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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

JENNY LISETTE FLORES, <i>et al.</i> ,)	Case CV 85-4544 DMG-AGR _x
)	
Plaintiffs,)	EXHIBITS IN SUPPORT OF
)	PLAINTIFFS' MOTION TO
- vs -)	ENFORCE THE SETTLEMENT
)	AGREEMENT [REDACTED
WILLIAM BARR, ATTORNEY)	VERSION OF DOCUMENT
GENERAL)	PROPOSED TO BE FILED
OF THE UNITED STATES, <i>et al.</i> ,)	UNDER SEAL] VOL. 3 OF 5
)	
Defendants.)	[HON. DOLLY M. GEE]

///

Declaration of A [REDACTED] B [REDACTED], [REDACTED]

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

1. My date of birth is [REDACTED] I am from San Salvador, El Salvador.
2. One of the reasons I left El Salvador is because of the danger there. The gangs had been kidnapping kids and recently they killed three kids who go to my school. Lots of parents were taking their kids out of school. I lived with my aunt and she had been dropping me off at the school gates and picking me up as well. But we were still scared.
3. I left El Salvador with my cousin on the 10th of January. She's 17 years old. When we crossed the border they kept us at a place in Texas for two days. They didn't give us very much to eat, just burritos and a soda. We were hungry.
4. My cousin and I were together at the border and for the first couple of weeks here in Homestead. But then she was released a couple of weeks ago. I couldn't say goodbye to her. They didn't let me see her.
5. The rules here are that you can't touch anyone. Sometimes when your friend is crying because they can't stand being here any longer you want to be able to give them a hug. But you can't because it's against the rules.
6. The hardest part about being here is waiting and having to be patient. I know it's a process, but I want to go live with my mom in Atlanta. My social worker and my counselor say my mom already sent her fingerprints and that they did a home study.
7. I think it's taking so long because my father tried to sexual abuse me when I was about six years old back in El Salvador. But my mom is the one who protected me from him and made sure I could go live with my aunt when that happened.
8. I don't know how much longer I will have to wait to see my mother. I miss my mom and my aunt so much. When I lived in El Salvador I talked to my mom all the time by video. Now I can only talk to my mom for five minutes twice a week and my aunt for five minutes twice a week. If I could, I would talk to my mom all day, every day.

9. I know there are kids who have been here longer, but I never thought I would be here for so long. It's sad when your friends leave, and you are still stuck here.

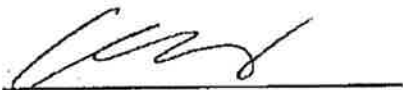
I, A [REDACTED] B [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.



March 26, 2018

Certificate of Translation

I, Clara Long, certify that I am fluent in English and Spanish and that I read the above declaration to A [REDACTED] [REDACTED] in Spanish. Executed this 26 of March in Homestead, Florida.



Clara Long
Human Rights Watch
350 Sansome St. Ste. 1000
San Francisco, CA 94104

Declaration of

D [REDACTED] J [REDACTED]

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

1. My date of birth is [REDACTED]. I am sixteen years old. I am from Honduras. I am an Evangelical Christian.
2. I traveled to the United States alone, without any of my family members. I crossed the border into Texas on March 4, 2019. Just after I crossed the river, border patrol agents took me into custody.
3. For four days, I was detained in a detention center that we called a *perrera* (dog kennel) in Texas. The *perrera* was horrible. The guards insulted us using the worst and ugliest words imaginable. They insulted our mothers too. They did not treat us with any respect. Because of my religious convictions, I cannot repeat the insults and curses that the guards used when speaking with us. When kids in the *perrera* talked with one other, the guards got mad. They told us to be quiet. The food was terrible at the *perrera*, and it was insufficient for me. I was hungry every day, and my hunger made it hard for me to sleep. It was also hard for me to sleep because there were no beds. We could try to sleep on the floor. We were only given a sheet of aluminum. That sheet was not enough to keep me warm, as it was extremely cold in the *perrera*. When the guards needed to call one child, they would do so in loud voices that would wake up all the children. At the *perrera*, we were inside all the time, with the lights on all the time. I did not know when it was day or night. I felt so bad at the *perrera*.
4. After being at the *perrera*, I was brought to the detention center in Homestead, Florida. I arrived here about seventeen days ago on or about March 9, 2019.
5. I wish I could leave Homestead and live with my aunt M [REDACTED] A [REDACTED]. She lives in Maryland and has been in the United States for many years. Her phone number is 410-501-7013.
6. I do not know when I can leave this place. I want to get out of here as soon as possible. I have spoken with a social worker two times about how I can leave. I understand that before I am released, my aunt's fingerprints need to be taken and the government must verify that she is actually my aunt. I do not know when my aunt will receive the fingerprinting appointment. My aunt also does not know this. I do not know anything about the *Flores* settlement agreement. No one here has given me information about my release options under *Flores*.

7. I am allowed to call my family two times each week, with a time limit of ten minutes per call. This is not sufficient time for me to talk with my family. I wish I had more time to talk with my family. They are a source of great emotional support for me. They share their affection for me, give me advice, and update me on how my loved ones are doing. On the days when I cannot call my family, I worry about them and feel anxious and depressed. I worry about my grandmother's health and how she and others are feeling.
8. I often feel sad and depressed here. I am accustomed to getting hugs from my family and to having my family say good night to me. I don't have anyone to do that for me here. I cry in my room some nights. I try to distract myself by reading the Bible, listening to music, or talking with other kids. But it is most hard and sad to think about my family because I miss them a lot.
9. Other children here are also very sad. They cry a lot. Some children do not have anyone to receive them in the United States. They do not know whether they can ever leave from here. These children are suffering the most. Much of the time they are crying and crying. They do not have energy, they do not have hope, they do not want to talk with anyone, and they are not motivated to play. One of my friends has no one to receive him in the United States. When he is in his room, he just cries and cries.
10. All the kids here must behave well and comply with all the rules. There are many rules. You must wear your clothing at all times. You must be friendly. You can only shower for five minutes, which does not feel like enough time to properly clean my body. You cannot give anyone a hug. You cannot leave. You need to be with a YC (Youth Counselor) who watches you all the time.
11. I have only been here for about seventeen days, but it seems like the rules and schedules frequently change. It is difficult to know what the rules are and what we need to follow.
12. If you misbehave or break a rule, you will get a report. If you get a report, you will be detained here for one extra month. There are some kids here who get into fights with each other and insult each other. They get reports and have to stay here for more time. If a child fights a lot, then he gets moved to a different shelter.
13. If anyone tries to escape, he will go to a detention center with more security. At that location, there are four guards watching each child at all times so he does not escape. After six months, the child will be deported.

14. The YCs tell us do not try to escape because you will be found and you will lose the opportunity to be here. The YCs change often, and it is hard to get to know the YCs very well. I do not feel comfortable with the YCs because I feel like I don't know them and I don't trust them.
15. In my dorm, we are woken up every day at 5:45 a.m. Then by 6:15 a.m., we must go to school, but we just sit there and do nothing for two hours. At 8 a.m., we are permitted to eat breakfast, and we start our learning at 8:45 a.m. I do not understand why they wake us up at 5:45 a.m. every day.
16. The same food is served at every meal here. Children sometimes do not feel like eating the same food over and over again. We complain about the food. At times I feel like vomiting because I see the same food again. At times I go hungry because I do not like the food.
17. As an Evangelical, I cannot play soccer or participate in other sports or activities that children here often do. I wish there were more opportunities for practicing music and learning from music teachers.
18. I do not have an immigration lawyer. I do not know how to apply for asylum. No one has told me about my *Flores* rights.

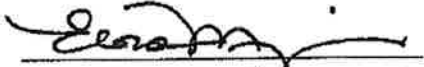
I, D [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.



26/03/2019
Date

Certificate of Translation

I, Elora Mukherjee, certify that I am fluent in English and Spanish and that I read the above declaration to D. [REDACTED] J. [REDACTED] in Spanish. Executed this 26th day of March, 2019 in Homestead, Florida.



Elora Mukherjee, Esq.
Morningside Heights Legal Services, Inc.
Columbia Law School
435 W. 116th Street
New York, NY 10027
Tel: 212-854-4291

**Declaration of N. [REDACTED] JU [REDACTED]
A# [REDACTED]**

I, N. [REDACTED] JU [REDACTED] (A# [REDACTED]) declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED]. I am a native of Mataquescentla, Municipality of Jalapa, Guatemala. I lived with my grandmother [REDACTED] in Aldea Morales, Mataquescentla, Guatemala. My parents also lived in Guatemala but I did not reside with them since the age of 13 years old.
2. I came to the United States with my father [REDACTED] my step-mother [REDACTED] and my 3 month old- sister [REDACTED]. We escaped Guatemala because our lives were in danger. My father operated a small restaurant in Aldea San Rafael, municipality of Santa Rosa, and was being extorted by the Mara Gangs in his locality. Despite my father having asked from protection from authorities to stop the extortion, nothing was done by us. On December 30th, 2017, my father was stabbed at least five times by the men who were extorting him, and he almost died. Because my father is diabetic, he was very delicate.
3. After my father was stabbed and in the process of recovering, he began getting threatening calls that they were going to kidnap me and my family. The police didn't do anything to protect us. We decided to escape Guatemala and come to the United States and seek asylum.
4. I left Guatemala on or about May 22nd, 2018. We traveled for about one month and one half as we were apprehended in Mexico by Mexican authorities and deported back to Guatemala. We crossed through Mexico again for about five days and made it to the U.S. border crossing legally the border as we sought asylum at the point of entry in Texas.
5. Once we entered the border station escorted by the border patrol agents, I was immediately separated from my father. I was taken to a trailer with my step mother and little sister where I remained for about four days. My step-mother and baby sister were taken to another place one day after we arrived and I never saw them again. I asked several times to the men watching me where my father was and if I could be reunited with him but they would yell at me telling me to remain quiet, and saying that I didn't belong because the United States government didn't want Guatemalans, Hondurans or Salvadorans in the United States.
6. After four days on this trailer, I was awakening one day at about 3 in the morning. I was instructed to take a shower and change and that we were leaving to another place. I remember I was taken to a place called "la hielera" by other detainees where I was given a new set of clothes. Later, I was taken to a group home about 30 minutes away by car.
7. Once I arrive to this new facility, I noticed there were about fifty other children. Everyone slept in mats in the floor. I stayed there overnight where I was fed, and the next day I was taken to the airport.
8. Once on the plane, I was told that I was coming to Miami with at least 35 other children. I believe I arrived to Miami on June 14th, 2018 at around 4 in the morning. From the airport, I was

transported to the center in Homestead. When I first arrived to this center, I was given an orientation, was checked by the medical staff and given new clothes. I was also able to shower and then I went to sleep.

9. After three days of arrival in Homestead, I was interviewed by a woman [REDACTED] who asked me questions about my family, why I came to the U.S., my life style, and she also said that if I had any questions, I needed to speak to [REDACTED] who was going to be my counselor.
10. Three days later, I met my case manager [REDACTED] who explained to me he was going to be handling my case. He asked me if I wanted to return to Guatemala and I told him no. He asked me if I had any family members in the U.S. and I told him that my Aunt B [REDACTED] lived in Iowa; so A [REDACTED] called her and permitted me to speak to her. I called B [REDACTED] and she informed me she was expecting to hear from you and that she didn't know my father's whereabouts. However, she was already in contact with my step mother who was going to be sent to Iowa with her and my little baby sister. My aunt said she was willing to be my sponsor and told my social worker she could take care of me. After that, I was able to call my grandmother and my mother in Guatemala who also didn't know where my father was.
11. Two weeks after having arrived to Homestead, I was taken to see a woman who wanted to give me news about my father's whereabouts. She told me my father was at another detention center in Texas. I was permitted to speak to my father over the phone. When we spoke, my father told me about everything he had gone through since we were separated. He told me he was seeking asylum for all of us so we didn't have to go back to Guatemala. He said I couldn't return to Guatemala so he wanted me to go to live with my aunt B [REDACTED] until everything was resolved.
12. I have been able to speak to my father video camera and by phone a couple of times. My father to this day does not know what is going to happen to me and he doesn't know the reason why I have not been released to the care of my aunt.
13. On Sunday July 22nd, 2018, I was told by the center authorities here at Homestead that by order of the government, I was going to be reunited with my father so the next day I was going to be taken to see my father. Unfortunately, it wasn't until three days later that I was taken to the airport and flown to Houston, Texas. Once in Texas, I was taken to an office where they said my father would meet me. However, after waiting for over several hours, my father never arrived and the government took me to a home around 4 in the morning so I could sleep.
14. On Thursday July 26th, 2018, I remained at the home all day waiting to be taken to see my father. I went to sleep again and was awoken at about three in the morning on Friday and told to gather my things because I was going to be taken back to the shelter where I had been staying- meaning Homestead. I asked what had happened to my father and they told me they could not reunite us yet because there had been some complications with my father's flight so in the meantime, they needed to take me back to Miami.
15. I arrived to Miami once again on Friday July 27th, 2018 and had to go through the same procedure as the first time. It wasn't until August 1st, 2018 that I was finally taken to see my counselor and case manager to find out what had happened to my father and why I was not reunited like they had said. They explained that they were no longer handling my case and to this

day, I still haven't spoken to anyone to find out what is going to happen to me and when will I be reunited with my father. I haven't spoken to my father either and no one knows his whereabouts.

16. I am very sad and frustrated because I haven't been reunited with my family. I am very fearful for my father's life if he is sent back to Guatemala. I am also very worried for my father's health as he is diabetic and need to inject insulin to stay alive. I want to leave this center and be with my family soon. I hope I can remain in the United States and start a new life with my family.

I, N [redacted] J [redacted] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

N [redacted]
J [redacted]

8/1/2018
Date

Certificate of Translation

I, Victoria Mesa-Estrada, certify that I am fluent in English and Spanish and that I read the above declaration to N [redacted] J [redacted] in Spanish. Executed this 31st of July, 2018, in Miami, Florida.

Victoria Mesa-Estrada

Date: 8/1/2018

Victoria Mesa-Estrada
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