

Declaration of Katherine Shattuck

My name is Katherine Shattuck. I am a first-year law student at the University of Washington School of Law in Seattle, WA. I served as a volunteer with the CARA Family Detention Pro Bono Project at the South Texas Family Residential Center, known as "Dilley," during the week of August 30, 2015.

On Friday, September 4, 2015, I met with [REDACTED], a mother from [REDACTED] detained at Dilley with her [REDACTED] son. We met for an initial intake in the visitation trailer at approximately 11:00 AM. At approximately 11:30 AM, a uniformed employee for Corrections Corporation of America (CCA), the private prison contractor who runs the Dilley facility, approached Ms. [REDACTED] and informed her that Immigration and Customs Enforcement (ICE) officials had been looking for her for because she "had to go to court." I informed the employee that we were unaware that our client had a hearing today. He told me it was his understanding that Ms. [REDACTED] did not have a court hearing, but rather a meeting with ICE "in court" at 11:00 AM. He said he did not have any more information about the nature of the appointment. I explained that we were about halfway through a scheduled appointment with Ms. [REDACTED]. I said we had not been informed of the appointment with ICE. I showed the employee a signed G-28 for CARA Project lead attorney, Brian Hoffman, and told him that I would like to accompany our client to her appointment. He did not object.

When I arrived at the court, another CCA employee opened the door and asked why I was there. I told her I was a representative of the CARA project who had come to accompany our client to a meeting at the court. I told her that Ms. [REDACTED] had signed a G-28 authorizing the CARA Project to represent her in immigration matters before ICE and USCIS. She told me that "no one" had court that day, and said that the meeting would be held in a room "next to" the court. She seemed upset by my efforts, and she directed me to an ICE officer standing outside the court building.

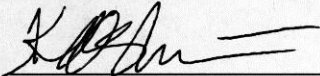
I approached the officer. I think his name was Officer [REDACTED]. I explained that Ms. [REDACTED] had been called to "court" in the middle of our intake meeting. The officer told me that Ms. [REDACTED] would not have been scheduled for court, but likely had a routine meeting with ICE. I explained that Ms. [REDACTED] had signed a G-28 authorizing the CARA Project to represent her in immigration matters before ICE and USCIS, and I requested that I be allowed to accompany her to the meeting. The officer said that was not possible. He said that ICE and the CARA Project had agreed that counsel could only be present at "legal proceedings." He said that the appointment was an introductory meeting that did not constitute a legal proceeding. I asked for more information about the meeting, and he again told me it was a routine appointment. I said it was our understanding that a G-28 allows the CARA Project to act as counsel to clients throughout their detention. I said that any discussions between ICE and the client, especially when presented as a meeting in "court," would seem to have legal ramifications. He replied that it was not feasible for counsel to be present at all interactions between CARA clients and ICE. I expressed that I understood that, but that to call a client to a meeting in "court" and deny access to legal counsel concerned me. I said our capacity to effectively represent the detained women

required that ICE communicate more clearly with us and with our clients. I asked that he convey these concerns to ICE. The officer was extremely polite during our conversation.

I met with Ms. [REDACTED] briefly a few minutes later. She stated that when she entered the court building, the woman at the front desk berated her for arriving late to her appointment. Ms. [REDACTED] told me she explained to the woman that she had not been informed of the meeting, but the woman insisted that she had, and continued to scold her. Ms. [REDACTED] was informed that her ICE officer had left, and that she would be called back for the meeting later in the day.

Ms. [REDACTED] was extremely upset when I spoke with her a few minutes after this incident. She was confused about the nature of the meeting and fearful of meeting with ICE without a legal representative. She reiterated several times that she had not been notified in advance of the meeting. Ms. [REDACTED] was tearful, and appeared intimidated and humiliated. I did not have the chance to speak with Ms. [REDACTED] about the details of the meeting with ICE because this day was my last day volunteering at the Dilley facility.

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


Katherine Shattuck

09/17/2015
Date