older son] and [my younger son] are really suffering here. They are being brave, but I can see that they are suffering. They cry every night. Every night they cry and I cry. It is awful. We left a life that was good when we were in so much danger that we were forced to leave. If we could have stayed in [country] we would have done that. My boys have changed. [My older son] is not hearing me now, it seems like he is not hearing me and he just reacts the third or fourth time that I say something to him. The little one just doesn’t listen to us at all. Sometimes they fight with each other or do things that attract the attention of the guards. We get so many warnings, but now I think I just should let them act how they want. They are just children who are having a hard time. I used [to] reprimand them and scold them a lot because I thought if we got so many warnings we would never get out of here. But now I think it won’t matter, and I should just let [my older son] and [my younger son] behave how they are feeling. . . . We are not fine. We all cry every night.”
1656-12	7/28/2025	E.O.N.M.	Child	13 (Declarant), 9	12	“I feel so bored. I don’t want to be here. I feel depressed and do not eat much.”

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Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1656-13	7/28/2025	I.C.B.	Child	14 (Declarant), 7	8	"Being here has affected my little brother a lot. He doesn't sleep well. He cries all night. Yesterday he had an attack where he would not stop crying from 7pm to 9pm and he was outside the room crying that he didn't want to go back in and that he wanted to be free."
1656-14	7/28/2025	F.J.A.	Parent	4	18	"I thought if I kept doing what they asked, they would give me and my son a chance here. But I can't take this detention for him anymore. He needs to be outside of here to have his life back. I am just so sad for him all the time."
1656-17	7/29/2025	M.O.	Parent	2	26-27	"One day I went to the psychologist because I was feeling stressed. I felt like things were crawling inside my head and I was feeling tired all the time. All the other families here are in the same boat as me, and sometimes they feel down, too."
1706-4	9/9/2025	J.R.F.	Parent	5	17, 19, 22	"My daughter has a completely different attitude now. She doesn't want to play with the other kids. . . . She doesn't want to eat due to her emotions. She's always been a big eater. . . . She's also become very anxious since coming here. She's biting her nails a lot."
1706-6	9/11/2025	I.B.	Parent	7, 2	32-34, 44, 63	"My older son is now becoming so depressed because this is a horrible place for a child. Knowing we can be deported any second, knowing that people are being taken in the middle of the night. Sometimes we are woken in the night when they take someone. ICE will come and wake up a family and tell them to pack their bag and take them to be deported in the dead of night. My kids are terrified, we are all depressed, staying here just waiting for our fate. My older son is suffering so much. He is only 7 years old. He is sensitive, but since being detained he cries constantly, he is volatile and emotional, we were so worried for him that we took him to the psychiatrist here who prescribed antidepressants and antipsychotics. . . . I am myself very depressed because of what is happening to our family, but I cannot take antidepressants because my son only drinks breastmilk and I am afraid medication would affect him. . . . Our children are suffering. They get worse every day. They are traumatized, my son's mental health is deteriorating, my toddler is hungry every day, it is more painful each day to watch my children endure being in this prison."
1706-7	11/18/2025	N.V.S.M.	Child	14	33, 48	"I feel very sad and stressed to be here. Sometimes I have anxiety attacks here. My nerves are so high. I don't know what is happening. My muscles will twitch because I'm so nervous and on edge. . . . We've seen women faint, have anxiety attacks, and kids that are autistic and have special needs. They need to leave here."
1706-9	11/19/2025	A.K.	Parent	1	20	"I am worried about my son and the effect of detention on him. First, he has become very aggressive since he has been here. He has never done this sort of thing before in his entire life. My child never used to bother anyone, and now he has started to hit me and his father. We are seeing him also start hitting himself in the face. This started about three weeks ago. So now we have him hitting me, himself, and his father."
1706-11	9/11/2025	M.R.P.	Parent	8	44-45, 51	"There are moments where my daughter and I are having a normal conversation and she gets quiet and just says, 'Mom when will we leave? When are we getting out? How many more days?' I've noticed a change in her attitude and personality, mostly because she is so

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						tired all the time. She can't rest properly. She doesn't cry, she is just quiet and thinking. She is withdrawn. She is on and off with the other kids. Sometimes there is interest from her to play with them, but then she just wants to sit alone for a long time. . . . I just have to keep going, I have to maintain myself. I am full of anxiety here. We are locked up literally. These are emotions I have never encountered before. I'm always tired. I want to take a nap sometimes in the afternoon but we can't. My hair is falling out."
1706-12	10/10/2025	N.G.C.	Parent	5	14, 19	"I am worried about my daughter. She will hardly eat at all. She constantly asks: 'When [can we] leave?' and 'When can I go back to my school?' and 'When can I wear my own clothes?' Sometimes my daughter doesn't want to leave our room because she is so sad and just wants to leave this prison so badly. She cries and cries about all of this. I am so worried that I barely eat. . . . I have been having a lot of nightmares about when we were arrested by the military outside the laundromat."
1706-17	10/9/2025	K.V.L.	Parent	6	14-21	"Since being detained here, my daughter asks about our cat and when she'll see her teacher again every day. She is normally a very extroverted girl. We are lying and telling her every day that she's on vacation here. She is already bored, though, and wants to study again. She is starting to regress behaviorally[,] too. She has started to wet her pants again since coming her[e]. She hasn't wet her pants and used a diaper in about 4 years. She peed her pants the other day and it leaked down into her tennis shoes. You can't put those in the washer, so I told her to wear her flip flops. The guards told me she couldn't walk around like that, though. They started yelling at me, and my daughter said ['M]om why are they yelling at us?['] There is no flexibility here for the fact that we are all dealing with kids. In addition to peeing her pants, she's crying a lot at night and saying she misses New York. She wants to go home. She is also asking at night to drink milk from my breasts. She hasn't had breastmilk in 4 years. This behavior is concerning to me and my husband. We had to bring her to the psychologist here who agreed she is regressing. Today we are seeing a psychiatrist."
1706-19	9/11/2025	N.C.G.	Parent	14	19, 21	"I worry a lot about my son. He does not have an appetite here; he is not eating a lot. He suffered so much before we arrived, and now I worry about what being here is doing to him. . . . I am holding so much here in my heart. I want to cry but I don't let the tears out. I have to be strong for my son, and I have to get us through this. There is no space or privacy to process what's happening. I just keep it all locked inside but sometimes I feel like I will explode, holding in all that is happening to us."
1706-21	10/9/2025	S.M.G.	Parent	2, 1	9	"My kids are having a hard time being here. The two-year-old is always anxious and cannot be still or stay in one place."
1706-22	9/10/2025	N.T.G.	Child	16	21	"The kids here can get sad when people get deported or their friends leave. Kids are tired of doing the same thing every day. We try to help kids who are sad and teach them to play a new game. Sometimes kids don't eat when they are sad."

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Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1748-4	2/12/2026	C.C.A.	Parent	15, 9, 7	35-36	"We are facing really serious racism and discrimination. Now every time [my daughter] sees the officials, she cries. She has been waking up at dawn crying."
1748-5	3/12/2026	M.S.P.	Parent	14, 12	22	"My older child takes medication for anxiety and depression, but detention increases anxiety because there is no way to know what is going to happen to us, where we are going to go next, and if he will stay in the country. Neither of my children have any memory of [our country of origin]. It's scary."
1748-6	1/15/2026	M.M.S.	Parent	9	4, 8, 24	"Our detention at Dilley has made me stronger in some ways, but it has mainly destroyed me. I know my daughter and I will need a lot of mental health support when we get out of here. This place has weakened us physically and mentally, and it is hard to keep going. . . . My daughter also suffers here because she has been getting very little sleep for months. She will sleep a few hours at night and then be awake for most of the night. My daughter doesn't understand why she can't sleep. She will often wake up [at] 3 a.m. and be awake for hours. She will then fall back asleep at 11 a.m. She just has no routine here anymore. She has never had trouble sleeping before – so it is definitely related to the stress of being imprisoned. She is constantly asking when we will leave and worrying what will happen, and that her friends will forget about her. . . . The suffering here is immense. I am very concerned about my child's health, and I don't want her to continue to suffer through all of this."
1748-7	1/15/2026	C.R.B.	Child	16	5	"Being at Dilley this long has been extremely hard on my mental health. It is really getting to me. I am having panic attacks."
1748-8	3/11/2026	N.P.V.	Parent	14, 11, 7	15	"The truth is [that] it has been the hardest on my fourteen-year-old son because he knows what is going on. He has so much anxiety and he doesn't want to eat. He is not able to fall asleep until 3 am. He doesn't understand why we are not able to leave. The younger ones don't understand as much so it's easier to keep them distracted."
1748-9	3/12/2026	E.C.M.	Child	13	4, 11-12	"ICE detained me with my mo and separated me from my dad. I feel so sad that I had to spend Christmas and New Year[']s without my dad. It hurt so much to not be able to get a hug or be close to him on those days. Every day that I remain here is destroying my hope for my life. I miss everything about my life in Chicago because I do not have anything here. . . . It is depressing being here, especially on the holidays. I never imagined that they would separate me from my dad like they did, and I am so scared that they will separate me from my mom now. I feel so much anxiety and nerves that I have to use the bathroom every 5 minutes here. I keep wondering what is wrong with me."
1748-10	3/11/2026	M.T.H.	Parent	6	12	"I also worry because my son has recently started talking in his sleep. I am concerned that it may be related to anxiety from being here. He always asks why the guards won't let us leave when we have done nothing wrong. He also brings up his experience in CBP and how we were crying and crying."
1748-11	3/11/2026	J.A.	Child	17	23	"It is very hard to be here because you feel like you're in jail. Like you're a criminal. This place makes you see how little you are."

(12) MENTAL HEALTH

Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1748-13	1/15/2026	C.H.H.	Parent	13	32, 35, 51	"I have depression and anxiety, and they sometimes do not have my pills which means that I cannot sleep. . . . [My son] cries a lot every night. During the day he can distract himself, but at night he is so sad. He is a big kid who has slept alone for years, but here, he always asks if he can sleep with me. He's so scared they will separate us. He did not do that before. . . . My son feels so sad that he is separated from his family. He doesn't want to show his feelings, but I know how he feels, when I see him cry while we're praying. We pray every night, and he always prays for release."
1748-15	3/12/2026	S.K.	Parent	2, 1, 10 mos.	20, 31, 53-54	"It's very hard for my three kids to be here. We cannot explain to them what is going on. They're bored here. They're stressed out. They want to see their dad at night, and they're not allowed to. We cannot explain these rules properly to such young kids. . . . I'm emotionally and mentally stressed, so my breastmilk has stopped coming. I'm not able to feed the little one, so she gets formula and a bottle. . . . [My kids] don't trust people as much anymore. The kids are more closed off. And if we were to talk about me, my hormones because of the stress have changed. I don't have a period and produce no milk. I am having memory problems and problems with my speech. I feel like no one will help me and we are stuck here forever. We feel as if we're animals at the zoo."
1748-17	2/12/2026	N.C.C.	Parent	14, 13, 10	14	"We are very worried about our oldest daughter. She doesn't want to leave the room. She doesn't want to eat. She doesn't have any motivation to do anything and is very depressed. She also has extreme anxiety and is doing things like eating the lip balm."
1748-18	2/12/2026	L.R.C.	Parent	15	5	"My daughter has not been wanting to get out of bed most days because she is so sad here. She spends all day crying, and does not eat much. When she gets up to eat, she puts her head on the table. Since coming here, she has had such bad anxiety that she is constantly gripping her hands and shaking her legs. I try to explain to her that we will leave, but it feels like they forgot we are here and we will be stuck here forever."
1748-21	2/11/2026	Z.V.	Child	17	45	"I feel mad and sad, because my parents have been working as taxpayers here for 13 years, and they own a business, but we are all still here. My dad is worried we will lose his business because he cannot update his insurance since he has been detained, and he will suffer debt if we can go home. We are also scared we will lose our home, because we have not been able to make our payments here. That is a huge concern for our family."
1748-22	1/14/2026	A.P.	Parent	14, 9	6-7, 17-20	"My daughters and I live separately from my husband. Our contact with him is only possible outside the rooms from 7 a m. to 8 p m. Nothing good comes out of that. When we were living together, we had quality time together. Now, he can't put our kids to bed, tuck them in, and tell them a story. This isn't possible and it's very difficult for them. They are not used to this. They used to sleep with us at night when they got scared, but now they can't do that. We felt like more of a family unit before coming here. . . . During our time at Dilley, my children have been constantly stressed and subjected to psychological pressure. [My younger daughter] stopped wearing diapers at 1.5 years old, and now we've already had 4 episodes where she has wet herself. She turned 9 on [date]

(12) MENTAL HEALTH

Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
						of this year; she should not be wetting herself. . . . [M]y older daughter, is constantly crying, and she gets hysterical easily. She cries in the shower. I can hear her crying from the shower. She's constantly sobbing. She is also constantly scratching herself. She does this when she is nervous. She has been doing it all over her body."
1748-23	1/14/2026	Y.H.H.	Parent	11	4, 12	"I see my daughter depressed and crying all the time. . . . She is sleeping all the time and doesn't want to do anything. I am worried because many times she doesn't eat anything. . . . I just want out of here. I can't continue to see my daughter struggle through all of this and deteriorate. I have lost faith and just want to leave for my daughter's sake."
1748-24	1/15/2026	S.S.	Parent	11, 11	16-17, 19-24, 52	"My son, [] has autism. . . . His stimming, which is a way for him to release pressure and stress, has gotten more frequent since coming here and he's even developed two new ones. . . . He has also been having repetitive behaviors. He can get stuck in a loop. For example, he'll repeat 'where are we going?' multiple times even though we said the answer already and we already left [for] that place or have even arrived there. We are seeing acute manifestation of repetitive behaviors now that we didn't before. He has also become more aggressive. He is struggling to restrain himself. If I don't respond to him in time, he'll pinch me. . . . He has also become less talkative since coming here. He is regressing and is less verbal. He is putting up a fight to everything. Even if we are going to go eat and he's hungry, he cries. When he gets dressed with his mom in the morning, he cries. If we have to go to medical to get him help, he cries. Everything is with tears. This never happened before coming here. It's important to note the tears, because people with autism actually really struggle to express emotions, but he is pushing through to do that because he's in so much pain. This is him saying he can't stay here anymore. Today, we saw him liven up for the first time when he got to play with the fidget spinner that you [Flores counsel] brought. He became cheerful and smiled. Lately, you cannot expect any smiles on his face. . . . For me, every day it's like being in a prison here or a concentration camp."
1748-25	1/14/2026	A.K.	Parent	2	20, 44, 53-55	"We are crying here every day. . . . [My son] is still hitting himself. About a month ago we saw the psychologist, and she said, 'My children do that too.' That was the final straw for us. Her children who are not detained are not going through anything like [our son] is. . . . Our child isn't developing properly at all. There are no plastic potties here. We can't potty train him. There are no developmental programs for his age group. There are no programs to develop his fine motor skills and no teachers. We also haven't gone to the gym for over a month now because there are so many people there due to the weather. We just walk around outside and there is nothing for him to do and not enough toys. The cruelest thing is that everywhere we go we have to stand in the longest line – library, kitchen, medicine store. Because there are so many people here, there are lines everywhere. My son is probably one of the youngest to be detained for this long."

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Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1748-26	2/12/2026	A.M.P.	Parent	9, 2	8	"It has been really horrible to be here. My two-year-old cries a lot for her Dad. He has to live in a separate area from us. My older daughter asks for her Dad all the time, too. She keeps asking what have we done wrong to be arrested and locked up here? My daughters also cry because they want to be with their grandmother in Denver."
1748-27	1/14/2026	N.M.	Parent	3	18, 25	"My lawyer asked for humanitarian parole and ICE never responded. She explained that it is not safe for me and the baby here, but they don't care. I am suffering. . . . Most of the kids have stayed here three or more months. They scream and chew their nails, many have regressed to wetting the bed again, they are all deteriorating psychologically."
1748-28	3/12/2026	J.B.A.	Parent	8	18	"Now we feel like we are getting the runaround and don't know when we will be able to leave. We just want to get out of here so our son doesn't have to suffer and get even more traumatized. He feels like a prisoner here. He just keeps asking what happened to his toys and why he can't call his grandma when he wants to and why we cannot leave."
1748-33	3/12/2026	N.S.R.	Parent	5	4, 11, 13	"Our son does not talk much other than basic words and has some developmental delays. We think the stress of being here and the lack of food options are causing him extreme distress and that may be why he is having such bad constipation. . . . My son is fighting more since we got here and is constantly taking off his glasses and throwing them on the ground. I worry that he is getting more anxious being here. He can't really play with other kids or go to the school here because he needs specialized attention. I worry that he will not get along with the other kids. It has been extremely hard to be here with a child with special needs. . . . No children should be here. It's especially hard for children with special needs like my son, but no child should have to live this way."
1748-34	10/10/2025	C.R.B.	Child	16	13, 16	"When we first got here, we didn't understand how to communicate with the outside world. They gave us some information, but it was really confusing. We were exhausted and it was hard to process. . . . They are making me go to mental health appointments here. I have been to two and they aren't helpful. They last not even ten minutes. They just ask how you're doing and if you've had suicidal thoughts or have tried to harm yourself. I say things like 'I could be better.' They just say I should not worry about things I can't control and that my mom is the adult and she can handle things. But all of this is happening to me, too, and I can't help but worry about it."
1748-37	2/11/2026	M.P.P.	Parent	7	14	"My son is all over the place and can never be still. At night he wakes up really scared. He often wakes up worried because he thinks that he missed school. Then he realizes he's locked up here and there isn't school. He eventually goes back to sleep and then sleeps until we have to get up to go to breakfast."
1779-4	4/22/2026	C.G.C.	Child	13	8, 15	"When I first got here, I felt really depressed. I would cry sometimes. I would shut down and want to be alone. . . . The kids here are sad. They get stressed out being locked in here. They do weird things that they wouldn't do at home. If I had to describe Dilley with one word, it would be 'horrible.' It is awful to be inside here all the time and feel like you're locked up."

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Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
1779-5	5/8/2026	A.O.	Parent	3	7, 13, 22	"I'm detained like someone who committed a crime. It is very stressful to be here. There is so much uncertainty, and I feel a lot of emotional stress. I am very worried for my son here. . . . I worry for my son's mental state. He has been going to the psychology team here because he's waking up at night very frightened and scared and crying a lot. He's become more aggressive. I think because of the stress. They've been switching us to different rooms with different people. . . . My son is very young, and he doesn't fully understand what is happening here. But I know he is very bored and he is often sad."
1779-6	4/22/2026	M.T.H.	Parent	6	9, 12	"Sometimes my son will just burst from all of his emotions and start crying. . . . My son is very anxious and has started biting his nails. He feels trapped inside the living area. He's always asking to go outside. He can never stop moving and settle down. Every night he cries at 8 p. m. when he has to say goodnight to his Dad. He wants to be able to be in the same place as him at night or even just hang out a little longer. Being separated from his father each night is probably the hardest thing for him."
1779-7	4/22/2026	R.G.H.	Parent	10	24	"My son has been feeling depressed. He feels sad because he sees kids leave and feels alone."
1779-8	3/11/2026	S.D.C.	Child	15	5-6, 9	"After being back here for so many months, I have started to feel like all the days are the same and I'm stuck between four walls. The only thing that changes from day to day is the topics we speak about. All the kids who I have gotten to know have started to lose their ability to try to stay upbeat, too. It feels depressing to just go to the same place every day and say goodbye to so many people while I remain stuck here. When my last friend left, I went back to the room and just cried. I asked my mom, 'Why are we still here?' I just want a normal life. I want to be free. . . . I feel so sad and impotent because I do not have information about what will happen and I see my mom losing hope. I was trying to keep my emotions up to give others strength, but whenever we get bad news, I feel so sad. A lot of the time, I try to do breathing exercises to stay calm. But when I keep so much bottled up inside, it feels even worse. I feel so locked up now that I do not even want to go anywhere inside the facility anymore. Even though I have a pass, I just do not want to get up and go outside. I used to love school, but I do not want to go anymore. Sometimes the officers who see me say, 'Oh, I thought you had left.' I feel depressed."
1779-10	4/23/2026	R.R.M.	Parent	11	10	"My daughter cries all the time and is sad and doesn't want to be here. She misses her friends from school and was doing very well there. Now that she's here, she doesn't like to leave the room or go outside."
1779-11	5/16/2026	O.S.	Child	16	9, 50-51, 82-85	"That place [Dilley] was mentally devastating for children. . . . My little siblings were not able to develop properly at Dilley. It's so important to grow and go to school and socialize. When we got home, my five-year-old sister didn't remember herself before Dilley. She kept asking us, 'What did I like to do before? What did I like to eat?' That was really concerning to me. I felt inferior at Dilley and without freedom. I am damaged mentally and physically from my time at Dilley. . . . Our high spirits right after getting

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Dkt. No.	Decl. Date	Decl. Initials	Parent / Child	Age(s) of Child(ren)	Decl. Para. No.	Quotation
						released from Dilley just made the re-detention that much worse. My mom was in pain for days after that. I lost a year of my life at Dilley. I lost a year of memories, of progress, of everything. I was finally able to see some of my friends recently after being released. They're all talking about prom and driving cars, and I'm thinking about whether or not I can stay in the U.S. Being at Dilley distances kids from the real world and takes away all the normalcy from everything. After you get released, the effects are still there. Nothing is normal anymore because you live in fear of going back to that place."
1779-12	3/11/2026	A.L.G.	Parent	4	4, 11	"My daughter suffers at night because she has to sleep in a separate area from her dad. She cries every night when she has to leave him. I have to pick her up to get her to come to our bedroom. She does not understand why her dad cannot stay with her and asks me over and over why dad is not with us. Then she cries herself to sleep and wakes up crying and scared throughout the night. She is so depressed. . . . Her anxiety has led her to start biting her nails non-stop, too."
1779-15	3/12/2026	W.L.	Parent	7	22	"I don't think my daughter is growing here – emotionally or physically. It feels like this place has diminished her. I'm very worried about her social development . . . while we have been here. I really want her to go to a normal school where she can make friends and develop."
1779-16	4/23/2026	J.A.I.	Child	16 (Declarant), 12	18	"The first days we were here, I was getting nightmares about the police coming to our house. I was crying a lot from all the trauma we experienced. I would try to go to the gym or go outside to distract myself. Sometimes I would color different characters and that would also help me calm down. I am not having nightmares as often, but I still feel traumatized. If there's a loud sound, I get startled and scared easily."
1779-18	4/23/2026	O.B.	Parent	4	21	"I am depressed because there is no one to talk with. People do not speak French, only English and Spanish. The stress is so bad I can't sleep. I wonder how things will go in court and I worry about that a lot."

Total Families Who Raised Complaints About Mental Health: 60

EXHIBIT 2

CENTER FOR HUMAN RIGHTS &
CONSTITUTIONAL LAW
Carlos R. Holguín (Cal. Bar No. 90754)
Bardis Vakili (Cal. Bar No. 247783)
Sarah E. Kahn (Cal. Bar No. 341901)
256 South Occidental Boulevard
Los Angeles, CA 90057
Telephone: (213) 388-8693
Email: crholguin@centerforhumanrights.org

Attorneys for Plaintiffs

Additional counsel listed on following page

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

JENNY LISETTE FLORES, *et al.*,

Plaintiffs,

v.

TODD BLANCHE, Acting Attorney General
of the United States, *et al.*,

Defendants.

No. CV 85-4544-DMG-AGR_x

DECLARATION OF AVNEET
CHHABRA

JUDGE: Hon. Dolly M. Gee

1 NATIONAL CENTER FOR YOUTH LAW

2 Mishan Wroe (Cal. Bar No. 299296)

3 Diane de Gramont (Cal. Bar No. 324360)

4 428 13th St, Floor 5

5 Oakland, CA 94612

6 Telephone: (510) 835-8098

7 Email: mwroe@youthlaw.org

8 NATIONAL CENTER FOR YOUTH LAW

9 Rebecca Wolozin (admitted *pro hac vice*)

10 2300 18th Street NW

11 P.O. Box 21156

12 Washington, DC 20009

13 Telephone: (202) 868-4792

14 Email: bwolozin@youthlaw.org

15 CHILDREN'S RIGHTS

16 Leecia Welch (Cal. Bar No. 208741)

17 2021 Fillmore Street

18 San Francisco, CA 94115

19 Telephone: (415) 602-5202

20 Email: lwelch@childrensrights.org

21 CHILDREN'S RIGHTS

22 Eleanor Roberts (admitted *pro hac vice*)

23 88 Pine Street, Suite 800

24 New York, NY 10005

25 Telephone: (212) 683-2210

26 Email: eroberts@childrensrights.org

DECLARATION OF AVNEET CHHABRA

I, Avneet Chhabra, declare as follows:

1. I am a Paralegal at the National Center for Youth Law. I support Plaintiffs' counsel in the above-titled action. If called to testify in this case, I would testify competently about these facts.

2. This declaration and the attached exhibits are based on my personal knowledge. If called to testify in this case, I would testify competently about these facts and those included in the exhibits described below.

3. Under the Court's August 21, 2015 order [Doc. # 189], Defendants Immigration and Customs Enforcement ("ICE") and Customs and Border Protection ("CBP") are required to provide Plaintiffs' counsel with monthly data reports on all class members in their custody collected under Paragraph 28A of the *Flores* Settlement Agreement ("monthly data reports").

4. Under attorney supervision, I regularly review Defendants' monthly data reports, which are produced in Excel format.

Sources of Data

5. Defendants produced multiple versions of some monthly data reports because of data errors identified by Plaintiffs in the initial reports. *See* Declaration of Rebecca Wolozin ¶ 15 & Ex. H [Doc. # 1764-3].

6. For purposes of this declaration, I analyzed the following data reports:

Date Produced	Original File Name
03/31/2026	CBP Children with TIC greater than 72 hours_FEB2026
05/01/2026	February 2026 ICE Flores Report Updated
05/01/2026	March 2026 Flores ICE Report Updated
05/01/2026	CBP Children with TIC greater than 72 hours_MAR2026

05/26/2026	April 2026 ICE Flores Report
05/26/2026	CBP Children with TIC greater than 72 hours _APR2026
07/01/2026	May 2026 ICE Flores Report
07/06/2026	CBP Children with TIC greater than 72 hours _MAY2026

Length of Stay in CBP Facilities

7. The CBP monthly data reports include only children held for over 72 hours in CBP custody. These data reports include parameters for “Encounter Date,” “Sector / Field Office,” and “Demographic.” Under “Demographic,” children are identified as unaccompanied minors (“UAC”), members of family units (“FMUA”), or accompanied minors (“AC”).

8. To summarize the placement of children by geographic location, I created a table in Microsoft Word with columns for “Field / Sector Office,” month, and “Demographic.” I included data from the February 2026, March 2026, April 2026, and May 2026 data reports. A true and correct copy of this table is attached hereto as Exhibit A (“CBP Data Analysis”).

9. To create this table, I followed the following steps in Microsoft Excel.

10. In the Excel data sheet for each month, I filtered by each “Field / Sector Office” individually to create lists of each placement by location. For each filtered list, I manually counted the number of children to produce a “Total” for that “Field / Sector Office.” A few children appear twice in the data because they had two separate stays in CBP custody that each exceeded 3 days.

11. I then filtered each list further by “Demographic” to produce a total for each category. I manually counted the number of individual children under “UAC,” “FMUA,” and “AC” for each “Field / Sector Office.”

12. Some children categorized as UAC in CBP’s data have “United States” listed as their country of origin. These children appear to be United States citizens misclassified as UACs. Because the monthly data does not include a separate category for United States citizens and because I have no further information

1 regarding these children, I maintained the classification that appears in CBP's data.

2 13. The monthly data report includes only abbreviations for Field/Sector Office.
3 Where I am aware of the corresponding location for that abbreviation, I listed it in
4 the chart.

5 14. To identify the 5 children with the longest times in custody in February,
6 March, April, and May 2026, I sorted the data by greatest TIC time and recorded
7 the information in the five top rows. I calculated days by dividing the hours by 24.
8 I rounded to the nearest day.

9 15. To identify the ages of class members at the time of CBP encounter, I
10 created a new column titled "Age" and used the following formula: =DATEDIF(E
11 ROW NUMBER, B ROW NUMBER, "y"). E is the "Date of Birth" column and B
12 is the "Encounter Date" column.

13
14 Length of Stay in Family Detention

15 16. The ICE monthly data reports include parameters for "Alien File Number,"
16 "Birth Date," "Country of Citizenship," "Book-in Date," "Book-out Date,"
17 "Facility Length of Stay (Days)," "Facility Name," "Facility Type," "Release
18 Reason," and "Unaccompanied Juvenile Y/N."

19 17. To summarize the length of stay for children in family detention in February
20 2026, March 2026, April 2026, and May 2026, I created a table in Microsoft Word
21 with columns for "Days," "Number of Individuals" and the month. A true and
22 correct copy of this table is attached hereto as Exhibit B ("ICE Data Analysis").

23 18. To create this table, I followed the following steps in Microsoft Excel.

24 19. In the Excel data sheet for each month of ICE data, I filtered by "Facility
25 Type" to "Family" to create a list of all placements in family detention for that
26 month.

27 20. For each month's list of placements in family detention, I sorted this list by
28 "Facility Length of Stay (Days)" from largest to smallest. Some children had

multiple records of detention under “Family” because they were booked out of the South Texas Family Residential Center (Dilley) to a hotel or other short-term facility and then re-booked into Dilley. For children with multiple records of detention under “Family,” I added the separate “Facility Length of Stay (Days)(s)” together if the later stays occurred in or extended into that month.

21. For each month of data, I manually counted the number of individual children with a length of stay in family detention in the ranges of 1-4 days, 5-7 days, 8-10 days, 11-13 days, 14-16 days, 17-19 days, 20-39 days, 40-59 days, 60-79 days, and 80+ days. For purposes of this calculation, I rounded all length of stay numbers down. For instance, a stay of 4.99 days would be counted in the 1-4 days range.

Length of Stay in Hotel Detention

22. With the same ICE data described in the prior section, I created a summary of data relating to hotel stays over 3 days for April 2026 and May 2026. A true and correct copy of this analysis is attached hereto as Exhibit B (“ICE Data Analysis”).

23. Hotel placements are listed as “Other” under “Facility Type” and with rare exceptions the “Facility Name” is listed as “JFMTCU Temp Hotel Stay” without identifying the name or location of the hotel. In April 2026, all hotel stays were listed under “JFMTCU Temp Hotel Stay.” In May 2026, the only other “Facility Name”(s) that referenced a hotel were “Embassy Suites – Dallas,” and “Embassy Suites by Hilton.”

24. To count the number of hotel stays over 3 days in April and May 2026, I filtered “Facility Type” to “Other” for each month’s ICE data. In the April 2026 data, I filtered “Facility Name” to include only “JFMTCU Temp Hotel Stay.” In the May 2026 data, I filtered “Facility Name” to include only “JFMTCU Temp Hotel Stay,” “Embassy Suites – Dallas,” and “Embassy Suites by Hilton.”

25. In each of these lists, I manually counted each individual hotel stay over

1 three days. In this count, I did not include hotel stays that took place entirely in
2 previous months. If a child was held in a hotel for over three days in both April and
3 May, they are included in both totals.

4 26. For each month, I sorted the list by “Facility Length of Stay (Days)” from
5 largest to smallest. I then identified the seven individual children with the longest
6 lengths of stay in hotels.

7 27. I removed all filters of “Facility Name” and “Facility Type” and provided
8 summaries of each of these children’s movements across ICE custody.

9 28. To identify the ages of class members at the time the data was captured, I
10 created a new column titled “Age” and used the following formula:

11 =INT(YEARFRAC(F ROW NUMBER,DATE(“YYYY-M-D”))), where “F” is the
12 “Birth Date” column and “YYYY-M-D” represents the date provided in the dataset
13 as the end of the reporting period. In March 2026, this was 2026-03-31. In April
14 2026, this was 2026-04-30.

15 29. Some children with the longest stays in hotels in April 2026 were also
16 identified as those with the longest stays in hotels in May 2026 because their hotel
17 stay extended from April to May. For the purposes of this analysis, I included
18 those children only in the May 2026 list of longest stays.

19
20 I declare under penalty of perjury that the foregoing is true and correct.

21
22 Executed on July 10, 2026 in Washington, D.C.

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26 Avneet Chhabra
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EXHIBIT A

Flores Monthly Reporting – CBP Data Analysis

I. Longest Times in Custody

	February 2026	March 2026	April 2026	May 2026
1.	679.50 Hours (28 Days) 0-year old L.B.O., FMUA, SDC	412.07 Hours (17 Days) 0-year-old M.G.T. FMUA, RGV	379.98 Hours (16 Days) 17-year old M.J.F. FMUA, RGV	384.23 Hours (16.01 Days) 4-year-old K.O.A.R., FMUA, YUM
2.	679.53 Hours (28 Days) 2-year-old E.N.B., FMUA, SDC	412.07 Hours (17 Days) 2-year-old J.J.T.D. FMUA, RGV	379.97 Hours (16 Days) 1-year-old M.G.A.F. UAC, RGV *Listed as UAC but Country of Birth is United States of America	375.77 Hours (16 Days) 0-year-old L.A.R. FMUA, TCA
3.	679.53 Hours (28 Days) 11-year-old E.A.B., FMUA, SDC	412.07 Hours (17 Days) 12-year-old A.M.G.T. FMUA, RGV	347.6 Hours (14 Days) 4-year-old Y.C.Y.Q., FMUA, EPT	324.92 Hours (14 Days) 10-year-old K.A.S.S. FMUA, RGV
4.	679.53 Hours (28 Days) 15-year-old O.G.B. FMUA, SDC	412.07 Hours (17 Days) 16-year-old J.S.G.T. FMUA, RGV	347.25 Hours (14 Days) 2-year-old J.D.M.R. FMUA, RGV	298.08 Hours (12 Days) 0-year-old L.G.G. UAC, RGV *Listed as UAC but Country of Birth is United States of America
5.	571.48 Hours	353.42 Hours¹	347.25 Hours	285.90 Hours²

¹ Three additional children aged 5, 9, and 11 years old had an identical length of stay of 353.42 hours in the March 2026 data.

² One additional child aged 11 years old had an identical length of stay of 285.9 hours in the May 2026 data.

	(24 Days) 8-year-old J.A.M.A. FMUA, EPT	(15 Days) 2-year-old I.O.P.G. FMUA, SDC	(14 Days) 3-year-old W.N.M.R. FMUA, RGV	(12 Days) 7-year-old J.S.T.B. FMUA, RGV
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II. Class Members in CBP Custody Over 72 Hours by Field/Sector Office

Field/Sector Office	February 2026				March 2026				April 2026				May 2026			
	AM	UAC	FMUA	Total	AM	UAC	FMUA	Total	AM	UAC	FMUA	Total	AM	UAC	FMUA	Total
Baltimore	–	–	–	–	–	–	–	–	–	–	–	–	0	0	1	1
Big Bend (BBT)	0	1	0	1	0	1	0	1	–	–	–	–	0	0	1	1
Blaine (BLW)	0	0	3	3	0	0	0	0	–	–	–	–	–	–	–	–
Buffalo	–	–	–	–	0	0	4	4	–	–	–	–	–	–	–	–
Buffalo (BUN)	–	–	–	–	0	0	1	1	–	–	–	–	–	–	–	–
Detroit	–	–	–	–	2	0	0	2	2	0	0	2	–	–	–	–
Detroit Sector (DTM)	–	–	–	–	–	–	–	–	0	0	2	2	–	–	–	–
Del Rio (DRT)	–	3	5	8	0	1	6	7	–	–	11	11	0	1	24	25
El Centro (ELC)	–	–	2	2	0	0	1	1	–	–	–	–	–	–	–	–
El Paso (EPT)	0	0	8	8	0	9	7	16	0	8	18	26	0	8	22	30

Houlton (HLT)	–	–	1	1	0	1	0	1	–	–	–	–	–	–	–	–
Havre (HVM)	–	–	1	1	0	0	2	2	–	–	–	–	–	–	–	–
Houston	–	–	1	1	0	0	0	0	–	–	–	–	–	–	–	–
Laredo	–	–	1	1	–	–	–	–	1	0	0	1	–	–	–	–
Laredo Sector (LRT)	0	6	3	9	0	26	6	32	0	26	12	38	0	12	10	22
Miami (MIP)	–	–	–	–	–	–	–	–	–	–	–	–	0	0	1	1
New York	–	–	–	–	0	0	3	3	–	–	–	–	–	–	–	–
New Orleans (NLL)	–	–	–	–	–	–	–	–	0	1	0	1	–	–	–	–
Rio Grande Valley (RGV)	0	18	17	35	0	24	22	46	0	19	23	42	0	29	21	50
San Diego		–	–	–	0	0	3	3	0	0	2	2	0	1	5	6
San Diego Sector (SDC)	0	5	20	25	0	1	18	19	0	0	6	6	–	–	–	–
Seattle	0	0	1	1	–	–	–	–	–	–	–	–	–	–	–	–
Southwest Land Border (SWB)	–	–	–	–	0	3	4	7	0	0	2	2	–	–	–	–
Tucson (TCA)	0	0	4	4	0	1	9	10	0	1	8	9	0	0	24	24

Tucson	—	—	—	—	—	—	—	—	0	0	2	2	—	—	—	—
Yuma (YUM)	—	—	—	—	0	0	1	1	—	—	—	—	0	0	4	4
TOTAL	0	33	67	100	2	67	86	156	3	55	86	144	0	51	113	164

EXHIBIT B

Flores Monthly Reporting – ICE Data Analysis

I. Class Members Held in Family Detention

Days	Number of Class Members			
	February 2026	March 2026	April 2026	May 2026
0-4 days	5	14	16	12
5-7 days	3	17	18	9
8-10 days	8	6	19	9
11-13 days	22	18	19	19
14-16 days	19	6	22	17
17-19 days	26	13	23	33
20-39 days	163	69	44	64
40-59 days	113	27	8	12
60-79 days	54	19	4	6
80+ days	66	20	11	6
20+ days	396	135	67	88
TOTAL	479	209	184	187

Please note some class members were transferred to a hold room, hotel stay, transport, etc. in between some of the days listed before being transferred back to family detention.

II. Hotel Summary

MAY 2026

In May 2026, there were **27 hotel stays over 3 days**. The seven longest were:

1. 7-year-old M.R.N.

- Initial ICE Book-in date: 04/21/2026, Hold Room
 - MVM Transport on 04/21 for 0.05 days
 - JFMTCU Temp Hotel Stay from 04/21/2026 until 05/03/2026
 - 11.31 days in hotel
 - MVM Transport on 05/03/2026
 - JFMTCU Temp Hotel Stay on 05/03/2026 until 05/04/2026
 - 1.1 days in hotel
 - MVM Transport on 05/04/2026 until 05/05/2026 for 0.31 days
 - JFMTCU Temp Hotel Stay on 05/05/2026 until 05/08/2026
 - 3.02 days in hotel
- **Total time spent in hotels: 15.43 days**

2. 11-year-old A.P.N.

- Initial ICE Book-in date: 04/21/2026, Hold Room
 - MVM Transport on 04/21 for 0.05 days
 - JFMTCU Temp Hotel Stay from 04/21/2026 until 05/03/2026
 - 11.31 days in hotel
 - MVM Transport on 05/03/2026
 - JFMTCU Temp Hotel Stay on 05/03/2026 until 05/04/2026
 - 1.1 days in hotel
 - MVM Transport on 05/04/2026 until 05/05/2026 for 0.31 days
 - JFMTCU Temp Hotel Stay on 05/05/2026 until 05/08/2026
 - 3.02 days in hotel
- **Total time spent in hotels: 15.43 days**

3. 6-year-old J.H.A.

- Initial ICE Book-in date: 04/22/2026, Hold Room
 - MVM Transport on 04/22
 - JFTMCU Temp Hotel Stay from 04/22 until 04/23
 - 0.33 days in hotel
 - MVM Transport on 04/23
 - JFMTCU Temp Hotel Stay from 04/23 until 04/28
 - 5.32 days in hotel
 - MVM Transport on 04/28
 - JFMTCU Temp Hotel Stay on 04/28 until 05/03/2026
 - 4.74 days in hotel
- **Total time spent in hotels: 10.39 days**

4. 9-year-old D.L.H.

- Initial ICE Book-in date: 04/22/2026, Hold Room
 - MVM Transport on 04/22
 - JFTMCU Temp Hotel Stay from 04/22 until 04/23
 - 0.33 days in hotel
 - MVM Transport on 04/23
 - JFMTCU Temp Hotel Stay from 04/23 until 04/28
 - 5.32 days in hotel
 - MVM Transport on 04/28
 - JFMTCU Temp Hotel Stay on 04/28 until 05/03/2026
 - 4.74 days in hotel
- **Total time spent in hotels: 10.39 days**

5. 11-year-old J.L.H.

- Initial ICE Book-in date: 04/22/2026, Hold Room
 - MVM Transport on 04/22
 - JFTMCU Temp Hotel Stay from 04/22 until 04/23
 - 0.33 days in hotel
 - MVM Transport on 04/23
 - JFMTCU Temp Hotel Stay from 04/23 until 04/28

- 5.32 days in hotel
 - MVM Transport on 04/28
 - JFMTCU Temp Hotel Stay on 04/28 until 05/03/2026
 - 4.74 days in hotel
- **Total time spent in hotels: 10.39 days**

6. 2-year-old A.M.H.

- Initial ICE Book-in date: 04/22/2026, Hold Room
 - MVM Transport on 04/22
 - JFTMCU Temp Hotel Stay from 04/22 until 04/23
 - 0.33 days in hotel
 - MVM Transport on 04/23
 - JFMTCU Temp Hotel Stay from 04/23 until 04/28
 - 5.32 days in hotel
 - MVM Transport on 04/28
 - JFMTCU Temp Hotel Stay on 04/28 until 05/03/2026
 - 4.74 days in hotel
- **Total time spent in hotels: 10.39 days**

7. 7-year-old C.F.R.

- Initial ICE Book-in date: 05/11/2026, Hold Room
 - MVN Transportation on 05/11 until 05/12/2026 for 0.32 days
 - JFMTCU Temp Hotel Stay from 05/12/2026 until 05/17/2026
 - 5.56 days in hotel
 - MVN Transportation on 05/17/2026 for 0.25 days
- **Total time spent in hotels: 5.56 days**

APRIL 2026

In April 2026, there were **36 total hotel stays over 3 days**. The seven longest (not including stays that extended into May) were:

1. 7-year-old J.C.R.

- Initial ICE Book-in date: 04/06/2026, Hold Room
 - MVM Transport on 04/06/2026 for 0.38 days
 - JFMTCU Temp Hotel Stay on 04/06/2026 until 04/07/2026
 - 0.93 days in hotel
 - MVM Transport on 04/07/2026 until 04/08/2026 for 0.43 days
 - JFMTCU Temp Hotel Stay on 04/08/2026 until 04/12/2026
 - 4.58 days in hotel
 - MVM Transport on 04/13/2026
- **Total time spent in hotels: 5.51 days**

2. 9-year-old G.J.C.R.

- Initial ICE Book-in date: 04/06/2026, Hold Room
 - MVM Transport on 04/06/2026 for 0.38 days

- JFMTCU Temp Hotel Stay on 04/06/2026 until 04/07/2026
 - 0.93 days in hotel
- MVM Transport on 04/07/2026 until 04/08/2026 for 0.43 days
- JFMTCU Temp Hotel Stay on 04/08/2026 until 04/12/2026
 - 4.58 days in hotel
- MVM Transport on 04/13/2026
- **Total time spent in hotels: 5.51 days**

3. 9-year-old X.B.P.

- Initial ICE Initial ICE Book-in date: 04/06/2026, Hold Room
 - MVM Transport on 04/06/2026 for 0.47 days
 - JFMTCU Temp Hotel Stay on 04/06/2026 until 04/07/2026
 - 0.84 days in hotel
 - MVM Transport on 04/07/2026 until 04/08/2026 for 0.46 days
 - JFMTCU Temp Hotel Stay on 04/08/2026 until 04/12/2026
 - 4.57 days in hotel
 - MVM Transport on 04/13/2026
- **Total time spent in hotels: 5.41 days**

4. 7-year-old G.M.H.

- Initial ICE Book-in date: 03/31/2026, Hold Room
 - MVM Transport on 03/31/2026 for 0.59 days
 - JFMTCU Temp Hotel Stay from 03/31/2026 until 04/06/2026
 - 5.26 days in hotel
 - MVM Transport on 04/06/2026
- **Total time spent in hotels: 5.26 days**

5. 6-year-old N.G.P.

- Initial ICE Book-in date: 03/31/2026, Hold Room
 - MVM Transport on 03/31/2026 for 0.51 days
 - JFMTCU Temp Hotel Stay from 03/31/2026 until 04/06/2026
 - 5.12 days in hotel
 - MVM Transport on 04/06/2026
- **Total time spent in hotels: 5.12 days**

6. 8-year-old J.G.P.

- Initial ICE Book-in date: 03/31/2026, Hold Room
 - MVM Transport on 03/31/2026 for 0.51 days
 - JFMTCU Temp Hotel Stay from 03/31/2026 until 04/06/2026
 - 5.12 days total in hotel
 - MVM Transport on 04/06/2026
- **Total time spent in hotels: 5.12 days**

7. 8-year-old Y.M.G.

- Initial ICE Book-in date: 04/07/2026, Hold Room
 - MVM Transport on 04/07/2026 for 0.38 days

- JMFTCU Temp Hotel Stay on 04/07/2026
 - 0.05 days in hotel
- MVM Transport on 04/07/2026 until 04/08/2026 for 0.44 days
- JFMTCU Temp Hotel Stay from 04/08/2026 until 04/12/2026
 - 4.57 days in hotel
- MVM Transport on 04/12/2026
- **Total time spent in hotels: 4.62 days**

EXHIBIT 3

DECLARATION OF ELORA MUKHERJEE

I, Elora Mukherjee, swear under penalty of perjury, that the following information is true and correct to the best of my knowledge and abilities:

1. My name is Elora Mukherjee. I am the Jerome L. Greene Clinical Professor of Law at Columbia Law School. I have served as the founding Director of the Immigrants' Rights Clinic at Columbia Law School since 2014. I have been licensed in the State of New York since 2006 and the State of New Jersey since 2005.
2. Since January 2007, I have provided pro bono representation to hundreds of children and families in immigration detention facilities, including those detained at the secure federal facilities in Dilley, Karnes City, and Taylor, Texas and in Berks, Pennsylvania.
3. Since 2025, I have provided pro bono representation to more than 90 children and their parents who have been detained at or are currently detained at the family detention facility in Dilley, Texas.
4. From March 1, 2026, to date, I have provided pro bono representation to 40 children and their parents who have been detained or are currently detained at the family detention center in Dilley, Texas.
5. Through my recent work at Dilley, and through my years of experiences working with children and families in detention, I have become familiar with the *Flores* Settlement Agreement and related judicial orders. I am also familiar with U.S. Immigration and Customs Enforcement's ("ICE") Family Residential Standards ("FRS").
6. I have read the ICE Juvenile Coordinator's report and attachments filed July 1, 2026. ECF Nos. 1802-1 ID#: 64505 & 1802-2 ID#: 64529.

7. The facts set forth are personally known to me and, if called as a witness, I could and would testify competently thereto under oath.

Exceedingly long periods of detention

8. From March 1, 2026 to date, I have been representing children and families who have been detained at Dilley for extremely long periods of time.
9. Based on my experiences with children and families detained at Dilley from March 1, 2026 onward, I know that ICE is not releasing children without unnecessary delay.
10. Based on my experiences with children and families detained at Dilley from March 1, 2026 onward, I have not seen consistent evidence that ICE is making and documenting prompt and continuous efforts to releasing children.
11. Below are summaries of the experiences of several families who I have been representing from March 1, 2026 to date.
12. My one-year-old client has been in federal immigration custody since about May 23, 2026. This child remains detained at Dilley to this day, for a total of 49 days and counting. This child has experienced severe diarrhea and diaper rash in detention, and has had limited access to age-appropriate food, formula, and bottled water. I have sought this family's release on humanitarian parole and have sought to facilitate an opportunity for the family to file refugee claims with the Canadian Border Services Agency. ICE denied the parole request, and ICE did not respond to my request to make the family available to meet with the Canadian Border Services Agency. I have no information about when ICE may release this child and their parents. To the best of my recollection, ICE never told me that this family had been categorized as a "national security risk" or a "failure to comply" case.

13. My ten-year-old client was in federal immigration custody from April 6, 2026, until today, July 11, 2026, for a total of 96 days. This child needs regular monitoring by pediatric cardiologists for a congenital heart condition. In detention, this child hardly ate. He felt fearful, anxious, withdrawn, and depressed. At night at Dilley, this child was too scared to sleep alone and needed their parent to be with them. At Dilley, this child wet their pants during the day and night. While detained, this child experienced diarrhea, stomach pain, and eczema flare-ups. Every day at Dilley, this child begged to leave the detention center. I filed two humanitarian parole requests for this child and their parent in June 2026. ICE denied these parole requests. On June 22, 2026, I reached out to the U.S. Attorney's Office for the Western District of Texas via email in an effort to seek the release of this family without the need for federal litigation. I have not received a response to my email to date. On June 24, 2026, I filed a federal habeas petition for this child and their parent. The habeas petition has been pending through today. Today, ICE released this child and their parent from Dilley without communicating with me, even though I had entered appearances as their counsel of record. To the best of my recollection, ICE never told me that this family had been categorized as a "national security risk" or a "failure to comply" case.

14. My four-year-old client was in federal immigration custody from May 5, 2026, through today, July 11, 2026, for a total of 67 days. This child has extremely serious special needs. In detention, this child hardly ate and their physical and mental health were deteriorating. I filed three humanitarian parole requests for this child and their parent. Today, ICE released this child and their parent from Dilley without communicating with me, even though I had entered appearances as their counsel of record. To the best of my

recollection, ICE never told me that this family had been categorized as a “national security risk” or a “failure to comply” case.

15. My three-year-old client was in federal immigration custody from about December 22, 2025, to June 10, 2026, a total of about 170 days. This child developed breathing difficulties in detention and regressed behaviorally by, for example, wetting the bed. I filed multiple requests for the release of this child and their parent in April 2026. On June 10, 2026, ICE released this child and their parent from Dilley without communicating with me, even though I had entered appearances as their counsel of record. To the best of my recollection, ICE never told me that this family had been categorized as a “national security risk” or a “failure to comply” case.

16. My sixteen-year-old client was in federal immigration custody from about January 15, 2026, to June 13, 2026, a total of about 149 days. I sought the release of this child and their parent on humanitarian parole. ICE denied the parole request on April 13, 2026. Subsequently, this child and their parent pursued a federal habeas petition, which was pending at the time of their release. On June 13, 2026, ICE released this child and their parent from Dilley without communicating with me, even though I had entered appearances as their counsel of record. To the best of my recollection, ICE never told me that this family had been categorized as a “national security risk” or a “failure to comply” case.

17. My clients eleven-year-old M. and twelve-year-old G. were detained at Dilley from about February 17, 2026, to June 11, 2026, a total of about 114 days. I filed four humanitarian parole requests for this family from April to June 2026. On June 11, 2026, ICE released M., G., and their parents from Dilley without communicating with me, even though I had

entered appearances as their counsel of record. To the best of my recollection, ICE never told me that this family had been categorized as a “national security risk” or a “failure to comply” case. Prior to their detention, M., G., and their parents had been building lives in Los Angeles for about four years as bona fide asylum seekers. M., a math-whiz, won a “perfect attendance” award at her school in Los Angeles. G. loved playing soccer, but felt, in his words, like “a bird in a cage” at Dilley. Both children’s mental and physical health deteriorated in detention. G. experienced blood in his stools for months. Both children had stomach pain and vomiting after drinking the water at Dilley. Both children were not getting sufficient vegetarian food. At times, including throughout May 2026, M. and G. maintain vegetarian diets for religious reasons, and they did not have access to sufficient vegetarian food at Dilley. Both children were unable to sleep properly at night because the lights are on 24/7 and guards make loud noises throughout the night. They were concerned that they were not receiving appropriate medical care. M. and G.’s mother’s health also suffered at Dilley, and M. and G. consistently stayed near her to help her with daily tasks and serve as her caretaker. The family has a motion pending before the Board of Immigration Appeals. M., G., and their parents have spoken publicly about their experiences in detention.¹

18. My nine-year-old client K. was detained at Dilley for about 85 days. To the best of my recollection, ICE never told me that this family had been categorized as a “national security risk” or a “failure to comply” case. K. and his mother entered the United States

¹ Sarah Stillman, *The Return of Family Detention*, The New Yorker (Apr. 13, 2026), <https://www.newyorker.com/magazine/2026/04/20/the-return-of-family-detention>; Maanvi Singh, *She celebrated her 11th birthday in ICE detention. Her wish: that her family could go home*, The Guardian (Apr. 27, 2026), <https://www.theguardian.com/us-news/2026/apr/27/texas-ice-family-detention>.

lawfully and were arrested when they were on their way to refill prescription medication for K. K. has severe autism. He could not understand why he was detained at Dilley for weeks on end. He grew increasingly disoriented and distressed at Dilley, hitting himself, crying through the night, and begging to return to his home and school in Louisiana. He could not stand the lights being on 24/7 or the noise of patrolling guards at night. K. was finally released on March 6, 2026, after I filed a parole request for him. K.'s mother has spoken publicly about her family's experiences in detention.²

19. My clients fourteen-year-old E.A. and her sixteen-year-old brother J.A. were detained at Dilley for about 126 days. To the best of my recollection, ICE never told me that this family had been categorized as a "national security risk" or a "failure to comply" case. Notably, the U.S. Court of Appeals for the First Circuit stayed this family's removal in February 2026. Prior to their detention, E.A. and J.A. had been building lives in Portland, Maine for more than three years as bona fide asylum seekers. E.A. was a stellar student, and J.A. was both a great student and a star soccer player. During their time in detention, E.A. and J.A. suffered from deteriorating mental health and physical health, they were unable to sleep properly because the lights were on 24/7, and they were unable to obtain appropriate medical care. E.A. and J.A. were devastated on or about November 12, 2026, when federal immigration authorities separated them from their nineteen-year-old sister

² Mike Hixenbaugh, 'This place broke something in us': Kids languish in ICE detention long past 20-day court limit, NBC News (Mar. 13, 2026), <https://www.nbcnews.com/news/us-news/children-languish-ice-detention-long-20-day-court-limit-rcna262525>; *Un niño con autism severo estuvo detenido por ICE cuatro veces más del tiempo permitido (A boy with severe autism was detained by ICE for four times longer than permitted)*, Noticias Telemundo (Mar. 13, 2026), <https://www.telemundo.com/noticias/edicion-noticias-telemundo/inmigracion/video/un-nino-con-autismo-severo-estuvo-detenido-por-ice-cuatro-veces-mas-del-tiempo-permitido-tmvo13145416>.

Olivia. E.A. and J.A. did not know where their beloved sister was for weeks. Later, Olivia was also detained at Dilley. E.A. and J.A. were released from Dilley on March 18, 2026, after I filed a parole request for them. I also filed a total of four parole requests for Olivia. When the parole requests were unsuccessful, I filed federal habeas litigation for Olivia. Olivia was released from Dilley on May 8, 2026, after the U.S. District Court for the Western District of Texas granted her federal habeas petition. Oliva, J.A., E.A., and their mother have spoken publicly about their experiences in detention.³

20. My fifteen-year-old client was detained at Dilley for about 151 days. To the best of my recollection, ICE never told me that this family had been categorized as a “national security risk” or a “failure to comply” case. This family was released into the United States on March 20, 2026, after I filed three parole requests for them.

21. My clients, a seven-year old and their twelve-year old sibling, were in federal immigration custody for about 100 days, including about 99 days at Dilley. To the best of my recollection, ICE never told me that this family had been categorized as a “national security risk” or a “failure to comply” case. I filed two parole requests for this family, but neither was granted. The family was deported on March 14, 2026.

³ Daniella Silva, *A teen and her family fled torture in Congo to resettle in Maine, but then ICE showed up*, NBC News (Apr. 25, 2026), <https://www.nbcnews.com/news/us-news/olivia-andre-ice-detention-fled-congo-to-maine-dilley-immigration-rcna341003>; Daniella Silva, *Teen says judge’s order for her release from immigration detention had her family screaming with joy*, NBC News (May 7, 2026; updated May 8, 2026), <https://www.nbcnews.com/news/us-news/olivia-andre-release-dilley-immigration-ice-detention-maine-rcna344006>; *Exclusive: Teen asylum seeker detained by ICE for nearly 6 months speaks out*, MS Now (May 10, 2026), <https://www.nbcnews.com/news/us-news/olivia-andre-release-dilley-immigration-ice-detention-maine-rcna344006>; *Olivia comes home: Teen reunites with family after ICE detainment in Dilley, Texas*, ABC News (May 11, 2026), <https://abcnews.com/video/132857770/>; *Children ‘held like criminals’ inside ICE detention center*, CBS News (May 31, 2026), <https://www.cbsnews.com/video/children-held-like-criminals-inside-ice-detention-center/>.

22. My two-year-old client was in federal immigration custody for about 136 days, including about 134 days at Dilley. To the best of my recollection, ICE never told me that this family had been categorized as a “national security risk” or a “failure to comply” case. The two-year old often refused to eat in detention. The water available at Dilley caused the child to suffer from diarrhea. Medical records from Dilley recorded the child as consistently being in the bottom 1 percentile in weight based on age and height (“weight-for-length ratio”). The child’s weight-for-length ratio even dropped to the zero percentile, which qualifies as “severe malnutrition.” I filed a parole request and a request for discretionary notices to appear for this family, but neither was granted. The family was deported on March 25, 2025.
23. Other children and families have suffered during their prolonged detention at Dilley in recent months, including some children and families who have spoken publicly about their experiences.⁴

Ongoing medical concerns and failure to accommodate special needs

24. I remain deeply concerned about the medical care and mental health care offered at Dilley.
25. I remain deeply concerned that children’s special needs are not adequately supported, met, or treated while they are detained at Dilley.

⁴ See, e.g., *The Families of Dilley ICE Detention: ‘Mama, I Don’t Want to Live,’* NBC News (May 28, 2026), <https://www.nbcnews.com/video/-it-s-simply-impossible-to-be-a-good-parent-there-264024133744>; *America’s Youngest Detainees: ICE has detained over 500 babies and toddlers under Trump*, MS Now (June 9, 2026), <https://www.youtube.com/watch?v=mn1YYD-R2zU>; *Las voces de Dilley (The voices of Dilley)*, Univision (May 29, 2026), <https://www.youtube.com/watch?v=LcuQ9Y4QPNg&v1=en-US>.

26. Children and their families consistently report that they are not receiving appropriate medical care and that children's special needs are not appropriately accommodated or supported.
27. Nearly all of my clients who have been detained at Dilley from March 1, 2026 to date have expressed concern about the medical care provided to them at Dilley.
28. My one-year-old client, currently detained at Dilley, has faced serious medical challenges at Dilley, as described above. This child's parents are extremely concerned about their child's deterioration at Dilley.
29. My ten-year-old client with a congenital heart condition regressed behaviorally at Dilley, as described above. This child's mental and physical health deteriorated in detention, as described above. For months, this child's parent was extremely concerned that this child was not getting appropriate medical care or mental health care at Dilley.
30. My four-year-old client with extremely serious special needs suffered and deteriorated in detention and at Dilley, both in terms of their physical and mental health. For months, this child's parent cried and sobbed each day and repeatedly because this parent was so worried that their child was not receiving appropriate medical or mental health care at Dilley.
31. My clients—a parent and two-year-old child—were kept in medical isolation for months at Dilley. The parent had been diagnosed with tuberculosis.
32. My two-year-old client, K., refused to eat solid food for twelve days while in federal immigration custody. According to his mother, he survived on only water and apple juice. K. and his mother are bona fide asylum seekers who built lives in California and complied with all their ICE check-in requirements and all requirements of the Intensive

Supervision Appearance Program (ISAP). They were released on April 1, 2026, after I filed two parole requests for them. His mother has talked publicly about their experiences in detention.⁵

33. My five-year-old nonverbal client, G., who has significant developmental delays, faced serious health problems in federal immigration custody. G. struggled to eat in detention and did not poop for nine days. The laxatives and enemas provided at Dilley did not significantly improve his conditions. During attorney-client meetings via Zoom video calls with the family, I saw that G.'s stomach appeared visibly distended and uncomfortable. Prior to their detention, G. and his parents complied with all ICE check-in requirements, all ISAP check-in requirements, and were bona fide asylum seekers living in Texas for more than two years. G.'s parents have talked publicly about their experiences in detention.⁶

⁵ Dara Kerr, *Two-year-old held by ICE sick and not getting adequate care, Democrat warns*, The Guardian (Mar. 30, 2026), <https://www.theguardian.com/us-news/2026/mar/30/texas-ice-detention-facility>; Pablo Manríquez, *The Toddler in the ICE Prison Who Wouldn't Eat*, Migrant Insider (Apr. 2, 2026); *Kaleth is back home safe*, Lidia Terrazas News (Apr. 3, 2026), <https://www.instagram.com/reel/DWtWqG2id8A/>; Anna Flagg, *et al.*, *25 Babies and Toddlers Are in ICE Custody on an Average Day*, The Marshall Project (June 9, 2026), <https://www.themarshallproject.org/2026/06/09/babies-and-toddlers-in-ice-detention>.

⁶ Mike Hixenbaugh, *Children's entertainer Ms. Rachel has a new cause: Freeing kids from ICE detention*, NBC News (Mar. 21, 2026), <https://www.nbcnews.com/news/us-news/ms-rachel-ice-detention-children-immigration-dilley-texas-center-rcna263786>; Mike Hixenbaugh, *Nonverbal 5-year-old who met Ms. Rachel over Zoom is released from ICE detention*, NBC News (Mar. 24, 2026), <https://www.nbcnews.com/news/us-news/ice-release-5-year-old-ms-rachel-zoom-dilley-texas-immigration-rcna264926>; *Tras su liberación, los padres del niño Gael relatan el calvario que vivieron detenidos por ICE (Following their release, the parent of young Gael recount the ordeal they endured while detained by ICE)*, Noticias Telemundo (Mar. 26, 2026), <https://www.telemundo.com/noticias/noticias-telemundo-en-la-noche/inmigracion/video/tras-su-liberacion-los-padres-del-nino-gael-relatan-el-calvario-que-vivieron-detenidos-por-tmvo13154399>; *"Nadie quiere ver eso para un hijo": Hablan los padres de Gael, niño con autismo que estuvo detenido en Dilley, Texas ("No one wants to see that happen to their child": The parents of Gael, a boy with autism who was detained in Dilley, Texas, speak out)*, Univision (Mar. 25, 2026), <https://www.univision.com/shows/noticiero-univision/nadie-quiere-ver-eso>.

34. As described above and in the associated news coverage, my nine-year-old client K., who has severe autism, struggled throughout his 85 days in detention.

Ongoing mental health concerns

35. Babies, toddlers, children and teenagers should not be detained at Dilley. Every child who I have represented in federal immigration custody from March 1, 2026 to date has experienced mental health distress in detention.

Inadequate access to clean drinking water and lack of appropriate palatable food

36. Every verbal child and parent who I have worked with at Dilley from March 1, 2026 to date has reported that they do not have access to sufficient clean drinking water. Families use their limited commissary funds to purchase bottled drinking water. I have reviewed medical records from Dilley for my clients in which children report that they are suffering from stomach pain, vomiting, diarrhea, and other stomach issues as a result of drinking the water that is available for free at Dilley.

37. Every verbal child and parent who I have worked with at Dilley from March 1, 2026 to date has reported that the food is not appropriate or palatable for children and families.

Access to Counsel and Access to Email

38. None of my clients has ever told me that they can call me from the Dilley facility at no cost.

39. When clients detained at Dilley call me, I hear an audio recording from Talton, a private corporation that profits from the phone calls of those in detention. The Talton audio

[para-un-hijo-hablan-los-padres-de-gael-nino-con-autismo-que-estuvo-detenido-en-dilley-texas-video.](#)

recording asks me if I would like to accept the call, and I must respond affirmatively before my client can speak with me. I do not believe that these Talton phone calls are confidential or free.

40. My clients detained at Dilley in May, June, and July 2026 have experienced difficulties in accessing the Internet and their email accounts.

41. For example, in June 2026, a parent who is my client reported to me that their family had lost all access to their email account in detention. It took weeks for this family to regain email access by using a new email address while detained at Dilley. My understanding is that this family lost all the emails associated with their original email account.

42. The ICE Juvenile Coordinator's report filed July 1, 2026 states: "Library staff can assist residents who need documents scanned or emailed to counsel." ECF No. 1802-1 ID#: 64505 at 18. This statement is not consistent with the experiences of my clients.

43. In recent months, some of my clients who are children have prepared handwritten letters and drawings that they want to email to me. These children and their families have been told by Dilley staff that their handwritten letters and drawings will not be scanned and emailed to me. Instead, Dilley staff have stated that they are willing to type out the children's handwritten letters and that only the typed versions will be sent to me. These children and families have understandably been frightened to share their letters with Dilley staff. Children and families fear retaliation from Dilley staff. For this reason, I have not received any handwritten letters or drawings from my clients at Dilley via email in recent months.

Family Separations Within the Dilley Facility

44. The ICE Juvenile Coordinator's report filed July 1, 2026 states: "Housing assignments are made with consideration of family composition, classification requirements, and the ages of children, with family unity preserved except where separation is required for safety or medical reasons." ECF No. 1802-1 ID#: 64505 at 13. This statement is not consistent with the experiences of my clients.
45. As described above in paragraph 19, my clients fourteen-year-old E.A. and her sixteen-year-old brother J.A. were detained at Dilley for about 126 days. E.A. and J.A. were detained by federal immigration authorities and brought to Dilley with their mother on or about November 12, 2025. E.A. and J.A.'s nineteen-year-old sister Olivia was detained by federal immigration authorities on or about November 12, 2025 as well, but then Olivia was detained at several different detention centers for weeks. During these weeks, E.A., J.A., and their mother had no information about the whereabouts or well-being of Olivia. They did not know whether Olivia was in the United States or had been deported. They were emotionally devastated. Every day for weeks, E.A. repeatedly and loudly called, "Olivia! Olivia!" at the Dilley facility in hopes of finding her sister. Eventually, Olivia was brought to the Dilley facility and detained separately from her family. Initially no facility staff or ICE personnel told E.A., J.A., Olivia, or their mother that they were all detained at Dilley. Then, one day, as Olivia was walking to the library at Dilley, she heard a voice calling her name. Facility staff did not permit Olivia to pause to see who was calling her name, and E.A. could not see Olivia, but this moment helped Olivia realize that her younger sister might be detained at Dilley as well. Olivia sought to confirm her family members' whereabouts. From then on, E.A. and J.A. were permitted

to spend limited time with Olivia, but they were not permitted to stay together as a family unit in detention. Oliva, J.A., E.A., and their mother have spoken publicly about their experiences of family separation.⁷ There were no “safety or medical reasons” justifying the separation of this family for months.

Education and Recreation

46. Children and parents I represent continue to express concern that the quality of schooling at Dilley is inadequate to meet children’s educational needs.

47. Children and parents I represent continue to express concern that children are not able or willing to meaningfully engage in recreational activities at Dilley because children’s physical health, mental health, and emotional well-being are deteriorating in detention.

Visitation

48. The ICE Juvenile Coordinator’s report filed July 1, 2026 states: “If a visitor knows the resident’s A number, has proper identification, and can identify themselves as a friend or family member, the visitor may visit with the resident.” ECF No. 1802-1 ID#: 64505 at 18. This statement is not consistent with the experiences of my clients.

⁷ Daniella Silva, *A teen and her family fled torture in Congo to resettle in Maine, but then ICE showed up*, NBC News (Apr. 25, 2026), <https://www.nbcnews.com/news/us-news/olivia-andre-ice-detention-fled-congo-to-maine-dilley-immigration-rcna341003>; Daniella Silva, *Teen says judge’s order for her release from immigration detention had her family screaming with joy*, NBC News (May 7, 2026; updated May 8, 2026), <https://www.nbcnews.com/news/us-news/olivia-andre-release-dilley-immigration-ice-detention-maine-rcna344006>; *Exclusive: Teen asylum seeker detained by ICE for nearly 6 months speaks out*, MS Now (May 10, 2026), <https://www.nbcnews.com/news/us-news/olivia-andre-release-dilley-immigration-ice-detention-maine-rcna344006>; *Olivia comes home: Teen reunites with family after ICE detainment in Dilley, Texas*, ABC News (May 11, 2026), <https://abcnews.com/video/132857770/>; *Children ‘held like criminals’ inside ICE detention center*, CBS News (May 31, 2026), <https://www.cbsnews.com/video/children-held-like-criminals-inside-ice-detention-center/>.

49. On May 29, 2026, visitors from a nonprofit organization who had befriended my clients and other detained at Dilley went to the facility for a visit. The visitors were initially permitted to meet with families, including two of my clients. The visitors then left the facility for lunch. When the visitors sought to reenter the Dilley facility to meet with additional friends in detention, CoreCivic employees told them that ICE had determined that their visits with additional friends would not be permitted and that ICE had directed them to leave the premises. One of the visitors asked if she did something wrong. The CoreCivic employee repeated that his directions came from ICE and that the visitors needed to leave. The visitors left immediately and were not able to meet with their friends at Dilley.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and abilities.

July 11, 2026

New York, New York



Elora Mukherjee

EXHIBIT 4

DECLARATION OF RODOLFO C. ALTILLO

I, Rodolfo C. Altillo, swearing under penalty of perjury, make the following declaration:

1. My name is Rodolfo C. Altillo, and I serve in the role of Managing Attorney for the Asylum Access Services (“AAS”) team at the Refugee and Immigrant Center for Education and Legal Services (“RAICES”). I have been in the role of Managing Attorney since July 2025. I have been licensed in the State of Texas since December 2020 and in the State of Maryland since December 2017; I am an attorney in good standing in each state.
2. In my current role as the Managing Attorney for AAS (formerly known as the Family Detention Services Program), I oversee free legal services for detained people and families facing expedited removal from the U.S., as well as people seeking asylum and related protections, at the Dilley Immigration Processing Center (“Dilley”).
3. RAICES is a 501(c)(3) nonprofit, non-partisan organization founded in 1986 and headquartered in San Antonio, Texas. Additional offices are located statewide in Austin, Corpus Christi, Dallas, and Houston. As a humanitarian aid organization in service to immigrant, refugee, and asylum-seeking people and families, RAICES provides free and low-cost immigration legal services, including, but not limited to, assistance with asylum applications, removal defense, DACA renewals, and status adjustments. RAICES provides this full range of immigration-related services to individuals who are in detention, or who are continuing to fight their cases following release.
4. AAS provides *pro bono* legal services for minors who are *Flores* class members and their families detained at Dilley. Since Defendants resumed detaining families at Dilley in April 2025, RAICES has served more than 500 families in ICE custody.

5. Through my current role as Managing Attorney of AAS, I am familiar with the terms and requirements of the *Flores* Settlement Agreement (“FSA”), as well as subsequent agreements and judicial orders related to it.
6. I am also familiar with U.S. Immigration and Customs Enforcement’s (“ICE”) Family Residential Standards (“FRS”). Between 2017 and 2025, I worked at Kids In Need of Defense (“KIND”), providing *pro bono* legal services to “Unaccompanied Alien Children” (“UCs”), including those detained under the custody of the Office of Refugee Resettlement (“ORR”), and families separated by the Trump Administration’s “Zero Tolerance Policy.”
7. I have reviewed RAICES’ prior declarations detailing ICE’s non-compliance with protections for minors, and I am familiar with prior judicial orders instructing ICE with regard to its compliance.
8. The facts set forth below are known personally to me and, if called as a witness, I could and would testify competently thereto under oath.
9. RAICES has noted a deterioration in specific areas regarding Defendants’ treatment of class members over the last few months, and several elements of their non-compliance with the FSA remain as previously reported in declarations to this Court.

Exceedingly long periods of detention.

10. Although RAICES has noticed ICE has started to release some families within 20 days of their arrival at Dilley, numerous families remain in federal custody far beyond that timeframe. As of July 08, 2026, the length of detention for the families we serve range from 28 to 96 days, all above 20 days. Thus, the average length of detention for clients currently detained at Dilley is about 53 days.

11. RAICES routinely sends formal e-mail correspondence to ICE officials titled “Release Status and Potential Violation of Flores Settlement,” which notes the number of days the family has been detained and requests the status of release and any proper documentation that ICE has made prompt and continuous efforts to release *Flores* Class Members and their parent(s). These requests are routinely ignored by ICE and remain unanswered, despite many follow up e-mails sent by staff. For example, since May 01, 2026, RAICES has sent approximately 30 of these e-mails to ICE on behalf of the families detained at Dilley. The e-mail notices have included families that were detained from 18 to 104 days. To date, only 17 emails have received a response.

12. Among these responses given by ICE, “failure to cooperate” or “national security risk” have not been offered as reasons for prolonged delay. When ICE has responded to our e-mails, no documentation has been provided and the following types of responses have been offered:

- a. Eight (8) responses cited families would remain detained pending removal proceedings and their upcoming hearings before EOIR;
- b. Seven (7) responses stated families were pending release or removal, generally without an approximate date of release or removal;
- c. One (1) response confirmed family’s removal; and
- d. One (1) response stated the family’s continued custody was pending review.

13. The following example illustrates how ICE fails to respond at all to notices where families have been in prolonged ICE detention:

- a. On June 1, 2026, ICE was notified that a family had already been detained for 104 days. No response was received. RAICES followed up on June 3 after 106 days in

detention and again on June 8 after 111 days in detention. No response was ever provided. RAICES learned the family was released on or about June 11, after 114 days in custody.

14. When ICE does respond to RAICES' inquiries, the most frequent response is that families will remain detained through the pendency of their removal proceedings. The following examples illustrate how ICE keeps families detained for the purpose of continuing their removal proceedings while detained, even when it leads to prolonged detention:

- a. On April 24, 2026, RAICES notified ICE that a family had been detained for 18 days and inquired on the status of release efforts;
 - i. ICE replied on April 27 that the family would remain detained due to their upcoming hearing on April 30;
 - ii. RAICES followed up on May 1 and May 5, 2026 regarding release status. ICE replied on May 5 that the family would remain detained until their upcoming hearing on May 14, 2026;
 - iii. RAICES followed up on May 14, May 15, and May 18 regarding release status. ICE replied on May 19, 2026 that the family, who had already been detained for 43 days, would remain detained until their upcoming hearing on June 01, 2026;
 - iv. RAICES followed up on June 1 and June 09 regarding release status. ICE replied on June 09 that the family, who had already been detained for 64 days, would remain detained until their upcoming hearing on June 11, 2026;

- v. RAICES followed up on June 16, 2026 regarding release status. ICE replied on June 17 that the family, who had already been detained for 72 days, would remain detained until their upcoming hearing on June 25, 2026;
 - vi. As of July 8, 2026 the family remains detained and their removal proceedings remain pending. They have now been detained for 93 days.
- b. On June 03, 2026, RAICES notified ICE that a family had been detained for 25 days and inquired on the status of release efforts.
- i. RAICES followed up on June 10, June 12, June 16, June 22, and June 23, regarding release status. No response.
 - ii. ICE replied on June 24, 2026 that the family, who had already been detained for 46 days, would remain detained until their upcoming hearing on June 25, 2026.
 - iii. The family's removal proceedings were dismissed at the June 25 hearing and an appeal is due on July 27, 2026. RAICES followed up on June 25, 2026 regarding release status. No response.
 - iv. Generally, when removal proceedings are dismissed, the Government is no longer prosecuting the case and no longer asking the court to issue a removal order. However, the Government has been strategically seeking dismissal of removal cases to then use administrative processes to expeditiously remove immigrants.
 - v. As of today, the family remains detained after 60 days in detention.
- c. On June 23, 2026, RAICES notified ICE that a family had been detained for 36 days and inquired on the status of release efforts. ICE replied on June 24, 2026 that

the family would remain detained until their upcoming hearing on July 07, 2026.

The family remains detained after 51 days in detention.

15. While some families who have final orders of removal get removed expeditiously, others remain in prolonged custody:

- a. On March 24, 2026 RAICES notified ICE that a family had been detained for 92 days and inquired on the status of release efforts. ICE replied on March 26, 2026 that there were no plans for release and that the client would be removed “soon.” On May 13, 2026, after the family remained detained for 142 days, RAICES once again followed up with ICE. No response. RAICES was unable to continue representing this family and it is unclear how much longer they remained detained after the 142 days;
- b. On April 27, 2026, RAICES notified ICE that a family had been detained for 32 days and inquired on the status of release efforts. No response. RAICES continuously followed up on April 29, May 05, May 12, May 13, May 14, 2026, all with no response. On June 12, 2026, ICE responded that the family would be released that same day. The family had been detained for 66 days.
- c. On May 21, 2026, RAICES notified ICE that a family had been detained for 32 days and inquired on the status of release efforts. After not receiving a response, RAICES followed up May 26 after the family had been detained for 37 days. ICE responded on May 27 stating the family was pending removal. The family was removed on or about June 11, 2026, after approximately 53 days in detention.

Ongoing medical concerns.

16. The most common and frequent complaint among clients at Dilley continues to be medical and mental health concerns. From May 2025 to May 2026, RAICES received approximately 1,480 reports of medical concerns at Dilley.
17. Clients have repeatedly shared complaints regarding Dilley's capacity to treat urgent, chronic, or complex medical needs. One client has a herniated disc and at times experiences excruciating pain she describes as "Level 10." Despite the severe pain, she is only given ibuprofen or acetaminophen and has been denied physical therapy. Another client reported that her 5-year-old son had been having blood in his stool. She took her son to medical and they took stool samples. However, after approximately a month, no results have been shared and no treatment given to her 5-year-old son, who continued to experience bloody stools.
18. A father shared with RAICES that one of his sons has a jaw condition and a wire in the apparatus he has in his mouth to help with the condition broke, making eating difficult and causing his son to bleed. When he took him to medical, he was told that they do not offer that kind of medical care at Dilley and the child would have to get medical care once he is released.
19. A mother shared with RAICES that she was concerned about her 7-year-old daughter's well-being after she sustained an injury that caused bleeding in her "private area." Medical staff concluded, without any imaging or X-rays, that there was no internal bleeding and did not offer additional treatment or follow up. The child continued to bleed the next day and continued to complain of pain in her private area.

20. A father told RAICES that when they were detained, his one-year-old son was still drinking formula. However, medical staff told him their one-year-old cannot drink formula anymore and forced them to switch to milk. However, the switch caused their son severe diarrhea and he has developed diaper rash, which causes him pain and discomfort.
21. One mother shared that her daughter was having an allergic reaction that was causing her lip to swell on a Saturday night. When she took her to medical, she was told that a doctor would not be available until Sunday morning. A nurse determined the allergic reaction was not urgent, gave the child Benadryl, sent her back to her dorm, and told them to come back the next morning. The child was not monitored and no further guidance given on what to do if the child's state worsened overnight. The child continued to feel tingling in her lips and had to wait until the next morning to get medical care.
22. RAICES clients also continue to complain that their medical concerns are ignored or dismissed by staff, without any examination, and then told their maladies are just psychological. For example, one client reports that she had thyroid issues and pre-diabetes that she managed with medication and specialized diet prior to detention. When she first arrived at Dilley, she did not have access to her medication. After alerting medical staff, they told her she would be evaluated in two months. After two months, no evaluation was given. She is also concerned about her pre-diabetes because she is experiencing vision loss. Medical staff have not evaluated, examined, or treated her medical conditions. Instead, a nurse told her that a miracle has occurred and she has been cured. Moreover, the nurse told her that all her medical concerns are due to mental health and she just needs to walk more. The only medication she has received for her concerns are antacids and ibuprofen.

Ongoing mental health concerns.

23. RAICES clients also report deteriorating mental health and inadequate care. For example, a client told RAICES that she suffers from anxiety and panic attacks, and that her condition has worsened from the stress of detention. She has had heart palpitations, shaking body and hands, temporary vision loss, and trouble sleeping. She requested medical care and did not receive it promptly, despite being in distress and having other detainees assist her. When she followed up with her request, she was told not to remind staff anymore and that staff would let her know when she can receive care. When she finally saw a counselor, he was not very helpful. Rather than providing support, he told her she would be deported, asked her several questions unrelated to her concerns, and she felt she was being interrogated rather than receiving help. She requested to see another counselor and was told she would have to wait.

24. Children's mental health also deteriorates during detention. One mother told RAICES that her five-year-old son always asks her when they will be able to leave and that he does not want to be there anymore. His mental health is also impacting his appetite and he does not want to eat. Another father told RAICES that he is concerned about his eight-year-old son's deteriorating mental health. The stress of detention is causing him to not eat well and to wet his bed. Although he is seeing a therapist, his condition is not improving. He has noticed that other children in detention are also wetting their beds and not eating well.

Harsher treatment of families.

25. Between May and June 2026, families detained in Dilley continued to report mistreatment and general rudeness by ICE and CoreCivic staff. From January to May 2026, RAICES has received approximately 106 complaints of mistreatment at Dilley.

26. Most commonly clients report being yelled at and being treated rudely by officers, guards, and medical staff. One client reported being yelled at by an ICE officer after trying to address an error with her name. Another client reported medical staff became angry because he knocked on their door and was told he is rude and has no manners. Even when just getting their medication, one client reports the pharmacist treated her rudely, aggressively placed her medication on the counter, and shutting the window where she gets her medication.

Inadequate Food and Water.

27. Families continue to report concerns about the quality and appropriateness of the food and water provided at Dilley. Consequently, many resort to not eating and experience weight loss, use their limited funds to buy food at the commissary, or experience gastrointestinal problems when eating the food and drinking the water at Dilley out of necessity. For example, many clients have reported that they experience stomach aches after drinking the water. One client reported that he gets itchy after drinking the water. Thus, many parents resort to buying bottled water for their children, especially if they are already sick. Similarly, several families have reported that they experience nausea, vomiting, and diarrhea after eating the food at Dilley.

28. Several clients also report that their requests for their dietary needs are not accommodated. For example, one mother reports that she and her son are lactose intolerant and also have food sensitivities. She has requested lactose free milk for her son and a blander diet since food tends to be too salty and fried. Another mother told RAICES that her son does not eat the food because it has too much spice and the meat they serve looks weird to her and she

cannot tell what kind of meat it is. She mostly resorts to buying food for him from the commissary.

Lack of Legal Orientation Program and Legal Rights Group Presentations

29. As of July 8, 2026, Class members and their family members detained in Dilley continue to be inadequately informed about their legal process and rights. Families do not have access to a Legal Orientation Program, and do not receive a Legal Rights Group Presentation provided for in section 6.4 of the FRS. While some families report they are given a “Flores Notice” after arriving at Dilley, many do not understand the content of the Notice and some report they only received an English copy.
30. As set forth in previous declarations, RAICES requested the requisite permission to provide detained class members and their families with Legal Rights Group Presentations. After Defendants denied the request without explanation, RAICES submitted a FOIA request on June 12, 2025 to seek clarification on DHS’s reason for the denial and what they would approve. The FOIA request remains pending without a response as of July 8, 2026. RAICES remains willing and able to provide these services to detained families and adequately explain the rights they have under *Flores* and generally while detained.

Hindered Legal Access

31. Families continue to report receiving inaccurate or misleading legal advice from non-attorney ICE and CoreCivic staff at Dilley. The advice appears intended to deter families from further pursuing legal relief and to pressure families to accept removal or voluntary departure instead. For example, a family was told by ICE that their case was complicated and they would be detained for a lengthy period related to stay of removal and her pending habeas case.

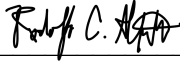
32. A father told RAICES that ICE was pressuring him and his son to accept voluntary departure. The officers were angry and asking why they wanted to fight their case if there was nothing else left to do in their case. He felt pressured to sign but his son did not, causing them to then be in different procedural postures and without counsel to explain the possible consequences of that decision.
33. Another parent told RAICES that her child has approved Special Immigrant Juvenile Status (SIJS) and is currently waiting for a visa to become available. When the parent addressed the matter with ICE and showed them an official USCIS Approval Notice of the SIJS I-360 Petition, the officer told them the document did not count as a notice and did not discuss the issue further.
34. Clients have also reported issues with accessing e-mail and free legal calls. One client informed us they were given a list of attorneys and legal services providers but were never told legal calls were free. Several clients have told us that they are not told how to make the free legal calls and that they are actually charged when making calls to legal services providers like RAICES. One client reported she was unable to call us because she did not have funds in her commissary account.
35. Several clients have also reported issues with internet and e-mail access. In part, this seems to be due to Dilley policy changes that were not announced to clients or to RAICES. For example, at some point Dilley stopped allowing families to use Gmail and instead transitioned to Proton Mail. However, one client alerted RAICES that Proton mail had been blocked. Recently, clients have started e-mailing from Atomic Mail accounts. Similarly, several clients have reported to RAICES that only certain computers have internet access but that those computers don't have the function to save information, such as their

immigration applications and other legal documents. This inconsistent and non-continuous use of email services and internet access limits both the information and documents clients can send and receive regarding their case and any evidence necessary for their case.

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

Dated: July 9, 2026

Austin, Texas

A handwritten signature in black ink, appearing to read "Rodolfo C. Altillo", is written over a horizontal line.

Rodolfo C. Altillo, Esq.

EXHIBIT 5

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, M [REDACTED] A [REDACTED] B [REDACTED] H [REDACTED], declare as follows:

2 1. This testimony is based on my personal knowledge, and the following facts are
3 true to the best of my understanding and recollection.

4 2. I am from [REDACTED].

5 3. I speak Spanish.

6 4. I have been detained for 22 days. I am detained with my five-year-old son.

7 5. I crossed the border on May 10th, and CBP detained me and my son in icebox
8 detention centers for three days before they took me to Dilley. We call them iceboxes
9 because they are so cold; they are CBP stations.

10 6. They took a DNA mouth swab from me and my son in border patrol but did not tell
11 us anything about it.

12 7. No one has told me why I have been detained so long. I signed a *Flores* paper
13 when they brought me to Dilley because the ICE officers told me that I had to sign it. But
14 it seems like a lie because there are a lot of people here for more than 21 days that have
15 not left yet.

16
17 **Detention in CBP Stations**

18 8. In that first CBP detention icebox, they took away my telephone even though I did
19 not have anything bad on it. Then they took me and my son to some cells, and they gave
20 us some burritos that were not really edible, so my son did not eat anything there. I asked
21 if there was other food and told the staff we needed other food for him to eat, but they
22 said they could not do anything about that. I asked them a few times, but they said no and
23 were rude.

24 9. In the first CBP center, the staff did not give us clothes or let us shower. They said
25 they would let us make phone calls, but then they never did.

26 10. When they moved us to Del Rio Station, I felt scared because I did not know what
27 was happening. I held my son and went with them.
28

11. When I got to Del Rio, I cried the whole time because they still would not let me contact anyone. While in CBP, my son and I did not get to call anyone, not even my mom. I kept saying I have the right to make one call, and I even asked if the staff could just call my mom, even if they would not let me speak, so she would know that we were alright and alive. But they did not let us contact her.

12. I was detained there with a friend and her child, but CBP deported them straight from the CBP detention center.

13. The staff said really ugly things to us while we were there. They told us that they would separate us from our children and would keep us detained in the cold cell for a long time. They also told us they would fine us and then deport us. A lot of the staff did not speak in Spanish but would give orders and then not pay attention to us when we tried to ask about what was happening.

14. My son cried the entire time he was in those places and shivered because he was so cold. They did not give us real blankets. Instead, they gave us these bags, which did not keep my son warm.

15. When they eventually moved us to Dilley, the staff woke us up at midnight and drove us for a couple of hours. We arrived at 3 a.m.

Dilley ICE Detention Center

16. When I got to Dilley, it was the middle of the night. The staff processed us and gave us some food and then we went to the bedroom.

17. The next day, when we got up, they took us to a little room with some ICE agents. The agents asked if we wanted to fight our case or leave voluntarily. Then, they made me sign the *Flores* paper. But they just put the paper in front of me and told me to sign it. They did not give me the paper after, and I did not get a copy of it, so I do not know what it says exactly.

18. No one told us what would happen next.

1 19. Being here is terrible for my son. He says he does not want to be here. My son
2 feels really sad, especially in the morning. When he wakes up, he tells me he does not
3 like being incarcerated. I tell him he must have faith in God that soon we will get out of
4 here.

5 20. My son no longer wants to eat. I think it is in part because it is so stressful to be
6 here, and my son gets so frustrated that he loses his appetite.

7 21. Also, every time I eat, I get a lot of gas and stomach pain, so I understand why he
8 doesn't want to eat here and why he feels bad. He is simultaneously hungry and doesn't
9 want to eat anything, so I mostly give him milk and cookies. As a mom, it makes me feel
10 worried that he has not been eating.

11 22. The day before yesterday, my son had a really intense pain in his stomach, and I
12 took him to the doctor here. They said his pain may just be because he is not eating well.

13 23. We have not been able to get a special diet for him either because it's so
14 complicated to be eligible for one. So, I just pray to God that we will get out of here soon.

15 24. No one has told me why we are still here. They just say I have another court date
16 on June 9th. I do not know what needs to happen for us to be freed, and the only answer I
17 have heard is that we just have to wait.

18 25. No one has given me a handout about my son's rights.

19 26. We never watched a video about my child's rights either.

20 27. I try to take him to the park and send him to school here. Sometimes he doesn't
21 want to go to school but he does go.

22 28. The lights are always on at night in our room. Sometimes, my son is uncomfortable
23 at night, so we do our best to turn away from the light to fall asleep.

24 29. For the most part we are buying potable water bottles here, because the water from
25 the filters has a really ugly taste. I am always trying to make sure I can buy it for my son
26 because I don't want us to get a stomach illness. It is expensive but we do it to stay
27 healthy.

1 30. I also get some help from other women here to buy ramen, so my son has
2 something to eat at night.

3 31. We have to pay to call our family members from here, so we only have been able
4 to call my son's family when there is money in the commissary. I have not heard about
5 free phone calls.

6 32. I have not been able to call lawyers and do not have money for lawyers, but I have
7 sent emails to RAICES attorneys. The day that they had me sign the *Flores* paper, they
8 gave me a paper with a couple of email addresses, and that is how I found RAICES's
9 email.

10 33. When I got here, there was no way to use my own email address. I cannot open my
11 Gmail account or create new Gmail accounts. There are a lot of restrictions, and we can
12 only use the email they allow here. So, I created a Proton account.

13 34. The people who work here are a mix of nice and not nice. The not nice ones look at
14 us with an ugly expression on their face and say things in a hostile manner. They want to
15 write up reports against people for everything. I am not sure what they are reporting on,
16 but there are some guards who just look at people and write things down. For example,
17 there was one guard who went into the playroom and started writing things down in a
18 notebook but did not say anything.

19 35. I have never used the grievance system because we are trying to avoid problems so
20 that our case will not be prejudiced. My first priority is getting my son out of here to my
21 family, and I am trying to avoid creating a situation that keeps me here by filing a
22 grievance.

23 36. When you go to the doctor here, you have to wait for a long time. Four days ago, I
24 asked for an appointment for medicine for a yeast infection, but they did not give me an
25 appointment. Then, I went back, and they told me they did not have the cream I needed to
26 treat the infection. I am still waiting for it. They said I might not get it until Friday, which
27 is four days from now.
28

1 37. Every day I just hope they will let us go. We are waiting for a response about
2 whether we can go to our sponsor. But we know there are some moms with children who
3 have been here for 50 days. It makes me lose hope and feel demoralized when I hear that
4 such long detention is possible. It's so hard, because it makes it clear that in reality the
5 government does not apply the *Flores* laws that they had us sign, because if they did, we
6 would not be here still.

1 I declare under my duty to tell the truth and penalty of perjury that to the best of my
2 knowledge, all the information I have here given is correct and complete and I understand
3 the legal consequences of testifying falsely to the authorities. Executed on this 1 day
4 of June 2026, at Dilley, Texas.



CERTIFICATE OF TRANSLATION

My name is Eleanor Roberts and I swear that I am fluent in both the English and Spanish languages and I translated the foregoing declaration from English to Spanish to the best of my abilities.

Dated: 06/01/2026



EXHIBIT 6

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, J [REDACTED] C [REDACTED] B [REDACTED], declare as follows:

2 1. This testimony is based on my personal knowledge, and the following facts are
3 true to the best of my understanding and recollection.

4 2. I am 48 years old, and my son is 10. We are from [REDACTED] and are here at Dilley
5 together. I have other kids, but they are not with me.

6 3. I speak Spanish and [REDACTED]. I only speak a bit of English.

7 4. Before Dilley, I was living in Florida with my family for about three years. I
8 entered the U.S. legally. I am an aviation mechanic.

9 5. We applied for asylum, and it's pending for our whole family.

10 6. We all had received Social Security cards and work permission—everything. We
11 have Florida IDs. And we have done all our taxes. We've never done anything criminal.

12 7. I was in family court near Dallas trying to figure out a custody situation for one of
13 my children when I was detained. ICE followed me from the court. I saw the car behind
14 me put on its emergency lights, and I pressed my breaks and stopped my car. I was in
15 park. Then, another car pulled up on the side of me and another in front so that we were
16 surrounded. I was in the car with my son. ICE officers swarmed the car. They all had
17 masks on. You couldn't see their faces, and they were all armed. They were very
18 aggressive and pulled us out of the car through the windows. I had the windows down
19 because it was a hot day.

20 8. It scared us a lot.

21 9. It was not necessary to surround us with three cars. We didn't even have time to
22 open our doors and get out of the car. It was very violent. My son was trembling and
23 crying.

24 10. I told them my son had to be with me. They tried to separate us in different cars. I
25 said, "Do not ask my son anything without me and don't separate us." They put me in the
26 car with handcuffs on my ankles and wrists. Despite asking, my son and I were separated
27 until we got to an ICE office. I said "Please, please give me my son. I need to see him."
28 They finally let us be together at the office. He said, "Dad, ICE asked me everything.

1 They asked when we got here, where we lived, if we wanted to be together, all this stuff.
2 I said I wanted to be with you.”

3 11. I didn’t ask about my other kids because God forbid they be with me. I didn’t bring
4 them up.

5 12. I thought they couldn’t talk to my son without me, as he is a minor.

6 13. There was an officer that was saying this was an error. He said, “This guy has his
7 documents and he’s a professional,” but the superior officer said they were going to take
8 us anyway.

9 14. I was in that office with my son from 10 a.m. to 6 p.m. I began to feel relatively
10 calm because we were there together. I told them, “You can’t talk to my kid without me,”
11 and they shut us in the room. We were in there alone. During this time, we couldn’t call
12 anyone. They took our phones and everything.

13 15. At 6 p.m., two officers came and said they had to take me and put me in handcuffs
14 in front of my son. This guy who came was nicer and he said, “I’m sorry we have to do
15 this in front of your son.” They were ICE officers too. They put me in a car with my kid.
16 I started to cry because it was so humiliating. I am a professional. I’ve studied. I didn’t
17 enter the U.S. without proper documents. I did everything right for my family.

18 16. My son said, “I don’t understand. You are not a criminal. I’ve only seen this on
19 television for criminals.”

20 17. Then we drove six hours in the car, and I had the handcuffs on the whole time.

21 18. We never received a card or letter or anything about asylum. If we had received
22 anything saying our asylum was denied, I would have left the U.S. on my own volition.

23 19. We arrived at Dilley at 1 a.m.

24 **Dilley ICE Detention Center**

25 20. I have now been detained at Dilley for 57 days with my 10-year-old son.

26 21. I told Officer [REDACTED] on the tablets here my son’s school is waiting for us to get
27 back. The school is trying to help us. The director of the school is trying to help my son.
28

1 If we don't leave here soon, he's going to miss the whole school year. We need to be
2 liberated.

3 22. Officer [REDACTED] said we couldn't leave because we had to wait for court. I asked if
4 he could please abide by the *Flores* law. He just said we had to wait for court.

5 23. ICE has not complied with *Flores*.

6 24. We received no presentation about our rights.

7 25. We never received a copy or paper of reasons why we're detained or what our
8 charges are. I have gone to the chapel to talk to ICE. They are not good for anything.

9 26. They laugh at the people that come and talk to them. They just say, "Wait for the
10 judge." They don't give you any information or reason for being here. I said I wanted to
11 use the *Flores* law. They said to me that I've lost my chance to do that. I said, "Can you
12 give me a copy of my case? I have a court date, and I don't know what it's about." They
13 said no. It's like being at a restaurant and you don't know what they're selling. There's
14 no menu.

15 27. Some information about rules here are on the walls, and the staff just say, "Read
16 them." They don't explain how things work like phones or laundry.

17 28. If you try to call RAICES and you press the number for "I am detained," it says
18 your call has been disconnected. You cannot leave a message or talk to anyone.

19 29. I had to call them with the private phones in the legal visitation office. It has to be
20 out of that room.

21 30. In the library, you can basically use nothing. They're always saying the internet is
22 down for some reason or another. I haven't been able to use my email at all since coming
23 here. I told them I wanted to use email, and I couldn't. They said I had to make a new
24 email here.

25 31. We only have library time from 4:45 to 7:45 p.m. That's only three hours. I can't
26 prepare for my asylum case during that time, because you can't save what you're working
27 on. The legal library is open whenever you want, but those computers have nothing on
28

1 them. There are legal books from 1998 to 2002 only, and they are all in English. The
2 legal library computers don't have email or Copilot.

3 32. A lot of people here with strong cases are being deported because they don't even
4 know what to fill out. Information like how to send mail to your court or judge is not
5 given out.

6 33. I have had many medical problems since coming here, and my son has had some
7 problems too.

8 34. I told ICE when I was first detained that I need an operation on my foot. ICE said
9 that wouldn't be a problem. I had a foot fracture before coming to Dilley and had not yet
10 been operated on, but I had already seen a doctor about it.

11 35. I got here and immediately told staff I needed an operation. They sent me to
12 Medical. Medical didn't give me any attention. They told me to use hot water on it. They
13 said to take a bottle of water and heat it up in the microwave or cool it down in the fridge
14 and put it on my leg. *That's it.*

15 36. Then, I was climbing the ladder in our bedroom here to put sheets on my kid's bed.
16 He sleeps on the top bunk. When I was climbing down, the ladder broke off, and I fell. I
17 fell on my bad foot, and it hurt a lot.

18 37. I had a fracture before, but now the fracture is worse. I went to Medical and said it
19 hurt a lot. They gave me a cast and did an x-ray. A week passed before they told me the
20 results of the x-ray. The medical staff finally said the x-ray said I didn't have much.

21 38. I told them I was taking Ibuprofen, but it was not enough. I needed more. I said,
22 "I'm in a lot of pain and want to go to a hospital." The doctor laughed at me. They
23 weren't helping me. Only when I said, "Give me my medical records so I can bring it to
24 my RAICES lawyer and get help," then, they changed.

25 39. Then, after one more week, I finally got the records. A nurse came out and told me
26 to sign something. The document said that they had sent me to physical therapy and all of
27 this other stuff. I said I was not going to sign this because it didn't happen. The nurse
28

1 said, "If you don't, I'm going to have problems and may get fired." I said, "Sorry, I can't
2 sign this," and I didn't.

3 40. That same day, Medical told me I had an appointment the following day. They said
4 the head doctor wanted to see me. When I saw him, he said I had a fracture that opened
5 up. He said the fall made it worse.

6 41. The doctor told me I could barely walk on it, or it would be very painful. He gave
7 me a boot. I still can't walk long distances. I mostly just go to my room, the bathroom,
8 and dining area.

9 42. The head doctor told me I need an operation by a specialist. The doctor said he
10 would write to ICE so that I am taken to an orthopedist for a check and possibly an
11 operation. The doctor said that the medical attention I need I cannot get here.

12 43. Last week, they finally offered to take me to a doctor's appointment off-site for my
13 leg. My fall happened over 40 days ago now. They told me I had to leave my son at
14 Dilley, though, and that he couldn't go with me. I said no, I didn't feel comfortable with
15 this. It scares me to leave him alone here, and he is scared too. We were separated during
16 our apprehension and don't want that to happen again. They told me an attorney has to
17 ask ICE if my son can leave with me off campus.

18 44. My son is also having medical problems. He has a small heart murmur, and before
19 this, he was seeing a cardiologist regularly.

20 45. Because he is growing a lot now, you have to check the murmur a lot. I asked for
21 them to check it. They just listened to his heart but that was it. I wanted him to be seen by
22 a cardiologist.

23 46. We have been asking about medical attention for his heart and my leg since we got
24 here. Yesterday, they finally took my son to a cardiologist off-site, and I went with him.
25 Luckily, his heart is doing well. Almost 60 days had passed before we got to see a doctor
26 for his heart.

27 47. I don't understand why I can go with him to a doctor's appointment, but he can't go
28 with me to mine.

1 48. My son is not doing well at all here. He wants to go back to his school and see his
2 principal and his friends. He is bored to be here. He told me, "Let's just accept wherever
3 they send us to—I just want to leave."

4 49. Every day, he goes to the school here. He's in fourth grade. But he told me they
5 just draw and play on the computers. They don't do math or teach him English.

6 50. The school is repetitive. My son has done the same homework five times. Also, at
7 school the teacher told them to behave well, be quiet, and don't say anything when a
8 congressman was visiting.

9 51. It's a daycare really, not a school.

10 52. Everyone is signing things in English here. In the medical unit, it's all in English.
11 There is never translation or interpretation. After a consult with a nurse or doctor, they
12 ask you to sign a blank form saying they have assisted you, but they fill out the details
13 later. I don't like this, because I want to confirm what they're writing is correct.

14 53. When you arrive here, you're very scared, so people just sign these forms. If there
15 is interpretation, it's ICE saying the form means this, but it's not a neutral interpreter or
16 professional interpretation.

17 54. I understand enough English that I can get by.

18 55. The food for me is fine as I'm an adult, but for my kid, it's not good. Everything is
19 fried and frozen and not fresh. The staff say that there is fruit every day. At first when we
20 arrived, there was only canned fruit, like canned pineapples.

21 56. The Halal menu had fresh fruit, though. Many of us had a meeting with ICE telling
22 them to please provide fresh fruit at least to the kids, even if not to any of the adults. The
23 [REDACTED] woman tries to give all the kids fresh fruit.

24 57. Now, some fresh fruit is provided about 2–3 days a week, but the breakfast is still
25 very bad. The staff say the food is a contract so that's why it can't be changed. A lot of
26 people skip breakfast.

27 58. My son needs a diet that is more balanced. He needs vitamins. The food here is not
28 healthy. All the kids need this to be better.

59. When we arrived here, they gave us a little shampoo, toothpaste, and toy toothbrushes. We used it one time and it broke. The toothpaste is gross. They told me if you want different stuff, you have to buy it. But I don't have my debit card, because they took it. They asked me if I brought cash, but I do not have cash. What a joke.

60. I used the shampoo they gave us upon entry and asked for more, and they said they don't have anymore. It lasted three days.

61. The soap is the hand soap from the bathroom. I told them this isn't for the body, and it's foam soap. You can't really wash your body with foam. We have to open the tops of the containers to get the liquid out and then use that. It's totally ridiculous.

62. There is an organization that is sending families money thankfully because otherwise the women wouldn't have enough money for sanitary products.

63. Also, we have to hide food here. Dinner time is 4 to 6 p.m. If my kid eats at 5 p.m., goes to play soccer at 7 p.m., then he's hungry again by 10 p.m. I take food from the dining area and hide it. The only snacks available all the time are milk, sugar cookies, and apples. The first three days, that was fine, but now it's not okay anymore.

64. My child has visited Germany, and we've seen the concentration camps in Munich. We've been to Dachau. He asked me if we are in a concentration camp here. All the signs there say we learn so that the story doesn't repeat itself. My kid says, "Dad, but it is equal to where we are. And they don't let us leave." They aren't killing us, but it feels like it. There are barracks, and the families are separated. "It's the same, dad," he says to me. And you even have the star too; here, you have to have your ID with you always.

65. He said, "In the movies, the Americans were not like the Germans, so why are they doing this?"

66. I hate to agree with my son, and I don't tell him it's the same, but it is. It's the same. It's like a modern-day concentration camp that the U.S. wants to normalize.

67. They don't kill you, but it's a concentration camp. Many of us don't even know why we are here.

1 68. A lot of people here haven't gone to Europe, but I have. I've seen the effects of
2 World War II. Maybe it is better for them to not know to be honest.

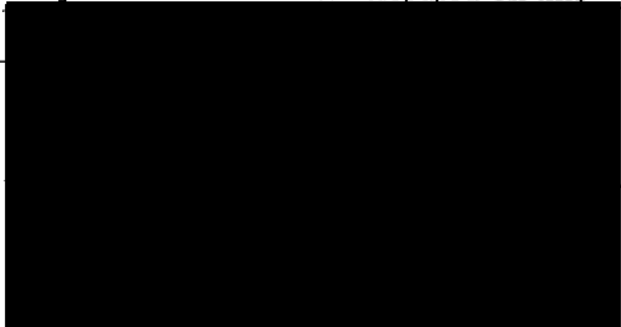
3 69. I feel like we are treated as animals here. This feels like a business.

4 70. When people from Congress come, it's total lockdown here.

5 71. With all the technology the U.S. has, just give us ankle monitors and release us.
6 It's such a waste of money paying for all of us to stay here.

7 72. I feel like my life isn't real. This feels like a fake movie. It's feels like science
8 fiction. I feel like I am in a bad dream.

1 I declare under my duty to tell the truth and penalty of perjury that to the best of my
2 knowledge, all the information I have here given is correct and complete and I understand
3 the legal consequences of testifying falsely to the authorities. Executed on this 3 day
4 of June 2026, at Dilley, TX



CERTIFICATE OF TRANSLATION

My name is Katherine Johnson and I swear that I am fluent in both the English and Spanish languages and I translated the foregoing declaration from English to Spanish to the best of my abilities.

Dated: 06/03/2026

Katherine Johnson

EXHIBIT 7

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, N [REDACTED] A [REDACTED] A [REDACTED], declare as follows:

2 1. This testimony is based on my personal knowledge, and the following facts are
3 true to the best of my understanding and recollection.

4 2. I am 17 years old. I am from [REDACTED].

5 3. I speak Spanish and some English.

6 4. I have been detained at Dilley for about 44 days. I am here with my mom, my
7 stepdad, and my four-year-old brother.

8 5. Before we came here, we had been living in Los Angeles for about two and a half
9 years. I was in 11th grade in high school. It was going really well. I liked my math class
10 the best, but really, I liked all my classes. I worked hard in school and was also a
11 cheerleader.

12 6. We had an immigration court date in January, and the judge said that our final
13 decision would be mailed to us. We never received anything. Then, on March 30th, ICE
14 told my mom to come in because they were going to give her an ankle monitor. Then, on
15 April 1st, they called her to come back in to take it off. We went in for the appointment,
16 but we got there late and they told us to come back on April 18, 2026. On April 18th, my
17 family all went back together. My mom went in by herself for the appointment. During
18 that appointment, they told her she would need to return for another appointment on May
19 5th. But five minutes later, they called her on the phone and told her to come back so they
20 could take off her ankle monitor. That turned out to be a lie.

21 7. When we got to the office, they took us into a back room. Once we got in there, the
22 lady locked the front door and ICE agents came in from the back door. The ICE agents
23 told us we were in ICE custody now and took all our phones. I was feeling scared and
24 very anxious. My brother started crying and yelling at my mom. ICE separated my
25 brother, mom and me from my stepdad. They put us in one car and my stepdad went
26 separately. He was handcuffed.

27 8. Then, they took us to another immigration facility. We were there for about four
28 hours. We went into an office, and after we had waited for a while, a man came in. I

1 asked him what would happen next, and he said they were going to let us go. Then,
2 another man came and said that we were going to be sent somewhere else. While we
3 were waiting, all they gave us to eat was burritos. My little brother was the only one who
4 ate them. He started vomiting soon after eating.

5 9. Next, they took us to the airport in Los Angeles, and we boarded right away for
6 San Antonio. Three people took us to the airport and went on the plane with us. When we
7 arrived in San Antonio, it was about midnight. We couldn't get off the plane for a while
8 because there was a bad storm. By the time we got to Dilley, it was about 3 a.m.

9 10. When I first got to Dilley, I felt extremely anxious. I hated feeling detained like a
10 delinquent. I wanted to talk to my family and tell them where we were. We hadn't been
11 able to tell them since they took our phones. I was also feeling sad because I didn't want
12 to be locked up on my birthday.

13 11. They showed us to our room, and we were all feeling exhausted. I was feeling
14 really sick too, because I had a cold. Then two days later, we had an orientation with a
15 video. It was about immigration. Afterwards, they told us about the rules, like how much
16 clothing we can have. They said we can only have three changes of clothes and one pair
17 of shoes. They also told us we can't take food out of the cafeteria. They have not
18 explained why we can have food from the commissary in our rooms but not the cafeteria.
19 They did not tell us anything about our *Flores* rights. Earlier that day, we met with an
20 ICE agent, and they showed us a piece of paper saying that children could not be detained
21 more than 20 days, but they didn't explain anything. I'm not sure what the point of the
22 paper is since we've been here more than 40 days so far.

23 12. The food here overuses condiments, and I don't eat much of it. I will just eat a few
24 of the meals. Even the fruit is bad – it's canned and tastes metallic like it's expired.
25 Often when I eat the food, it will hurt my stomach. I have lost six pounds. My little
26 brother also doesn't like the food. He would eat it at first, but then he started getting belly
27 aches and now he doesn't want to eat it at all.

1 13. I don't drink the water from the tap here because it tastes really bad and looks
2 cloudy. I drank the water when I first got here for about a week. I got a lot of
3 stomachaches. Some people drink it because they don't have money to buy bottled
4 water. A lot of people say the water made them feel bad when they drank it.

5 14. The prices at the commissary are too high. A single bottle of coke is \$3 and cereal
6 is \$8. My parents also buy us the soups, ramen, and mac and cheese because they worry
7 my brother and I aren't eating. The last time we went to the commissary, the water was
8 79 cents. I have not heard that the price went down to 29 cents.

9 15. I have to pay for phone calls to my family. We are spending about \$70 a week on
10 phone calls.

11 16. I have trouble sleeping because of all my racing thoughts. Will I go back to
12 school? Will I go back to LA? Has my GPA gone down? I had a 4.0, and I was hoping
13 to get scholarships. Now I don't know what is going to happen.

14 17. I have been to the school here twice, but it's mainly just drawing so I decided not
15 to go back. There's not really teaching or learning. It's not like my high school where
16 there were group projects, homework, and exams.

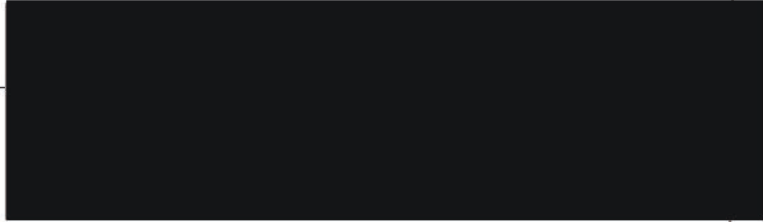
17 18. Some of the guards in the morning are okay, but in the later shifts the guards are
18 always very controlling. Some of the guards are really rude and sarcastic and will say
19 we're here because we are all criminals.

20 19. My little brother is not doing okay. He is crying a lot, and always saying how
21 much he misses his family and LA. He's always saying how much he doesn't want to be
22 here. And every time another family leaves, he will start crying at the window. He will
23 ask if he can go with them. He is always asking questions. When can we leave to go
24 back to Los Angeles? Why haven't we left? Why are we still here? He says he wants to
25 go back to our yellow house in LA. He is always telling people we are leaving the next
26 day even though no one has told us that. Every day, he asks for his dad to pray for us to
27 be able to leave. It's especially hard for him at 8 p.m. when all the dads leave for their
28 living area.

1 20. I have been to medical here for menstrual cramps, but they won't give me the
2 medicine that helps me. They will only give me ibuprofen for three days even though the
3 pain lasts for six days. When my family has had medical needs like rashes and a foot
4 infection, it takes three visits and a complaint to ICE just to be able to talk to a doctor.

5 21. It feels like a jail here. Some of the guards actually tell us we're here because we
6 committed crimes and we should be happy to be here. They say we shouldn't complain
7 because taxpayers are paying for all of us to be here. But we didn't ask to come here.
8 They didn't give us a choice. My mom was working hard and supporting our family.
9 They try to make you feel like you're a criminal even when you're a straight-A student.

1 I declare under my duty to tell the truth and penalty of perjury that to the best of my
2 knowledge, all the information I have here given is correct and complete and I understand
3 the legal consequences of testifying falsely to the authorities. Executed on this 2nd day
4 of June 2026, at Dilley, Texas
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CERTIFICATE OF TRANSLATION

My name is Diana Cano and I swear that I am fluent in both the English and
Spanish languages and I translated the foregoing declaration from English to
Spanish to the best of my abilities.

Dated: 6/02/2026

Diana Cano

EXHIBIT 8

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, L [REDACTED] R [REDACTED]-V [REDACTED], declare as follows:

2 1. This testimony is based on my personal knowledge, and the following facts are
3 true to the best of my understanding and recollection.

4 2. I am 46 years old. My children are 12, 14, 16 and 17. My oldest daughter and I
5 are from [REDACTED], and my three youngest children were born in [REDACTED].

6 3. I speak Spanish.

7 4. I came to the United States about three years ago. I was living in California with
8 my four kids. I had been going to ICE check-ins for three years.

9 5. On March 31, 2026, I went to my ICE check-in at Ventura County like always, but
10 this time it was different. They said I was going to be detained. They did not tell me
11 why – they just said they would send me to a third country. I was told that I needed to
12 have my children come to detention. They said I had to send an Uber to our apartment to
13 get my four children. They didn't give me the option of having my children stay with
14 someone. Later that day, we flew from the airport in LA. We didn't get to Dilley until
15 around noon the following day.

16 6. When we arrived at Dilley on April 1, 2026, they didn't give us an orientation. The
17 day after we arrived, ICE gave us a paper to sign that said that children can't be detained
18 more than 20 days. But the ICE agent told us that even though the paper said kids
19 couldn't be here more than 20 days . . . it really didn't apply to anyone in this facility
20 because the immigration judge isn't going to let kids leave without their parent or vice
21 versa. It was very illogical.

22 7. My children are not able to make free phone calls to family members. They were
23 given one 5-minute phone card when we first arrived, but that was it. We end up
24 spending at least \$30 per week on phone calls to family.

25 8. On April 23rd, 2026, CoreCivic staff said we needed to get our things ready
26 because we were going to be deported. I demanded to speak to ICE and the agent said
27 we were going to be put on a plane to [REDACTED]. We got our things ready and boarded a
28 large bus at around 11 pm. The bus was sectioned off and divided with a lock. We

1 then went to another detention center and picked up about six people who were
2 shackled. They were in the other section of the bus. A guard said it was because they
3 were “bad people.” Next, we stopped at another center, but just so we could use the
4 bathroom. Then it felt like they just drove us in circles for hours. I don’t know the
5 area, but I think we went to Laredo and then to San Antonio. Eventually they put my
6 children and I on another bus around 6 am and we drove for a while before we came
7 back to Dilley. We were on the bus for twelve hours – until about noon the next day.
8 We never made it to an airport – we just ended up right back where we started.

9 9. I asked ICE why this happened, but they never told me why. To this day, no one
10 has ever provided me with an explanation.

11 10. When they brought us back to Dilley, they told us we had to do everything all over
12 again as if we were brand new to the facility. We went through intake as if we had just
13 arrived on April 24, 2026. The admit date on the Dilley census that says we arrived here
14 on 4/24/2026 is a joke. I think they did all of this so that it didn’t look like my four kids
15 had been here past the 20 days in violation of *Flores*.

16 11. When we were living in California, my children and I were diagnosed with pre-
17 diabetes. We followed a special diet before we arrived here. I am very concerned about
18 the foods that are available for my children to eat. My daughters are mainly not eating
19 the foods here. When I arrived, I asked the medical people for a pre-diabetic diet for my
20 children. Medical told me that we did not qualify for a special diet. They said special
21 diets were just for people with hypertension or who were already diabetic.

22 12. My twelve-year-old has had an especially hard time with the food. She cannot
23 tolerate how overused condiments are, especially with sauces, because she is allergic to
24 artificial coloring. Lately, she’s had a horrible allergic reaction to the artificial coloring
25 in the food here. It has really flared up badly. Her lips and mouth have been swollen
26 and inflamed. She really can’t eat much of anything. I asked for her to be put on a
27 special diet, but they said that it was not necessary and she should just avoid foods with
28 artificial coloring. At medical, they said the allergy medicine was causing a loss of

1 appetite, but she finished the treatment four or five days ago and she still hasn't been
2 eating. I think she is not eating both because of depression and because so many of the
3 foods here cause her to have an allergic reaction.

4 13. I have bought a toothbrush, toothpaste, water and soap from the commissary. The
5 toothbrush they gave us when we first arrived fell apart after a couple uses and my son
6 said the toothpaste was not good. The handwash in the shower made my children's skin
7 itchy. The tap water here has a bad smell like chlorine. When we first arrived, my son
8 drank the water. It made his stomach hurt and he got diarrhea that day. The water also
9 comes out dirty. There is a filter, but I don't trust it. It looks like dirty water. I raised
10 the issue with medical, and they said the filtered water was fine. I asked her why all the
11 medical staff drink bottled water and she just kind of stared at me.

12 14. Since I have been here, I have filed two grievances about the guards here. The
13 guards are really rude and disrespectful. They will talk to us like we are criminals. When
14 we're eating, they will stare at us and as soon as we are done – they will shoo us out
15 rudely. The guards act like we are all trying to escape. How would I do that with my
16 four kids? They treat us like animals.

17 15. One time a guard in the cafeteria was complaining about the families at Dilley and
18 said we should be appreciative of the food here. She said, "Why are they complaining?
19 If they were in their own countries, they would be eating shit."

20 16. One female guard liked to torment the families at night by jumping repeatedly on
21 an area of the metal hallway outside the rooms that made a loud booming sound. She
22 would hold on to a pole and jump with all her weight so that she could make a very large
23 sound. I saw how she did it. She would make sure to jump on that area throughout the
24 night to startle and awaken us. It went on for a month off and on. I confronted her about
25 it directly, but she said she didn't speak Spanish. I then went to a supervisor, but the
26 behavior continued. Then my son (who understands English) heard her talking in English
27 to another guard who was telling her to stop making that noise. She said: "What are
28 those Latinos going to do to me?" Finally, after that, I submitted a grievance on the

1 tablet and told them to watch the video. Because I submitted the grievance on the tablet,
2 I do not have a copy of it. After I submitted the grievance, they said they were moving
3 this guard to another area. I have not seen her or another guard since then.

4 17. Another time, two of my daughters went to take a shower. One was changing and
5 one was in the shower. One of the male cleaning staff came in the bathroom without
6 knocking and my daughter raced into the shower again because she was partially
7 undressed. The staff member stood in front of the bathroom stall and signed a piece of
8 paper. Then my daughter, who was showering, yelled out to ask if her sister was still
9 there. Then the staff member left and went outside. He then knocked and said
10 “cleaning” – but came right back in. My daughter came out of the shower after getting
11 dressed and was startled and stared at him and then he left again. My daughters were
12 really shaken up about the incident. I submitted a grievance right after it happened.
13 Later that day, the manager said the girls had to do a physical and mental exam as part of
14 the procedure for the grievance. I asked to keep a copy of the grievance about the entire
15 incident, but they only let me keep a copy of my grievance. I have been told that the
16 staff member is no longer employed at Dilley. Since that day, my daughters have been
17 scared to go in the bathroom alone and I have been scared, too. Now they only go to the
18 bathroom together, and someone stands outside.

19 18. Between all the noise, the loud guards, and the lights on – my children have had a
20 hard time sleeping here. We are able to turn off some of the lights, but it is still very
21 difficult. During the night, they are also checking on us every 40 minutes. They used to
22 come in the room, but now they will do the check-ins by looking through the windows.
23 My oldest daughter especially struggles because she is on the top bunk and it’s brighter.
24 My two younger daughters’ backs are hurting because of the bunk beds. My oldest three
25 struggle to fall asleep every night.

26 19. I am really worried because my seventeen-year-old daughter will turn 18 in a few
27 weeks on June 23rd. ICE has told me that if we are still here, they will separate her and
28 take her to Blue Butterfly with the single females. My oldest is very shy and timid; she

1 doesn't really defend herself. She is young for her age and it's worrisome. I am worried
2 this could happen. I think about doing a hunger strike if this happens.

3 20. My kids are worried here all the time. They get very sad because they have only
4 been able to talk to their mother two times. She is in a separate detention center in San
5 Bernadino. I think because we are not together and the kids were living with me, they
6 did not treat her as part of a family unit. It has been really hard to get in touch with her,
7 and my kids can't talk to her without the assistance of the manager of our living area.

8 21. My kids are also really sad about missing out on their schooling. They were in
9 12th grade, 11th grade, 8th grade, and 6th grade before we were detained. My oldest
10 daughter is sad to be missing out on her senior year. She is missing out on all the
11 graduation events with her friends. We had already paid for her to do some trips in
12 California with her closest friends. She even had bought new outfits for the trips. I think
13 all of those things are gone now because we had to leave everything in our apartment.
14 The other kids are worried that they will not move up to the next grade because they have
15 missed more than two months of school. My son is hoping to be a chemical pharmacist
16 and has been working hard to get good grades. He is great with chemistry and is already
17 being recruited by universities. It's so hard because all of my children are struggling. I
18 try to stay strong for them, but it's so hard for all of us not to know what will happen and
19 whether their dreams will be shattered.

20 22. My younger kids are going to the school here. My son went for a day and found it
21 too boring. My oldest daughter felt the same. The only reason the younger kids go is
22 because they are bored. They say they mainly just draw. Sometimes there will be basic
23 math like addition and subtraction.

24 23. My children also miss their three cats. They treat them like their children. They
25 are worried they aren't being well taken care of and get upset when they don't hear
26 updates about them. One of the cats is blind in one eye and needs special care. They
27 worry about who will take care of their cats if they get deported.
28

1 24. It's so hard to be here. I never sleep. I'm always on guard. I don't trust anyone
2 here and I am constantly worried about my kids' safety. It feels like a prison – even with
3 the school and things – they are constantly counting us, surveilling us, and monitoring
4 our every move. They have already been harming us psychologically and mentally every
5 day we have been here. The only thing left is for them to hurt us physically.

1 I declare under my duty to tell the truth and penalty of perjury that to the best of my
2 knowledge, all the information I have here given is correct and complete and I understand
3 the legal consequences of testifying falsely to the authorities. Executed on this 2nd day
4 of June 2026, at Dilky, Texas.



CERTIFICATE OF TRANSLATION

My name is Diana Cano and I swear that I am fluent in both the English and
Spanish languages and I translated the foregoing declaration from English to
Spanish to the best of my abilities.

Dated: 6/2/2026

Diana Cano

EXHIBIT 9

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, M [REDACTED] P [REDACTED]-O [REDACTED], declare as follows:

2 1. This testimony is based on my personal knowledge, and the following facts are
3 true to the best of my understanding and recollection.

4 2. I am 47 years old and my son, [REDACTED], is fourteen years old. We are from [REDACTED].

5 3. I speak Spanish.

6 4. We have been detained at Dilley for 8 days. We have been living in the U.S. for
7 over 3 years. First, we lived in New York for a year. Then we moved to Arizona where
8 we had been living for over two years. My son was in 8th grade and doing really well at
9 his school. He had a lot of friends, and all the teachers would tell me how great he was
10 doing.

11 5. About a week ago, I was driving to work at around 7:30 in the morning. I was
12 passing by a Walmart and saw a police car flashing its lights for me to pull over. I pulled
13 off into a parking lot. I was driving by myself and got really scared. I had not done
14 anything wrong, so I asked the police what I had done to be pulled over. Before I knew
15 what was happening, the police crashed through my window with a baton and four police
16 officers pulled me out of the car. They threw me down and handcuffed me, and then took
17 me to a detention facility in Phoenix.

18 6. Once we got to the detention facility, they asked me about my son. I told them that
19 he was at school. An ICE officer then drove me to my son's school. Once we got there, I
20 went to the principal's office and told her what was happening. I asked her to bring my
21 son outside so that we didn't upset the students. The school staff then brought him out to
22 the parking lot.

23 7. My son was really scared but more than anything he was sad because he was going
24 to miss his 8th grade graduation ceremony in a couple days. I had already gotten
25 permission from my work to take his graduation day and the next day off so we could
26 enjoy the end of the school year together. I was proud and was looking forward to
27 celebrating with my son.

1 8. After we picked up my son, ICE drove us back to the detention facility. We spent
2 the day and night in a jail cell. The jail cell had nothing but a bench and a toilet. The
3 bench wasn't big enough for both of us to sleep on, so we took the cushion off the bench
4 and slept on the floor. It was awful. At one point, there was a huge cockroach crawling
5 on my son and he started yelling. They only gave us burritos to eat—burritos for dinner,
6 then in the middle of the night they basically threw two more burritos at us, and then they
7 gave us burritos again for breakfast the next morning. The first burritos tasted really bad
8 —like they were already expired. We didn't eat much of them, and we definitely didn't
9 eat the other burritos.

10 9. The next morning they took us to the airport and flew us to San Antonio. After we
11 arrived in San Antonio, they drove us to Dilley.

12 10. When we first got here, they didn't do any kind of orientation. They didn't show
13 us a video or anything. No one has ever told us about our *Flores* rights other than an ICE
14 agent saying my son isn't supposed to be here for longer than 20 days. No one told us
15 anything about our case or what would happen next. I have no idea whether anything
16 will happen after 20 days. But I have been told that if I get a lawyer, it will be a longer
17 process to get out of here.

18 11. When we got to Dilley, I just felt completely shut down and overwhelmed. I felt
19 so bad that my son was going through this situation. He doesn't deserve this. It is so
20 hard to be here with no liberty. They control everything here. We can't even vent or
21 laugh with other families without having an issue with the guards. They will threaten you
22 with getting a report or make a loud "shhh" noise for you to stop talking. This happens
23 all day long, not just at night. I don't understand why we can't even have a conversation
24 among neighbors. We're already locked up in here? What do they think we are going to
25 do?

26 12. My son hasn't been able to make any calls to family since we arrived here because
27 I didn't have any money in my account. No one has ever told me that my son could make
28 free phone calls to his family. They gave my son and me a phone card when we first

1 arrived. My card was for five minutes and my son's card was for three minutes, I think.
2 I used my card, but my son has not been able to use his card. When we try to use it, the
3 phone just cuts off. I have asked the staff about the card not working, but no one has
4 helped me. When I went to talk to staff about it, they told me that the workers who take
5 care of phone cards weren't there. They said to come back later.

6 13. My son got a hygiene kit when we first arrived that just had a toothbrush, tooth
7 paste, and a little lotion. He was using the hand soap in the shower but I was worried
8 because the soap was too harsh for his skin and his arms were getting really dry. Our
9 neighbor let me have her shampoo, and I have started having my son use it instead of the
10 hand soap.

11 14. I asked for information about my case here, and they said that nothing was in the
12 system. The staff were able to see I have an appeal already in the system, and they said
13 that soon there might be an update so I could be released to fight my case from outside of
14 here.

15 15. When we first arrived, I asked a staff here where I could buy water because I don't
16 like the taste of the water here. The staff said the water here is fine; it has a filter and I
17 should drink the water. She would not tell me where I could buy it. I finally was able to
18 buy bottled water today at the commissary. I also bought deodorant and ramen soup for
19 my son.

20 16. My son doesn't like the food here, and he's not eating much. It has too many
21 condiments, and every day it's always the same, same, same. It is so hard to get kids to
22 eat when it's like that. The adults here don't like the food, but it is really hard for the
23 children. This morning, my son was crying because he didn't want to eat. I am trying to
24 make him eat because I don't want him to get sick.

25 17. There is nothing for the kids to do in their rooms, which is hard because the kids
26 have to be in their room by 8 p.m. All they can do is just watch TV. There are no toys in
27 the rooms.
28

1 18. One day, my son and the other kids living in our room were playing with a ball that
2 they made from rolling up paper. The boys were just playing and having fun. As soon as
3 the guard heard the boys laughing, she came in and said they had to stop. I don't
4 understand why it was a problem for boys to play with a balled-up piece of paper when
5 there were three moms right there with them. That's how it is here.

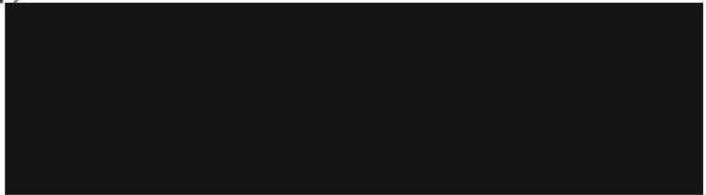
6 19. It is hard to sleep here because the lights are on all night. We wake up many times
7 throughout the night because the lights never go off. The sound of the AC coming on
8 also startles us and wakes us up. It's hard because we have so much time to think and so
9 much time to worry. The kids look so tired from just being here. The stress and boredom
10 are hard on them.

11 20. My son only has one pair of pants and two pairs of shorts. He has one pair of
12 shoes, and they won't let you wash them. No one has told us we could get more clothing
13 or shoes than we have.

14 21. My son started going to the school today. I hope he will like it so that he has
15 something to do during the day.

16 22. I wouldn't wish this place on anyone. It's so hard to explain what we are going
17 through here, not knowing what's going to happen next. I just don't have the words. But
18 it's really awful.

1 I declare under my duty to tell the truth and penalty of perjury that to the best of my
2 knowledge, all the information I have here given is correct and complete and I understand
3 the legal consequences of testifying falsely to the authorities. Executed on this 15th day
4 of June 2026, at Dilley, Texas.



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CERTIFICATE OF TRANSLATION

My name is Diana Cano and I swear that I am fluent in both the English and
Spanish languages and I translated the foregoing declaration from English to
Spanish to the best of my abilities.

Dated: 6/1/2026

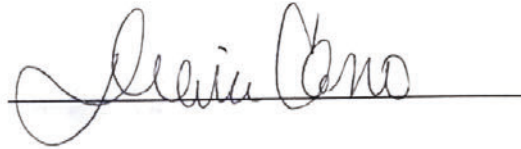


EXHIBIT 10

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, L [REDACTED] R [REDACTED] P [REDACTED], declare as follows:

2 1. This testimony is based on my personal knowledge, and the following facts are
3 true to the best of my understanding and recollection.

4 2. I am 16 years old. I am from [REDACTED].

5 3. I speak Spanish and English.

6 4. I have been detained at Dilley since April 1, 2026, about 70 days now.

7 5. Before that, I lived in California for three and a half years with my three sisters and
8 my father. I was in high school in 10th grade. This past Friday was the graduation of one
9 of my sisters from 8th grade, and this past Saturday was the graduation of my oldest sister
10 from high school. My sisters missed both of them.

11 6. My oldest sister had plans to go to college in the fall. She was preparing her
12 college applications when we were detained. Since being at Dilley, she hasn't been able
13 to fill out those applications and submit them.

14 7. My favorite classes in high school were chemistry and geometry. I like the
15 sciences. Next year, I am taking four AP classes. I miss my friends, my studies, my
16 phone, and my cats.

17 8. Our apprehension was very traumatic. I was asleep at home with my siblings, and
18 my mom and dad both went to an ICE check-in together because their cases are
19 combined. My dad thought it was just a simple check-in to maintain his Social Security
20 numbers and work authorization.

21 9. At the check-in, though, the ICE agent told my dad he would be deported to a third
22 country. The agent said something like, "If your kids don't come now, you will be
23 separated."

24 10. I woke up to my dad calling me. He said to grab my siblings, some of our stuff,
25 and immediately get in an Uber to the ICE office.

26 11. By the time we got to the ICE office, my mom had already been separated from my
27 dad.
28

1 12. My mom and dad are divorced, and my dad has custody of us. We think that
2 because of this she isn't here with us in Dilley. She's in an ICE prison for adults
3 somewhere. ICE decided my dad would stay with us and not my mom even though she is
4 our biological mother.

5 13. This has been really hard for me and my siblings. We have only been able to call
6 her twice during the entire time we've been at Dilley. There has been a lot of
7 miscommunication it seems between our two facilities about setting up phone calls.

8 14. I don't understand why we have to be here at Dilley. My siblings and I don't have
9 deportation orders. Our immigration cases were closed, and we all have social security
10 numbers, work authorization, and real IDs.

11 15. No one ever explained my rights to me here. I asked for them, and ICE told me
12 they don't know what our rights are.

13 16. When we first arrived to Dilley, we signed a form about *Flores*. But ICE told me
14 we don't qualify for *Flores*. They didn't tell me why.

15 17. Most of the time, the food here is horrible. The water is also horrible. Even though
16 there are filters, they don't work.

17 18. The lights are on all night, you cannot sleep, and the bed is hard.

18 19. Medical seems incompetent. My sister and my dad go a lot. The nurses supposedly
19 consult with the doctor, but we never see the doctor when we go to the medical unit.

20 20. My dad has a problem with his spine. In California, he was getting injections and
21 special medicine for his back pain because it's so bad. Here, they just give him ibuprofen,
22 and this causes his stomach to hurt. My dad also had an infection where he was peeing
23 blood here, and he never saw a doctor for that.

24 21. My youngest sister has gone to the doctor a lot, but they just say she's all good.
25 She has allergies to artificial food coloring. Her mouth turns red and is irritated and dry
26 when her allergies act up. This has been happening after she eats.

22. We were told she didn't qualify for a special diet. They said the special diet is only for people who have religious reasons, diabetes, or severe allergies that could cause you to stop breathing.

23. The only thing she's been able to eat is salad.

24. One day, after being here for a few weeks, we were taken on a bus for 11 or 12 hours. The bus was supposed to take us to an airport to go to [REDACTED]. We never arrived at the airport, though, because we had to stop at a prison to pick up various people first. I think we missed our flight because of all the people we had to pick up and drop off.

25. It was like a school bus but modified. All the windows were blacked out. There was a door that separated us from the driver. There was another door that separated the criminals from the families.

26. There was a bathroom on the bus, but it did not have a door. There was no privacy. Once we picked up the people from the prisons, we could not go to the bathroom because of the lack of privacy.

27. The whole day we only received a tiny bottle of water, two sandwiches, one apple, and some cookies.

28. During the bus ride, I felt like all hope was lost.

29. Someone eventually called the bus driver and said we had to come back to Dilley.

30. My 17-year-old sister is very worried about what will happen to her when she turns 18.

31. She turns 18 this month. We're all worried because CoreCivic told us that she'd be sent to the "Butterfly" section in Dilley on her birthday and separated from us. Someone else said she'd be brought to a federal prison for adults.

32. Some staff members here are angry and don't want to hear me or don't talk to me. Some staff are mean to me, my sisters, and my dad. They can speak to us in a gross and rude way. Sometimes, they are racist. If you ask for something, sometimes they will just ignore you.

1 33. We are locked in our rooms when there are protests, sometimes for two to four
2 hours.

3 34. The education is monotonous and boring here; I know all the material already. It
4 doesn't work. I will only get Fs for grades now because I am not at my old school.

5 35. My sisters and I need more clothes. We can only get three shirts, three pants, and
6 one pair of shoes.

7 36. The soap here is for hands, not for the body. This type of soap does not work for
8 my hair. I need bar soap and good shampoo. The only thing you can do is pay for better
9 soap and shampoo.

10 37. A snake tried to attack me outside the library. My dad moved me out of the way
11 and it hissed at me.

12 38. Being at Dilley makes me nervous. I am not free, and my only friends are my
13 sisters. I am sad after two months of living here. I miss so many things: what I did at
14 home, studying, going to the park, and playing with my cats. All of these things I cannot
15 do here.

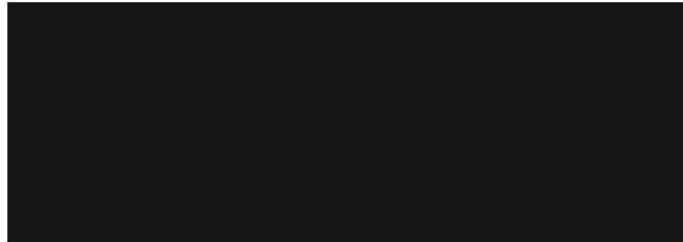
16 39. You can't repair your life when you get out of here. It's very hard to leave here and
17 return to normal. How can you start a new life with no money and no home? This is the
18 worst thing about Dilley.

19 40. The phone calls here are not free. If you can't pay, they charge the person you're
20 calling.

21 41. I want to study when I grow up and be a physicist or pharmacist.

22 42. If I could change one thing here it would be the access to internet. The computers
23 are super blocked and controlled here. We can't communicate with our lawyers privately.
24 The emails are all monitored. I wish there was more privacy, I wish I could use Google to
25 help my family. We can't use Google here. Everything is controlled.

1 I declare under my duty to tell the truth and penalty of perjury that to the best of my
2 knowledge, all the information I have here given is correct and complete and I understand
3 the legal consequences of testifying falsely to the authorities. Executed on this 8 day
4 of June 2026, at Dilley, TX.



CERTIFICATE OF INTERPRETATION

My name is Katherine Johnson and I swear that I am fluent in both the English and Spanish languages, and I interpreted the foregoing declaration from Spanish to English to the best of my abilities.

Dated: 06/08/2026

Katherine Johnson

EXHIBIT 11

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, M [REDACTED] G [REDACTED] O [REDACTED], declare as follows:

2 1. This testimony is based on my personal knowledge, and the following facts are
3 true to the best of my understanding and recollection.

4 2. I am from [REDACTED].

5 3. I speak Spanish.

6 4. I have been detained for 53 days, and for 47 of those days I have been detained at
7 Dilley. I am detained here with my nine-year-old daughter and seven-year-old son.

8 5. I lived in Texas for about 7 years with my children.

9 6. After border patrol arrested me on April 10, 2026, they took me to a CBP icebox in
10 Brownsville.

11
12 **Brownsville and McAllen CBP Detention**

13 7. CBP kept me in iceboxes with my children for five days. First, we spent a
14 few hours at the icebox in Brownsville, and then they moved us to McAllen. When CBP
15 transferred us to McAllen, my daughter felt frightened and started having these bad
16 reactions—she got a headache and a bloody nose. The staff just said that was normal.

17 8. When we were in CBP, they took my phone with all my contact information in it.
18 Since they took my cell phone, I did not have the number to call my lawyer there. The
19 people who worked there treated us badly. They said they would deport me. There was
20 one man, who said he oversaw immigration, who spoke with harsh words, and asked
21 what we were doing there. He did not believe me about the things I told him, like that I
22 had a lawyer I wanted to contact. He just kept saying I was a liar and that they would
23 deport me. I felt really bad, and I started to cry, because I knew I was not lying. My
24 children felt so scared during that time because they did not know what was
25 happening. My kids were worried that they would separate us, so they kept grabbing me.

26 9. My son and daughter did not really eat while in CBP, because the staff just gave
27 us burritos or hamburgers, but the burritos did not taste good. The staff served the
28 burritos early in the morning, and the kids would not eat all day.

1 10. We slept on the floor with aluminum blankets and lights on. It was hard being
2 there.

3 11. When they moved us to Dilley after five days, they transported us in a truck with
4 cameras. It took about two hours. My children felt very scared because they did not know
5 where we were going. My daughter got a bloody nose again. The staff only told me that
6 we were going to a new place.

7
8 **Dilley ICE Detention Center**

9 12. When we got to Dilley, the staff processed us and took us to our room. The next
10 day, ICE wanted to speak with us, so they took us to room number 100, along with
11 everyone else who arrived. They said that we could not spend more than 20 days at
12 Dilley. They then asked us to sign a paper about the *Flores* law. I signed for myself and
13 for my children. But now I think it was a lie because there are many people like me who
14 have been detained for over 50 days and have not been freed. We later learned from the
15 news that people are mostly getting out using habeas corpus petitions.

16 13. After we signed the paper, the officers kept the paper and did not even give us a
17 copy.

18 14. I have only heard about *Flores* from ICE when they had us sign the paper.

19 15. Since then, no one here has told me how long we will be here.

20 16. No one has given me a handout about my children's rights.

21 17. I do not remember watching a video about my children's rights either. They
22 showed us a video when we got here, but it was about immigration law and credible fear
23 interviews. I've heard from many people that they are no longer showing the immigration
24 video, though.

25 18. I have not heard about my children's right to be released from Dilley without me.

26 19. No one has told me anything about bond hearings.

27 20. There are some tablets where you can get updates about the immigration case.
28

1 21. Recently, there was an ICE person who talked to me about my case, and he said
2 that they would not let us out because we still have immigration court dates pending.

3 22. Being here makes my children feel bad. They want to get out of here. They also
4 miss their brother because it has been 8 months since they last saw him. They are
5 traumatized. I just keep thinking about my five-year-old, whom I have not been able to
6 speak to.

7 23. I am so scared they are going to deport us and keep us separated from my son,
8 who lives in the U.S. He is my children's brother, and they miss him.

9 24. There is a commissary store here.

10 25. When we first got here, we could not make any calls to anyone because we did not
11 have money in our commissary account. I was allowed to make one call, but the person I
12 called did not pick up. There is definitely no way to make free calls to family. If you do
13 not have money, you cannot call anyone.

14 26. So, I could not call anyone until some people donated money to my account.
15 Then, I could start making calls and buying shampoo and food for children to eat at
16 night. My children get really hungry at night, and we need to go to the commissary for
17 them to be able to eat.

18 27. When we got here it was cheaper, but they have recently increased prices for
19 shampoos, soups, and sodas.

20 28. Now, I can speak with my mother-in-law, my children's grandmother, and a friend
21 who has contact with my five-year-old son. My children and I still have not had a chance
22 to speak with my other children who are not detained with us.

23 29. I have also been paying for calls to my friend to ask her to gather evidence to send
24 me for my case. It is so hard not having access to any records here.

25 30. I cannot use my Gmail here either because they took away my phone and the
26 computers only allow you to access Proton for email.

27 31. Recently, an ICE counselor found out people were donating to our commissary
28 accounts, and she came to our room and said we cannot speak with people who would

1 donate to our accounts. She accused me of meeting with organizations that would help
2 people with their commissary accounts, and she told me I should not be doing that or
3 sharing commissary numbers. I told her I was only meeting with a pastor who was
4 helping. She said people who want to donate to us are not allowed to communicate with
5 us or come visit us.

6 32. When we first got here, they gave us a really small shampoo bottle. When it
7 ran out, I spent a week asking for more shampoo, but the staff said they did not have any
8 more. So, since then, we have had to buy it at the commissary.

9 33. We also need to fill out a paper to ask for more clothes when ours break, but we
10 have been waiting for new shoes for my daughter for more than a week since we made
11 the request. She could not wear them without getting her feet wet.

12 34. When my son's pants broke, I submitted a paper saying they were broken and
13 requesting replacements. But the staff said we were lying and that we had hidden the
14 pants in an effort to get more clothes. They searched our room to try to prove we were
15 just trying to get more clothes. Now my son only has one pair of shorts that need to be
16 washed every day.

17 35. I also asked for a sweater for my daughter because only my son and I
18 got sweaters, but the staff said they do not have any in her size, so she still does not have
19 one.

20 36. It is difficult for my children to sleep here because the lights are on all night. I am
21 detained in a room with just my children. A couple of nights ago, we all woke up when a
22 bunch of ICE officers came into the room at 3 a.m. They were checking for things, but I
23 am not sure what they were looking for. It was terrifying. When they saw that I woke up,
24 they left the room. I do not know what they were doing there.

25 37. My children have been sick with stomach aches since getting here, and my son has
26 suffered from a fever. I think the food makes them sick to their stomachs. I took them to
27 the doctor and got medicine for their stomach aches.

1 38. The food here is repeated a lot. It's always the same. It also has too many
2 condiments for children to eat it. There are so many kids who do not eat because they get
3 stomach pain and diarrhea. We have seen some people get different food, but the staff
4 just give us the same food over and over again. I heard a woman who works here
5 say it's all canned food, and they just heat it up.

6 39. The water here is really bad, too. We do not have enough money in our
7 commissary account to buy water, so we have to drink water from the tap, but it gives us
8 diarrhea. So, we have consistent diarrhea.

9 40. There are a lot of officials who treat us poorly. These staff are mean, and they are
10 always checking you and looking at you. They tell people they will give them a report
11 that will affect their case for anything you do. They will give people reports for anything,
12 even just speaking to each other. Once, when there was no detergent, a woman went to
13 take hand soap to use it in the washing machine, and a staff member made a report
14 against her. The staff told her it would go to the judge in her case. Then there was another
15 time when a woman walked over to a separate housing hallway to talk to her friend, and
16 the staff said they were filing a report against her for doing that. It makes us all feel bad
17 and scared of doing anything. We have heard that the more reports we get, the longer
18 they will keep us and our children detained.

19 41. I guess someone could try to file a grievance, but we are all just trying to get out
20 and we know they will try to file a report that hurts us, so we do not complain.

21 42. There is also one woman who works here who will not let the kids play. She walks
22 around them and critiques them, so when that woman comes by, the children all leave the
23 park.

24 43. State representatives came two times in the last month, and there was a paper that
25 some people could sign their names on. But for anyone whose name was not on the
26 paper, they locked all of us in our rooms and said we could not leave. Those were the
27 only times that they gave us good food. It was different than the food we normally get.
28

1 44. We also see snakes in the hallway here. All of us fear them ending up in our beds
2 and the bathroom, but the staff here say we cannot kill them.

3 45. I take [REDACTED] and [REDACTED] to school here, but the school only gives them coloring, and
4 the children feel like they are not learning. They both want to learn more.

5 46. My children cannot wait to get out of here so they can go to real school and
6 reunite with their brother.

1 I declare under my duty to tell the truth and penalty of perjury that to the best of my
2 knowledge, all the information I have here given is correct and complete and I understand
3 the legal consequences of testifying falsely to the authorities. Executed on this 2 day
4 of June 2026, at Dilley, Texas.

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CERTIFICATE OF TRANSLATION

My name is Eleanor Roberts and I swear that I am fluent in both the English and Spanish languages and I translated the foregoing declaration from English to Spanish to the best of my abilities.

Dated: 06/02/2026

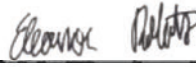


EXHIBIT 12

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, J [REDACTED] C [REDACTED] M [REDACTED], declare as follows:

2 1. This testimony is based on my personal knowledge, and the following facts are
3 true to the best of my understanding and recollection.

4 2. I am 44 years old. I am from [REDACTED].

5 3. I speak Spanish.

6 4. I have been detained at Dilley for 62 days. I am here with my daughter, who is
7 seven.

8 5. She was in second grade before we were detained. We were apprehended in
9 Arizona, where we've lived for the past two and a half years.

10 6. After being apprehended, we waited all day in an ICE office. That was April 7th.
11 On April 8, 2026, we traveled the whole day and then arrived here to Dilley, Texas.

12 7. I have never received an orientation or video about my rights.

13 8. On April 9th, ICE had us sign a paper that said *Flores* exists, but they aren't
14 applying it right now. I signed it. The paper just notifies us of *Flores*, but RAICES told
15 me that ICE doesn't respond to many parole requests that use *Flores*.

16 9. We received another document called "Notice to Alien of File Custody Review"
17 on May 26th, which said we have to wait another month here when we have already been
18 here since April.

19 10. These papers are all in English. There sometimes is a translator in person, but we
20 don't receive the papers in our own language.

21 11. For the *Flores* document, an ICE agent told me what it means, but the paper was
22 still in English. We didn't get a copy of that one.

23 12. We all have headaches all the time. I think it could be the food, but it also could be
24 the anxiety. None of us want to be here.

25 13. My daughter is usually very calm, but she's been biting her nails here. She's
26 stressed. She was very social and liked to play and hangout with younger kids before
27 coming here, but now she doesn't.

28 14. I have noticed a big change in her.

1 15. She asks me every day why we are here and when we can leave. She obviously
2 wants to stay here in the U.S. and go back to her school. And now it's summer vacation,
3 and she's missing all of that fun stuff.

4 16. On June 2, 2026, my daughter was injured in the park here. She was playing on the
5 monkey bars, and she fell on her private area. There was some blood coming out. They
6 made us wait a bit before seeing a doctor. They kept her overnight at Medical to review
7 how she was doing.

8 17. They didn't review her internally, though, and I am afraid she has internal
9 bleeding. She feels weird still. She feels off balance, she's walking weirdly, and she told
10 me it feels like there is something inside her moving around – like a weight.

11 18. Yesterday, June 7th, we went again to Medical and told them how she felt. They
12 said all was good and she wasn't bleeding anymore. They still didn't review her though
13 for internal bleeding. I am still worried about internal bleeding. I want her to see someone
14 about this.

15 19. I did write a grievance about my child's medical issues. I have not received a
16 response to that yet.

17 20. The food here makes us sick. We are losing weight. We eat the food and have to go
18 right to the bathroom. Sometimes we eat, sometimes we don't. If we do eat, we go
19 directly to the bathroom afterwards.

20 21. My daughter is not eating a lot. It's the same food every day.

21 22. We are drinking the tap water. The stuff directly from the tap doesn't taste good,
22 but we'll drink it out of the Gatorade containers they have around. The prices at the
23 commissary have gone up a lot. The noodle prices have gone up too.

24 23. My daughter doesn't want to go to the school anymore because every day is the
25 same. She says they just color to pass the time.

26 24. We received a hygiene kit when we arrived, but the stuff isn't good, so we buy it
27 now from the store. I think you can get more for free, but I'm not sure. The toothbrushes
28 only last for one use.

1 25. The bathrooms are so dirty here. There is mold everywhere in the showers.

2 26. The phone calls here are not free. You have to pay to use them. 10 dollars will last
3 about five days, but that's only for short calls.

4 27. We can't use Google in the library.

5 28. The guards do sometimes yell at the kids here; there is one, in particular, who yells
6 a lot.

7 29. There is not enough recreation for my daughter here. There are a few Legos;
8 mostly they just let her draw. We have to buy more colors at the store here. The guards
9 just give them one or two to draw with.

1 I declare under my duty to tell the truth and penalty of perjury that to the best of my
2 knowledge, all the information I have here given is correct and complete and I understand
3 the legal consequences of testifying falsely to the authorities. Executed on this 8 day
4 of June 2026, at Dilley, TX.



CERTIFICATE OF TRANSLATION

My name is Katherine Johnson and I swear that I am fluent in both the English and Spanish languages and I translated the foregoing declaration from English to Spanish to the best of my abilities.

06/08/26
Date

Katherine Johnson
Signature

EXHIBIT 13

**REDACTED VERSION OF DOCUMENT
PROPOSED TO BE FILED UNDER SEAL**

1 I, D [REDACTED] C [REDACTED], declare as follows:

2 1. This testimony is based on my personal knowledge, and the following facts are
3 true to the best of my understanding and recollection.

4 2. I am 37 years old. I am from [REDACTED].

5 3. I speak [REDACTED] and some limited English.

6 4. I have been detained at Dilley for 21 days, but I have been detained for longer than
7 that. I am with my son, who is four years old.

8 **CBP Detention**

9 5. We were in a CBP facility called Otay Mesa for seven days.

10 6. On our third day there we received a credible fear interview, and they concluded it
11 was negative. When the judge reviewed it, though, she said it was actually supposed to be
12 positive. No one told me this; I just overheard the judge say it with my limited English.

13 7. I think that's why we were there for so long, because of the interview results.

14 8. At CBP, I only received two phone calls. I got one at the border and another to try
15 to reach a pro bono attorney, but no one picked up. After that, I asked for more calls to
16 call my mother or our sponsor because I was so nervous and stressed, but ICE said no.

17 9. The facility had a toilet, metal benches, and gym mats for sleeping.

18 10. The toilet in our room could only be flushed from the outside. An officer who
19 passed by the room had to flush the toilet. They did this multiple times a day, including at
20 night. Because it was very loud, my child was very scared and fearful every time an
21 officer walked by. I don't know why they did that. He had a fear of the flushing toilet for
22 a while after that. It would wake us up in the middle of our sleep too.

23 11. They did not allow us to talk to any other families while we were there. It was
24 painful for my son that we couldn't speak to the other families, because he had made a
25 friend with one of their daughters when we crossed the border.

26 12. Sometimes, they'd allow my child to watch cartoons, but that was it and it was a
27 very short period of time. All the time was limited. There was limited time to eat, limited
28 time to watch TV, and more.

13. Before my child eats, he has to jump and run around. He cannot do this quickly, so that was very hard for us.

14. He was also punished and received restricted TV time for running around.

15. One day, they didn't even open the window so my child could look through it.

16. It was very difficult and stressful there because I wasn't aware of what was going on. They only told us one hour prior to being moved to Dilley that we were going to be moved to a different place.

17. I would like to add that there were some nice people in that center who had compassion for the kids, but only a few of them.

18. They allowed no toys or food within the room where we stayed. I had to come up with a chasing game or with a game involving toilet paper, because I didn't have any other resources available to me.

19. Over the seven days, we only received three showers, and one of those times we had to take a car to go to place to shower.

20. It was very difficult to shower because the water only worked for a short period of time, and you have to keep pressing the button all the time to get more water out. When you have to care for your child too, it's impossible to get a decent shower.

Dilley ICE Detention Center

21. We arrived to Dilley on May 13th.

22. The next day, May 14th, ICE provided me with a paper and asked me to sign the paper. There was no interpreter or translator. The form said it was a *Flores* notice. I asked one of the ICE officers what this meant, and he said they wouldn't keep me here for more than 20 days.

23. I haven't received any follow-up, though, on when or if I'm being released and I've been here for more than 20 days, even more if you count my time before Dilley.

24. My understanding is that they only started to give this piece of paper out to people in the month of May.

1 25. The only thing I know is that they called my sponsor and asked whether they could
2 purchase tickets for us, but I'm still here. It's been more than a week since they called my
3 sponsor, and today is day 21 since I signed that form.

4 26. My child is my main concern right now. He's very hyperactive. At mealtimes, for
5 example, he's running and jumping. Now, he has a poor appetite. And I'm very
6 concerned that we're still here and won't be released. He often has tantrums.

7 27. Yesterday at dinner, my child was very active. He couldn't sit still for one minute.
8 He was running and jumping on the tables. Yesterday I spoke to someone in charge, and I
9 told her that his hyperactivity is just how his nervous system is managing stress right
10 now. The staff here can't even calm him down, and they can't control him. It's difficult
11 for staff to look after him. A nice staff woman said she'd check about the status of our
12 case and took picture of my A-number.

13 28. He had these hyperactive behaviors before we got here, but now they've gotten
14 worse. He's deteriorated a lot in the past few days. It's not controllable now.

15 29. I provided a medical record from [REDACTED] to the medical unit here about his speech
16 delay. Yesterday, we went to see a doctor. I told the doctor that my son is restless and has
17 a poor appetite, but she said it's normal. The plan was to see a psychologist or counselor
18 after that, but we haven't seen one yet.

19 30. My son drinks milk and juice, but he doesn't eat other normal food. This has gotten
20 worse in the past few days.

21 31. People are asking me if he's autistic. He's almost 5 years old, and he doesn't really
22 speak. I'm concerned about his health and safety. He can say phrases, but he doesn't
23 answer questions or maintain a dialogue.

24 32. At CBP, the TV my son got to watch was extremely limited. Now, he has a
25 negative reaction to the TVs here. The girl in our room likes to turn the TV on to watch
26 cartoons, and my son reacts poorly to that. He asks to turn it off.

33. Before detention, he was sleeping with a stuffed animal, a bear, but not anymore obviously. He also liked to play with an iPad and phone before coming here, but we don't have them here.

34. The problem is that he understands we're in captivity. He's small, but he does understand. Before he had friends, but they've all left now. There are new people now, so he understands it's not going well for us.

35. He needs a change of circumstances, settings, and actions, because it is very hard for him to have to do the same thing every day. He doesn't do well when he's subjected to some type of restriction.

36. There are iPads here, but you have to pay-to-play so we don't do that.

37. We can leave our room here, but my child still understands his freedom is limited.

38. Over the last few days, he's only said the words "mother" and "plane" so I understand he wants to leave, but I don't know what to tell him because I don't know what is going to happen to us. He'll say, "Mother, let's fly." He knows that before, when we moved around, we took a plane, so that's how I know he wants to leave.

39. He said today, "Mom, I'm sick and tired of everything." This was surprising for me to hear, because he usually doesn't speak. This probably means that this experience is so difficult for him that he had to say something like this.

40. I feel pain for my child, because it's not his fault that he has to be in captivity.

41. His sleep is okay because he's so drained by the end of the day. I, however, get up every hour. My sleep is not good. I don't know if I'm sleeping at all. It's not acceptable for me to take sleeping medicine, because I can't risk not being able to monitor him.

42. We received a hygiene kit when we entered here. We have asked for more and they gave it to us for free.

43. I don't recall any know your rights presentation. I remember I was given info on pro bono lawyers, but that was it.

44. Every day, I cry. It's the same scenario the next day.

1 I declare under my duty to tell the truth and penalty of perjury that to the best of my
2 knowledge, all the information I have here given is correct and complete and I understand
3 the legal consequences of testifying falsely to the authorities. Executed on this 2 day
4 of June 2026, at Dilley, TX.



CERTIFICATE OF TRANSLATION

My name is Iryna Iudina and I swear that I am fluent in both the English and [REDACTED] languages and I translated the foregoing declaration from English to [REDACTED] to the best of my abilities.

2026-06-16

Date

Iryna Iudina

Digitally signed by Iryna Iudina
Date: 2026.06.16 11:56:40 -07'00'

Signature