

EXHIBIT 89.1

EXHIBIT 18

DECLARATION OF LUIS ALBERTO FRANCO-CRUZ

I, Luis Alberto Franco-Cruz, hereby declare:

I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

1. My name is Luis Alberto Franco-Cruz. I am a national of Guatemala. I am 23 years of age.
2. I speak Spanish. I can't read or write in Spanish. I do not speak or read English.
3. I was picked up by U. S. Border Patrol agents on June 28, 2014. There was a fence indicating we were entering the U.S., the coyote told us. We were walking for about four hours after that when the Border Patrol caught us. It was around mid-day. It was hot. I was with about 8 people.
4. I was transported to a Border Patrol station. I don't know the name. The trip lasted about 2 hours from where I was picked up. I was driven there in a Border Patrol truck. I was riding in the bed of the truck. There were about 8 other people in the truck. ~~I had no family with me.~~
5. Once at the Border Patrol station, I was placed in a cell that was about 24 feet by 18 feet large. When I first got there, they had us in a small room where they took our fingerprints. There only the 8 of us in that first room. Then we went into a bigger room. There were varying numbers of people in that cell. When I first got there, I'd say there were about 60 people. The others in that cell were only men. There women in a different cell. I didn't see any kids there.
6. The only furniture in the cell consisted of cement benches that ran along the sides of the room. There were no benches in the middle. There were about 3 of these benches in the cell. This was enough space for approximately 30 people to sit down, at the most. Not enough for everyone. Because there was not enough room on the benches for everyone to sit at one time, some people had to stand or to sit on the floor.
7. I was kept in this cell from 3 p.m., approximately, on June 28th, and then left around 8 am on the Monday, June 30, so I was at the Border Patrol facility for two nights. There were no beds in the cell and we were not provided any blankets or other bedding other than an aluminum blanket. I slept on the floor. The light was on. It bothered me.
8. The temperature in the cell was very cold. The Border Patrol agents took my belongings, including a sweater and long-sleeve shirt from me before putting me in the cell, so all I was wearing was a short sleeve shirt. I was not able to get warm. There were no blankets given to us. The guards would not change the temperature. Many people asked them to warm up the temperature, the guards responded by making it colder. They didn't like it when we spoke among ourselves. Even if just a few people talked, they punished all of us by making it colder. All they gave us to stay warm were aluminum sheets that

did not keep us warm. They threatened to make it colder about 3 times, and they did it each time.

9. There three toilets in the cell. The toilet was exposed. There were no doors. There was enough toilet paper for everyone. When we ran out of toilet paper, the guards brought us some, but not right away. The toilet was dirty.
10. There one sink in the cell but no soap or paper or cloth towels. We dried our hands with toilet paper and washed our hands with nothing but water. It was impossible to wash your hands or clean yourself after using the toilet. There also were no toothbrushes, toothpaste, or shower facilities.
11. They gave us some water in a big container. We used juiceboxes they gave us as cups.
12. We were given food 3 times a day. Each time they gave us a small burrito (a few inches). I didn't like it so I didn't eat them. All I ate were a couple of cookies. I was very hungry. I felt weak.
13. I didn't ask to use a phone to call anyone. I had been caught by Border Patrol before and the last time they told me I couldn't place a call. So I didn't want to ask this time.
14. I was not informed by Border Patrol that I had a right to call the Guatemalan consulate. I first learned I could call the consulate when I got to the detention facility in Florence, Arizona.
15. To go from the Border Patrol facility to the courthouse, it took about an hour in a bus.
16. I was never permitted to go outside or even to leave my cell. I was not handcuffed while in detention.

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17. The first time I had to sign a document was when I was in the desert after I was picked up by Border Patrol. They asked what we had with us like money, our names, they wanted to know if we had drugs. I signed. Then I got in the car. I don't know how to write, so I just put my initials. Then, when we went to the hielera, they took my prints, and then they gave me a form that talked about court and deportation and that I could challenge my deportation. They didn't really give me the choice of whether to sign or not sign. The only reason I knew what the form said is because another detainee told me. The officers didn't tell me what it meant. I told him I couldn't read. He said to put my initials. They didn't ask me if I was scared to back to Guatemala.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 11th day of July 2014 in Florence, Arizona.

Luis

Luis Alberto Franco-Cruz

CERTIFICATE OF TRANSLATION

1. My name is JAMES LYALL, and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, LUIS ALBERTO FRANCO CRUZ, in Spanish.
3. LUIS ALBERTO FRANCO CRUZ affirmed that the contents of the declaration were true and correct to the best of his knowledge.

I declare under penalty of perjury of the laws that the foregoing is true and correct. Executed this 1st day of July 2014 in Florence, Arizona.




EXHIBIT 19

DECLARATION OF ODILIA VELASQUEZ VASQUEZ

I, Odilia Velasquez Vasquez, hereby declare:

I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

1. My name is Odilia Velasquez Vasquez. I am a national of Guatemala. I am 38 years of age.
2. I speak and read Spanish. I speak a little English.
3. I was travelling with my seven year old US citizen daughter and my four year old nephew when were detained by Border Patrol agents near Douglas, Arizona on Tuesday, March 31st, 2015 around 6pm.
4. We were transported to the Douglas Border Patrol station. The trip lasted about 30 minutes. We were driven in a large white van. There were about 10 other people in the van with us.
5. Once at the Douglas Border Patrol station, we were placed in a cell that was about 3 meters by 2 meters large. There were 4 other women and four other children in the cell.
6. The only furniture in the cell consisted of concrete benches that ran along the sides of the room.
7. We were kept in this cell for 18 hours. We spent 1 night in this cell. There were no beds nor bedding and we had to try to sleep sitting up on the concrete bench.
8. The temperature in the cell was painfully cold. We were shivering and our bodies hurt from cold. The Border Patrol agents took my sweater from me before putting me in the cell, as well as the sweaters from my daughter and my niece, so all we were wearing were short sleeves shirts. The children were crying from the cold.
9. We were never given any blankets or anything to stay warm. I asked for my children's sweaters because they were so cold and he said he couldn't bring anything. Due to the temperature in the cell, I was not able to sleep at all and the children could only sleep about two hours.
10. The light was kept on all night which also made it very hard to sleep. There was a lot of noise from the guards, which made it difficult to sleep.
11. It was also difficult to sleep because the guards took me out of the cell four times over the course of the night to interview me and fill out paperwork. They asked about my nephew and why I brought him.
12. There was one toilet in the cell. The toilet was partially screened by a short wall.

13. There was one sink in the cell but no soap or paper or cloth towels. We could only rinse our hands after using the bathroom. There also were no toothbrushes, and no bathing or shower facilities.
14. There were no waste bins in the cell and there was garbage on the floor. The cell was dirty and the smell was awful.
15. No one ever came to clean the cell in Douglas in our time there.
16. We were very tired when we were detained and became increasingly exhausted in detention.
17. There was no water container in the cell and the only option to drink water would have been the sink above the toilet. But there were no cups so it was very difficult to drink that water and we were not able to rehydrate. We were very dehydrated in our time there.
18. We were given something to eat only twice in our time there. The food consisted of juice, crackers, and burritos. We felt like we could not eat because we were so cold and tired.
19. When we arrived we were never asked about our health nor given a formal medical exam. While we were in detention, in part because of the cold, my daughter developed an ear infection. I told migration officials and asked for help but they said "there is no medicine here."
20. I signed many papers and the agent did not explain to me what the papers said, since they were in English. But I think that some of them were about my nephew. I asked what the papers were about but the agent didn't understand me because he did not speak Spanish.
21. After spending 18 hours in the Douglas Border Patrol station, we were moved to the Tucson Border Patrol station. We spent a total of 3 hours in the second Border Patrol station.
22. The conditions in Tucson were similar to the conditions in Douglas.
23. When we arrived in Tucson we were not asked about our health. My daughter was crying from her ear pain but the agents did not offer any support.
24. The migration officials were very angry with me and hit his mouse against his desk to express his frustration.
25. When we were leaving the Tucson station, the migration officials separated my nephew from us and said they were taking him to his dad and I was very upset because my nephew started to cry. I called his dad as soon as I was released from detention but he said he had not received any call from immigration officials. We are all scared because as of right now we do not know where my nephew is and his father is very worried about him.

26. While we were detained, I felt very sad and desperate and felt guilty for having brought my daughter. I was also very upset because she was crying and sick.

27. I lived 12 years in the US and have two US citizen children.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 2 day of April, 2015 in Tucson, Arizona.

Odilia Velásquez Vásquez

CERTIFICATE OF TRANSLATION

1. My name is Joanna Foote, and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, Odilia Velasquez Vasquez, in Spanish.
3. Odilia Velasquez Vasquez affirmed that the contents of the declaration were true and correct to the best of his knowledge.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 2 day of April in Tucson, Arizona.

A handwritten signature in black ink, appearing to read 'Joanna Foote', is written over a horizontal line.

EXHIBIT 20

DECLARATION OF VICTOR HUGO ROSAS GARCIA

I, Victor Hugo Rosas Garcia, hereby declare:

I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

1. My name is Victor Hugo Rosas Garcia. I am a national of Mexico. I am 29 years of age.
2. I speak and read Spanish. I do not speak English, but I do understand a little bit of English. This has made it very difficult because the guards get angry when we cannot understand English.
3. I was picked up by U. S. Border Patrol agents on June 28, 2014 around 9:00 a.m. in Naco, Sonora.
4. I was transported to the Naco Border Patrol station in a Border Patrol van. I was handcuffed. The trip lasted about 10 minutes. There were already three other men in the van when they picked me up.
5. Once at the Naco Border Patrol station, I was placed in a cell called a "hielera" (freezer) that was about 15 feet by 14 feet. There were about 10 other people in the cell. The others were only men.
6. There were only concrete benches that ran along the sides of the room and also one concrete bench that ran down the center of the room. There were about three of these benches in the cell. This was enough space for approximately 20 people to sit down.
7. I was kept in this cell for about 24 hours. I spent one night in this cell. There were no beds in the cell and we were not provided any blankets other than an aluminum sheet. I slept on the concrete floor because others were lying on the concrete bench, and there was not enough room. Because there was no room, about five guys had to sleep sitting up.
8. The temperature in the cell was very, very cold. When I was picked up, I had a sleeveless shirt and a sweatshirt. The Border Patrol agents took my shirt, so all I was wearing was a sweatshirt. As hard as I tried I could not get warm. I now understand why dogs sleep in a little ball, to keep warm, but I couldn't even keep warm by doing that. We did ask the guards to change the temperature but the guards didn't change it. It was almost as if we ask them to change the temperature due to the cold, they would make it colder. The small aluminum sheet that they gave us did not keep us warm, it only covered half of my body.
9. There was only one toilet in the cell. The toilet was only partially screened from view.
10. There was one sink in the cell but no soap or paper or cloth towels. There also were no toothbrushes, toothpaste, or shower facilities.

11. There was no water fountain. We had to drink from the sink water but we had no glasses or cups. We would open the top of the juice containers we would get and reuse them as drinking cups.
12. We were given something to eat twice or three times a day. They gave us a burrito, cookies and a juice for breakfast, lunch, and dinner. Honestly the food was awful, I even think the burritos were bad but I had to eat them because I was so hungry. Many of the guys preferred not to eat. It was not enough food to eat, I was hungry all the time.
13. I was never told I could use the phone. I did not ask to use the phone because I had been detained in Brownsville before and in Brownsville they told me I couldn't use the phone. I was never told I could call an attorney.
14. I was informed by the television in my cell that I had a right to call my consulate. However, the television had no sound, we could only see. Twice I told the guards that I wanted to call my consulate and they said I could call later. But I was never allowed to call.
15. I suffer from stomach issues, colitis. It was hard to be in detention because I had to wait to use the bathroom or I was embarrassed to use the bathroom too often in front of everyone. So I would wait or hold it, and that's not good for me.
16. I was kept in this cell for 24 hours. I was then moved to another Border Patrol station.
17. I was never permitted to go outside or even to leave my cell.
18. I was moved to another Border Patrol station in Tucson after spending 24 hours in the first station. I spent a total of 24 hours in a cell in the second Border Patrol station in Tucson. The conditions of the cell at the second station were worse. The cell was about the same size as Naco, but there were about 35 men total. It was very crowded and uncomfortable in that cell. We fit okay standing, but we were not all able to sit down. Sometimes if you went to use the bathroom you would lose your seat.

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19. I spent one night in the second cell. Like the first, there were no beds and the only blanket was the aluminum sheet they gave us. I slept on the cold, concrete floor because there was no room on the benches. I was too worried about getting stepped on at night to get any sleep at all. Some men had to sleep sitting down because there was no room. The temperature was very cold as well. The aluminum sheet was not enough to keep warm. I kept getting cold and waking up throughout the night. The guards made the cell even colder when we asked them to change the temperature. The guards told us to be quiet and made it colder as punishment. The food was exactly the same, but we were given only one juice all day. We also had to reuse this juice box as a cup to drink out of the water container in the cell because there were no cups to drink water.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 11 day of July 2014 in Florence, Arizona.



Victor Hugo Rosas Garcia

CERTIFICATE OF TRANSLATION

1. My name is Nora Praciado, and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, Victor Hugo Rosas Garcia, in Spanish.
3. Victor Hugo Rosas Garcia affirmed that the contents of the declaration were true and correct to the best of his knowledge.

I declare under penalty of perjury of the laws that the foregoing is true and correct. Executed this 11 day of July 2014 in Florence, Arizona.

Nora Praciado

EXHIBIT 21

DECLARATION OF VALDEMAR PEREZ PEREZ

I, Valdemar Perez Perez, hereby declare:

I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

1. My name is Valdemar Perez Perez. I am a national of Guatemala. I am 38 years of age.
2. I speak and read Spanish. I do not speak or read English.
3. I was travelling with my fifteen year old son when we were detained by U. S. Border Patrol agents around Douglas, Arizona on April 11, 2015.
4. We were transported to the Douglas Border Patrol station. The trip lasted about 30 minutes. We were driven there in a Border Patrol truck. There were about 10 other people in the truck with us, including unaccompanied minors and women with children.
5. Once at the Douglas Border Patrol station, we were placed in a cell that was about 6 meters by 3 meters large. There were two other people in the cell, one other man and his son.
6. The only furniture in the cell consisted of concrete benches that ran along the sides of the room.
7. We were kept in this cell for 16 hours. We spent 1 night in this cell. There were no beds in the cell and we were not provided any blankets or other bedding. We had to try and sleep on the concrete floor.
8. The temperature in the cell was very cold. The Border Patrol agents told my son and I that we could only wear one layer so we only had on our light jackets and had to take off our shirts.
9. We were only given thin aluminum sheets to stay warm. The sheets only helped us warm up a little bit. We could not ask the guards to change the temperature because they did not speak Spanish. We could only sleep a few hours that night.
10. The light was kept on all night which also made it very hard to sleep. It was also difficult to sleep because there were constantly people moving in and out of the cell.
11. My son and I were woken up three times over the course of the night so that the agents could interview me. The interviews lasted about thirty minutes each.
12. There was one toilet in the cell. The toilet was only partially screened from view by a wall. When we arrived there was no toilet paper. We had to ask the guards for toilet paper.

13. There was one sink in the cell but no soap or paper or cloth towels. We could only rinse our hands because there was no way to wash them. There also were no toothbrushes, and no bathing or shower facilities. I brought a toothbrush, soap with me and it was taken away from me.
14. When we arrived in detention we were already very tired, hungry and thirsty from the journey.
15. There was a water container in the cell. We were given snacks four times. But the food only consisted of crackers and juice. It was too little food to keep us from being hungry before the next snack.
16. When we arrived we were only asked by one agent if we felt healthy. We said that we felt fine. But in reality my son and I both had very sore throats but we were afraid of telling the agents about our medical needs because we were not sure what would happen. We were never given any formal medical exam.
17. In the Douglas Border Patrol station I signed various papers that I did not understand. They were in English and the agent just told me to sign them without explaining the papers.
18. After spending 16 hours in the Douglas Border Patrol station we were transferred to the Tucson Border Patrol station. We were detained in that station for 24 hours. We spent one night in the station.
19. When we initially arrived at the Tucson station, my son and I were put in the same cell. But after several hours more mothers arrived with their children and the agents transferred me to one cell and my son to another cell. I was very sad to be separated from him. We were separated for about 14 hours until we were released together.
20. The first cell in the Tucson station was not very crowded, but when I was transferred to a cell with only men it was more crowded. At one point, there were a total of 30 men in the cell.
21. The bathroom facilities in the two cells in Tucson were similar to those in the Douglas station.
22. There were no beds nor bedding in the cell where I was detained and I had to sleep on the cold concrete floor.
23. The two cells in Tucson were very cold. Before entering the first cell, the agents made my son and I take off our jackets and we were only wearing short sleeve shirts. We both suffered from the cold and our bones hurt because of it. Due to the cold I was only able to sleep off and on.
24. We were not given a formal medical exam in Tucson nor were we asked about our health.

25. The food in Tucson was similar to Douglas. We were only given juice and crackers. At this point we had only eaten those same snacks for two days and I was very hungry. My son also was very hungry and I had to tell him to just be patient and put up with the hunger because there was no other option. We were also fed up with the same dry and bad tasting cracker.
26. The first time my family member gave me their address I wrote a number wrong. The agents said that I had the wrong address and if I did not get it right they would not release us. I was very sad and stressed because we were suffering so much and I was afraid of staying for longer.
27. I was stressed in detention because I was wondering about what would happen. I was very sad and worried that we would stay in detention for longer because we could not sleep well and we were hungry and I wasn't sure if we could continue to put up with the conditions.
28. I am afraid of returning to my country

I declare under penalty of perjury that the foregoing is true and correct. Executed this 14 day of April, 2015 in Tucson, Arizona.



CERTIFICATE OF TRANSLATION

1. My name is Joanna Foote, and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, Valdemar Perez Perez, in Spanish.
3. Valdemar Perez Perez affirmed that the contents of the declaration were true and correct to the best of his knowledge.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 14 day of April in Tucson, Arizona.

A handwritten signature in black ink, appearing to read 'Joanna Foote', is written above a horizontal line.

EXHIBIT 22

DECLARATION OF ARACELI CASTRO VASQUEZ

I, Araceli Castro Vasquez, hereby declare:

I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

1. My name is Araceli Castro Vasquez. I am a national of Mexico and I am 51 years of age. I am the mother of eight children and grandmother of six, including my two U.S. citizen grandchildren.
2. I speak Spanish but I do not speak or read English.
3. On the afternoon of Wednesday, January 7, 2015 I arrived at the Nogales Port of Entry in Nogales, Arizona with my two youngest children, my fourteen year old daughter and nine year old son. We presented ourselves to officials and asked them for help. I explained that the situation in our hometown is very dangerous and after some discussion we were detained in a small room.
4. After about forty-five minutes, my children and I were transported to a CBP detention center near Nogales. I do not know the name of the facility but the officials there were dressed in blue. The trip lasted about ten or fifteen minutes. We were driven along with three other people, a woman and her two children. The other mother said that one of the two children was a U.S. citizen.
5. Once at the detention center, the other mother and I were placed in leg shackles. Officials took our jackets and outer layers of clothing. The six of us were then placed in a cell that was about two meters by three meters. There were four or five metal benches. There were five canoe-like plastic "beds" on the floor. There was no other furniture.
6. There was a bathroom outside the cell, but there was no soap and we were not able to bathe or shower while detained.
7. We were fed small portions of food, a box of juice, some crackers, a small burrito. My children and I were very hungry. There was a water cooler, but there were only two paper cups so we had to share them to drink water.
8. It was very cold in the room. Because the officials took our jackets and we only had one layer of clothing we were very cold. We were given thin yellow plastic blankets but they were not sufficient to keep warm.
9. We spent the night in the Nogales detention center. There were not enough canoe beds for everyone, so my daughter had to sleep on the floor on a plastic mat. I slept in one of the "beds" but it was cold and hard and very uncomfortable. Because of the discomfort and the cold, and because the lights were left on, it was very difficult to sleep.
10. Officials took me out in the middle of the night to answer questions and sign a lot of paperwork. The paperwork I signed was not explained to me.

11. The next morning, after about eighteen hours in the same room, we were taken out and transported by bus to Tucson. The child of the other woman we were detained with did not go with us because he was a U.S. citizen. I do not know where he was sent.
12. We arrived in Tucson around late morning. My children and I were placed in a cell about four by five meters in size. There were about ten other people in the cell, all mothers with young children. The youngest child was only 16 months old.
13. My children and I were held in this cell for another 7 or 8 hours. The room was very cold, colder even than the room in Nogales.
14. There were several concrete benches, and some of the women had thin mattresses. There were about six mattresses, but not enough for everyone in the cell. Because it was so cold the concrete benches were like ice. Officials gave us thin aluminum blankets but as in Nogales they were not adequate to keep warm. The mothers wrapped their children in the blankets to try to keep them warm but they were still very cold.
15. There were two bathrooms in the cell and a sink. There was no soap or towels and still we were unable to shower or bathe.
16. We received the same snack food – a small burrito, crackers, a box of juice. Again there were not enough drinking cups for everyone and people had to share cups to drink water.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 9th day of January 2015 in Tucson, Arizona.



CERTIFICATE OF TRANSLATION

1. My name is James Lyall, and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, Araceli Castro Vasquez, in Spanish.
3. Araceli Castro Vasquez affirmed that the contents of the declaration were true and correct to the best of her knowledge.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 9th day of January 2015 in Tucson, Arizona.

A handwritten signature in black ink, appearing to be "J Lyall", written over a horizontal line.

EXHIBIT 23

DECLARATION OF MARIA LORENA LOPEZ LOPEZ

I, Maria Lorena Lopez Lopez, hereby declare:

I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

1. My name is Maria Lorena Lopez Lopez. I am a national of Guatemala. I am thirty years old and the mother of two children.
2. Prior to leaving my country I was sexually assaulted. I fled my country and I am afraid to return.
3. I am currently detained by U.S. Immigration and Customs Enforcement in Eloy, Arizona.
4. I speak Spanish. I do not speak or read English.
5. I was arrested by U. S. Border Patrol agents on or around the evening of January 2, 2015 near Naco, Arizona. The group I was with had been abandoned in the desert for approximately one week without enough food or water, so I was relieved when Border Patrol found us.
6. I was transported in a Border Patrol vehicle to what I believe was the Naco Border Patrol station. The trip lasted about twenty minutes.
7. At the Naco Border Patrol station, I did not receive a medical evaluation, even though I was experiencing heavy, sustained vaginal bleeding. I asked for medical attention but the agents said it was just my period and gave me some tampons. I was very worried about my health but I did not receive a medical examination until after I was transferred to ICE custody, approximately five days later.
8. In Naco, agents tried to get me to sign a deportation order, but I refused. I told them I was seeking asylum and that I wanted to see a judge, but the agents told me I was just here to work, and that I didn't have the right to see a judge because I broke the law. They had me sign a lot of other papers without explaining to me what they were.
9. I was detained in a concrete cell that was about four meters by four meters in size. There were a few concrete benches but no other furniture and no beds.
10. There were about fifteen other women in the cell with me, so it was very crowded and there was not enough room for everyone to sit or lie down on the benches.
11. There was one toilet and a sink, but no soap, towels, or waste bins.
12. The cell was very cold. Before they put me in the cell, Border Patrol agents removed my outer layers of clothing so all I was wearing was a blouse and a pair of tights.

13. We were each given a thin aluminum sheet but no other bedding or protection from the cold. The sheet did not keep me warm, and it was impossible to sleep on the cold concrete floor. Border Patrol left the cell lights on all night and it was very crowded in the cell, which made it even harder to sleep.
14. Border Patrol gave us small burritos and some crackers a few times a day, and sometimes we were given juice boxes, but I felt too sick to eat.
15. At one point, a Salvadoran woman was placed in our cell. She had also been in the desert for several days. Her feet were extremely swollen and she was in great pain. She asked for medical attention but in the time I was there with her she did not receive any.
16. After about two days, I was transferred to the Border Patrol facility in Tucson, where I was detained another two days in very similar conditions. The cell I was held in was about the same size as in Naco, but there were even more women in this one, approximately twenty. It was extremely crowded and again it was impossible for everyone to sit or lie down on the few concrete benches.
17. It was also very cold in the Tucson facility. One Mexican woman asked an agent to turn off the air conditioning. The agent said, "Don't ask or we'll turn it up."
18. Again we were given thin aluminum sheets that did not protect us from the cold. I tried to sleep on the concrete floor but still I could not sleep because of the cold and the bright lights.
19. As in Naco, there was one toilet and a sink, but there was no soap, towels, or waste bin.
20. In the approximately four days I was detained, I was not given the chance to bathe, shower, or brush my teeth, even though I had been in the desert for more than a week before I was apprehended.
21. There were not enough drinking cups so we had to share a few cups or re-use our juice cartons to drink water.
22. Someone asked an agent if she could make a phone call and the agent said no, so I did not ask to make a phone call.
23. At one point, a woman named "Rosa" arrived. She had been lost in the mountains for several days and was very sick with a fever and was shaking constantly. We asked Border Patrol to help but in the time I was there they did not do anything to help her.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 20th day of March 2015 in Eloy, Arizona.



CERTIFICATE OF TRANSLATION

1. My name is James Lyall, and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, Maria Lorena Lopez Lopez, in Spanish.
3. Maria Lorena Lopez Lopez affirmed that the contents of the declaration were true and correct to the best of his knowledge.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 20th day of March 2015 in Eloy, Arizona.

A handwritten signature in cursive script, appearing to read 'JL', is written over a horizontal line.

EXHIBIT 24

DECLARATION OF FRANCISCO CHAY QUINONES

I, Francisco Chay Quinones hereby declare:

I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

1. My name is Francisco Chay Quinones. I am a national of Guatemala. I am 24 years of age.
2. I speak and read Spanish. I do not speak or read English.
3. I was picked up by U. S. Border Patrol on June 28, 2014. When I was picked up, I was in the desert. I entered the United States near Sonora, Arizona and had been walking for about eight hours when I was picked up.
4. I was transported to a Border Patrol station that was about two and a half hours away from where I was arrested. I do not know the name of that station. I was driven there in a van. There were about 9 other people in the van with me.
5. Once at the Border Patrol station, I was placed in a cell that was about 25 feet by 15 feet. There were various cells at the Border Patrol station. I was held in three cells in total while I was there. There were about 10 people in the first cell, 20 people in the second, and about 60 people in the last. All of the cells I was held in were the same size. There were only men in the cells I was held in. ~~Children were with women.~~
6. The only furniture in the cell consisted of concrete benches that ran along the sides of the room and also ran down the center of the room. There were about five of these benches in the cell. There was enough space for approximately 30 people to sit down. In the last cell, there were not enough benches for everyone to sit on them at the same time. Because there was not enough room on the benches for everyone to sit at one time, some people had to stand or to sit on the floor.
7. I was first detained by Border Patrol on Saturday, June 28. I was there until Monday, June 30. I was held in the first cell for approximately two hours. I was held in the second cell for approximately three hours. I was held in the last cell for about two days and two nights, from about 6:00 p.m. Saturday until about 7:00 a.m. on Monday. There were no beds in the cell and we were not provided any blankets or other bedding except for an aluminum sheet. I first tried to rest by sitting down and then I had to sleep on the floor. The light was kept on all night which also made it very hard to sleep.
8. The temperature in the cell was very cold. People called it a hielera. When I was arrested I had a long sleeve military style jacket that I had just bought. Border Patrol took the jacket away from me. So, when I was in the hielera, all I had was a short sleeve shirt and the pants I was wearing. I was not able to get warm. There were no blankets given to us. The guards threatened that if they were too loud, they would make it colder. It was clear

people were cold – some were shivering. The guards would not change the temperature. All they gave us to stay warm were aluminum sheets that did not keep us warm.

9. There were three sinks in the cell but no soap. We used toilet paper to dry off. There also were no toothbrushes, toothpaste, or shower facilities.
10. There was an icebox that had water and ice, but there were no cups. To drink, when we got our food we got a little juice box. We then used those juice boxes, poked a hole in them, and then filled them with water.
11. We were given something to eat three times a day. Twice they gave us only cookies (just two cookies) and we had water. Once they gave us a rice and bean burrito with a juice box. I was hungry. It wasn't enough food. The food was barely edible but we had to eat it. I was so hungry that I had a hard time sleeping. The hunger was the worst on Sunday night.
12. I asked to use the phone to call a family member (some of my family lives in the United States, and some live in Guatemala) and was told that I could not make any phone calls at all. They said I would be able to call people once I got to the next jail. No one made any calls from the Border Patrol Station.
13. I was not informed by Border Patrol that I had a right to call the Guatemalan consulate. Other people in the cell told me that eventually, I'd be able to call the Guatemalan consulate.
14. I was never permitted to go outside or even to leave my cell.
15. While I was arrested in the desert, they asked me for my name and my family's names, where I was from, and then they asked me to sign a document, which I didn't have a chance to even look at. They said sign here. They did not provide me with a copy. I do not know what it was for.
16. When I got to the Border Patrol station, they took my fingerprints, and then they asked me to sign documents. They didn't give me a copy. The document was in English. They didn't translate it for me. They asked if I was threatened in my country and they said I'd need proof to win my case. I was made to understand that if I didn't sign, I'd be in jail for 3-4 more months. They said I might lose and I'd spend this time in jail for nothing.

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17. It took 2 hours to get from the Border Patrol Station to the courthouse where I got sentenced to one month.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 10th day of July 2014 in Florence, Arizona.



Francisco Chay Quinones

CERTIFICATE OF TRANSLATION

1. My name is Alejandro D. Barrantes Rojas, and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, Francisco Cloy Quinones, in Spanish.
3. Francisco Cloy Quinones affirmed that the contents of the declaration were true and correct to the best of his knowledge.

I declare under penalty of perjury of the laws that the foregoing is true and correct. Executed this 10 day of July 2014 in Florence, Arizona.



EXHIBIT 25

DECLARATION OF VERONICA RODRIGUEZ ALVARADO

I, Veronica Rodriguez Alvarado, hereby declare:

I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

1. My name is Veronica Rodriguez ^{Alvarado} ~~Hidalgo~~. I am a national of Mexico. I am 33 years of age. J.R.A.
2. I speak and read Spanish. I do not speak or read English.
3. I was picked up by U. S. Border Patrol agents around Sasabe, Arizona on/about December 5, 2014.
4. I was transported to the Tucson Border Patrol station. Before arriving in Tucson, the officers driving the van pulled over and made all of us throw out the food we had in our belongings. The trip lasted about one hour and 30 minutes. There were about eight other people in the van with me.
5. Once at the Tucson Border Patrol station, I was placed in a cell that was about 8 x 5 meters large. There were 13 women in the cell.
6. The only furniture in the cell consisted of concrete benches that ran along the sides of the room and also ran down the center of the room. At the time I was there, this was enough space for all 13 women to sit down.
7. I was kept in this cell for three days. I spent three nights in this cell. There were no beds in the cell and we were not provided any blankets or other bedding. We asked the guards for a cushion to sleep on because the floor was so cold. We were denied. I had to try and sleep on the concrete floor. The other women also slept on the floor and some slept on the benches.
8. The temperature in the cell was very cold. It was so cold, I had a severe headache and backache from the cold. The Border Patrol agents took my sweater from me before putting me in the cell, so all I was wearing was a short sleeve shirt.
9. There were no blankets given to us. The guards would not change the temperature. When we asked to raise the temperature, the guards ignored us. All they gave us to stay warm were aluminum sheets that did not keep us warm. I tried to curl up on the floor and huddle with some of the other women in order to stay warm, but I was not able to get warm. During the night, I would wake up often and walk around the cell to try to warm myself up.
10. There were two toilets in the cell. The toilet was only partially screened from view.
11. While I was detained, I had my menstrual period and so did a few other women. Each of us were only given two sanitary pads each day. This was not enough and other women

shared their unused pads with me. When we asked the guards for more pads, we were denied and told that there were no more.

12. There were two sinks in the cell but no soap or paper or cloth towels. It was impossible to wash your hands or clean yourself after using the toilet. There also were no toothbrushes, and no bathing or shower facilities. I brought a toothbrush, soap with me and it was taken away from me along with my other property.
13. There were no waste bins in the cell and there was garbage on the floor. The cell was dirty.
14. There was a water container in the cell but no cups for drinking water. Each one of use used the empty juice carton given to us during our meals to drink water. We asked three different guards for cups but they either ignored us or told us there were none.
15. We were given something to eat three times a day. The food consisted of a small burrito with meat and beans and/ or crackers and sometimes a small juice. It was too little to keep me from being hungry before the next meal.
16. I asked to use the phone to call a family member but I was told that I would only be allowed to call the consulate. I decided not to call.
17. One woman who was detained with me had a fever and asked the guards for medicine. She was told that they could not give her anything because they are not doctors and refused to help her.
18. The guards asked me to sign some documents that were in English. I did not understand the documents but signed them. I asked the guard when I would get my belongings back including my money and identification and was told that I was abandoning them and they would be destroyed after 30 days.
19. I have three U.S citizen children who are 13, 10 and 8 years old. I came to the U.S. to be with them. I lived in the U.S. for nine years previously.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 16th day of December, 2014 in Florence, Arizona.



A handwritten signature in black ink, appearing to be 'Antonio B.', is written over a horizontal line.

CERTIFICATE OF TRANSLATION

1. My name is Joana Foote, and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, Veronica Rodriguez Alvarado, in Spanish.
3. Veronica Rodriguez Alvarado affirmed that the contents of the declaration were true and correct to the best of her knowledge.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 16th day of December 2014 in Florence, Arizona.



A handwritten signature in black ink, appearing to read 'Joana Foote', is written above a horizontal line.

EXHIBIT 26

DECLARATION OF DOMITILA GOMEZ BARTOLOM

I, Domitila Gomez Bartolom, hereby declare:

I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

1. My name is Domitilia Gomez Bartolom. I am a national of Guatemala. I am 30 years of age.
2. I speak but do not read Spanish. I do not speak or read English.
3. My ten year old son and I were picked up by U. S. Border Patrol agents around Douglas, Arizona on December 16, 2014.
4. We were transported to the Douglas Border Patrol station. The trip lasted about 10 minutes. We were driven there in a Border Patrol car. There were about 3 other women with children in the car with us.
5. Once at the Douglas Border Patrol station, we were placed in a cell that was about 10 feet by 10 feet large. There were 6 other women with their children in the cell.
6. The only furniture in the cell consisted of concrete benches that ran along the sides of the room. Only about four of us fit on the benches so the rest of the women and children had to sit on the floor.
7. We were kept in this cell for 28 hours. We spent 1 night in this cell. There were no beds in the cell and we were not provided any blankets or other bedding. We had to try to sleep on the cold concrete floor.
8. The temperature in the cell was very cold. The Border Patrol agents took my shirt before putting me in the cell and only left me a light sweater.
9. All they gave us to stay warm were aluminum sheets that did not keep us warm. There was no way to warm up so we had to just put up with the cold. Neither my son nor I could sleep for more than half an hour because we were so cold and uncomfortable.
10. Half of the lights were kept on all night which also made it very hard to sleep. The cell was also very noisy because all of the children were crying.
11. There were two toilets in the cell. The toilet was only partially screened from view. We could see the others when they went to the bathroom. When we ran out of toilet paper, we had to wait fifteen minutes for the guards to bring us more. Detainees did not always flush toilet paper, so used toilet paper remained in the cell until the trash was removed.
12. There were two sinks in the cell but no soap or paper or cloth towels. We could not wash our hands well after going to the bathroom. There also were no toothbrushes, and no

- bathing or shower facilities. I brought a toothbrush, soap with me and it was taken away from me and they threw them away.
13. There were no waste bins in the cell and there was garbage on the floor. The cell was dirty and the smell was awful. They only came to clean twice and in the meantime the cell got very dirty from all of us.
 14. The other women who had babies had to beg the guards for diapers in order to obtain them.
 15. When we were detained we were already hungry and tired. We had not eaten for an entire day and a half.
 16. The other women and children were also tired and hungry from their journey.
 17. There was a water cooler in the cell but no paper cups and we had to refill old juice containers in order to drink water.
 18. We were given something to eat twice a day. The food consisted of only crackers and juice. It was very little food and my son and I were very hungry.
 19. I had a headache and a stomachache but I did not ask for medical attention because I was afraid that they would not help me.
 20. After 28 hours in the Douglas Border Patrol Station, I was taken to the Tucson Border Patrol Station.
 21. In Tucson, they put us in a cell that was 15 feet by 10 feet. There were ten women with approximately fifteen children in the cell when I arrived.
 22. Just like Douglas, the only furniture was concrete benches. There was not space for all of us on the benches so some of us had to sit on the concrete floor.
 23. My son and I were in the cell in Tucson for 48 hours. We spent two nights there. We were only given a thin mattress to sleep on. We were only able to sleep for a few hours at a time because it was so cold.
 24. Just like Douglas, the cell was very cold and we were only given aluminum sheets. Many children were crying because it was so cold.
 25. The light was left on all night, which made it difficult to sleep. It was also very noisy from all of the children crying.
 26. The toilets and sinks were similar to the facilities in Douglas.
 27. There was no water cooler in our cell so we were not able to drink water for the entire first day in Tucson. We had to ask several times for water and only on our second day did

they bring us a water cooler. We were all very thirsty because we had not had sufficient water.

28. We were given food twice a day. They only gave us juice and crackers to eat. It was too little food and my son and I were hungry before it was time for the next snack. My son cried because he was so hungry.

29. All of the children were dirty from days of not bathing and were crying because of the cold and their hunger.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 19 day of December 2014 in Tucson, Arizona.

Domitila Gomez

CERTIFICATE OF TRANSLATION

1. My name is ^{Joanna}~~Forte~~, and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, ^{Domitila Gomez}~~Bartolom~~, in Spanish.
3. ^{Domitila Gomez}~~Bartolom~~ affirmed that the contents of the declaration were true and correct to the best of his knowledge.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 19 day of December 2014 in Tucson, Arizona.

A handwritten signature in black ink, appearing to be 'Joanna', written over a horizontal line.

EXHIBIT 27

DECLARATION OF JOSE GARCIA RODRIGUEZ

I, Jose Garcia Rodriguez, hereby declare:

I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

1. My name is Jose Garcia Rodriguez. I am a national of Mexico. I am 24 years of age.
2. I speak and read Spanish. I do not speak or read English.
3. I was picked up by U. S. Border Patrol agents at/around Altar on/about December 6, 2014.
4. I was transported to the Casa ^{Grande} Border Patrol station. The trip lasted about two hours. I was driven there in a Border Patrol van. There were about seven other people in the van with me, including three women. *J.G.R.*
5. Once at the Casa Grande Border Patrol station, I was placed in a cell with about 18 other men.
6. The only furniture in the cell consisted of concrete benches that ran along the sides of the room. There were about ^{two} ~~four~~ of these benches in the cell. This was enough space for approximately 10 people to sit down. At the time I was there, this was enough space for everyone to sit down. *J.G.R.*
7. I was kept in this cell for 20 hours. I spent one night in this cell. There were no beds in the cell and we were not provided any blankets or other bedding. I had to try and sleep on the concrete bench.
8. The temperature in the cell was very cold. The Border Patrol agents took my backpack away from me before putting me in the cell, so all I was wearing was a long sleeve shirt even though I had a sweatshirt and extra pants in my backpack.
9. No blankets were given to us. The guards would not change the temperature. People inside the cell would yell to have the temperature turned up, but the guards did not pay any attention. I only slept about two hours while I was there because it was so cold and the bench was very hard.
10. The guards at Casa Grande would often yell at people in English when they didn't respond to questions or commands, even when they did not understand.
11. There were no showers or places to bathe in Casa Grande. I was not given soap, toothpaste or a toothbrush while I was there.
12. There was only one toilet in the cell in Casa Grande. It was dirty and not cleaned during the time I was there. The toilet was only partially screened from view. There was one sink in the cell in Casa Grande but there was no soap or towels.

13. While I was detained in Casa Grande, I was given two meals. One meal consisted of a package of crackers and juice and the second meal consisted of a small burrito and crackers. This was not sufficient food.
14. I was transported to Tucson in the afternoon by bus with approximately eight other people.
15. I was kept in a cell in Tucson for three days. I spent ^{two J.G.R.} ~~three~~ nights in the Tucson cell. There were about 45 people in the cell when I arrived there. There was not enough space in the cell. Many people were sitting or lying on the floor. When I arrived, I had to remain standing.
16. The only furniture in the cell consisted of three concrete benches that ran along the sides of the room and one that ran down the middle of the room. There were about four of these benches in the cell.
17. The temperature in the Tucson cells was very cold. We were each given an aluminum sheets but nothing else to keep us warm. I tried to cover myself as best I could to keep warm but the floor was really hard and cold. Due to the temperature in the cell and not enough space, I was only able to sleep for about six hours intermittently each day.
18. There were four toilets in the cell. The toilets were partially screened from view. There was not enough toilet paper for everyone. When we ran out of toilet paper, the guards did not pay attention. While I was there, we had to wait for eight hours before getting more toilet paper. The toilets were dirty and were only cleaned once while I was there. There were no trash cans in the cell so trash was put on the floor until it was removed.
19. There were four sinks in the cell but no soap or paper or cloth towels. It was impossible to wash your hands or clean yourself after using the toilet. There also were no toothbrushes, and no bathing or shower facilities.
20. There was a water container in the cell but no cups for drinking water. Each of us would use the empty juice cartons that were given to us with our meals.
21. We were given something to eat four times a day. The food consisted of crackers and/or a small burrito with juice. It was too little to keep me from being hungry before the next meal.
22. The Border Patrol guards in Tucson behaved very aggressively and were verbally abusive. They often yelled at people in English when they did not understand a question or a command. I felt humiliated seeing this behavior and treatment toward others.
23. While I was in Tucson, I was given various documents to sign. The Border Patrol official explained some of the documents to me but I did not understand many of the papers that I signed.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 16 day of December 2014 in Florence, Arizona.

Jose G.R.

CERTIFICATE OF TRANSLATION

1. My name is ^{Joana} Foote, and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, ^{Jose Garcia} Rodriguez, in Spanish.
3. ^{Jose Garcia} Rodriguez affirmed that the contents of the declaration were true and correct to the best of his knowledge.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 16 day of December 2014 in Florence, Arizona.



EXHIBIT 28

DECLARATION OF SOLEDAD HERNANDEZ YESCAS

I, Soledad Hernandez Yescas, hereby declare:

I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

1. My name is Soledad Hernandez Yescas. I am a national of Mexico. I am 28 years of age.
2. I speak and read Spanish. I only speak a little English.
3. I was travelling with my ten year old US citizen daughter, my eight year old US citizen son, my three year old daughter and my two year old daughter. We turned ourselves in to US Customs and Border Protection agents at the Nogales port of entry on March 31, 2015 around noon.
4. We were put in a holding cell at the port of entry, which was about 2 meters by 2 meters. We were the only people in the cell.
5. We were in this holding cell for approximately nine hours.
6. The only furniture in the cell were two metal benches.
7. The cell was painfully cold. We were so cold that my bones hurt and we were all shivering. We were only given a thin nylon sheet but it only helped us warm up a little bit. My children were crying because of the cold and my ten year old and eight year old, who are both US citizens, started to get sick because of the cold and developed a cough.
8. We were not given anything to eat for nine hours, until we were about to leave the cell. We had not eaten all day long and we were very hungry. My children were crying because they were so hungry.
9. There was a water cooler in the cell with cups.
10. There was no bathroom in the cell. We had to ask for permission when we wanted to go to the bathroom. The bathroom was located down the hall.
11. My two year old daughter still uses diapers and she dirtied her diaper but I was not able to change her. I asked the agents if I could take out the diapers that I had in my bag but they said I was not allowed to access my belongings. My daughter was crying because she was uncomfortable with her dirty diaper.
12. There was a sink in the bathroom but no soap. There were also no bathing facilities.
13. We were never asked any questions about our health nor were we given a formal medical exam.

14. In our time in the cell it was never cleaned.
15. I heard the agents talking amongst themselves that they wanted to just kick all of the Mexicans who were showing up.
16. I am still breastfeeding my two year old and while I was feeding her a male agent watched me the whole time. I heard them talking about my breastfeeding amongst themselves. I felt very uncomfortable when he was watching me and I think that he was doing it to bother me.
17. After nine hours in the holding cell at the Nogales port of entry, we were transferred to the Tucson Border Patrol station.
18. Once at the Tucson Border Patrol station, we were placed in a cell that was about 3 meters by 3 meters large. There were three other families in the cell and in total, including children, there were fourteen people in total.
19. The only furniture in the cell consisted of concrete benches that ran along the sides of the room.
20. We were kept in this cell for 19 hours. We spent 1 night in this cell. There were pads on the ground that were about three inches thick. We slept on those pads.
21. There were two toilets in the cell. The toilet was only screened by a short wall.
22. I did not have an opportunity to change my daughter's diaper even though I asked for diapers. So I decided to throw away her dirty diaper and just be very attentive to whether or not she wanted to go to the bathroom.
23. There were two sinks in the cell but no soap or paper or cloth towels. It was impossible to wash your hands or clean yourself after using the toilet. There also were no toothbrushes, and no bathing or shower facilities. I brought a toothbrush, soap with me and it was taken away from me.
24. There were no waste bins in the cell and there was garbage on the floor. The cell was dirty.
25. The agents asked us to sweep up the cell. They asked us "who came to the US to work?" and handed us a broom.
26. The cell was never cleaned more thoroughly than simply us sweeping up the trash. No one ever came to clean the bathroom or disinfect any of the surfaces in the cell.
27. There was a water container in the cell but no cups. We had to reuse our old juice boxes to be able to drink the water.

28. We were given something to eat three times a day. The food consisted of crackers, burritos and juice.
29. I was never given the opportunity to make a phone call.
30. We were never asked about our health when we arrived, nor were we given a formal medical exam. My ten year old and eight year old at this point felt very sick but were not offered medical care.
31. I was sad while in detention because I saw how my children were suffering.
32. I lived six years in the US and have two US citizen children.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 2 day of April, 2015 in Tucson, Arizona.

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CERTIFICATE OF TRANSLATION

1. My name is Joanna Foote, and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, Soledad Hernandez Yescas, in Spanish.
3. Soledad Hernandez Yescas affirmed that the contents of the declaration were true and correct to the best of his knowledge.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 2 day of April in Tucson, Arizona.

A handwritten signature in cursive script, appearing to read 'Joanna Foote', is written over a horizontal line.

EXHIBIT 29

DECLARATION OF NELVIA MAZARIEGOS MORALES

I, Nelvia Mazariegos Morales, hereby declare:

I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

1. My name is Nelvia Mazariegos Morales. I am a national of Guatemala. I am 19 years of age.
2. I speak and read Spanish. I do not speak or read English.
3. I and my one and a half year old daughter were detained by U. S. Border Patrol agents around Douglas, Arizona around 4pm on Friday, February 20th.
4. We were transported to the Douglas Border Patrol station. The trip lasted about 25 minutes. We were driven there in a Border Patrol van. We were the only two passengers in the van.
5. Once at the Douglas Border Patrol station, we were placed in a cell that was about two meters by three meters large. There was one other mother and two children in the cell with us.
6. The only furniture in the cell consisted of one concrete bench that ran along one side of the cell.
7. We were kept in this cell for 19 hours. We spent one night in the cell. There were no beds in the cell and we were not given any blankets or bedding. We had to sleep on the ground.
8. The temperature in the cell was very cold. When we were put in the cell the Border Patrol agent took away my sweater so I was only wearing a short sleeve shirt.
9. We found a thin aluminum sheet in the cell that we wrapped up in to stay warm. The sheet helped a little bit but I was still very cold because we were sleeping on the cold floor.
10. My daughter cried because her feet hurt since they were cold.
11. My daughter and I only slept about three hours. We were not able to sleep much because it was so cold and my daughter could not sleep on the hard floor.
12. There was one toilet in the cell. The toilet was only partially screened by a short concrete wall.
13. There was one sink in the cell but no soap or paper or cloth towels. So we were not able to wash our hands after going to the bathroom. There also were no toothbrushes, and no bathing or shower facilities.

14. The cell was very dirty with trash strewn across the floor. During our time in the cell, no one came to clean.
15. For the first 19 hours in detention, the agents did not give me any diapers for my one and a half year old daughter. She dirtied her diaper and had to spend the whole night with a dirty diaper. I couldn't ask for diapers until 11am the next day because the door was closed and I did not see any agents to ask.
16. By the time we were detained, we were already tired from walking in the desert. We had not eaten anything other than crackers and juice since Tuesday so we were already very hungry.
17. I did not notice any water container in the cell in Douglas. We tried to stay hydrated just by drinking the juice that we were given.
18. We were given food approximately four or five times over the course of our time in Douglas. The food consisted of burritos, juice and crackers. My daughter was not used to the food so she did not eat anything and was very hungry.
19. When we arrived, we were not given any medical exam. We were also not asked about our health. My baby's stomach was hurting badly but we did not receive any attention for the problem.
20. After spending 19 hours in this cell, we were transferred to the Tucson Border Patrol station. We spent a total of 20 hours in the Tucson station and spent one night there.
21. The facilities in the Tucson station were similar to those in Douglas, except that there were thin mattresses on the floor on which we could sleep.
22. The cell in Tucson was still very cold and just like in Douglas we were only given thin aluminum sheets to keep warm, which did not help much.
23. The food was similar to that in the Douglas station. There was, however, a water container in Tucson but no cups so we did not drink water.
24. In Tucson we were not given any medical exam nor did any agents ask us about our health.
25. I felt very bad while I was detained because we couldn't communicate our needs to the agents and it was very cold. My daughter cried for most of the time that we were detained because of the bad conditions.
26. I am afraid of returning to my country.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 24 day of February, 2015 in Tucson, Arizona.



CERTIFICATE OF TRANSLATION

1. My name is Joanna Foote, and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, Nelvia Mazariegos Morales, in Spanish.
3. Nelvia Mazariegos Morales affirmed that the contents of the declaration were true and correct to the best of his knowledge.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 24 day of February 2015 in Tucson, Arizona.

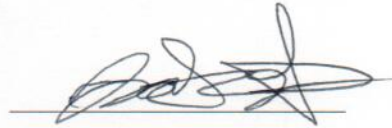
A handwritten signature in black ink, appearing to read 'Joanna Foote', is written over a horizontal line.

EXHIBIT 30

DECLARATION OF MAURA VELASQUEZ HERNANDEZ

I, Maura Velasquez Hernandez, hereby declare:

I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

1. My name is Maura Velasquez Hernandez. I am a national of Guatemala. I am 26 years of age.
2. I speak and read Spanish. I do not speak or read English.
3. I was travelling with my six year old son and my two year old son when we were detained by U. S. Border Patrol agents around Douglas, Arizona around 1am on Saturday, February 21st.
4. We were transported to the Douglas Border Patrol station. The trip lasted about 20 minutes. We were driven there in a Border Patrol van. There was one other mother with two children in the car.
5. Once at the Douglas Border Patrol station, We were placed in a cell that was about three meters by three meters large. There was only one other mother with two children in the cell.
6. The only furniture in the cell consisted of one concrete bench that ran along two sides of the cell.
7. We were kept in this cell for 28 hours. We spent 2 nights in this cell. There were no beds in the cell and we were not provided any blankets or other bedding. We had to sleep on the ground.
8. The temperature in the cell was very cold. The first night we were not even given a thin aluminum sheet to keep warm. I put my sweater on the ground so that my children could at least lay on that.
9. The second night we were given a thin aluminum blanket. That blanket helped slightly for us to keep warm but we still had to lay on the cold concrete floor to sleep so we were still very cold.
10. Due to the temperature in the cell, I was not able to sleep at all. My children only slept a few hours.
11. It was also difficult to sleep because they called me out four times to interview me.
12. There was one toilet in the cell. The toilet was only partially screened by a short wall.

13. There was one sink in the cell but no soap or paper or cloth towels. So we were only able to rinse our hands after going to the bathroom. There also were no toothbrushes, and no bathing or shower facilities.
14. I did not have any diapers for my two year old son and I had to be very attentive to whether or not he needed to go to the bathroom to try to keep his diaper as clean as possible. But his diaper became soaked through with urine.
15. We were tired when we were detained because we had been crossing the desert.
16. There was a sign above the sink that said "drinking water." There were no cups so we had to drink the water out of our hands.
17. We were not given food until Saturday afternoon. In order to eat the first night, we found some crackers that were lying on the ground and left over from the other families. We divided the crackers amongst the four children in the cell but my son kept crying and saying that he wanted food.
18. When they finally did give us food twice or three times, the food consisted of juice, crackers and burritos. The food was barely edible. We were very hungry because we had not eaten for over a day.
19. We could not ask for any food or water when we needed it because the cell was completely closed off and we could not see any agents.
20. When we arrived, we were not asked any questions about our health nor were we given a medical exam. My son and I had a bad cough but we did not receive any treatment.
21. When I was taken out of the cell for my interviews, I heard one other migrant said that he felt very sick and the Border Patrol agent said that he would have to put up with the sickness because there was no way to get medical attention.
22. I signed several documents and they never told me what the documents said. The agents simply told me to sign without explaining.
23. After spending 28 hours in this cell, we were moved to the Tucson Border Patrol station. We spent a total of 12 hours in the Tucson station.
24. The facilities in the Tucson station were similar to those in Douglas, except that in Tucson the cell was slightly larger.
25. There were also mattresses on the floor and there were two toilets.
26. In Tucson the cell was at least partially open so we could call to the agents to make requests, unlike in Douglas.
27. I felt terrible while detained because I was disoriented and did not know what was happening.

28. I am afraid of returning to my country.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 23 day of February, 2015 in Tucson, Arizona.

A handwritten signature in black ink, appearing to read "Maria T. Hu", is written over a horizontal line. The signature is somewhat stylized and scribbled.

CERTIFICATE OF TRANSLATION

1. My name is ^{Joana} Foote, and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, ^{Maura Velasquez} Hernandez in Spanish.
3. ^{Maura Velasquez} Hernandez affirmed that the contents of the declaration were true and correct to the best of his knowledge.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 11 day of February 2015 in Tucson, Arizona.



EXHIBIT 31

DECLARATION OF CECILIO MEDINA VALENCIA

I, Cecilio Medina Velencia, hereby declare:

I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

1. My name is Cecilio Medina Velencia. I am a national of Mexico. I am thirty years of age. I am the father of two U.S. citizen children.
2. I speak Spanish. I do not speak or read English.
3. I was picked up by U. S. Border Patrol agents on or around December 6, 2014 in Nogales, Arizona.
4. I was transported to the Nogales Border Patrol station. The trip lasted about ten minutes. I was driven there in a Border Patrol truck and arrived around mid-afternoon.
5. At the Nogales Border Patrol station, I was placed in a cell that was about three meters by four meters. There were about five concrete benches, but no other furniture in the cell. When I arrived, there were about thirty-five other people in the cell. As more people arrived, there may have been upwards of forty people. It was extremely crowded and there was not enough room to lie down or for everyone to sit on the benches. People were sitting and lying on the floor.
6. The temperature in the cell was very cold. The Border Patrol agents took my clothes and belongings from me before putting me in the cell, so all I was wearing was a shirt. It was not enough to keep warm.
7. I spent the night in this cell and was there for about fifteen hours in total. There were no beds in the cell and I was not provided any blankets or other bedding apart from a thin aluminum blanket.
8. I had to try to sleep on the cold concrete floor, but I was unable to fall asleep because of the cold and because there were so many people in the cell it was very uncomfortable. The light was kept on all night, which also made it very hard to sleep.
9. There were three toilets in the cell. The toilet was partially screened from view behind a short wall, but with so many people in the cell there was no privacy. There was no waste basket so there was trash and paper on the floor.
10. There were sinks above the toilets, but no soap and no towels. We could not wash our hands or clean up after eating or using the toilet. There also were no toothbrushes, and no bathing or shower facilities. Most of the people in the cell were apprehended in the desert and were dirty from days of walking, but they were not able to bathe either.
11. There was a water cooler in the cell but no cups. So, we had to use discarded juice cartons to drink water.

12. Agents brought us a little food, some crackers and a small burrito, but it was not enough to eat and I was still hungry after eating.
13. The day after I was arrested, I was put on a bus with about thirty other people and sent to the Border Patrol station in Douglas, Arizona. There was no explanation provided about where I was going or why, but at some point I heard we were being sent to Douglas.
14. In Douglas, they put me in a cell without about thirty or thirty five other people. The room was about the same size as the previous cell in Nogales, so again it was very crowded with so many people. There were some metal benches along the wall but not enough for everyone to sit down, so again people were lying and sitting on the floor.
15. There was only one bathroom and one sink. There was no soap and no towels, and no way to bathe.
16. There were no beds and we did not receive any blankets or other bedding. I tried to sleep on the floor but again it was too cold and uncomfortable.
17. Again our water came from a thermos, and again we had to drink from used juice cartons. We were fed small portions of crackers and burritos but I was still hungry.
18. After about two days in the Douglas Border Patrol station, I was driven to court in Tucson.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 16th day of December 2014 in Florence, Arizona.

Cecilia Medina

CERTIFICATE OF TRANSLATION

1. My name is *Joanna Fante* , and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, *Cecilio Medina Valencia* , in Spanish.
3. *Cecilio Medina Valencia* affirmed that the contents of the declaration were true and correct to the best of his knowledge.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 16th day of December 2014 in Florence, Arizona.



EXHIBIT 32

DECLARATION OF CELIFLORA RODRIGUEZ JUAREZ

I, Celiflora Rodriguez Juarez, hereby declare:

I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

1. My name is Celiflora Rodriguez Juarez. I am a national of Mexico. I am 22 years of age.
2. I speak and read Spanish. I do not speak or read English.
3. I was picked up by U. S. Border Patrol agents around Naco, Arizona on December 6, 2014.
4. I was transported to the Naco Border Patrol station. The trip lasted about 15 minutes. I was driven there in a Border Patrol van. I was the only person in the vehicle.
5. Once at the Naco Border Patrol station, I was placed in a cell that was about 3 meters by 2 meters. There were eight other people in the cell.
6. There were two concrete benches in the cell. There was not enough space on those two benches for all nine of us to sit. The rest had to sit on the ground.
7. I was kept in this cell for about 40 hours. I spent 2 nights in this cell. There were no beds in the cell and we were not provided any bedding. I had to sleep on the concrete floor.
8. The temperature in the cell was very cold. The Border Patrol agents took my jacket from me before putting me in the cell, so all I was wearing was a very thin long sleeve shirt.
9. They gave us only one aluminum blanket per person. The blanket did not help me keep very warm. Due to the temperature in the cell, I was only able to sleep for about four hours each night.
10. There was no space for all of us to sleep. Some of us had to even sleep in the bathroom. We were packed in tightly when we laid down. The light was kept on all night which also made it very hard to sleep.
11. There was one toilet in the cell. The toilet was only partially covered from view. When we ran out of toilet paper, we asked a guard for toilet paper and often it took them time to bring us more. Other people in the cell threw the toilet paper on the floor and so the bathroom got dirty.
12. There were two sinks in the cell but no soap or paper or cloth towels. So there was no way to wash your hands or clean yourself after using the toilet. There also were no toothbrushes, and no bathing or shower facilities. I brought a toothbrush and soap with me and it was taken away from me by Border Patrol.

13. The sinks had a leak so the water ran out into the cell. Some other women had to dry off the floor with paper so that they could sleep there.
14. There were no waste bins in the cell and there was garbage on the floor. The cell was dirty and the smell was awful.
15. I was very hungry and thirsty when I was detained.
16. There was a water cooler in the cell and but no cups for drinking water. We would use our old juice boxes and fill them with water so that we could drink.
17. They gave us food twice a day. Once it was crackers and juice and the second time burritos and crackers. The food was not sufficient and I was very hungry.
18. After about 40 hours in the Naco Border Patrol Station, I was transferred to another Border Patrol station.
19. I was put in a cell that was 3 meters by 4 meters. There were twelve of us in the room.
20. There were three concrete benches in the room. There was not room for all of us on the benches so some of us stayed on the ground.
21. Just like in Naco, they gave us each one aluminum blanket but we were very cold and it was difficult to sleep because there was no bedding.
22. I was in the cell for about 24 hours and spent one night there. I had to sleep on the floor. It was difficult to sleep because it was so cold.
23. There were two toilets. The floor around the toilets were dirty because of the dirty toilet paper on the ground.
24. There were two sinks in the cell. There was no soap or towels in the bathroom.
25. Just like the other facility, they gave us burritos twice and once they gave us crackers and juice. The burrito made my stomach hurt.
26. There was a water cooler but no cups. We had to use our old juice boxes to drink water.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 16th day of December 2014 in Florence, Arizona.



CERTIFICATE OF TRANSLATION

1. My name is JAMES LYALL, and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, CELIFLORA RODRIGUEZ SUAREZ, in Spanish.
3. CELIFLORA RODRIGUEZ SUAREZ affirmed that the contents of the declaration were true and correct to the best of her knowledge.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 16th day of December 2014 in Florence, Arizona.

A handwritten signature in black ink, appearing to be 'JL', written over a horizontal line.

EXHIBIT 33

DECLARATION OF NASARIO GONZALEZ-PELEAZ

I, Nasario Gonzalez-Peleaz, hereby declare:

I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

1. My name is Nasario Gonzalez-Peleaz. I am a national of Mexico. I am 40 years of age.
2. I speak Spanish and read some. I speak and read only a little English.
3. I was picked up by U. S. Border Patrol agents in the desert around Agua Prieta on December 6th.
4. I was transported to the Douglas Border Patrol station. I was driven there in a Border Patrol van with 4 other people in the van with me.
5. Once at the Douglas Border Patrol station, I was placed in a cell that was about 15 meters by 15 meters large. There was one large concrete bench running along the outside of the cell. There were between 30-40 other people in the cell. There were so many people that many of us had to stand and had barely any room to move. Some of us were on the floor as well.
6. I spent 2 nights in this cell. I did not sleep the entire time because there was no place to sit or lie down, and I was sandwiched between other people. The cell was very cold, and the lights were on the entire night. They took my warm clothes, and only gave us an aluminum sheet with which to sleep. It did not help to keep me warm.
7. There was one toilet in the cell. It was only partially hidden from view by a small wall.
8. There was one sink but no soap or towels. Most people had spent a lot of time in the desert and were very dirty, but it was impossible to really wash your hands or clean yourself after using the toilet. The conditions became disgusting with so many people packed into a cell in this way.
9. The floor was covered in garbage and toilet paper that people had used to dry their hands after going to the bathroom. There was nowhere else to put it.
10. I was hungry and tired the entire time. I never slept, and my back became sore from standing. There were people all around me, including at my feet.
11. Many people were sick, and the cell was full of the sound of coughing.
12. There was a water container in the cell, but no cups. We would run out of water often because there were so many people and the guards would not listen when we asked for more. We could only drink the smallest amount to get by.

13. We would be given a small burrito, crackers, and a small juice. But sometimes we wouldn't even get the burrito. Sometimes they would bring us food in the middle of the night when we were sleeping and it would be old by the time people woke up. Burritos *NP* would lie on the cold ground during the night. When we asked for more food, it was never given. The food was never enough, and I was very hungry.
14. I have Advil in my backpack for my back, but the agents took the pills away from me when they placed me in the cell.
15. The guards did not respond to our needs, when we asked for more food or water. They would tell us not to ask for anything.
16. I then was moved to the Border Patrol station in Tucson, where I was kept for a few hours before court. The cell there was basically the same as in Douglas, with very many people in the cell with me.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 16th day of December 2014 in Florence, Arizona.

NARAO. G P.

CERTIFICATE OF TRANSLATION

1. My name is JAMES LYALL, and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, Nasario Gonzalez-Peleaz, in Spanish.
3. Nasario Gonzalez-Peleaz affirmed that the contents of the declaration were true and correct to the best of his knowledge.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 16th day of December 2014 in Florence, Arizona.

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

EXHIBIT 34

DECLARATION OF ANGEL HERNANDEZ REYES

I, Angel Hernandez Reyes, hereby declare:

I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

1. My name is Angel Hernandez Reyes. I am a national of Mexico. I am 28 years of age.
2. I speak Spanish. I can understand a little English but cannot read or write in English.
3. I was apprehended by U. S. Border Patrol on the morning of Friday, June 27, 2014 near Sasabe, Arizona.
4. I was transported to the Tucson Border Patrol detention facility in Tucson, Arizona. The trip lasted about an hour. I was driven there in a Border Patrol truck with two other detainees.
5. We arrived at the Tucson facility around noon. I was placed in a cell that was about 30 feet by 20 feet in dimension. I was placed in the cell alone, but that afternoon more people were placed in the cell. Eventually there were about 50 people in the cell. It became so crowded that there was hardly any room to move.
6. The only furniture in the cell was concrete benches that along the sides of the room and along the sides of a short wall in the center of the room. This was enough space for approximately 20 people to sit down. Because there was not enough room on the benches for everyone to sit at one time, most of the people in the cell had to stand or to sit on the floor.
7. There were other cells in the facility that did not have nearly as many people in them, but officials did not move some of us to other cells to create more space.
8. I was kept in this cell for about 66 hours. There were no beds in the cell and we were not provided any blankets or other bedding. I had to try and sleep on the concrete floor. The light was kept on all night which also made it very hard to sleep. I was kept a total of three nights in this cell.
9. The temperature in the cell was extremely cold. The Border Patrol agents took my extra clothes from me before putting me in the cell, so all I was wearing was a short sleeve shirt. I asked for more blankets but officials told me we could only have one aluminum blanket. It was not enough to keep warm and I was shivering constantly. Someone asked the officials to make the cell warmer, but they were ignored; in fact, after the request was made we could feel the cell get even colder.
10. Once a day we were taken out and lined up in the hallway while someone cleaned the cell. They only spent a few minutes cleaning and the cell was still dirty afterwards.

11. There were three toilets in the cell but one was broken and was covered with plastic wrap. The toilets were only partially screened from view behind a short wall.
12. The sinks were built into the toilets, with a small wash basin above the toilet. Only one of the sinks worked properly; the other two did not produce enough water to wash our hands. There was no soap, and no paper or cloth towels. It was not possible for us to wash our hands after using the toilet. There also were no toothbrushes, toothpaste, or shower facilities.
13. There was a water container in the cell and but no cups for drinking water. We had to drink from our used juice boxes to drink water.
14. We were given something to eat three times a day. The food consisted of a small burrito or a packet of peanut butter crackers, sometimes with a box of juice. It was too little to keep me from being hungry all the time. There was nowhere to put the wrappers for the food so used food wrappers were always scattered around on the ground.
15. I asked to use the phone to call a family member and was told that I could not call anyone except for my consulate.
16. I was never permitted to go outside or even to leave my cell.
17. While I was detained, I signed documents I did not understand. The official gave me a stack of papers written in English and told me that I had to sign.

PENALTY OF PERJURY A H

I declare under penalty of perjury of the laws that the foregoing is true and correct. Executed this 10th day of July 2014 in Florence, Arizona.

Angel H
Angel Hernandez Reyes

CERTIFICATE OF TRANSLATION

1. My name is Yessenia Medrano, and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, Angel Hernandez Reyes, in Spanish.
3. Angel Hernandez Reyes affirmed that the contents of the declaration were true and correct to the best of his knowledge.

I declare under penalty of perjury of the laws that the foregoing is true and correct. Executed this 11 day of July 2014 in Florence, Arizona.



A handwritten signature in blue ink, appearing to read 'Yessenia Medrano', written over a horizontal line.

EXHIBIT 35

DECLARATION OF FLORA ELIZABETH GONZALEZ GOMEZ

I, Flora Elizabeth Gonzalez Gomez, hereby declare:

I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

1. My name is Flora Elizabeth Gonzalez Gomez. I am a national of Guatemala. I am 21 years of age.
2. I speak and read Spanish. I do not speak or read English.
3. I and my three year old daughter turned ourselves into Customs and Border Patrol agents at the Nogales port of entry on Tuesday, February 24th, 2015 at 10am.
4. We were put in a small mesh tent that was about 2 meters by 2 meters. There were one other woman with her child and a fourteen year old unaccompanied minor in the tent with us.
5. We were detained in the tent for approximately 14 hours. We spent part of one night in the tent.
6. The only furniture in the tent was one small metal bench and a small cot. There was not space on the cot for all of us in the tent so my daughter and I slept on the cot and the unaccompanied minor slept on the bench. The other woman and her child were transferred to another tent where there were many more families.
7. The fourteen year old unaccompanied minor in the tent was chained at the ankles.
8. It was very cold in the tent. My sweater was taken away from me when we were detained and we were only given two nylon blankets. The blankets helped up stay a little warm, but we were still cold.
9. The bathroom was in another room. We had to ask permission to go to the bathroom.
10. There was a sink in the bathroom but no soap so we could not wash our hands well after using the toilet. There were no bathing or shower facilities. We were not given toothbrushes. I had a toothbrush in my bag but they did not allow me to take it out and use it.
11. We were not given water and there was no water container in the tent. I saved my extra juice for my daughter because she was thirsty. We had to ask permission to go outside to the water containers, but there was no cup with the container so we were not able to drink the water. I was very thirsty because I could not drink any water
12. We were only given food twice in the fourteen hours we were detained there. The food consisted of crackers, juice, and burritos. But the food was difficult to eat because it made

- us feel sick. My daughter was crying because she was hungry. One official brought her an extra cup of soup, but the rest of the officials did not respond as she continued to cry.
13. We had not eaten for a day before we were detained so we were already hungry and thirsty and tired.
 14. We were never given a medical exam. At the time when we turned ourselves in, I had pills with me because I get very bad migraines and stomachaches. But those pills were taken away from me and my head began to hurt as well as my stomach.
 15. The CBP agent who interviewed me said I was lying to her, even though I protested that I was telling the truth. She and other agents said that we were just coming to invade the US and said that it was a waste of time for us
 16. I signed various papers. I asked what the papers said and they said that I was obligated to sign all of the papers. I did not understand what the papers said because the majority of the papers were in English and the CBP agents did not explain them to me. Of all of the papers I signed, only two were in Spanish. I did not want to sign the papers I didn't understand but I thought I had no option and that they would not let me go until I signed.
 17. After fourteen hours in the tent, we were put in a bus and transferred to the Tucson Border Patrol Station.
 18. Once at the Tucson Border Patrol station, we were placed in a cell that was about 3 meters by 4 meters large. There were seven other mothers and eight children in the cell with us.
 19. We were in the Tucson station for 14 hours.
 20. The only furniture in the room was a long concrete bench that ran along three walls of the room.
 21. We were given very thin two inch pads to put on the floor. There was barely space for all of us to lay down on the pads and we felt very crowded on the floor.
 22. The cell was very cold. We were given a thin aluminum sheet but it was difficult to stay warm. The cold made my daughter cough and cry as well.
 23. There was no trash can. The cell was very dirty because the floor was covered with trash. A cleaning crew came once to clean out the trash.
 24. There were two toilets, which were only partially hidden by a short wall. We were embarrassed to use the bathroom because the officials could see us. One of the toilets was backed up and smelled terrible. The bad smell made my head hurt. Even when people came to clean the cell, they did not clean the bathroom.

25. There were two sinks. But we did not use the second sink because it was above the bathroom that smelled terrible. There was no soap in the sink so we could only rinse our hands.
26. There was a water container in Tucson but no cups. I had to reuse the juice container to drink water. My head hurt from dehydration because it had already been almost a day since I had drank water.
27. We were given food twice in our time in Tucson. The food consisted of crackers, juice and burritos. But the food was barely edible and my daughter cried from hunger.
28. We were never told that we could use the phone in Tucson.
29. ~~In Tucson, the Border Patrol agent threw away my pills.~~ I had a severe migraine and stomach pain because I need those pills for my medical problems. (9)
F.K.G.
30. We were not given a medical exam in Tucson. One agent asked how we felt and I said that my head and stomach hurt but they did not offer me medical care. One woman said that her stomach hurt and the agents said that it was just because of hunger or cold and was unimportant and she did not need medical attention. The woman was crying because of the pain.
31. I felt desperate while I was detained because I was so hungry and in so much pain. My daughter cried most of the time that we were detained.
32. I am afraid of returning to my country.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 26 day of February, 2015 in Tucson, Arizona.



CERTIFICATE OF TRANSLATION

1. My name is Josuan Foote, and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, Flora Elizabeth Gonzalez Gomez, in Spanish.
3. Flora Elizabeth Gonzalez Gomez affirmed that the contents of the declaration were true and correct to the best of his knowledge.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 26 day of February 2015 in Tucson, Arizona.

