

# **EXHIBIT 3**

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

1 I, C [REDACTED] G [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 13 years old. I was born in [REDACTED], but I have been living in Florida since I  
5 was a baby. I have never been back to [REDACTED] since I was born.

6 3. I speak English and Spanish.

7 4. I have been detained at Dilley for 90 days. I keep track of the days on the  
8 calendar.

9 5. I have lived in Miami for as long as I can remember. I have a nine-year-old  
10 brother and a five-year-old sister who were both born in the U.S. I am in 7<sup>th</sup> grade. My  
11 favorite things about my school are robotics, science, and reading. In my robotics class,  
12 we were making robot cars. After school, I like to play soccer and FIFA on my  
13 PlayStation. I also like to stay up late and sleep in on the weekends. Things were going  
14 well before we came to Dilley.

15 6. One day, I went to an ICE check-in meeting with my mom. They told her to bring  
16 me. We showed up at the meeting, and they told us we were being taken to a detention  
17 center. I felt very scared. My mom said she could ask whether I could possibly stay with  
18 my stepdad and my siblings, but I was worried about being apart from my mom. I was  
19 also worried that if I didn't go with her, she would go to a jail.

20 7. After the meeting, they took us directly to the airport. We flew to Houston and  
21 then to San Antonio. We stayed at a hotel for one night in San Antonio, and then they  
22 drove us to Dilley.

23 8. When I first got here, I felt really depressed. I would cry sometimes. I would shut  
24 down and want to be alone.

25 9. It's hard to sleep here because the lights are on all night and the bed is  
26 uncomfortable. My back hurts a lot from the bed because the mattress is so thin. My  
27 back never used to hurt at home. I wake up a lot at night here.

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1 10. We live in the yellow area. I think there are about 62 people there right now.  
2 There are three other families living in our room. Each of the families has a mom and a  
3 son. We get along okay.

4 11. The food gets boring. Mostly they give the same food – so when you’ve been here  
5 twelve weeks, it repeats a lot. The food has made my mom sick. When she ate the  
6 meatballs, she felt sick and had to go to the bathroom right away.

7 12. They tell you that you can have as many servings of the food as you want, but  
8 when it’s good – like the pizza – you can only get one serving. I feel hungry sometimes  
9 because I often don’t want to eat the food. My mom will buy me ramen and chips from  
10 the commissary for the days that I’m not eating the food.

11 13. The water from the tap here tastes weird, so my mom buys bottled water from the  
12 commissary.

13 14. When I first got here, they didn’t have school at all. In March, they set up a  
14 classroom for the older kids and I started going for a couple hours a day. It’s not the  
15 same as actual school. They do kind of teach us, but not the level I was being taught at  
16 my school. I miss my robotics and science classes the most.

17 15. The kids here are sad. They get stressed out being locked in here. They do weird  
18 things that they wouldn’t do at home. If I had to describe Dilley with one word, it would  
19 be “horrible.” It is awful to be inside here all the time and feel like you’re locked up.

20 16. The bathrooms here are dirty, and I wish they would clean them more often.

21 17. I talk to my stepdad and siblings on the phone every day. I don’t know how much  
22 it costs, but I know we have to pay for the calls and it adds up.

23 18. The past few days, there has been a lot of rain. Having to stay inside makes you  
24 feel even more like you’re locked up.

25 19. If I could change one thing here, it would be to turn off the lights at night.

26 20. I am hopeful that we can get out of here. I want to be able to see the messages on  
27 my phone and go to my house and play with my little brother.

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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 22<sup>nd</sup> day  
4 of April 2026, at Dilley, Texas



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# **EXHIBIT 4**

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

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

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

4 2. I am 39 years old. I am from [REDACTED].

5 3. I speak [REDACTED].

6 4. I have been detained at Dilley for 135 days. I am detained here with my son who is  
7 three years old. He was born in [REDACTED].

8 5. I spoke to *Flores* Counsel in March and April.

9 6. My son and I arrived in the United States and we were sent to a very cold place  
10 that was some kind of detention facility. We stayed there for a few hours and then we  
11 were taken to another detention facility that was also very cold. We were in that second  
12 place for two days and then we were sent to Dilley. They gave us food, water, and a foil  
13 blanket.

14 **Dilley ICE Detention Center**

15 7. I'm detained like someone who committed a crime. It is very stressful to be here.  
16 There is so much uncertainty, and I feel a lot of emotional stress. I am very worried for  
17 my son here.

18 8. No one has told me why my son and I have been here for so long. I think I need to  
19 wait for a review of some sort, and they just keep telling me I need to wait. They don't  
20 tell me anything else.

21 9. All this time I have been here, I write on the tablet to ICE and they just say they are  
22 analyzing my case. They came and talked to me a bit ago about giving up my son's  
23 nationality. They have threatened to separate me from my son as well. I asked to be sent  
24 to a third country, if nothing else, for our safety, and ICE said that would only mean we  
25 have to stay here longer.

26 10. No one has told me about any rights my son has here or any rights that are specific  
27 to him as a child. I don't remember being shown any video about my rights or my son's  
28 rights here.

1 11. A few weeks ago, my son had a cold and he had a fever. It's the second time he's  
2 had a cold and been sick since we've been here. Every time he is sick, I go to the  
3 medical care facility. This time, they were helpful.

4 12. Now, I'm having medical problems too. A doctor here told me I have a UTI. I was  
5 prescribed antibiotics. I was taking them for two days when the doctor called and said,  
6 actually don't take them anymore. The doctor said it's actually bacteria with the kidneys  
7 or liver. I have never had these types of problems before. I have a lot of stomach pain as  
8 well here.

9 13. I worry for my son's mental state. He has been going to the psychology team here  
10 because he's waking up at night very frightened and scared and crying a lot. He's  
11 become more aggressive. I think because of the stress. They've been switching us to  
12 different rooms with different people.

13 14. My son has a very hard time sleeping here. I try to get him to sleep around 8 p.m.  
14 but he often can't fall asleep until midnight or 1 a.m. I am not sure why he is having  
15 trouble sleeping; maybe because there is a lot of stress here. We've also switched rooms  
16 and now we are in a new space with new people. That probably is making it harder for  
17 him to sleep too.

18 15. My son has not been eating well. Lots of people are getting sick, and I am always  
19 very worried my son will also get very sick. I went to the doctor many times because I  
20 was worried about my son not eating. The doctors weren't able to do anything. The last  
21 few weeks my son has been eating milk, juice, and apples. He doesn't eat much else. No  
22 one has offered me any toddler food or pouches for my son. I don't think the water is  
23 good here either. My son has had diarrhea here, and I think it's because of the water. I  
24 could buy water, but I don't have money to do that very often.

25 16. They have given us diapers and wipes for my son, but they haven't offered us any  
26 food that is more appropriate for a little kid. The only soap that is available is the same  
27 soap that is used to wash hands or do dishes. They have never offered me any different  
28 soap for my son either.

1 17. A lot of kids here have been here for more than 21 days.

2 18. I was given a list of lawyers who I could call to try and get help. I have tried to  
3 call but I always get voicemail, and I think because I leave a message in [REDACTED] and  
4 not Spanish, no one has called me back. Someone from RAICES only contacted me after  
5 *Flores* Counsel flagged my case for them.

6 19. I have been able to communicate with the staff with the Spanish I do know, but I  
7 am not fluent in Spanish. No one has offered me interpretation for [REDACTED], even if  
8 I'm speaking to the officers here.

9 20. I am not aware of any process to let the staff know about complaints or concerns I  
10 have. Everything is in English or Spanish, not my language.

11 21. My son sometimes plays in the gymnasium and on the play structure. There is not  
12 much else for him to do here. He feels very bored. Some days we can't go outside  
13 because the sun is so strong here. At the gym, sometimes there are teenagers playing,  
14 and one teenager accidentally hit my kid in the face. It was an accident, but it still scared  
15 me to go back.

16 22. My son is very young, and he doesn't fully understand what is happening here.  
17 But I know he is very bored and he is often sad. He made a friend here, but that friend  
18 left and yesterday he was crying a lot and asking for this friend. It's hard for him to be  
19 here for so long. Until today, he would ask for his friends [REDACTED] or [REDACTED]. The kids  
20 leave and he's the only one who stays.

21 23. Recently, there have been small snakes at the park where children play and in the  
22 bedroom area as well.

23 24. No one has been bitten so far but everyone is scared. Moms are afraid to take their  
24 kids to use the toilet in the bathroom so some kids have been pooping on the floor.

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 May 2026, at Dilley, Texas.



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I, Katherine Johnson, hereby declare under penalty of perjury, the following:

I am an attorney at Children’s Rights. On April 23, 2026, I met with A.O. with the assistance of a telephonic interpreter provided by Jeenie, identified by Interpreter ID 083614 and named Bruna, who is certified to interpret in the English and [REDACTED] languages. During our meeting, I read the “Declaration of A.O.” in English, and Bruna interpreted the entirety of the declaration into [REDACTED] for A.O. A.O. confirmed that all the information contained in the declaration is correct and complete to the best of her knowledge. On May 8, 2026, I met with A.O. again with the assistance of a telephonic interpreter provided by Jeenie, identified by Interpreter ID 277060 and named Erica, who is certified to interpret in the English and [REDACTED] languages. A.O. added two sentences to her declaration at this time and Erica interpreted the entirety of those two sentences. A.O. confirmed that all the information in them was correct and complete to the best of her knowledge.

  
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Signature

05/12/2026  
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Date

# **EXHIBIT 5**

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

1 I, M [REDACTED] T [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 27 years old and my son, [REDACTED], is six years old. We are from [REDACTED].

5 3. I speak Spanish.

6 4. We have now been detained at Dilley for 66 days, and before that we were in CBP  
7 detention for about 10 days. This is an update from my earlier statement.

8 5. I am very upset and stressed because they are not telling us what will happen with  
9 our case.

10 6. At the end of March, ICE said we were being taken to Ecuador. Around 5:30 p.m.  
11 one evening, the guards came to our room and told us to pack up our things because we  
12 were leaving. Then the guards brought us to intake. We waited for about an hour and  
13 then some transport people came to pick us up. They said they would take us to  
14 Louisiana and then to Ecuador. We were adamant that we didn't want to leave. The  
15 transport people said they could not take us against our will and that if we didn't leave  
16 voluntarily, ICE would have to chain us up and take us out. We insisted that we were not  
17 leaving voluntarily, and they called ICE. An ICE officer showed up and was really mean  
18 to us in front of our son. I just tried to stay calm and not back down. I told them we had  
19 not agreed to go to Ecuador and that we had a court date that we wanted to keep. ICE  
20 then said that if we wouldn't go the right way, they would take us chained another day,  
21 and the guards brought us back to our room.

22 7. We then had a court date on March 31, 2026. At the hearing, the judge said he  
23 would only give me a bond, but not my husband or son. I did not understand that, and  
24 we said that it needed to be for our family. The judge then gave us another court date for  
25 April 9, but at that hearing the judge said he would not give any of us a bond, but we  
26 could appeal the decision.

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1 8. An attorney later told us that there was a document with my signature on it  
2 agreeing to go to Ecuador, but I never signed a paper agreeing to that. I do not know  
3 how my signature is on that document.

4 9. As time has gone by, it has been harder and harder for my son. My son sees other  
5 friends leave here and asks: when we will be able to leave? Why are we still here?  
6 Recently he asked me: when are we going to get out of jail? I tried to explain to him that  
7 Dilley isn't actually a jail. But he knows what it feels like here, that we cannot leave or  
8 go to a park, that he cannot have his toys, and that the bed is so uncomfortable. I  
9 understand it feels like a jail. There are so many restrictions, and the guards are so rude –  
10 a child is yelled at even if he spills some milk. Sometimes my son will just burst from all  
11 of his emotions and start crying.

12 10. My son still does not eat well here. The food is too spicy and has too many  
13 condiments and sauces for him. Also, dinner is served at 5 p.m., so by 8 p.m. he is  
14 hungry. We have to buy food for him to eat at the commissary. We will buy soup, tuna,  
15 crackers, and bread. We also have to buy water.

16 11. They recently brought down the cost of a pack of water from \$30 to \$9. About a  
17 month or so ago, a lot of the children became sick and were vomiting a lot. They told the  
18 parents the children needed to be drinking more water. The families complained and  
19 complained because they could not afford the water. The guards told us they were  
20 dropping the price of the water because of this but I don't know if that is true.

21 12. My son is very anxious and has started biting his nails. He feels trapped inside the  
22 living area. He's always asking to go outside. He can never stop moving and settle  
23 down. Every night he cries at 8 p.m. when he has to say goodnight to his Dad. He wants  
24 to be able to be in the same place as him at night or even just hang out a little longer.  
25 Being separated from his father each night is probably the hardest thing for him.

26 13. My son was not sleeping well at all because the lights are on all night. The night  
27 shift guards for our area will now allow me to put a towel over the bunk bed so that the  
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1 light doesn't go through the area where my son is sleeping. This has helped him a lot but  
2 they really should just turn off the lights at night so all the children can sleep.

3 14. My son had started going to school at Dilley and was excited about the new  
4 program, but soon he didn't want to go again. He said the teachers were just teaching the  
5 same things and he wasn't learning anything new.

6 15. Not having toys here is one of the things that makes my son feel like he is in jail.  
7 He doesn't understand why he can't have his own toys. There are toys in the day care  
8 room, but kids can only go there when parents have court hearings or meetings. Children  
9 cannot have toys in their own rooms - where they have to spend a lot of time. It is really  
10 hard for my son not to have toys.

11 16. If you want crayons for your child to draw, you have to buy them at the  
12 commissary. If your child draws a picture of anything negative about this place, the  
13 guards will take it from your room.

14 17. The process to get more clothes is complicated. You have to make a written  
15 request and explain why you need more clothes. Then they go to your room and check  
16 your clothes to see if the reason you gave was true. It can take days for them to check the  
17 clothes in your room. It's also hard because children are only allowed to have one pair of  
18 shoes - even when it is raining a lot and their shoes are really soggy.

19 18. For two weeks, I had been asking for new shoes for my son because the soles were  
20 broken. I had been waiting and waiting, but then the day a senator came to Dilley - I was  
21 suddenly able to get the new shoes. I notice that things families have been asking for  
22 often happen around the time the politicians visit.

23 19. About two weeks ago, my son had diarrhea and vomiting but it went away pretty  
24 quickly. I think it was the food since he was sick for just one day. If it was a virus, it  
25 would have probably lasted longer. A few days ago, my son fell on his wrist and it was  
26 swollen and painful. Medical was very dismissive and just gave him ice.

27 20. It is hard to be here for so long. I try to stay busy by washing clothes or cleaning  
28 the living area - I just try to find something to do to keep my mind off of things. I try to

1 talk to other moms for support, but that can be hard, too. I am happy for families when  
2 they leave, but it is frustrating to be the ones still here. I just want to get out of here.

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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 22<sup>nd</sup> day  
4 of April 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: 4/22/2026 Jean Cano

# **EXHIBIT 6**

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

1 I, R [REDACTED] G [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 36 years old. I am from [REDACTED].

5 3. I speak Spanish.

6 4. I have been detained at Dilley since March 7, 2026, almost 50 days. I have been  
7 here with my son [REDACTED] since then. He is 10 years old.

8 5. No one has told me why we have been here so long. All they have told me is that  
9 they won't let us go. A friend not at Dilley called RAICES to get us a lawyer, who then  
10 called me. Our lawyer at RAICES has contacted ICE several times to find out why we  
11 are here past the 20 days under *Flores* (on April 1, 2, 10, 14, and 20), but ICE has not  
12 responded to her emails or questions. ICE told me today that they won't let us go  
13 because they don't have authorization for my son's case.

14 6. Before I arrived at this facility I was living in San Antonio, Texas for about two  
15 years. Before that, I lived in El Paso, Texas, for a year and half. I lived with my son,  
16 [REDACTED]. [REDACTED] was in fourth grade when we were arrested. He wanted to be an engineer  
17 and build houses. His favorite subject was math. He was also very athletic and loved  
18 sports, especially soccer.

19 7. Since being detained here, [REDACTED] misses school, his friends, playing, our  
20 apartment that we don't have anymore, his freedom, and everything he had in the  
21 apartment. He wrote all this in a letter. He doesn't like to play anymore. He misses the  
22 friends that he makes here who leave. It's not easy for me to have my son in this  
23 situation.

24 8. I was arrested in my car at 5 a.m. on the way to work in a restaurant. My girlfriend  
25 was with me and she was arrested, too. She is at Dilley, but I can't see her because we  
26 are not married. [REDACTED] was sleeping and was going to go to school with the babysitter. I  
27 said, "I have my son in the apartment; please don't take me." They didn't believe me and  
28 were going to take me. They were armed with big and small guns. They dragged me out

1 of the car, put me on the ground and handcuffed me. They did not identify themselves,  
2 but I saw "ICE" on their jackets. I begged them not to take me because of my son, and  
3 they didn't believe me. Then they took the keys out of my pockets and all my  
4 identification, including my social security card.

5 9. They went into the apartment with guns out as though they were looking for a  
6 criminal. They found my son asleep, grabbed him by the arms, and told him to get  
7 dressed, that we were going to leave. They grabbed [REDACTED]'s book bag, emptied it of his  
8 notebooks, and grabbed shoes and clothes, stuffed them in the bag, and said, "Let's go."  
9 I was still handcuffed, but they did not handcuff [REDACTED].

10 10. While we were being arrested, no ICE agent told me that my son could stay with  
11 someone else while I was arrested. I tried to show the ICE agents my documents,  
12 including my work authorization, my [REDACTED] passport, and my immigration  
13 document, but they just took them away and said "Let's go."

14 11. We were first taken to an ICE processing facility in San Antonio near my  
15 apartment until 10 p.m. and then got on a bus to come to Dilley at 3 a.m. My son was  
16 hungry the whole day and got only some water and a small sandwich.

17 12. When we arrived at Dilley, no one told us how long we will be here. No one told  
18 us what will happen next. On April 6, we had a video conference at Dilley with a judge.  
19 We did not have a lawyer. The judge wanted to separate my son and me, and told us this  
20 in court. My son told the judge he didn't want to be separated from me and leave me  
21 alone. I don't want to be separated from my son.

22 13. We have another video conference with a judge on April 28 supposedly about my  
23 son, but I am not sure. I don't know if I will have a lawyer at that video conference. No  
24 one has told me about any other hearing.

25 14. Dilley does not have the kind of conditions that any family should be in. Hygiene  
26 is a big problem – it's not adequate.

27 15. My son doesn't have any soap or shampoo; I have to buy all of it. He can only use  
28 the liquid hand soap.

1 16. About a month and a half ago, [REDACTED] got a fungal infection on his face and his  
2 feet. He uses a cream every morning and night – sometimes it works and sometimes it  
3 doesn't work, but because of the water it comes back again.

4 17. He only has one pair of shoes and has to wear them when they are wet after it  
5 rains.

6 18. Treatment of kids is a big concern. No one here is qualified to work with children  
7 –they treat the children like adults. CoreCivic does not speak nicely to the kids; they yell  
8 directly at the kids instead of going to the parents first.

9 19. The third biggest concern is the food. It's all processed, frozen food. The only  
10 things they make here are the French fries.

11 20. I had a DNA test but nothing happened afterwards; they did not give me a paper to  
12 say if [REDACTED] is my son. I have heard that if the test shows the child is not the son or  
13 daughter, then the family is separated. I have heard that the parent is deported or sent  
14 somewhere else.

15 21. When we arrived at Dilley, someone told us that the *Flores* law applied to us, but  
16 they didn't tell us what that meant. They tried to get me to sign a piece of paper that  
17 might have been about this. But it was in English and I didn't understand. No one has  
18 told me about my rights except my RAICES lawyer; she is the only one who has told me  
19 about [REDACTED]'s *Flores* rights, that [REDACTED] can't stay here longer than 20 days and that his  
20 *Flores* rights are being violated.

21 22. I have never seen a video about our rights.

22 23. People who are getting released have told me they are getting released because of  
23 *Flores*.

24 24. My son has been feeling depressed. He feels sad because he sees kids leave and  
25 feels alone. I don't know if seeing the therapist helps. He tells me, "Every time I go  
26 outside I feel bored; I don't want to play. When I go to the play area, there aren't any  
27 toys for kids my age except PlayStation." Sometimes he goes on the treadmill.

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1 25. Sometimes the food doesn't sit well with my son; I have to buy him ramen.

2 Sometimes I have to buy water at the store because the water here is not good.

3 26. My son is not comfortable because the bed is hard; the metal sticks in his back.

4 The lights are on all night. We have bad sleep here; the lights hit our eyes all night. We  
5 feel like caged chickens in an incubator.

6 27. I can't call my family because they are not in this country and it costs too much. I  
7 have to pay to call anyone I know here. The only time it's free to call is when you first  
8 get here, and that's only for five minutes.

9 28. I got a list to call, but no one answered. To get through, you would need to be on  
10 the phone all day calling.

11 29. Use of email here is very limited; I can't use Gmail. I can only receive emails from  
12 my lawyer and I have to call her back on the phone.

13 30. On April 6, the judge told us we did not qualify for a bond hearing. I had a credible  
14 fear interview at Dilley, but was denied, just like everyone here. There is no way out.

15 31. The only person who has talked to me about my case is the lawyer from RAICES.  
16 We do not have a case manager here.

17 32. Whenever someone comes from Congress, we aren't allowed to leave our rooms.  
18 We are put on lockdown whenever there are visitors, and whenever there are protests  
19 outside. Protests happen a lot.

20 33. I know of a friend here who files grievances and has been told if he doesn't stop,  
21 he'll be sent somewhere else. I have other friends who have complained, and they have  
22 been deported.

23 34. Education here doesn't work for [REDACTED]. He says it's very bad. Some teachers are  
24 nice, but some teachers make him sit alone if he tries to help another kid. One teacher is  
25 particularly strict.

26 35. [REDACTED] feels bad when he can't go out when he wants to and can't bring snacks  
27 outside the play area; he tells me they yell at you when you do try to leave with food.

28

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 22 day  
4 of April 2026, at Dilleys.



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CERTIFICATE OF TRANSLATION

My name is KAITLYN VELAZQUEZ 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: 04/22/26 Kaitlyn Velazquez

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# **EXHIBIT 7**

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

1 I, S [REDACTED] D [REDACTED] C [REDACTED], declare as follows:

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

4 2. I am 15 years old. I am from [REDACTED].

5 3. I speak Spanish.

6  
7 **Dilley ICE Detention Center**

8 4. I have been detained at Dilley for 143 days this most recent time, and this is my  
9 second time being detained at Dilley. I've waited for so many weeks to get out of here.  
10 My mom and I receive no information about what is happening or how long we will be  
11 here. After months of detention, the officials only told us that there was a mistake in one  
12 of our forms that we had to refile, and that was contributing to us remaining detained. My  
13 mom tries to be strong, but we have been waiting for freedom for so long that sometimes  
14 she cries in the corner.

15 5. The first time they detained me here for a few days, but that was so different than  
16 my current detention. After being back here for so many months, I have started to feel  
17 like all the days are the same and I'm stuck between four walls. The only thing that  
18 changes from day to day is the topics we speak about. All the kids who I have gotten to  
19 know have started to lose their ability to try to stay upbeat, too.

20 6. It feels depressing to just go to the same place every day and say goodbye to so  
21 many people while I remain stuck here. When my last friend left, I went back to the room  
22 and just cried. I asked my mom, "Why are we still here?" I just want a normal life. I want  
23 to be free.

24 7. ICE has kept me separated from my baby sister for eight months. I lived with her  
25 when she was a newborn. I still think about holding her when she was three months old  
26 and the bond we developed. We felt so connected. I just want to be with her. I try to make  
27 calls, but I always feel sad because even though I knew her as a baby, I'm missing  
28 milestones like her first steps. These are such special moments that I wanted to be there

1 for and it hurts to miss those experiences. My mom feels so sad because she cannot be  
2 there to comfort her or help her with her necessities. It just feels so ugly to have to hear  
3 about her without being with her.

4 8. Even though we have been detained here for over four months, the ICE officers do  
5 not give us any information about how long we will be here. They just say the orders are  
6 from above them.

7 9. I feel so sad and impotent because I do not have information about what will  
8 happen and I see my mom losing hope. I was trying to keep my emotions up to give  
9 others strength, but whenever we get bad news, I feel so sad. A lot of the time, I try to do  
10 breathing exercises to stay calm. But when I keep so much bottled up inside, it feels even  
11 worse. I feel so locked up now that I do not even want to go anywhere inside the facility  
12 anymore. Even though I have a pass, I just do not want to get up and go outside. I used to  
13 love school, but I do not want to go anymore. Sometimes the officers who see me say,  
14 “Oh, I thought you had left.” I feel depressed.

15 10. I keep a calendar in my notebook where I mark an “X” next to each passing day to  
16 track how long I’ve been here. I try to keep track of the important days, too, like when we  
17 have immigration court, because that is the only thing I can look forward to. I go to  
18 library every day looking for more information about our case in the system, but I do not  
19 find information. I feel disillusioned and it makes me cry with anxiety that I might not get  
20 out of here.

21 11. Everything feels so bad here because we have spent so much time here. If we had  
22 only spent a couple of days, maybe things would feel different. Having to sleep with the  
23 lights on all the time for months has made me so tired. I do not know what it means to  
24 have a pleasant night of sleep anymore. Even when we finally fall asleep with the lights  
25 on late at night, they knock loudly on the door at 6 a.m. every morning and call our  
26 names, which wakes us back up.

27 12. Two days ago, the staff did something scary. About 5 officers with ICE badges and  
28 about 10 staff from CoreCivic came into the hallway between the rooms where we sleep

1 around 9 p.m. It was dark outside, and they started covering our windows by standing in  
2 front of them. We were not allowed to leave our room, so we tried to look out the  
3 window to see what was happening. We saw they brought chains and shackles into the  
4 room across from us. They grabbed this woman from that room and she and her daughter  
5 started crying. She had a pending appeal in her immigration case and was waiting for her  
6 response from the court and started saying her case was not over and that they could not  
7 deport her at this point. But then, they chained her right there. Her 10-year-old cried  
8 harder as she watched her mom be shackled. The officers just took them away and put  
9 them in a car. It made us all so scared. This was so different than when other people  
10 leave.

11 13. The children in that room came over to ours afterwards and we were in shock. The  
12 girl who was in the bunk next to that family said she felt so awful that she had to watch  
13 and could not do anything to help. Now we are all feeling so scared that this will happen  
14 to us. We now feel like the people who work here are capable of doing anything to us.

15 14. The lack of dignity and respect that the staff showed that night really shocked me. I  
16 do not know why they had to remove her like that. That woman did not do anything bad  
17 that made her deserve that treatment or to be made a spectacle in front of so many  
18 families. It seemed like they were trying to embarrass her and make us all scared. Why  
19 could they not just call a meeting with her and talk to her? It also makes us all fearful,  
20 because we have our own cases pending, and what happens if officers decide to chain us,  
21 too? I won't have any way to defend myself.

22 15. Another time, ICE took a woman who was very pregnant with toddlers to be  
23 deported, but the pilot would not let her board the flight. When she came back, she was  
24 crying because she had to stay detained.

25 16. There is still no way to communicate with people via our Gmail emails, and we  
26 cannot use Google to look up information about how to do immigration appeals.

27 17. I have never seen a video about my rights. I only ever found out about my rights  
28 when I looked them up in ChatGPT. But then the library took away access to ChatGPT,

1 too, which I used to look up legal information and medical questions about how to treat  
2 my allergies.

3 18. I have very sensitive skin, and the borders of the laundry machines, which are  
4 always dirty, give me rashes and hives. My skin feels so itchy, and sometimes it is red.  
5 The feeling does not go away. Sometimes when I do the laundry, the clothes all come out  
6 stained, and it makes me think there are bacteria all over everything.

7 19. I have seen a lot of people who were sick with coughs and vomiting who the  
8 medical people turned away. They told did not need treatment.

9 20. The nurses here only ever give Tylenol regardless of the type of sickness.

10 21. I haven't been able to make any free pro bono calls here by using the system where  
11 you are supposed to mark 6. I saw a woman try it recently, and it did not work.

12 22. The education provided used to be only one hour of classes, where they only let 12  
13 kids in. Kids would go early, and be turned away because there were more than 12. The  
14 teacher would just tell them to come earlier the next. But even when I got into the  
15 hourlong class, the teacher would just give us a packet and say to do it. It was the same  
16 every time. I tried to tell the teacher that I already did this, but they just said to do it  
17 again. That experience did not feel like school, so I stopped going. I hear they have  
18 expanded the hours, but I cannot imagine it's any better.

19 23. While we can speak with a lot of people because we speak Spanish, the people  
20 who do not know Spanish or English really struggle here. My mom tries to help the  
21 Turkish families and other families who do not know English or Spanish with the tablets,  
22 but they do not really have a way to understand things.

23 24. How long will we have to be here? We are reasonable people and we do not pose  
24 any risk. We want to follow rules. We do not understand the reason they would keep us  
25 so long. This does not help anyone. It seems like we are still here because the people  
26 higher up in the government want to feel good about themselves and their egos. I just  
27 want a normal life with my family and sister.

28

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 10 day  
4 of March 2026, at Dilley.




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CERTIFICATE OF TRANSLATION

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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: 3/10/2026



# **EXHIBIT 8**

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

1 I, G [REDACTED] S [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 12 years old. I am from [REDACTED] and so is my sister, but my parents are from  
5 [REDACTED].

6 3. I speak English, [REDACTED], and [REDACTED].

7 4. My family and I were living in Los Angeles, California for about four years before  
8 coming here.

9 5. I have been detained at Dilley for 64 days. I'm here with my dad, mom, and  
10 younger sister.

11 6. I was in sixth grade in LA, and my sister was in fifth grade. I liked my school a lot  
12 there. My favorite subject was Physical Education.

13 7. The four of us were living in an apartment in LA. We used to live with my cousins,  
14 but then my cousins moved to live in the floor above us.

15 8. Since getting here, something I miss the most is how my cousins and I used to  
16 hang around. I miss them a lot.

17 9. We always studied a lot before coming here. It was study, study, study. Here, it's  
18 not like that.

19 10. We were detained because we voluntarily showed up to an ICE check-in in LA.  
20 We've always showed up to our ICE check-ins. We've never missed one.

21 11. We stayed in a hotel for one night before coming here. It was right in front of the  
22 LAX airport, but I don't remember the name. We had no privacy, because three ICE  
23 officers also stayed in the room with the four of us. There were two beds. We got the  
24 beds, and they slept on the couch. It was very uncomfortable.

25 12. Then, we took a plane the next day to San Antonio and came straight here, to  
26 Dilley.

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1 **Dilley ICE Detention Center**

2 13. After about 15-20 days of arriving here, we had a DNA test. We asked why they  
3 had to do that, and they responded for security reasons. They made up an excuse, they  
4 said to ensure no one is taking other people's kids, that we had to prove my dad was  
5 actually my dad. They did the DNA testing for everyone in my family, including me.  
6 We've heard of other families having to do that too.

7 14. We never received a know your rights training. I have never heard of or seen an I-  
8 770 form.

9 15. We remember the video playing when we first came in. There was someone  
10 talking on it, but we don't remember anything about it.

11 16. Before meeting with you, we had heard the word *Flores* before. Our lawyer said  
12 we are going to do the parole request under *Flores*.

13 17. We never heard it from anyone here though. We never knew we were only  
14 supposed to be here for 20 days. Some people have been here for 10 months, so that  
15 doesn't seem true.

16 18. I have never received an individual release hearing.

17 19. Once when we talked to ICE, they said that if we didn't sign our travel documents  
18 we could be separated. My dad was scared of this so he signed for us. My mom has not  
19 signed yet, though, which is why we are still here.

20 20. I have never seen a judge here, just ICE officers.

21 21. The only thing we got when we arrived was the list of free legal services.

22 22. About two weeks ago, we received the handbook. It was in [REDACTED]. They asked us  
23 to sign and we signed.

24 23. We haven't gotten any shampoo. They said those are only for babies. If we want  
25 shampoo, we have to buy it at the store.

26 24. We are not getting floss. We are getting very cheap toothbrushes and toothpaste.  
27 You can buy better stuff at the store. The toothbrushes are really small.

28 25. My mom has diabetes and rheumatoid arthritis.

1 26. Once, they kept her in the medical annex for five days so they could test out new  
2 medicines on her. They would check her blood in the morning and at night. And one  
3 morning, it was 279. This is very bad. It's dangerous. You could go into a coma.

4 27. My dad argued with them to stop the medication, because she was getting so bad.

5 28. Since 2018, he has been giving her medication and food and knows how her  
6 disease works.

7 29. They aren't giving her all the medicines she used to be on before here. At first, the  
8 food they were giving her was also all wrong.

9 30. Now, they are giving her a special diet.

10 31. She only got a special diet for the first time last week. My dad has been asking all  
11 the time for her to get this.

12 32. My mom, sister, and I also need a vegetarian diet on Tuesdays and Thursdays for  
13 religious purposes, and the staff just say to eat off the salad bar. We are [REDACTED], except my  
14 dad is Christian.

15 33. My mom also has a back hernia that was never operated on.

16 34. For nine days now, she can barely move her right leg. She's been trying to walk  
17 but it's getting worse. She has slept at medical for the last nine nights. So has my sister.

18 35. We are able to visit them during the day.

19 36. Today, the doctor came and finally saw her after she has been in medical for the  
20 past nine days. He saw her the first day she was in medical for this foot issue, and did not  
21 see her at all the other days until today. We asked them, "Why aren't you referring her to  
22 a specialist?" Then the doctor got mad at my dad and said, "You're going to tell me when  
23 to send her to a specialist? If you're going to talk to me like this, I'll tell security to not  
24 let you in anymore."

25 37. This all affects me because if we go back to [REDACTED], my dad will get in trouble. He is  
26 not safe there. Then, who will take care of my mom? Me.

27 38. I am nervous my mom could get worse.  
28

1 39. It's difficult to watch the staff here not help her. I get very mad, but I can't say  
2 much about it. A nurse is supposed to help you. They don't even clean the room she's in.

3 40. The food is really bad here. They reuse the food. For example, today if there are  
4 hotdogs, in two days there will be mini corndogs. It's gross.

5 41. If I could change the food here, I would want fresh food every day, and you could  
6 go eat any time you want. Right now, there are certain times to eat, and if you don't go  
7 then you'll starve.

8 42. I miss [REDACTED] foods, they don't have any [REDACTED] food here. My mom and aunt used  
9 to cook it for us.

10 43. They put filters on the water, but it still smells like chloride. It's very heavy. One  
11 time it caused us to throw up, but now we just drink bottled water. First it was 30 dollars  
12 per case, but now it's 10 dollars. A lot of people complained when Congress came, so  
13 they had to lower the price.

14 44. I can't sleep well here. Back at home, I like to sleep in darkness. It's not dark here.  
15 You can't put something up like a towel to block the light. Sometimes there are noises at  
16 night too from staff. We don't feel comfortable using the eye masks.

17 45. It makes me feel hopeless to be here for so long, because now it'll take me and my  
18 whole family a long time to get back to normal because of how much money and  
19 education we have lost. We lost the apartment in LA. They are throwing out all of our  
20 stuff. Our cousins tried to save the most that they could before the landlord threw it all  
21 out.

22 46. I can't talk to my friends because I don't know any of their phone numbers. It's  
23 pretty expensive to talk on the phone. If you don't have money here and you're about to  
24 be deported, you're screwed. You're probably starving from the food here and you can't  
25 tell anyone where you are going.

26 47. We have received one visit from my uncle.  
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1 48. Sometimes my parents have a tough time communicating with staff, because they  
2 don't speak a lot of English. They talk to me or my sister because we know English  
3 better than them.

4 49. One time ICE told my dad to get lost. My dad was just trying to ask if there was an  
5 appeal in our file. The ICE officer lost his mind a bit at us.

6 50. I have never heard of a case manager. We just go to the chapel to talk to ICE if we  
7 have to.

8 51. We have been here when there have been lockdowns. Any time there is an outsider  
9 coming, everyone must be in their rooms. And, you have to be escorted to the dining hall  
10 or medical. It has happened maybe four times since I've been here.

11 52. My dad used the grievance system one time for the doctor who threatened him.

12 53. The religious guy in the chapel told us about the grievance system. Otherwise, we  
13 wouldn't have known. No one had previously told us how to do this. They just told us  
14 certain rules like you can't wash your blankets and you can't wear slippers outside.

15 54. I used to go to the education room during the day. I went because my friends were  
16 going, but now I don't go. My mom's condition is getting worse, so I am just staying  
17 with her.

18 55. I feel very bored here a lot. You can go to the library or the gym, but it's different  
19 when you don't have your freedom. The timing to go anywhere is all limited too.

20 56. We can only use the tablets to access prayers from 8 a.m. to 8 p.m., but there is a  
21 prayer we are supposed to do at 4 a.m. We can't access the tablets at that time to pray.  
22 There isn't really a silent place to pray here. There is a time for Quran and the Bible in  
23 the Chapel, but that's it. There isn't a time for our religion.

24 57. My sister has a lot of stomach pain. We think it's from the food, but we aren't sure  
25 what it is. They are just giving her Ibuprofen and Tylenol.

26 58. My dad also needs a knee brace. He has asked for an MRI, but the staff said no.

27 59. If I could change one thing here it would be to shut down the whole facility.  
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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 22 day  
4 of April 2026, at Dilley, TX.

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# **EXHIBIT 9**

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

1 I, R [REDACTED] R [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 40 years old. I am from [REDACTED].

5 3. I speak Spanish.

6 4. I have been detained at Dilley since March 24, 2026, about 30 days. I am here with  
7 my daughter [REDACTED], who is 11.

8 5. Before I arrived at this facility, I was living in Texas with my daughter for about  
9 three years. I lived in Houston, then Dallas for eight months, then back to Houston. I was  
10 visiting in San Antonio when I was arrested.

11 6. I was arrested in my car; the police noticed that my car was missing lights. All five  
12 people in the car were arrested, including my daughter and me; three have already been  
13 deported. Everyone in the car was handcuffed except my daughter, who was screaming  
14 and crying. My daughter and I spent the night in jail; after a day, my daughter and I were  
15 brought to Dilley.

16 7. No one told me my daughter could stay with someone else.

17 8. My daughter does not eat the food because she doesn't like it; she only eats the  
18 salad. I only eat the salad because the other food makes me sick.

19 9. My daughter and I can't drink the water here because it makes us sick; our friends  
20 give us bottled water and we split a bottle between us.

21 10. My daughter cries all the time and is sad and doesn't want to be here. She misses  
22 her friends from school and was doing very well there. Now that she's here, she doesn't  
23 like to leave the room or go outside.

24 11. No one told me about my or my daughter's legal rights until RAICES attorneys  
25 met with me after I had been here more than two weeks. I only heard about *Flores* from  
26 other people here after they saw me crying and told me about it and the 20 days and gave  
27 me the RAICES phone number. I never saw a video or got a form about my rights.  
28

1 12. The RAICES lawyers told me that my daughter could be released without me, but  
2 we don't want to be separated.

3 13. But I am afraid to go back to [REDACTED] because I am afraid I will be killed. I have  
4 not had a credible fear interview.

5 14. The beds are too hard and hurt our backs and necks. We wake up sore all over our  
6 bodies. I get a headache from the lights. My daughter sleeps on the top bunk and moves  
7 around a lot because she has trouble falling asleep because of the lights.

8 15. The RAICES attorneys said they would come back, but I am not sure when I will  
9 see them.

10 16. ICE told me I could get \$2,600 if I sign a voluntary departure form.

11 17. CoreCivic staff yell at my daughter whenever she doesn't stay near me.

12 18. Whenever there are visitors here, they do not let my daughter and me leave our  
13 room.

14 19. There is nothing more than coloring here for my daughter; she is not learning  
15 anything.

16 20. Neither my daughter nor I have enough clothes and they are too big for us. When  
17 we ask for different clothes, staff are not nice to us and refuse to give us what we need.

18 21. We can only get shampoo if we buy it. We only got soap when my friend left it for  
19 us; otherwise, we only get soap if I go around asking for it.

20 22. When my daughter grows up, she would like to be a doctor.  
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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 23 day  
4 of April 2026, at Dilley.



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CERTIFICATE OF TRANSLATION

My name is KAITLYN VELAZQUEZ 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: 04/23/26 Kaitlyn Velazquez

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# **EXHIBIT 10**

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

1 I, O [REDACTED] S [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 English and [REDACTED].

6 4. I was detained at Dilley for 323 days consecutively from June 3, 2025 to April 23,  
7 2026.

8 5. On April 23, my family and I were released from Dilley, but we were re-detained  
9 two days after that at our ICE check-in. We were almost deported, but luckily our lawyer  
10 was able to help us.

11 6. I have now been out of Dilley for about three weeks.

12 7. I was at Dilley for almost a year with my mom; my older sister [REDACTED], who is 18  
13 years old; my younger sister [REDACTED], who is nine years old; and my twin siblings [REDACTED] and  
14 [REDACTED], who are five.

15 8. I spoke to *Flores* Counsel in August of 2025, March of 2026, April of 2026, and  
16 May of 2026.

17 **Dilley ICE Detention Center**

18 9. That place was mentally devastating for children.

19 10. No one ever discussed my rights with me for more than 10 months. We weren't  
20 told any instructions or told anything about our case or rights. We had to find out  
21 everything on our own. Just one week before being released, we were given our  
22 CoreCivic handbook for the first time, more than 10 months after our arrival. And when  
23 we read it, we saw that it had clear lies. It was very different than the reality we were  
24 facing. When we brought up these differences to the officers and supervisors there, they  
25 said they weren't even aware of these things in their own handbook.

26 11. The handbook said there was a hygiene kit, but we never got any of that. We asked  
27 them about conditioners and sunscreen, but we had to buy all these things from the  
28 commissary.

1 12. There was all-purpose hand soap in the bathroom. It caused rashes for a lot of  
2 people. My mom couldn't use it, because it would cause redness. We were supposed to  
3 wash our hair and body with that.

4 13. We were never shown any videos. No one spoke to us or helped us through  
5 anything. We were never even told there was a video.

6 14. We never heard the word "*Flores*" except from our lawyer. ICE never mentioned  
7 the *Flores* agreement to us. However, when we found out about it and asked them about  
8 it, they said our case was different. Almost eight months into our detention, we asked  
9 them for humanitarian release based on the *Flores* agreement. They never responded to  
10 us.

11 15. My mom and my younger sister were suffering from medical neglect for many  
12 months there. Almost four to five months ago, my mom started to have slight  
13 discoloration on her face. At that time, it was only a few spots. She brought up the issue  
14 to the CoreCivic medical staff several times. However, the doctor couldn't diagnose her  
15 and said he would refer her to a dermatologist. Since then, my mom asked both the ICE  
16 and CoreCivic supervisors to approve her medical appointment. She explained to them  
17 that the discoloration was spreading rapidly and that her sickness was getting worse.  
18 Until our release, she hadn't seen anyone, and no one ever followed up or cared about her  
19 issue.

20 16. Further, she discovered a weird bump in her chest about three to four months ago.  
21 She was really worried about it and brought it up to the nurses and the doctor repeatedly.  
22 The nurses just gave her ibuprofen for her pain and ignored the issue. She went to them  
23 repeatedly, but every time they just gave her painkillers and didn't try to find out what  
24 was actually wrong with her. She explained to them multiple times that her family has a  
25 history of cancer, that her aunt has breast cancer, and that her grandma died from  
26 leukemia. She expressed how much stress it was causing her and how worried she was  
27 for her children. The doctor, after almost four or five visits, finally referred her to do a  
28

1 CT scan to find out what was wrong with her. He said it wasn't guaranteed that ICE  
2 would approve it, but that he wrote it down.

3 17. She waited for almost a month for that referral to be approved and told ICE about  
4 it several times, yet nothing happened. She waited for so long until one day her pain got  
5 so severe she went to medical just asking them for painkillers. Her pain was so severe  
6 that she needed to be transported to the ER. It was only then that she finally got her CT  
7 scan and the other tests she needed. The ER doctor determined that she needs to be seen  
8 by more specialists, do an ultrasound, and complete other tests.

9 18. When she came back to Dilley, though, no one followed up with her until she went  
10 to them again telling them about her pain and asking about her referrals from the ER.  
11 Until our release, nothing had been done for her yet, and she had been in pain that whole  
12 time.

13 19. In addition, my five-year-old sister had 13 cavities in her teeth. At first, they didn't  
14 cause her pain, and the facility didn't have dental services. In November, the facility's  
15 dentist saw her and determined that she had 13 cavities. But since that time, he did  
16 nothing to stop these cavities from worsening or to treat them.

17 20. Her pain got significantly worse over time, and by February, she would cry and  
18 scream for several hours if she wasn't on painkillers. So, she was kept on painkillers for  
19 two months straight. A five-year-old couldn't live without painkillers for two months, and  
20 instead of actually treating her and stopping the cavities, they just gave her more  
21 painkillers.

22 21. The food at Dilley is one of the biggest issues for all the residents. Many times,  
23 people would stop eating for several days after finding mold or even worms in their food.  
24 I saw a real worm in the food before. My older sister once found a human fingernail in  
25 her food.

26 22. The food was very greasy and very repetitive. I was eating the same things for the  
27 last 10 months. My younger sibling would sometimes skip all the meals in the day and  
28 eat nothing but the noodles that we would buy from the commissary. Even the

1 commissary didn't provide any healthy or good options. Everyone just ate noodles almost  
2 every day.

3 23. Children had to watch as the officers and staff ate pizza, donuts, and outside food  
4 that the kids cried when they saw, but they didn't care and ate in front of them cruelly.  
5 They would eat candy and lollipops in the middle of the recreation area, knowing that all  
6 the kids would do anything to get what they have but can't.

7 24. We were there for almost a year and were never asked about any food. Why  
8 wouldn't you ask the family that's been there the longest?

9 25. The back of the cafeteria had a board that said they asked the residents what was  
10 our favorite food, and the answer would be something we had never been served before.  
11 Apparently, someone wrote "Thank you everything is great" to a question asking "How  
12 can we better serve you?" I have no clue who they were interviewing.

13 26. The lights were so bright throughout the whole day. They were barely dimmed  
14 during the night, and at 8 a.m. an officer would come and turn on the lights right over  
15 your head even if you were sleeping.

16 27. The officers had no consideration whatsoever and would report you or yell at you  
17 if you just tried to dim the lights throughout the day for a nap or if you were tired. It was  
18 very hard to sleep throughout the night when at any moment people could walk into your  
19 room and wake you up at any time. The eye masks were made of a bad and irritating  
20 material. They were kid-sized and didn't fit me or any adults.

21 28. We were always paying for the phone. No one ever told us anything about free  
22 calls to our family or even to our attorney. Many people that didn't have money would go  
23 for weeks or even months without communicating with their families. It was one of the  
24 most taxing things for people there. Some people paid more than \$500 just for phone  
25 calls to be able to stay in touch with their loved ones.

26 29. We saw some numbers for lawyers posted at Dilley when we arrived, but no one  
27 explained what they were for or how we could reach them. Many of the numbers weren't  
28 up to date and didn't work. They never gave us any advice concerning the lawyers.

1 30. I want to say a few things about the staff at Dilley. First, when my older sister  
2 turned 18 and was separated from us, my mom begged ICE to bring her back or to at least  
3 allow us daily visitation at the beginning. One of the ICE agents then threatened her and  
4 said, "If you keep arguing, we will ship your daughter to another facility that is 200 miles  
5 away and you will only get to have a call with her once every two weeks."

6 31. We believe [REDACTED] was separated from us to live in a different part of Dilley  
7 because she spoke to the media. Staff said it was because she turned 18, but she had been  
8 18 for almost seven months at that point. It felt like retaliation for speaking to media.

9 32. The separation of our family from [REDACTED] was so heartbreaking and especially  
10 damaging for her.

11 33. Second, there was one time an officer was yelling at my younger siblings for  
12 fighting over the PlayStation. My mom said, "You shouldn't yell at them like that." The  
13 officer said, "It's a privilege, not a right, and we'll take it away if we want to." The officer  
14 then said, "You have no rights here except a place to sleep, medical attention, and food."

15 34. Third, many of the staff in the cafeteria were very racist towards me and my family  
16 They would serve less food to the people who were not Latino, or they would refuse to  
17 give us more servings even though the rules said you could get more. Sometimes, they'd  
18 tell my younger brother you can't have more food but then they would give more food to  
19 another kid.

20 35. Pregnant women received no different treatment at Dilley. There was a woman who  
21 was eight months pregnant who also had a child, and they wouldn't let her husband take  
22 the kid so she could rest. They received no different food or anything special.

23 36. Babies, age three and under, don't get any special or different food. I've heard it's  
24 hard to get formula for them. Babies have a lot of needs, and if moms had more than one  
25 kid it was very difficult for them at Dilley.

26 37. Even my mom with five kids, she'd have to take all three little kids to the bathroom  
27 at one time – otherwise she'd get in trouble.

28

1 38. There are no teddy bears or toys for kids at Dilley. With my five-year-old siblings,  
2 I saw this firsthand. Because there were no toys, they were really sad. They knew they  
3 were supposed to have toys, and they would miss theirs at home so it's mentally  
4 damaging for them. They would try to make toys out of random things. They had this  
5 feeling of wanting something and never being able to have it through no fault of their  
6 own. It was bad for their development, and it would be healthier for them to have toys  
7 there – even if just as a distraction from Dilley. They didn't do anything wrong, and it felt  
8 like they were unfairly being punished at Dilley.

9 39. The grievance system at Dilley did not work at all. We would just do it to get a  
10 record of something. We knew nothing would change. No one ever even told us about the  
11 grievance system. No one knows about it at Dilley; our family would tell other people.

12 40. The psychiatrist we met with at Dilley was really nice, and my mom was crying  
13 about the lack of Halal food one time, and she said she should write a grievance. She said,  
14 “Make sure you don't tell anyone I told you this.” This was after we had been there for  
15 two to three months already.

16 41. They do absolutely nothing for grievances. There is a grievance coordinator there,  
17 her name is [REDACTED]. She always would lie and say anything we said about the  
18 officers didn't have evidence. She just covers for the staff and facility. The grievance  
19 response would always say this is “unfounded.” I think my mom submitted over 60  
20 grievances, and only one was founded. The one that was founded was just because  
21 someone forgot to write a response to her grievance, but when they eventually wrote the  
22 response – it was still unfounded.

23 42. No matter what we wrote, they'd say it was unfounded. My mom probably  
24 submitted 20 grievances about her health. The response was always unfounded, and staff  
25 would say they couldn't let her know about a referral for “security reasons.” Even when  
26 my mom would say her sickness was getting worse, that's all the response would say.

27 43. Everyone struggled to send anything via email, even to their lawyers. Gmail was  
28 blocked for several months up until our release, and you were unable to make Proton

1 emails without verifying through Gmail. The proton email storage is very limited, and for  
2 people who have been there for a long time, it's hard to send and receive things with such  
3 a small storage space. I asked why they blocked Gmail, and they said that's just policy. I  
4 think this was because everyone was trying to talk to reporters. Until the day I left, there  
5 was still no Gmail access.

6 44. I went to both the old and new version of school at Dilley. The new way wasn't  
7 really improved. If you wanted to learn on your own, you could, but you just sat there on  
8 the computer doing Khan Academy. It wasn't a school. There was no teacher assigned to  
9 talk to you or anything.

10 45. I lost a year of school, so I am a year behind my friends now. I am trying to catch  
11 up through multiple sessions of summer school. I'm going to have to do summer school  
12 plus eight classes in one semester next year instead of the usual four or five to catch up.  
13 Even if I do all that, it still may not be possible to catch up.

14 46. Access to clothes and shoes was determined by staff. Whoever we were with at  
15 first did not give us access to new clothes, but then our second officer was better. The  
16 first officer said we were only allowed one shirt, one pair of pants, one pair of pajamas,  
17 and a sweater. Because of this, we were washing our clothes every day. If my five-year-  
18 old siblings spilled something, that was it for the day because you couldn't wear your  
19 pajamas outside the bedrooms. If you asked for more clothes, you had to show staff it  
20 was ripped. That treatment lasted our first six months there.

21 47. You could only have one pair of shoes. For me, I'm a size 12, so if my shoes broke  
22 or something it would take almost a week to get a new pair. There was a whole week I  
23 had to walk around in slides. When we changed units and officers, it was a bit better.

24 48. I was mostly really bored the whole time I was there. Weirdly, it was more fun  
25 when there were more people my age there, but of course I don't want people to be  
26 detained there. There was mostly just Uno cards, and everyone had to share those.

27 49. It was extremely hot there so we wouldn't go outside until 6 p.m. or so. The TVs  
28 were mostly in Spanish, and we don't speak Spanish. It was definitely just really boring.

1 50. My little siblings were not able to develop properly at Dilley. It's so important to  
2 grow and go to school and socialize. When we got home, my five-year-old sister didn't  
3 remember herself before Dilley. She kept asking us, "What did I like to do before? What  
4 did I like to eat?" That was really concerning to me.

5 51. I felt inferior at Dilley and without freedom. I am damaged mentally and  
6 physically from my time at Dilley.

7 52. The day we got released, they didn't let my lawyer into the facility to see my  
8 family. They said he was outside, but they didn't let him in. He had a legal meeting  
9 scheduled with us in-person at 1 p.m. At the same time, we got called to intake and were  
10 told ICE needs us there.

11 53. We were told only to go to intake. They didn't tell us anything else. We waited for  
12 ICE for almost 45 minutes at intake. We kept asking to see our lawyer, but they never  
13 said anything and just said they had to bring us to intake.

14 54. We were at intake for so long until my mom got very frustrated and said she  
15 needed to go to the bathroom and grab some stuff from her bedroom. They let her and  
16 then she called our lawyer from the bedroom. That's how we found out we were getting  
17 released. I don't understand why no one could just tell us.

18 55. It's crazy they couldn't just tell us the truth. We were confused for almost three  
19 hours. ICE never came to intake even though we were waiting for them, and eventually  
20 we were released.

21 56. We stayed the night at a hotel in San Antonio. We woke up early the next day and  
22 drove all the way home to Colorado. ICE wanted us to have a check-in that day, but we  
23 couldn't because we had to drive home. Eventually they said to just come to the check-in  
24 the following day, Saturday. We got home at 3:30 a.m., and the appointment was at 9  
25 a.m. The appointment is 1.5 hours from our home, so we had to get up around 6 or 7 a.m.  
26 in order to get ready and drive to the appointment. They wouldn't change the time.

27 57. My three younger siblings slept a little, but not me, my mom, or [REDACTED].  
28

1 58. We met one of our lawyers outside the check-in area, and she told us we were  
2 going to be okay. An ICE officer told her they were going to keep the check-in very  
3 short, and that we'd be in and out. That was a lie.

4 59. They took my mom and [REDACTED]'s ankle monitors off, and we thought that was a  
5 good sign.

6 60. After that, an officer said, "You have a final order of removal, and we are going to  
7 put you guys on a plane back to your country."

8 61. I asked to call our lawyer who was right outside and was told I don't have that  
9 right since I had a final order of removal.

10 62. An officer threatened [REDACTED], saying to her our family would be separated and that  
11 handcuffs would be used on her and my mom if we didn't comply.

12 63. After that, we stopped fighting.

13 64. We never got to call our lawyer. We got pushed into a van and it had bars on it. It  
14 was like a police car with tinted windows to separate criminals from agents. There was  
15 only one baby chair originally. They brought another one, but it was not tied to the back  
16 of the car to keep it in place, so one of my younger siblings was not safely buckled in.

17 65. It was really unsafe, and they were driving really fast.

18 66. My mom kept asking for a phone call to our lawyer, and we were still denied it.  
19 The officer then proceeded to ignore my mom.

20 67. My three little siblings were crying and very confused. The car ride was very  
21 difficult for them, because it felt like a real jail setting.

22 68. I had a bad stomachache and was feeling really nauseous. I said we had to stop  
23 somewhere because I had to throw up. The agent told me to throw up on the floor. I  
24 started crying at that point. It was really stressful. My stomach really hurt, and I didn't  
25 want to throw up on my family.

26 69. We didn't go to a commercial airport; we arrived to a private tarmac. There were  
27 maybe 20 agents waiting for us, and they all had guns.

28

1 70. Finally, we got a phone call right before we got on the plane. We saw eight other  
2 people who were private security contractors. These people were the ones on the plane  
3 with us. I don't know who they work for, but they weren't ICE officers.

4 71. A nurse came to talk with us. My mom said her heart hurt, her blood pressure was  
5 very high, and she didn't feel safe to fly. The nurse checked her and said she was good to  
6 go.

7 72. We flew from Colorado to Michigan. We got some crackers and water on the  
8 flight, but that was it until nighttime.

9 73. My mom's chest hurt very badly. She repeatedly told the nurse on the flight she had  
10 a heart issue and was having really bad pain. The nurse said she couldn't give her anything  
11 besides ibuprofen. The nurse finally told my mom she'd taken as much ibuprofen as a  
12 person can take in a single day.

13 74. The plane ride was very hard for [REDACTED], my nine-year-old sister. She was so scared  
14 and confused. She had plans to return to school and then all of a sudden her plans and  
15 dreams went away and she was devastated.

16 75. That whole time, we didn't know where we were going or what was happening.

17 76. At some point, we landed in Michigan. We were told we'd go from there to New  
18 Jersey. In the air to New Jersey, the plane turned around. No one told us why, though. We  
19 were forced to keep our seatbelts on during the whole flight. Security told us that even  
20 though they were not wearing their seatbelts. My mom was in a lot of pain. She was  
21 having issues breathing, and it helped her to undo her seatbelt. A security guard who was  
22 very rude pushed my mom into her chair when she tried to undo her seatbelt to breathe  
23 better, belted her in, and put her hands on the clasp so my mom couldn't take it off.

24 77. We landed back in Michigan and waited there for three hours. Around 8 p.m. EST  
25 we got cold pizza. This was the first piece of real food we had eaten all day. As we were  
26 eating, we took off. We still weren't told where we were going. One of the security  
27 guards took pity on us and finally told us we were going back to Denver, but he wasn't  
28 supposed to.

1 78. The flight was about four hours long.

2 79. We got off the plane in Denver and were greeted by two ICE agents who took us in  
3 the same van we came in just to retraumatize us. They took us back to the same office. At  
4 this point, it was very late at night.

5 80. After signing a bunch of papers, we still had to drive 1.5 hours home.

6 81. The best way I can describe that day is that somehow it was worse than all the  
7 months we spent at Dilley combined. For those 10 months we always had some sense of  
8 hope and knew our lawyer was trying to help us. This was an immediate threat, and it  
9 was so scary. It was our biggest fear coming true.

10 82. Our high spirits right after getting released from Dilley just made the re-detention  
11 that much worse.

12 83. My mom was in pain for days after that.

13 84. I lost a year of my life at Dilley. I lost a year of memories, of progress, of  
14 everything. I was finally able to see some of my friends recently after being released.  
15 They're all talking about prom and driving cars, and I'm thinking about whether or not I  
16 can stay in the U.S.

17 85. Being at Dilley distances kids from the real world and takes away all the normalcy  
18 from everything. After you get released, the effects are still there. Nothing is normal  
19 anymore because you live in fear of going back to that place.

20 86. Getting back into a normal routine has been a bit rough, especially after the re-  
21 detention of my family. It's kind of hard to know what normalcy really is. We were there  
22 for so long that nothing really feels normal. I can't describe it.

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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

4 5/16/2026

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8 Signature

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# **EXHIBIT 11**

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

1 I, A [REDACTED] L [REDACTED] G [REDACTED], declare as follows:

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

4 2. I am from [REDACTED].

5 3. I have been detained at Dilley for 77 days with my husband and my four-year-old  
6 daughter, [REDACTED].

7  
8 **Dilley ICE Detention Center**

9 4. My daughter suffers at night because she has to sleep in a separate area from her  
10 dad. She cries every night when she has to leave him. I have to pick her up to get her to  
11 come to our bedroom. She does not understand why her dad cannot stay with her and  
12 asks me over and over why dad is not with us. Then she cries herself to sleep and wakes  
13 up crying and scared throughout the night. She is so depressed.

14 5. We have never gotten the opportunity for my daughter spend a night with my  
15 husband. Since we got here, the staff have told us that children have to spend the night  
16 with their mom unless there is an emergency where the mom goes to the hospital. Even if  
17 a child says they want to spend one night with their dad, the officers would not allow any  
18 child to do so.

19 6. It is also hard for [REDACTED] to sleep because the lights stay on all night. We are not  
20 allowed to cover our heads with towels to block it out, and when we try to the guards  
21 bang the doors open with their radios on loud and wake everyone up. They come in and  
22 out of the room a lot and it always wakes her up.

23 7. We also wake up with back pain here, because the mattresses are so thin. My  
24 daughter sleeps on top of me trying to be more comfortable.

25 8. Sometimes [REDACTED] doesn't want to play or do anything but lie down on top of me  
26 because she is so sad. The few times that I left her with my husband so that I could have a  
27 bit of time alone, the officials asked where I was immediately. So, I generally cannot  
28 have a moment to myself, even if my head hurts.

1 9. My whole head is inflamed. It feels like there is water in my ears, and they feel  
2 bad. I have pain that goes up my neck and into my teeth. I do not know what is causing it.  
3 But no matter what type of pain or sickness we have, whenever we go to medical, they  
4 give us ibuprofen. I wish there was some way to get a real diagnosis. My mom is a health  
5 director, and I know that it's not good to just take high doses of ibuprofen all the time.

6 10. My daughter has lost her appetite over the months we have spent here. We are  
7 always trying to motivate her to eat, but each meal is harder than the last. It has gotten  
8 worse over time. At first, she would eat some food, but as the days go on, there are more  
9 and more things she will not eat. Mealtime has become a struggle because she cries a lot  
10 and does not want to eat.

11 11. Her anxiety has led her to start biting her nails non-stop, too.

12 12. We try to take her to school to try to get her to have some interaction with other  
13 children. Starting last week, they started having some more school hours. The class she  
14 goes to is for children who are ages 4 to 7, and it makes our 4-year-old feel frustrated  
15 because she does not understand the things that the older kids do.

16 13. She has had many stomachaches, too, while here and is constantly getting spots all  
17 over her face. We do not know what it is. They gave her a small baby shampoo when we  
18 first got here, but it is so small that it ran out, so we have had to buy shampoo since then.  
19 Even still, we all have dry and peeling skin from the water in the showers and the soap.

20 14. There are some days when my husband's stomach hurts, and he finds the pain feels  
21 worse when he drinks the tap water. We try to save up to buy water bottles, because the  
22 tap water gives our daughter diarrhea. The guards say the water is fine, but they will not  
23 drink it. It tastes so bad. So, while everyone uses the sink water for washing our hands,  
24 anyone who can buy water does so that they will not feel sick. One trick I use is taking  
25 ice and letting it melt. That melted ice water does not make me feel as sick, but it means I  
26 must wait for it to melt.

27 15. This week, a congressperson came, and we all felt hopeful that he would be able to  
28 help with what is happening here.

1 16. Still, no one has explained to us why we are still here. All of the families who have  
2 been here for a long time talk with each other, and we do not know what about our cases  
3 is keeping us detained. When I talk to ICE officers, they say we have to wait for our next  
4 court date, but mine isn't scheduled yet, so we have no idea how long we have to wait.

5 17. After the last court date, an ICE officer told me I would have to be here 21 more  
6 days, even though I had been here for a long time. When I asked why, she said "I do not  
7 know why, it says it in the system." I tried to ask more questions, but she said there were  
8 other people waiting and that I had to go.

9 18. I feel so frustrated that I cannot do anything to get my daughter out of here. At  
10 times, I have gone to ask ICE officials for more information, but they just say I need to  
11 wait. They do not take what is happening to our daughter's mental health seriously. The  
12 staff say that there are some people who have been here longer and we just need to wait.

13 19. There are some people who have spoken to reporters, but doing that makes me  
14 scared because I think ICE might retaliate against us and keep us longer.

15 20. We still do not have access to Gmail here to contact our lawyers. Yesterday,  
16 someone new to Dilley asked the library how to email his lawyers, and the people in the  
17 library said he could not use Gmail and would have to use Proton. But people have to pay  
18 for Proton, so we cannot really use it.

19 21. For the past month, some of us have been praying at night and singing hymns.  
20 There was one person who led us in prayer and the mariachi brothers helped make the  
21 music. The person who led us left so now we are in charge of leading the songs. But we  
22 need to learn the songs, so we tried to look up some hymns in the library on the  
23 computer, but they were all blocked. When we asked the staff in the library for access to  
24 lyrics for hymns, they said that looking up that information was not allowed.

25 22. The facility also took away our access ChatGPT after they noticed people printing  
26 information about how to ask for information and make grievances. The staff are just  
27 trying to stop us from having access to tools to advocate for ourselves.  
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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 10 day  
4 of March 2026, at Dilliey.



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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: 3/11/2026

Eleanor Roberts

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# **EXHIBIT 13**

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

1 I, E [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 38 years old. I am from [REDACTED].

5 3. I speak Spanish.

6 4. I have been detained at Dilley for 91 days with my son, [REDACTED], who is 13 years  
7 old.

8 5. I came to the U.S. with my son in 2014. We have lived in Florida for 12 years. I  
9 also have a 9-year-old son and a 5-year-old daughter. They are both U.S. citizens.

10 6. I have been going to ICE check-ins every year since 2015. About a week before  
11 my most recent ICE check-in, I got a text from ICE saying that I needed to bring  
12 [REDACTED] to my next check-in and they would give me an excuse for his school absence. I  
13 was scared because I thought that meant we might get detained.

14 7. I went to the ICE check-in on January 22, 2026. At first, I was speaking to an ICE  
15 officer who I usually meet with and answering her regular questions. Then two ICE  
16 officers came in and said that we were being arrested. They told us that we would not be  
17 getting handcuffed because we were a good family with no problems. They said they  
18 would take us to a place in Miami first and then to a family detention center where we  
19 could be together. The ICE agents did not tell us that [REDACTED] had the option of staying  
20 with his stepfather and siblings in Miami.

21 8. They took us to a border patrol station and we stayed in a room for a couple hours.  
22 They took my fingerprints and ran DNA tests on both of us. Once I got to Dilley, I later  
23 met a pregnant woman who had also been arrested at her ICE check-in in Miami. She  
24 said she'd been detained at this same station for a few days in a cold cell with her small  
25 children while waiting for transportation to Dilley. They slept on the floor with mats and  
26 aluminum blankets. Hearing her story made me feel grateful that we were only there for  
27 a short time.

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1 9. After that, two people picked us up from the office and took us to the airport to  
2 come to Texas. They explained to us that my son and I would not be separated and they  
3 showed us a video about who they were and what was going to happen. We then took  
4 two planes to get to San Antonio. When we arrived in San Antonio, they said we would  
5 be spending the night at a hotel. We got to the hotel a little after 11 p.m. About two  
6 hours later, two other people came to our room and replaced the people who had traveled  
7 with us. The next day, we stayed in that room until about 3 p.m. I asked if my son and I  
8 could go outside for fresh air because I get anxiety inside a small room for long periods,  
9 but they said unfortunately we could not. Then around 2 p.m., two different people came  
10 to the hotel to transport us to Dilley.

11 10. During this time, [REDACTED] would ask questions and be very pensive. He said the  
12 only way he would cry is if he saw me cry, so I was trying to be as strong as possible. I  
13 was so worried that we would be sent to [REDACTED] and that I would not be able to be with  
14 my other children. I was allowed to make one call to my partner when I was getting  
15 fingerprinted, but at that point I didn't know what was going to happen. He was very  
16 worried during this time because he did not know where we were. I was not allowed to  
17 call him and my children again until we were at Dilley.

18 11. My partner shared that when he showed up at school to pick up our children that  
19 day instead of me, my nine-year-old started crying and said "Where is mom? Did she get  
20 arrested?" I am so worried about my children. We are so close. They would even sleep  
21 with me.

22 12. When I got to Dilley I was absolutely devastated. I had a horrible headache and  
23 even vomited from the stress of the apprehension and being separated from my younger  
24 children.

25 13. At the intake, they gave us clothes and allowed us to shower. They also X-rayed  
26 both me and my son. I'm not sure why.  
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1 14. During the orientation, I remember that they spoke to us about getting money for  
2 voluntary departure. I don't recall anyone mentioning anything about *Flores* or *Flores*  
3 rights.

4 15. They assigned us to a room with other mothers and their sons. We have been  
5 moved three times to different rooms. We started off in the red area and now we are in  
6 the yellow area.

7 16. It is very hard to sleep with the lights on all night. It's harder for my son because  
8 he has to sleep on the top bunk. The officers will not let parents sleep on the top bunk so  
9 I am not able to switch places with him. There is a small difference in the light when  
10 some are turned off, but it is still too bright and doesn't help. They offer eye masks but  
11 they are so tight and uncomfortable. They would leave marks on my son's face and he  
12 didn't want to wear them. My son also complains a lot about having back pain from the  
13 bunk beds.

14 17. My son has gotten so bored with the food and he will only eat limited number of  
15 things. The mealtimes are also challenging because breakfast and dinner are served so  
16 early. I need to buy snacks at the commissary because he is hungry in the evenings. We  
17 can only go to the commissary once a week so I have to plan ahead with buying food and  
18 water. The only fruit they give us is from cans. When my son sees some people with  
19 special diets getting fresh grapes, he really craves them. I told him that once we get out  
20 of here, he can have all the grapes he wants.

21 18. Since the beginning, I have always bought bottled water for my son. I used to let  
22 the ice melt that they give us and drink that water. The tap water always tasted weird and  
23 made me feel a weird sensation when I would drink it, but I couldn't afford to buy it for  
24 both of us because it used to cost \$30 for a 24-pack. Then one day, I saw a bunch of  
25 white particles in the bottom of the cup of water from the melted ice – and I did not feel  
26 comfortable drinking the tap anymore.

27 19. They recently reduced the price of water to \$9 and now I have the "luxury" of  
28 drinking clean water, too. At a community meeting about a month ago, a mother stated

1 that it was very unkind not to give children water. The following week, they had lowered  
2 the price of the water. I do not know if it was connected. At the community meeting  
3 about a week ago, a different mother raised how hard it was for children not to get fresh  
4 fruit when they are seeing other people eat it who have special diets.

5 20. They gave us some hygiene products when we first got here – a toothbrush that  
6 broke after the first use, a small tube of transparent toothpaste, a tiny lotion, a deodorant  
7 that was not adequate. They did not give us shampoo or soap – they just expect us to use  
8 the hand soap in the showers. We buy shampoo, soap, toothpaste, toothbrushes, and  
9 deodorant at the commissary. We ask to be able to buy wipes to use, but they do not sell  
10 them.

11 21. My son talks to his stepfather and siblings every day. When we got here, we were  
12 given \$5 each for a call, but after that children have to pay for calls to family members.  
13 We end up spending \$26-30 every two days on phone calls to my children in Miami.

14 22. I feel being here at Dilley is a like a trial and God is testing me. I try to focus on  
15 that there must be a purpose to what I am going through. I can see all the bad things that  
16 are happening, but I am grateful that my children are alive. At this point I am so tired,  
17 and I feel like I will just have to do whatever they decide. But I am worried about my  
18 son. He believes that he will go back to Miami, and that is what has been keeping him  
19 going. I know there's a real possibility that we won't be able to go back and I am scared  
20 of having that conversation with him.

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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 23<sup>rd</sup> day  
4 of April 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: 4/23/2026 Diana Cano

# **EXHIBIT 14**

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

1 I, W [REDACTED] L [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 34 years old. I am from [REDACTED].

5 3. I speak [REDACTED].

6 4. I have been detained at Dilley for two months. I am here with my seven-year-old  
7 daughter and my husband.

8 5. When we arrived to the United States, we were taken to CBP. We had to be in CBP  
9 for eight days. It was very crowded, there were a lot of people and they were always  
10 coming in and out. There were probably about 20 people in one cell with me and my  
11 daughter with everyone sleeping on the ground.

12 6. In CBP the only thing we had to eat was burritos every day. My daughter was the  
13 only child there and we were separated from my husband. It was very cold and they only  
14 gave us t-shirts. I asked for a blanket for my daughter, but they denied me. When one of  
15 the other detainees left, I was able to use the blanket they had.

16 **Dilley ICE Detention Center**

17 7. Here at Dilley my daughter and I sleep in one area but my husband has to be in  
18 another part of the facility. From 8 a.m. to 8 p.m. every day we are allowed to all be  
19 together but at night my husband has to go to a different part of the facility. It would be  
20 ideal if we could be together all the time, as a family unit, but that's what the rules are  
21 here and we can't change them.

22 8. We have not been told why we have been here so long. The officers here have told  
23 us that it is the new agenda in the United States that they don't want immigrants. They  
24 threatened us to try and pressure us to agree to leave and told us we would be separated  
25 from our daughter and jailed. But we said we do not want to leave the United States and  
26 they have not threatened us again.

27 9. No one has explained to us what our rights are here at Dilley or what rights our  
28 daughter has here. We were not shown any video about our daughter's rights here.

1 10. My biggest concern for my daughter here is that there is no school. They say they  
2 have school, but it's not real school. Our daughter went for one day and the teacher told  
3 her that if she can't speak English, she shouldn't speak at all. They gave her one book in  
4 [REDACTED], but she can't read yet and no one is able to help her. I asked her to go back and  
5 try again but she cried and said she is scared.

6 11. When we were first here my daughter would get sick every two weeks or so. Now  
7 that there are fewer people here, she is not getting sick as often. They don't give her any  
8 vitamins here. We went to the medical building the first two times my daughter was sick,  
9 but it was useless. They only give out Tylenol or ibuprofen so it's not useful to go.

10 12. Our daughter really doesn't like the food here. It doesn't taste good. The green  
11 beans here are especially gross and they have caused my daughter to throw up and have  
12 diarrhea. The cauliflower once had bugs in it and now everyone here is afraid to eat that  
13 and won't accept it. The food is unhygienic here. Especially when we first arrived our  
14 stomachs hurt all the time after eating. Our daughter really only eats toast while here and  
15 she hasn't been growing or gaining weight. We buy a lot of ramen at the commissary so  
16 that there is enough food our daughter will eat.

17 13. There is an area near where we sleep where we can get snacks during the day and  
18 they often have apples but they are sometimes bruised and I've seen worms in them. Two  
19 different times, I've seen milk in the snack area that is spoiled.

20 14. It's hard for our daughter to sleep here because the lights are always on. She can't  
21 sleep for long periods of time because the lights are on and people are coming in and out  
22 of the room to inspect. It's as though she's always only half asleep. They gave us an eye  
23 mask, but our daughter doesn't like to wear it because it's really uncomfortable. And  
24 even with the eye mask, there are still people coming in and out of the room at different  
25 times.

26 15. We have access to phones here but it's too expensive for us to make phone calls. It  
27 costs too much money for us to be able to actually use the phones.  
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1 16. It's been difficult for us to communicate with the staff because we don't speak  
2 English. If something really important is happening, they'll find an interpreter but it's not  
3 something that is usually available. The people who speak Spanish are treated much  
4 better here.

5 17. Our daughter has been bullied here, and the staff don't do enough to intervene or  
6 help.

7 18. The living area doesn't always feel clean. For example, I don't think they clean the  
8 water filters and the laundry machines are often very dirty. Also, the toilets here are too  
9 tall for kids and it's hard for our daughter to get on and off the toilet by herself.

10 19. It's very difficult to get different clothes and switch clothing sizes. Our daughter  
11 wasn't given the right size of clothing at first and we had to fill out a form and then wait a  
12 week to get clothes that fit her. Shoes are the hardest part. The shoes break every couple  
13 of weeks and when it rains they fall apart. If you need new shoes or need to change the  
14 size of shoes it takes a very long time.

15 20. There is not a lot for our daughter to do here. She watches TV. She has used the  
16 recreation space but she's pretty bored here. There are only three places she goes – the  
17 playground, the library, and the gym. Also, there are only ten books in [REDACTED] in the  
18 entire library.

19 21. There is no privacy here, there is no space here where we can be on our own. There  
20 are twelve people in the room my daughter and I sleep in so there is no privacy there.  
21 Then during the day, there are always people watching you. The officers are always  
22 watching us.

23 22. I don't think my daughter is growing here – emotionally or physically. It feels like  
24 this place has diminished her. I'm very worried about her social development because  
25 while we have been here. I really want her to go to a normal school where she can make  
26 friends and develop.

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 12<sup>th</sup> day  
4 of March 2026, at Dilley, Texas.

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CERTIFICATE OF INTERPRETATION

My name is Theresa Cheng and I swear that I am fluent in both the English and [REDACTED] languages and I interpreted the foregoing declaration from English to [REDACTED] on March 12, 2026, to the declarant to the best of my abilities.

Dated: March 12, 2026 Theresa Cheng

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# **EXHIBIT 15**

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

1 I, J [REDACTED] A [REDACTED] I [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 English and Spanish.

6 4. We have been detained at Dilley for about 50 days. I am here with my mom and  
7 my 12-year-old brother.

8 5. I have been living in Texas for 8 years. I am a sophomore in high school and my  
9 brother is in 6<sup>th</sup> grade. My favorite classes in school are Biology, AP Spanish, and  
10 Business. In my Business class, we were learning about entrepreneurship, and I was  
11 excited about what we were going to learn in that class in 11<sup>th</sup> grade. My brother likes  
12 reading and soccer.

13 6. About two months ago, my family was sleeping at our home in Austin and  
14 suddenly I heard a really loud noise at our front door. It was a Monday morning at about  
15 5 a.m. and I was half awake because it was almost time to get up for school. I heard a  
16 loud pounding on the door and then police were yelling. Then they made another very  
17 big sound and I heard a lot of police come charging inside. I don't remember how many,  
18 but it was terrifying. They came into my little brother's room and my room. They  
19 pointed a gun at my little brother; threw him against a wall; grabbed him by the hair; and  
20 then put handcuffs on him. They did the same thing with me. They also put handcuffs  
21 and shackles on both my parents' hands and feet.

22 7. Next they separated me and my mom from my dad and my brother. They took us  
23 in separate cars, and it was really scary because no one told us where we were going or  
24 what would happen next. They brought my mom and I to a detention center in  
25 Pflugerville. I was relieved when my dad and brother showed up there about 20 minutes  
26 later.

27 8. At the detention center, they separated my brother, my mom and I from my Dad.  
28 Around 1 p.m., they told my brother, mom and me that we were going to a family

1 detention center. They didn't tell us why our Dad wasn't going with us or where he was  
2 going. I asked if I could give my Dad a hug goodbye, and they said no. I kept asking and  
3 asking – but they wouldn't let me. That was the last time I saw him. Apparently, they  
4 brought my Dad to Dilley at some point but we never saw him and we don't know how  
5 long he was here. He was later brought to another facility, but I am not sure where it is.

6 9. It is hard to be here – especially the food. I don't go to breakfast because it is too  
7 early and it's just the same thing every day. It's also hard because they serve dinner very  
8 early. We have to buy food at the commissary because we're hungry by 8 p.m. My mom  
9 especially has a rough time because she's not getting the medicine she needs for her food  
10 allergies and that causes a rash.

11 10. We are tired of not having fresh fruit here. All we get is a couple kinds of canned  
12 fruit. It is frustrating because I know they have fresh fruit, but you can only get it if you  
13 have a special diet. There was a meeting recently with the guards, and we all asked for  
14 fresh fruit, but the guards said it was just for people with special diets. I don't  
15 understand that.

16 11. When I first came to Dilley, I drank the water and it made my stomach hurt right  
17 away. I didn't want to drink it after that. I would either melt the ice or drink bottled  
18 water. We now mainly drink the bottled water because they recently dropped the price.

19 12. They do not give kids enough clothes. They just give you three t-shirts and three  
20 pants or shorts. So – if you want a pair of pants, you can only have two pairs of shorts.  
21 My mom and I are washing clothes every other day because we don't have enough  
22 clothes otherwise.

23 13. It is hard to sleep with the lights kept on all night. They will turn off some lights,  
24 but the others are always on. Even after two months, I'm not used to it and it is still  
25 really hard to sleep. I tried to wear the eye mask, but it was too tight and I couldn't sleep

26 14. When we first got here, they gave us lotion, toothpaste, deodorant, and a tooth  
27 brush. The toothpaste didn't work; the toothbrush fell apart quickly; and the deodorant  
28 was strange and also didn't work. The hygiene kit doesn't include soap or shampoo.

1 They said we should use the hand wash in the shower, but my mom used it and it caused  
2 little spots on her arms. Now we buy soap, shampoo, toothpaste, deodorant, and  
3 toothbrushes from the commissary, in addition to food to water.

4 15. They tell us we can't drink apple juice outside our room or the cafeteria. They say  
5 it's because of bees, but we see the staff here eating lots of foods and drinking Starbucks  
6 outside and just throwing it in the garbage.

7 16. When I first got here, I went to the classroom but no one was teaching us. They  
8 would just give you a reading and staff would give the answers. For math, they would  
9 just give worksheets. Now they have Khan Academy on some of the computers in the  
10 classroom, and that is better but it is not like high school in the U.S. where we have  
11 teachers who are teaching us while we take notes. It's not the same at all.

12 17. When we got here, they gave us an orientation about the rules and layout here.  
13 They didn't tell us about our rights. We learned about *Flores* from other residents.

14 18. The first days we were here, I was getting nightmares about the police coming to  
15 our house. I was crying a lot from all the trauma we experienced. I would try to go to  
16 the gym or go outside to distract myself. Sometimes I would color different characters  
17 and that would also help me calm down. I am not having nightmares as often, but I still  
18 feel traumatized. If there's a loud sound, I get startled and scared easily.

19 19. It feels really unfair to be here when we did nothing wrong. I am hoping we can  
20 go home soon and stay in the United States. I want to finish high school, go to a  
21 university, and start my career.

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 23<sup>rd</sup> day  
4 of April 2026, at Dilley, Texas



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# **EXHIBIT 16**

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

1 I, Y █ G █ -P █, 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 33 years old. My daughter is 15 months old, and my son is 12 years old. My  
5 son and I are from █, and my daughter was born in █.

6 3. I speak Spanish.

7 4. We have been detained at Dilley since March 31, 2026. We were previously here  
8 for 27 days in July after we first came to the United States. ICE released us in August  
9 without any explanation. We were put on a bus and driven to a shelter in Laredo. We  
10 then went to live with a sponsor.

11 5. My twelve-year-old son was able to start school right at the beginning of the  
12 school year in August. Things were going okay and we were adapting.

13 6. My husband and I were both given ankle monitors when we were released from  
14 Dilley. We went to ICE check-ins in September, December, and then every month after  
15 that.

16 7. My husband was deported in February from his ICE check-in. Once my husband  
17 was deported, I was worried this would happen to me and the kids, too.

18 8. Then at my March ICE check-in, I was told that I would be fingerprinted,  
19 processed, and taken back to Dilley. They said that I was going back because I hadn't  
20 passed my credible fear interview. I told them that that was the case when I was released  
21 and the government already knew that. They said we would need to be re-processed at  
22 Dilley.

23 9. Dilley is just the same as before except that this time I have generally not had  
24 problems with making sure my daughter has clothes, diapers and bottled water for her  
25 formula. One time, a guard refused to let me have bottled water for her formula and said  
26 I would need to use the tap water. I reported her – and the next day the supervisor put a  
27 piece of paper on the wall in our room saying we were entitled to six bottles of water per  
28 day for the baby. Things have been okay since then.

1 10. I think that guard just doesn't like me because there always seems to be an issue  
2 with her. Another time, the same guard would not let me put our stroller inside even  
3 though my baby is allergic to cats and the cats were getting inside the stroller at night  
4 causing my daughter to have bad allergic reactions. I went to medical to explain what  
5 was going on. I don't know who they talked to but after that they ensured I had  
6 permission to bring the stroller in every night.

7 11. At first I wanted to fight to stay here, but at this point I am just resigned that we  
8 will be sent to [REDACTED].

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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 23<sup>rd</sup> day  
4 of April 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: 4/23/2026 

# **EXHIBIT 17**

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

1 I, O [REDACTED] B [REDACTED], declare as follows:

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

4 2. I am 23 years old. I am from [REDACTED].

5 3. I speak French and [REDACTED], my mother language.

6 4. I have been detained at Dilley since April 14, 2026, for about a week. I am here  
7 with my daughter [REDACTED], 4 years old.

8 5. I was arrested at the border with my daughter. The border guards spoke English to  
9 me. They searched me and cut my shoelaces and my daughter's shoelaces. The next  
10 place they took us was full of military officers.

11 6. Then they took us to another place with a lot of immigrants. We stayed there one  
12 night. Then they took us and another family here to Dilley.

13 7. No one has told me how long we will be at Dilley.

14 8. No one has told us anything about our rights here at Dilley.

15 9. We never saw a video and no one has told us about *Flores*. This is the first time I  
16 am hearing about *Flores*.

17 10. No one has discussed my daughter's right to be released, and I don't want us to be  
18 separated.

19 11. ICE gave me the phone numbers of lawyers I could contact and also asked if I am  
20 afraid to return to my country – a credible fear interview. There was an interpreter on the  
21 telephone.

22 12. I have not contacted lawyers because I thought I have to pay. This is the first time I  
23 am hearing I don't have to pay for calling lawyers.

24 13. I can't understand anything here – no one has explained anything to me in French.  
25 There does not seem to be anyone here besides me who speaks French. My daughter  
26 speaks only [REDACTED].

27 14. I have not had a translator or interpreter since we arrived here.  
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1 15. The food here and the food we normally eat are very different. We eat only  
2 chicken, French fries, and rice here. We cannot eat anything else, although we have tried.  
3 There are also apples, cookies, and milk that we can eat. Sometimes there are grapes or  
4 oranges, but not every day.

5 16. My daughter and I drink only bottled water, but I don't have any money so one of  
6 the women who lives here gives it to me.

7 17. We have received only one very small bottle of shampoo since arriving here. We  
8 have not gotten any soap. We only have the liquid soap in the bathrooms. My daughter's  
9 skin is getting dry and flaky and so is mine.

10 18. The phone in my room does not work, even though it worked when we first  
11 arrived.

12 19. ICE told me I have an appointment to see a judge on May 4, but I don't understand  
13 what will happen. I will need an interpreter.

14 20. We have only one pair of shoes each, and I have only one sweater.

15 21. I am depressed because there is no one to talk with. People do not speak French,  
16 only English and Spanish. The stress is so bad I can't sleep. I wonder how things will go  
17 in court and I worry about that a lot.

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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 23 day  
4 of April 2026, at Dulley.



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CERTIFICATE OF TRANSLATION

My name is Danièle Girard and I swear that I am fluent in both the English and <sup>French</sup> ~~Spanish~~ languages and I translated the foregoing declaration from English to <sup>French</sup> ~~Spanish~~ to the best of my abilities.

Dated: 04/23/2026

