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12 **UNITED STATES DISTRICT COURT**  
13 **SOUTHERN DISTRICT OF CALIFORNIA**

15 Ms. L. et al.,

16 *Petitioners-Plaintiffs,*

17 v.

18 U.S. Immigration and Customs Enforcement  
19 ("ICE"); et al.,

20 *Respondents-Defendants.*  
21  
22  
23  
24

Case No. 18-cv-00428-DMS-  
MDD

Date Filed: June 25, 2018

**PLAINTIFFS'**  
**SUPPLEMENTAL**  
**MEMORANDUM IN**  
**SUPPORT OF CLASSWIDE**  
**PRELIMINARY INJUNCTION**

NO HEARING DATE

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## INTRODUCTION

On March 9, when Plaintiffs first sought classwide relief, the government had already taken hundreds of children from their parents. When this case was argued before the Court on May 4, the number of separated children had grown to more than 700. The government has since confirmed that between May 5 and June 9 alone, over 2,300 children were separated from their parents. More than 2,000 of those children remain separated. This follows the government’s “zero tolerance” policy announced on May 7, three days after this Court held arguments.

On June 20, President Trump signed an Executive Order that purports to end further separations. It does not. The Order contains explicit loopholes, including an exception for separations that the government deems in the “interests” of the child. Because the government interprets that best-interest standard in a way that would allow separations that are inconsistent with this Court’s prior due process opinion—and with universally accepted child welfare norms—a preliminary injunction remains critical to prevent future unlawful separations.

Even more pressing, the Order does not address the reunification of already-separated families at all, and the government has no meaningful plan for swiftly ensuring that such reunifications occur. Thus, thousands of families remain separated, and many parents have no idea where their children are or how to find them. With each added day of separation, the terrible trauma inflicted by the government on both parents and children continues to mount. Many of the children are babies and toddlers who every night are crying themselves to sleep wondering if they will ever see their parents again. Indeed, one separated child was only 4 months old and another was still breastfeeding. *See, e.g.*, Declaration of Laura Tuell (“Tuell Decl.”), Ex. 32, ¶ 17b (noting child who was taken from her mother while breastfeeding); *id.*, ¶ 17a (mother told that daughter would be waiting for her after court appearance; daughter was gone when mother came back); Declaration of

1 Manoj Govindaiah (“Govindaiah Decl.”), Ex. 36, ¶ 6(b) (father separated from  
2 *four-month-old baby*, then deported without baby).

3 Without immediate action from this Court, these families will remain  
4 separated. The Office of Refugee Resettlement’s (“ORR”) normal release process  
5 for children in its care will not swiftly reunify most separated families, because that  
6 process is not designed to reunify children with detained parents. Having spent  
7 months cruelly separating families and defending its right to do so—including for  
8 weeks after this Court declared that practice “brutal, offensive” and contrary to  
9 “traditional notions of fair play and decency”—the government cannot be left on its  
10 own to end the suffering it has intentionally caused. This Court’s intervention is  
11 necessary to ensure that these due process violations are swiftly corrected.

12 As set forth more fully in the proposed Order submitted with this brief,  
13 Plaintiffs respectfully request that the Court require Defendants to:

- 14 1) reunify all children with their parents within 30 days, and within 10 days for  
15 children under 5 years old, except where the government has clear evidence  
16 that the parent is unfit or a danger to the child, or the parent is in a criminal  
17 facility that does not house minors;
- 18 2) provide parents, within 7 days, telephonic contact with their children;
- 19 3) stop separating children from their parents except where there is clear  
20 evidence that the parent is unfit or a danger to the child, or the parent is in a  
21 criminal facility that does not house minors;
- 22 4) not remove separated parents from the United States without their children,  
23 unless the parent affirmatively, knowingly, and voluntarily waives the right  
24 to reunification before removal.

25 **I. Recent Events: The Government Has Now Separated More Than Two**  
26 **Thousand Children from Their Parents.**

27 Defendants have been separating thousands of families throughout the last  
28 year. Even before the government formally announced its zero tolerance policy, it

1 had separated hundreds of children from their family members. *See* Decl. of  
2 Stephen B. Kang (“Kang Decl.”), Ex. 38, ¶ 3.

3 On May 7, 2018, Attorney General Sessions announced an initiative to refer  
4 “100 percent” of immigrants who cross the Southwest border for criminal  
5 immigration prosecutions, also known as the “zero-tolerance policy.” Kang Decl.,  
6 Ex. 38, ¶ 4. Attorney General Sessions stated that as part of that prosecution, the  
7 parent’s child “will be separated from you as required by law.” *Id.*

8 In early May, the pace of family separations increased. At a Senate Judiciary  
9 Committee hearing in May, a deputy chief of U.S. Customs and Border Protection  
10 (“CBP”) testified that between May 6 and May 19 alone, a total of 658 children  
11 were separated from their family members. Kang Decl., Ex. 38, ¶ 5. In June 2018,  
12 the Department of Homeland Security (“DHS”) reported that in the six weeks  
13 between April 19 and May 31, the administration took around 2,000 children away  
14 from their parents. *Id.*, ¶ 6. And on June 19, CBP officials confirmed that “[o]ver  
15 2,300 children were separated from their parents at the U.S.-Mexico border  
16 between May 5 and June 9.” *Id.*, ¶ 8; *see also id.*, ¶ 7 (documenting cases of  
17 separated children living in cages and being cared for by other children).

18 On June 20, President Trump issued an Executive Order (“EO”), Section 3 of  
19 which provides that DHS “shall, to the extent permitted by law and subject to the  
20 availability of appropriations, maintain custody of alien families during the  
21 pendency of any criminal improper entry or immigration proceedings involving  
22 their members.” Kang Decl., Ex. 38, ¶ 9, Sec. 3(a).

23 The EO contains exceptions that will allow the continued unlawful family  
24 separation of families. Kang Decl., Ex. 38, ¶ 9, Sec. 3(b). And significantly, the  
25 EO makes *no* mention of how the government intends to reunify already-separated  
26 children with their parents, even though thousands of parents and children remain  
27 apart. The government has since claimed in a public statement that it has begun to  
28

1 put in place efforts to reunite. As set forth below, however, those measures are  
2 wholly inadequate. Kang Decl., Ex. 38, ¶ 10.<sup>1</sup>

3 **II. There is No System To Reunify Separated Families Expeditiously, and**  
4 **the Government’s Existing “Reunification” Process Is Not Designed to**  
5 **Address the Current Crisis.**

6 At the June 22 telephonic hearing, the government’s counsel could not clarify  
7 whether Defendants intend to quickly reunify already-separated parents. As to  
8 parents who had been separated from their children as a result of the government’s  
9 decision to prosecute them for illegal entry, government counsel admitted that she  
10 “can’t speak to the . . . further effect of the executive order on that detention”:

11 [The Court asked before:] when a parent is released from criminal custody  
12 and taken into ICE custody, is the practice to reunite them in family  
detention? And at that time I said no, that was not the practice. I think my  
answer on that narrow question would be the same.

13 Kang Decl., Ex. 38, ¶ 22 (“June 22 Hearing Transcript”), at 29:25-30:12.

14 In response to the Court’s questions about whether any system exists that  
15 would allow separated parents to reunite with their children, government counsel  
16 relied entirely on ORR’s *preexisting* processes for releasing immigrant children  
17 from its custody, which do not address parents who remain in DHS custody:

18 MS. FABIAN: There are procedures by which O.R.R. then releases minors to  
19 the custody of a parent *who has been released from custody*, and those are  
20 the procedures . . . . Whether there is . . . additional procedures that can be  
21 put in place to improve those procedures or expedite [them], I think that is  
something that is the subject of ongoing discussion. But at the moment the  
process is the same . . . .

22 June 22 Hearing Transcript at 30:18-31:1 (emphasis added).

23 The core problem is that ORR’s preexisting process for releasing children  
24 from custody is not adequate to meet the current need for swift reunification. For  
25 starters, as the government’s counsel explained at the June 22 hearing, ORR’s  
26 process only addresses release to *non-detained* parents. June 22 Hearing Transcript  
27 at 33:2-22. But DHS continues to detain hundreds, if not thousands, of the parents

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<sup>1</sup> The Order could of course be rescinded at any time.



1 whose children have been taken away. ORR's existing process will not facilitate  
2 their reunification at all. Declaration of Robert Carey (former head of ORR)  
3 ("Carey Decl."), Ex. 33, ¶¶ 7-9.

4 More broadly, ORR's sponsorship and reunification processes were designed  
5 for the entirely different situation of a child who comes to the border *alone*, where  
6 ORR must look for a sponsor (family member or otherwise), and investigate that  
7 sponsor. *See* Carey Decl., Ex. 33, ¶¶ 2-7 (describing purpose and function of  
8 preexisting reunification processes). Here, in contrast, the child was forcibly taken  
9 from his or her own parent. In this situation, ORR must simply give the child back  
10 (absent clear evidence the parent is unfit or a danger). But that is not happening.  
11 ORR's preexisting process is simply not set up to quickly reunite an unlawfully  
12 separated child. *See* Kang Decl., Ex. 38, ¶ 23 (describing a separated parent's  
13 attempt to reunite with her child using ORR's existing process).

14 For example, ORR has no systems designed to flag a child as having been  
15 separated from a parent at or near the time of the family's arrest; track the identity  
16 and detention location of the separated child's parent after the separation; ensure  
17 regular contact between a separated detained child and her detained parent; or  
18 reunify the child and parent in an ICE family detention facility. *See* Carey Decl.,  
19 Ex. 33 ¶¶ 8-9; Supplemental Declaration of Michelle Brané ("Supp. Brané Decl."),  
20 Ex. 31, ¶¶ 4-5, 8-11; Supplemental Declaration of Jennifer Podkul ("Supp. Podkul  
21 Decl."), Ex. 30, ¶¶ 3-5, 12; Tuell Decl., Ex. 32, ¶¶ 7-17 (numerous parents  
22 separated from kids and given no information about their kids' locations).

23 Now that the government is aware that its actions are under scrutiny, it is  
24 likely to point to hastily-created and ad hoc procedures to show that it is addressing  
25 the current crisis. But its June 23 DHS Fact Sheet only describes a process by  
26 which "adults who are subject to removal are reunited with their children for the  
27 purposes of removal." Kang Decl., Ex. 38, ¶ 10 ("DHS Fact Sheet"); *see id.*  
28 (describing "removal coordination"). It does not show the existence of any process

1 to swiftly reunify all detained parents with their children. *See also* Supp. Brané  
2 Decl., Ex. 31, ¶ 12 (explaining why the processes described in the Fact Sheet will  
3 not reunify detained parents); Supp. Podkul Decl., Ex. 30, ¶ 14 (same).

4 Moreover, the evidence demonstrates that these recent steps are woefully  
5 inadequate even to allow *communication* between parents and children, much less  
6 to reunite them. For instance, ORR has created a 1-800 hotline number that  
7 supposedly allows parents to find the children that have been taken from them. But  
8 ORR's hotline regularly puts people on hold for 30 minute periods, and it is  
9 infeasible for detained parents to stay on the line that long. *See* Supp. Brané Decl.,  
10 Ex. 31, ¶¶ 5-6; Supp. Podkul Decl., Ex. 30, ¶¶ 6-8. Moreover, ORR's hotline is  
11 now generating a constant busy signal. *Id.* Similarly, DHS has created a hotline for  
12 ORR caseworkers or attorneys trying to find parents. But that hotline merely  
13 permits a caller to request contact with a detained parent, and field offices can  
14 decline to respond to such requests. Supp. Podkul Decl., Ex. 30, ¶¶ 10-11; *see also*  
15 Govindaiah Decl., Ex. 36, ¶ 6(c) (describing detained separated parents who could  
16 not access ORR/DHS communications systems to contact children).

17 Thus, if the government is left to follow its existing practices – which put the  
18 onus on parents to request reunification with their children, and without any reliable  
19 system in place for them to do so -- the overwhelming majority of children will not  
20 be reunited any time in the near future. That will mean that more and more children  
21 will suffer irreparable harm. As Plaintiffs' preliminary injunction briefs explained,  
22 the forcible separation of children can permanently traumatize children, and the  
23 effects can last through the child's lifetime. Over the past month, the scientific and  
24 professional condemnation of the administration's practice has only grown, with  
25 *thousands* of experts joining to describe the lasting harm that every day of  
26 separation inflicts on children. Major medical associations—including the  
27 American Medical Association, the American College of Physicians, the American  
28 Academy of Pediatrics, the American Psychological Association, the American

1 Psychiatric Association, and a group of over 5,000 medical professionals and  
2 experts—have voiced their vehement and unified opposition to this brutal practice.  
3 Kang Decl., Ex. 38, ¶¶ 11-19.

4 Nor is there any question that the assessment of the medical community is  
5 correct. One of the parents who submitted a declaration in this case, J.I.L., was  
6 finally reunited with her 4 and 10 year-old boys after months of separation, but both  
7 boys constantly ask whether someone will come to take them from their mother  
8 again. Declaration of Lisette Diaz, Ex. 35, ¶¶ 2-3. The 4 year-old is having  
9 nightmares, and often wakes in the night to search for his mother. *Id.*, ¶ 3. That  
10 deep-seated, potentially permanent trauma and sense of vulnerability is precisely  
11 what the medical community predicted would occur. This little boy, and thousands  
12 of other small children, will be forever scarred. And this is to say nothing of the  
13 harm that parents are suffering. *See* Kang Decl., Ex. 38, ¶ 20 (reporting on father  
14 who committed suicide after being separated from his family).

15 Immediate injunctive relief is necessary to ensure that the daily irreparable  
16 harm of separation ends promptly.

17 **III. The Flores Settlement Agreement Does Not Prohibit the**  
18 **Reunification of Separated Children with Their Detained Parents.**

19 At the June 22 hearing, this Court inquired whether any injunctive relief  
20 would “be good for only a 20-day period in light of the *Flores* Settlement . . . .”  
21 June 22 Hearing Transcript at 13:5-10. As Plaintiffs explained, even if the *Flores*  
22 settlement rigidly required release of children on the 20th day, which it does not, it  
23 would still mean the government should be reuniting children with their detained  
24 parents for that 20-day period, which the government is not doing. *Id.* at 13:20-  
25 14:1. Moreover, many families are released by or before the 20-day mark, because  
26 they are able to show they have bona fide asylum claims and are not a flight risk or  
27 danger. *Id.* at 14:2-5; Declaration of Carlos Holguin (“Holguin Decl.”), Ex. 37, ¶ 9.  
28 Most fundamentally, the *Flores* Settlement does not remotely abrogate or remove a

parent's existing right to make decisions concerning the care and custody of their own children. *See* June 22 Hearing Transcript at 14:6-16:10. The Settlement is for the benefit of the children and in no way would require the forcible release of a child where the parent believes it is not in the child's best interests. Thus, where a parent and child are detained together in a family detention center, a parent may choose to keep the child with her, especially where the child is of a tender age. *See* Holguin Decl., Ex. 37, ¶¶ 5-8, 10 (*Flores* Class Counsel explaining that the settlement does not require release over the parent's objection). In short, the *Flores* Settlement poses no bar to ordering reunification of children with detained parents.<sup>2</sup>

**IV. Any Injunction Should Ensure That Parents in DHS Custody Can Remain Detained with Their Children, Even if the Parents Are Facing Criminal Prosecution.**

Plaintiffs wish to clarify a point of confusion that may have arisen as a consequence of the government's shifting practice regarding the detention of parents facing criminal prosecution. Plaintiffs continue not to challenge the separation of a parent from a child for the period that the parent is in a criminal facility that does not permit children. However, the mere fact that the parent is being prosecuted for illegal entry does not mean that separation is required. If the parent is being prosecuted but is nonetheless being held in a DHS facility, then there is no need to separate the family, because DHS can house families. And indeed, the June 20 Executive Order directs DHS to detain parents with their children "during the pendency of any criminal improper entry or immigration

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<sup>2</sup> Plaintiffs' claim in this case, and this discussion of *Flores*, pertain only to those parents who came to the United States with their minor children, and were separated from their children by DHS. This case does not address the rights of children who come to the United States alone. In addition, any knowing and voluntary waiver by the parent of their child's release rights under *Flores* would apply narrowly to the child's right to be released or held in a licensed facility after 20 days. The parent would not, of course, waive any other rights that *Flores* provides.

proceedings . . . .” EO Sec. 3(a). Accordingly, a plaintiff parent and child should have the ability to remain together, even if the parent is currently undergoing criminal prosecution, as long as the parent is detained in a DHS facility, rather than a criminal facility that does not permit children.

**V. An Injunction to Prevent Future Separations Remains Necessary, and the Court Should Order the Government to Follow Well-Established Child Welfare Standards.**

Plaintiffs also request that this Court preliminarily enjoin future separations. Although the June 20 Executive Order purports to end future separations, it contains a significant carve-out that authorizes family separation “when there is a *concern* that detention of an alien child with the child’s alien parent would pose a risk to the child’s welfare.” Kang Decl., Ex. 38, ¶ 9, EO Sec. 3(b) (emphasis added). Those vague terms are not defined, and allow DHS officers enormous leeway to effect separations for unconstitutional reasons.<sup>3</sup>

The example of S.S., who was taken from Ms. L. based on a mere allegation that they were not related, is illustrative. As the Court is aware, Defendants have claimed that it was in the 6 year-old’s own interests to be separated from her mother, because Ms. L did not have her documents with her by the time she reached the United States after a 10-country journey from the Congo (a common occurrence for asylum seekers, *see* Anker and Gilman Declarations, Dkt. 48-1, Exs. 19-20). Yet rather than verify parentage through a DNA test or other means, the government separated the child for close to 5 months. This ran contrary to well-settled child welfare practices. As explained by one the country’s leading child welfare experts, it would never be in a child’s interests to separate the child *before* taking basic steps to verify parentage, even where the government genuinely had

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<sup>3</sup> Lawyers representing separated parents testify that separations are continuing to occur in cases, like Ms. L.’s, where the parent has not been prosecuted. *See* Tuell Decl., Ex. 32, ¶¶ 7-12, 13a, 13c, 14-15, 16d, 16f, 16h, 16i, 16l-16p, 16r-16s.

1 doubts about parentage (something that would have seemed unlikely in Ms. L.’s  
2 case given that the child was frantically pleading with officers not to take her away  
3 from her mother). *See* Guggenheim Decl., Ex. 17, Dkt. 48-1, ¶¶ 14-20.

4 Critically, Defendants have continued to defend the legality of Ms. L.’s  
5 separation from her daughter. Thus, because the EO allows the government to  
6 separate when it deems it in the interests of the child, the EO does not eliminate the  
7 need for an injunction to prevent future separations. To the contrary, the EO is an  
8 explicit grant of authority for the government to continue separations like Ms. L.’s.

9 At the June 22 hearing, the Court also asked if it would be appropriate to  
10 separate children on the basis of criminal history. It is not, unless the criminal  
11 history is indicative of a parent’s danger to his or her child. Professor  
12 Guggenheim’s supplemental declaration explains that “the only basis for separating  
13 children from parents in American law is when it is done to protect them from  
14 imminent danger that could result from being allowed to continue to reside with the  
15 parent.” Supp. Guggenheim Decl., Ex. 34, ¶ 6. Therefore, “[c]riminal convictions  
16 are relevant only insofar as they bear on the fitness of the parent, and even then  
17 must be considered in combination with a totality of the factors that go to the best  
18 interests of the child.” *Id.*; *see id.*, ¶¶ 8-9 (citing state case law explaining that  
19 under a proper application of the best-interest standard, mere fact of criminal record  
20 does not make a parent unfit). Otherwise, a parent could lose her child merely  
21 because she made a mistake in the past.<sup>4</sup>

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24 <sup>4</sup> Indeed, the June 23 DHS Fact Sheet underscores the need for an injunction,  
25 because it explains that even its limited reunification procedures may not apply  
26 whenever “the adult is a criminal alien.” Kang Decl., Ex. 38, ¶ 10. This broad,  
27 undefined term is deeply at odds with the best-interest standard, as it does not  
28 provide any individual assessment of the severity of the criminal record, let alone  
whether that record bears on the fitness of the parent.

1 Applying this universally-accepted understanding, Plaintiffs’ proposed order  
2 would still permit the government to separate children when there is a genuine  
3 reason for believing that the parent is a danger to the child, but would not permit the  
4 government to separate a family whenever it simply declared it in the child’s  
5 interests.”

6 **VI. Parents Facing Imminent Deportation Require Safeguards to Ensure**  
7 **that They Are Not Removed Without Their Children.**

8 Parents who are facing imminent deportation without their separated children  
9 are in particularly grave need of immediate relief. As the Court observed, parents  
10 facing deportation without their accompanying children are “part and parcel” of this  
11 case. June 22 Hearing Transcript at 41:16-22; Am. Compl., Dkt. 32, at 12.

12 There is evidence that parents have been deported without their children. *See*  
13 Govindaiah Decl., Ex. 36, ¶ 6(b) (father separated from four-month-old baby, both  
14 deported separately); Kang Decl., Ex. 38, ¶ 21 (father separated from six-year-old  
15 daughter, then deported without her); Tuell Decl., Ex. 32, ¶ 16k (parent who was  
16 deported without her child). There is a real risk of this continuing to occur given  
17 the lack of tracking, and parents are terrified that this will happen to them. *See*  
18 Declaration of Kristin Greer Love, Ex. 29, ¶¶ 4-18 (describing cases of fathers at  
19 risk of imminent deportation who remain separated from young children). This  
20 Court should therefore prohibit the government from removing any parent without  
21 their minor child where the parent requests to be deported with the child.

22 **VII. Plaintiffs’ Order Provides the Appropriate Framework for**  
23 **Expeditious Reunification.**

24 Plaintiffs have attached a Proposed Order that sets forth their requested relief  
25 in greater detail. The Proposed Order includes three key components.

26 First, it sets clear deadlines for reunifying already-separated children with  
27 their parents. Without timetables, it is impossible to ensure compliance with the  
28 injunction. For example, in this case, Ms. L. was separated from her daughter on



1 November 5 and was not reunited until March 16—five months of separation  
2 resulting from the government’s failure to take simple steps to confirm her  
3 relationship with her daughter. Ms. C. was reunited in June, more than *eight*  
4 *months* after her release from criminal custody. Mr. U., another parent declarant in  
5 this case, has still not been reunited after eight months. The length of these  
6 separations is typical of the class.

7         Thirty days is an appropriate general deadline for the government to mobilize  
8 its substantial resources to fix a problem that it deliberately created, and reunify all  
9 parents—whether detained or not—with their children (absent clear evidence of  
10 neglect, abuse or unfitness or a detained parent’s stated desire that the child not be  
11 reunified with them). A shorter deadline—10 days—is appropriate for children  
12 under age five, since they are particularly vulnerable. *See, e.g., Hernandez v.*  
13 *Sessions*, 872 F.3d 976 (9th Cir. 2017) (affirming injunction requiring DHS to  
14 provide class members bond hearings within 45 days); *Saravia v. Sessions*, 280 F.  
15 Supp. 3d 1168, 1205-06 (N.D. Cal. 2017) (ordering agency to grant hearings for  
16 detained youth within 7 days of rearrest); *Armstrong v. Schwarzenegger*, 2007 WL  
17 2694243, at \*6 (N.D. Cal. Sept. 11, 2007) (ordering agency to implement new  
18 tracking system for parole proceedings within 14 days).

19         Second, the Court should order the government to provide Class Members  
20 with a way to contact their children telephonically within one week of the order.  
21 Many of the parents do not even know where their children are, and have not had  
22 any chance to reassure their children that reunification will happen. *See, e.g., Tuell*  
23 *Decl., Ex. 32, ¶¶ 7-17* (describing dozens of cases at one detention center alone in  
24 which parents were not told where their separated children were taken).

25         Third, the Court should ensure that any future separations comply with well-  
26 settled constitutional due process standards. Importantly, the mere presence of  
27 criminal history cannot be a categorical bar to reunification, nor can the government  
28



1 fail to take basic steps to verify parentage prior to separation (as it did in Ms. L.'s  
2 case). *See* Supp. Guggenheim Decl., Ex. 34, ¶¶ 5-6.<sup>5</sup>

3 \* \* \*

4 Defendants may claim in their upcoming filings that they intend to create a  
5 plan for reunification and to stop future separations. The time for vague promises  
6 has passed, especially given that this Court put the government on notice three  
7 weeks ago that the practice of separating fit parents from their children was “brutal  
8 [and] offensive,” in violation of due process.

9 Despite the Court’s warning, the government continued to separate hundreds  
10 of additional children each week, and, as importantly, has failed to reunify those it  
11 has separated. Indeed, for those separations that occurred due to a prosecution  
12 (such as Ms. C.’s), the government does not even offer a justification for continuing  
13 the separation once the parent is released from jail. It simply argues that the initial  
14 separation was justified while the parent was in criminal custody.. But that is  
15 wholly unresponsive to Plaintiffs’ claim that the *continued* separation is  
16 unconstitutional without a clear demonstration of unfitness or danger to the child.

17 Only this Court can immediately remedy the severe harm that the  
18 government’s unconstitutional policies have wreaked on these vulnerable children  
19 and their parents. No more parents and children should have to go sleep wondering  
20 if and when they will ever see each other again.

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25 <sup>5</sup> The Court asked if Plaintiffs currently sought to enjoin separations occurring in  
26 the interior of the United States. June 22 Hearing Transcript at 19:17-22. Plaintiffs  
27 maintain that all unlawful separations should be enjoined. But if the Court  
28 determines that further record development would be necessary regarding the  
interior, the Court can reserve that issue and order relief for all class members who  
were apprehended at or within 100 miles of the U.S.-Mexico border.

# CONCLUSION

For these reasons, this Court should grant Plaintiffs' request for a preliminary injunction.

Dated: June 25, 2018

Respectfully Submitted,

/s/ Lee Gelernt

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 19, 2018, I electronically filed the foregoing with the Clerk for the United States District Court for the Southern District of California by using the appellate CM/ECF system. A true and correct copy of this brief has been served via the Court's CM/ECF system on all counsel of record.

/s/ Lee Gelernt  
Lee Gelernt, Esq.

*Ms. L. et al., v. U.S. Immigration and Customs Enforcement, et al.*

**EXHIBITS TO PLAINTIFFS' SUPPLEMENTAL MEMORANDUM IN  
SUPPORT OF CLASS-WIDE PRELIMINARY INJUNCTION**

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# Exhibit 29

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14 **UNITED STATES DISTRICT COURT**  
15 **SOUTHERN DISTRICT OF CALIFORNIA**

16 Ms. L., et al.,

17 *Petitioners-Plaintiffs,*

18 v.

19 U.S. Immigration and Customs Enforcement  
20 ("ICE"); et al.,

21 *Respondents-Defendants.*

Case No. 18-cv-00428-DMS-MDD

**DECLARATION OF KRISTIN  
GREER LOVE**

**CLASS ACTION**

1 I, Kristin Greer Love, make the following declaration based on my personal  
2 knowledge and declare under the penalty of perjury pursuant to 28 U.S.C. § 1746 that  
3 the following is true and correct:

4 2. I am a Staff Attorney with the ACLU of New Mexico. I am an active member  
5 of the State Bar of New Mexico and an inactive member of the State Bar of  
6 California.

7 3. On June 21, 2018, I visited the Otero County Processing Center, a private  
8 prison where people in ICE custody are detained, in Chaparral, New Mexico. There, I  
9 met with three fathers from Honduras (Mr. S., Mr. J., and Mr. M.) who are separated  
10 from their children and are now facing imminent deportation. All three fathers have  
11 signed forms ordering their removals from the United States. But they remain  
12 separated from their children and fear being imminently removed without their  
13 children.  
14

15 **Mr. S.**

16 4. Mr. S, a 27-year-old father, has been separated from his 6½-year-old son, J.,  
17 since May 26, 2018. He has only spoken with his son twice by phone since then. He  
18 wept throughout our meetings and fears that he will never see his son again.

19 5. Mr. S and his son came to the United States on May 23, 2018. Border Patrol  
20 kept them in cold temporary detention cells—known as *hieleras* or freezers—for three  
21 days. On May 26, government agents arrived and lined up the children on one side of  
22 the *hielera* and the parents on the other side. The agents took J., and did not say  
23 anything about where they were going to take him. He was devastated and feared for  
24 his son’s safety. Mr. S struggles to sleep and thinks constantly about his son.

25 6. Mr. S. was then sent to a prison in El Paso, Texas. Mr. S. was convicted of  
26 illegal entry and sentenced to “time served.” Mr. S was then transferred to ICE  
27 custody in Otero.  
28

1 7. Mr. S. knows that his 6-year-old son is detained at a children's shelter in  
2 Miami, Florida. But he has had difficulty speaking with his son or his son's  
3 caseworker. Mr. S. said that he has to pay for calls to ORR and the shelter, and was  
4 not aware of any way that he could communicate with ORR or the shelter without  
5 paying by the minute for calls on the private prison phones.

6 8. On June 21, the day after the President issued the Executive Order on family  
7 separation, Border Patrol agents visited Mr. S. and told him that he had three options:  
8 (1) sign a deportation order and be reunited with his child; (2) sign a deportation order  
9 and request to be deported *without* his child; (3) refuse to sign the order and be sent to  
10 a "federal prison," where he would be jailed "indefinitely" with his child.

11 9. Mr. S. chose the first option. But he is very scared that the government will not  
12 reunify his son with him before the government deports him to Honduras. The  
13 government and the private prison guards refuse to give him any information.

14 **Mr. J.**

15  
16 10. Mr. J. and his seven-year-old son, L., came to the United States on May 10,  
17 2018, and turned themselves in to Border Patrol. Border Patrol agents told Mr. J. that  
18 he would be transferred to federal custody and that his son would be placed in a foster  
19 home until he (Mr. J) completed his sentence. The agents asked for Mr. J's  
20 identification card and L's birth certificate, which Mr. J provided.

21 11. Mr. J asked the agent why they were separating him and his young son and the  
22 agent told him he was "foolish" for bringing his son.

23 12. In the *hielera*, when they agents came to take the children, Mr. J. told L. that he  
24 was going to play with the other children. The agents took the children away from the  
25 holding cell, leaving the parents behind. That was the last time Mr. J saw L.

26 13. Mr. J spoke with L. once, on June 20, 2018. He believes that his son is in  
27 Phoenix, but he is not sure. Mr. J and L's family members completed paperwork so  
28



1 that L could go and live with them. But L. refuses to live with those family members  
2 because he wants to be with his father.

3 14. On June 21, Border Patrol agents visited Mr. J. (as they did Mr. S.) and gave  
4 him the same choice between accepting his deportation and being sent to a federal  
5 facility with his son. Mr. J. chose to be deported with his son.

6 15. L.'s caseworker has contacted Mr. J. and told him that she is waiting for Mr.  
7 J.'s deportation paperwork so they can be deported together. But Mr. J. has heard of  
8 other parents being deported without their children, and he fears this will happen to  
9 him. Mr. J is overwhelmed with grief and sadness and is desperate to be reunified with  
10 his son.

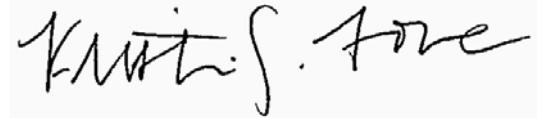
11 **Mr. M.**

12 16. Mr. M is 38 years old and the father of 13-year-old L. They came to the United  
13 States on May 12, 2018. They spent three days together in a cold holding cell. On the  
14 third day, a government agent told Mr. M.: "You will go to a prison for zero to six  
15 months," the agent said. "The boy will go to a shelter." They agent allowed the father  
16 and son to hug before they took his son away.

17 17. That was the last day that Mr. M saw L. He has not spoken with his son since  
18 and does not know where his son is. No one at Otero has told him how he can locate  
19 his son. Mr. M spoke with the Honduran consulate and pleaded for help. The consular  
20 official said that they could not help and that his son is in the hands of the U.S.  
21 government.

22 18. Mr. M. agreed to his deportation more than a week ago and begged the Border  
23 Patrol agent who presented him with the form to help reunify him with his son. Mr. M  
24 is desperate to be reunified with his son before he or his son is deported. He fears that  
25 he will never see his son again.  
26  
27  
28

1 I declare under penalty of perjury that to the best of my knowledge the above  
2 facts are true and correct. Executed this 24th day of June, 2018, in Albuquerque, New  
3 Mexico.  
4

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KRISTIN GREER LOVE  
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# Exhibit 30

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14 **UNITED STATES DISTRICT COURT**  
15 **SOUTHERN DISTRICT OF CALIFORNIA**

16 Ms. L., et al.,

17 *Petitioners-Plaintiffs,*

18 v.

19 U.S. Immigration and Customs Enforcement  
20 ("ICE"); et al.,

21 *Respondents-Defendants.*

Case No. 18-cv-00428-DMS-MDD

**SUPPLEMENTAL  
DECLARATION OF JENNIFER  
PODKUL**

**CLASS ACTION**

1 1. I, Jennifer Podkul, make the following declaration based on my personal  
2 knowledge and declare under the penalty of perjury pursuant to 28 U.S.C. § 1746 that  
3 the following is true and correct:

4 2. I am an attorney and Director of Policy at Kids in Need of Defense (“KIND”), a  
5 national organization that represents children in immigration matters throughout the  
6 United States, promotes pro bono representation of immigrant children, and advocates  
7 for laws and policies that ensure the protection of children and promotes their rights to  
8 due process and fundamental fairness. I am a member of the State Bar of Maryland.

9 3. KIND represents or coordinates the representation of thousands of immigrant  
10 children throughout the United States, including children who are held in the custody  
11 of the Office of Refugee Resettlement (“ORR”), as well as those who have been  
12 reunified with a sponsor in the United States. KIND is representing children detained  
13 in Washington who have been separated from their parents. KIND runs a return and  
14 reintegration program in Guatemala and Honduras for children wishing to return to  
15 their country of origin. We provide technical assistance to lawyers for immigrant  
16 children.

17 4. Since the government began separating children from their accompanying  
18 parents, we have begun representing several such children. We have received  
19 numerous requests from other lawyers and advocates who are working with this  
20 population and seeking to reunite the children with their parents. Accordingly, our  
21 organization is familiar with the issues faced by separated children, including barriers  
22 to reunifying them with their accompanying parents.

23 5. To my knowledge, the government currently has no automatic system for  
24 reuniting children the government has separated from their parents. My understanding  
25 is that the government has no method for even identifying the parents of separated  
26 children.  
27  
28

1 6. Currently, there are two general methods for reuniting separated children with  
2 their parents, depending on whether the parent remains in ICE custody or has been  
3 released from immigration detention.

4 7. A parent can only seek to find out where their separated child has been taken by  
5 calling a hotline. The parent can call that number, explain who they are, and try to  
6 obtain information about their child. Supposedly, an ORR case worker will try to  
7 match the parent to a separated child in its custody, and then call the parent back.

8 8. This system is not functioning in practice, however. This hotline is now  
9 completely overburdened with phone calls, and KIND was receiving reports that  
10 persons calling that number were put on hold for as long as 30 minutes. Parents in  
11 detention have restricted phone access, and cannot stay on the line nearly that long.

12 9. Moreover, the toll free number does not work from outside of the country. That  
13 means for parents who have already been deported they cannot call this number to try  
14 and find out where their child is being detained.

15 10. Alternatively, the separated child can attempt to find out where their detained  
16 parent is located, either through an ORR case worker or the child's attorney. Of  
17 course, this is only possible if the child is old enough to communicate relevant  
18 information; a very young child cannot even do that much. Sometimes, but not  
19 always, there is information in the child's case file that will indicate who the parent is  
20 and where they might be detained.

21 11. As stated above, this ORR worker or child's attorney cannot directly call a  
22 detained parent. Instead, ICE has provided its own hotline number for parents seeking  
23 to find out where their separated children are located. So an ORR worker or attorney  
24 must call that hotline and leave a message with ICE. The ICE hotline worker then  
25 sends a message to the local ICE field office where the parent is detained, and requests  
26 that the field office arrange communication between parent and child. Sometimes the  
27 field office refuses that request or is too overburdened to timely respond.  
28



1 12. If the parent has been released from custody, but the child remains detained in  
2 ORR custody, the parent can ask ORR to become a sponsor of the child. That parent  
3 must go through ORR's usual reunification process. My understanding is that there is  
4 no special process in place for ORR to reunify separated children with their parents.  
5 The usual ORR reunification process can take weeks or months, depending on the  
6 child's circumstances.

7 13. If a parent is deported, there is no automatic alert to ORR of the parents  
8 removal from the United States. KIND has received requests from non-governmental  
9 organizations in Guatemala asking for assistance locating a child who was sent to  
10 ORR custody. Moreover, there is no system to expedite repatriations of children who  
11 have been separated from parent once parent has been deported.

12 14. I have reviewed public statements released by government agencies since the  
13 Executive Order was issued, such as the DHS "Fact Sheet: Zero-Tolerance  
14 Prosecution and family Reunification." They reaffirm that ORR will use its  
15 preexisting processes for reuniting children with their parents, but those processes  
16 only apply to parents who are not in detention. As to parents who remain in ICE  
17 detention, the government's statements indicate that they will only reunite parents "at  
18 time of removal." But removal proceedings can often take significant time, and these  
19 statements do not speak to what will happen to parents in ICE custody who have not  
20 completed their removal proceedings.

21 15. I declare under penalty of perjury under the laws of the United States of  
22 America and Maryland that the foregoing is true and correct, based on my personal  
23 knowledge. Executed in Silver Spring, Maryland on June 25, 2018.  
24

25  
26  
27  
28  
  
JENNIFER PODKUL

# Exhibit 31



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**UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF CALIFORNIA**

Ms. L., et al.,

*Petitioners-Plaintiffs,*

v.

U.S. Immigration and Customs Enforcement  
 ("ICE"); et al.,

*Respondents-Defendants.*

Case No. 18-cv-00428-DMS-MDD

**SUPPLEMENTAL  
 DECLARATION OF MICHELLE  
 BRANE**

CLASS ACTION

1 I, Michelle Brané, make the following declaration based on my personal  
2 knowledge and declare under the penalty of perjury pursuant to 28 U.S.C. § 1746 that  
3 the following is true and correct:

4 2. I am an attorney and Director of the Migrant Rights and Justice Program at the  
5 Women's Refugee Commission ("WRC"). WRC is a national research and policy  
6 advocacy organization that protects the rights of women, children, and youth  
7 displaced by conflict and crisis. I am expert in U.S. immigration policies and  
8 detention, particularly the custody and detention of young children and families  
9 fleeing persecution. I am a member of the State Bar of New York.

10 3. Since the U.S. government began separating children from their accompanying  
11 family members, WRC has been attempting to identify systems for tracking parents  
12 and children, attempting to track and document identified cases, and advocating for  
13 better systems to reunify separated children with their parents.

14 4. My understanding is that the government currently has no system in place for  
15 automatically reunifying a separated child with her parent. Either the parent or the  
16 child (working through an Office of Refugee Resettlement ("ORR") case worker or an  
17 attorney) must request to make contact or for reunification with their family members.

18 5. My understanding also is that the government has no method for even tracking  
19 or identifying the separated child's parents. When a family comes to the border, and  
20 the Department of Homeland Security ("DHS") or Customs and Border Patrol  
21 ("CBP") takes the child, the parent is currently given no information about where the  
22 child will be sent. In some cases parents are told to call a 1-800 hotline number for  
23 information, but no other detail is provided. Similarly, when the child is referred to  
24 ORR custody, the child is given no information about where their parent is detained.

25 6. We have received reports from parents who attempt to call the 1-800 hotline  
26 that it is ineffective. Some report that they get only busy signals when they call,  
27 others report being placed on hold for over 30 minutes which results in being  
28

1 disconnected due to limited phone access from ICE detention. Others have not even  
2 been informed of this hotline. Even if contact is made through the hotline, they are  
3 instructed to leave a message with their identifying information and relationship to the  
4 child, and a number where they can be reached. ICE detainees are not able to receive  
5 phone calls in detention. Thus, the only method of obtaining information or  
6 communicating with their child is through one-on-one requests and cooperation from  
7 an ICE Detention Officer.

8 7. Of course, both children and parents are frequently transferred among different  
9 facilities. So even if a person knew where their family member was at a specific point  
10 in time, that information will likely be out of date in a matter of days or weeks.

11 8. My understanding is that U.S. Customs and Border Protection (which is  
12 responsible for apprehending and processing families arrested at or near the border),  
13 and Immigration and Customs Enforcement (which is responsible for maintaining  
14 long-term immigration detention facilities) do not share a database. The two agencies  
15 also have no way of accessing information contained in the other agency's database.  
16 So when CBP sends a separated parent to ICE, there is no way for ICE to tell whether  
17 the parent was apprehended with minor children, or what happened to those minor  
18 children.

19 9. It is also my understanding that neither the CBP nor the ICE databases are  
20 coordinated with the Department of Health and Human Safety ("HHS") or the Office  
21 of Refugee Resettlement ("ORR").

22 10. While it is my understanding that CBP has developed an identifying number for  
23 families that have been apprehended together, my understanding is that this number is  
24 not transferred into the ICE or HHS-ORR databases.

25 11. It is my understanding that even where contact between a parent and a child is  
26 made, ICE has no plans or procedures in place to reunify the parent with the child  
27 other than arranging for them to be deported together after the parent's immigration  
28

1 case is concluded. I am not aware of any directive instructing Deportation Officers to  
2 facilitate reunification while the immigration case is pending.

3 12. I have seen and reviewed public statements by government agencies since the  
4 Executive Order was issued, such as the DHS "Fact Sheet" on family separation.  
5 These statements simply confirm that ORR will use its preexisting processes for  
6 reuniting children with their parents, which only apply to nondetained parents. As to  
7 parents in ICE detention, the Fact Sheet, for example, indicates only that they will  
8 reunite parents "at time of removal." But removal proceedings can take months or  
9 even years to resolve, particularly if a parent is requesting asylum, and the  
10 government's recent statements do not address what will happen to parents in ICE  
11 custody awaiting the conclusion of their proceedings.

12 13. I declare under penalty of perjury under the laws of the United States of  
13 America and Maryland that the foregoing is true and correct, based on my personal  
14 knowledge. Executed in Hyattsville, Maryland on June 25, 2018.  
15

16  
17  
18 

19  
20 MICHELLE BRANE  
21  
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28

# Exhibit 32

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14 **UNITED STATES DISTRICT COURT**  
15 **SOUTHERN DISTRICT OF CALIFORNIA**

16 Ms. L., et al.,

17 *Petitioners-Plaintiffs,*

18 v.

19 U.S. Immigration and Customs Enforcement  
20 ("ICE"); et al.,

21 *Respondents-Defendants.*

Case No. 18-cv-00428-DMS-MDD

**SUPPLEMENTAL  
DECLARATION OF LAURA K.  
TUELL**

**CLASS ACTION**

1. I, Laura K. Tuell, make the following declaration based on my personal knowledge and declare under the penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:
2. I am Firmwide Pro Bono Counsel with the law firm Jones Day. In my capacity as Firmwide Pro Bono Counsel, I manage Jones Day's Laredo Project, which aims to provide, on a pro bono basis, information and Know Your Rights ("KYR") presentations as well as, on a more limited basis, full direct representation to women in the custody of Immigration Customs and Enforcement ("ICE") at the Laredo Detention Facility in Laredo, Texas.
3. As part of this ongoing project, the firm's attorneys offer KYR presentations to detained women and then meet with as many of the women who request an interview as possible to screen their cases for full representation.
4. We obtained the information in this declaration during these KYR presentations and screening interviews.
5. Beginning in approximately March 2018, we began to see an increase in the separations of mothers and children while giving KYR presentations in Laredo and screening interviews in Laredo and surrounding detention centers.
6. Below summarizes, on a week-by-week basis, the pertinent information obtained from mothers we encountered through our Project who were separated from their children.

1 7. The week of March 19 to March 25, we encountered through our Project one  
2 (1) mother separated from her children:

- 3  
4 a. A mother, J.I.L.M. (AXXXXXXX849), was separated from her sons, 10-  
5 years-old and 3-years-old. The government did not provide J.I.L.M.  
6 information regarding her separated sons' location(s). Upon information  
7 and belief, J.I.L.M. had not been criminally prosecuted.  
8

9 8. The week of March 26 to April 1, we encountered through our Project one (1)  
10 mother separated from her child:

- 11  
12 a. A mother, M.I.Q.L. (AXXXXXXX043), was separated from her 3-year-old  
13 son, J.A.A.Q. The government did not provide M.I.Q.L. information  
14 regarding her separated son's location. M.I.Q.L. had not been criminally  
15 prosecuted.  
16

17 9. The week of April 16 to April 22, we encountered through our Project two (2)  
18 mothers separated from their children, including the following:

- 19  
20 a. A mother, J.L.G.G. (AXXXXXXX916), was separated from her 14-year-  
21 old son, J.J.V. J.L.G.G. presented at the port of entry on April 7, 2018.  
22 The government did not provide J.L.G.G. information regarding her  
23 separated son's location. J.L.G.G. had not been criminally prosecuted.  
24  
25 b. A mother, Y.C.M. (AXXXXXXX307), was separated from her 6-year-old  
26 daughter, K.E.S.M. She presented with her husband and her daughter at  
27  
28



1 the border on the Reynosa Bridge on April 11, 2018. The government did  
2 not provide Y.C.M. information regarding her separated daughter's  
3 location. Y.S.M. had not been criminally prosecuted.  
4

5 10. The week of April 23 to April 29, we encountered through our Project two (2)  
6 mothers separated from their children:  
7

8 a. A mother, S.Y.C.R. (AXXXXXX966), was separated from her 6-year-  
9 old daughter, A.V.C.R., and 17-year-old son, J.A.M.C. The government  
10 did not provide S.Y.C.R. information regarding her separated daughter's  
11 or son's location. Upon information and belief, S.Y.C.R. had not been  
12 criminally prosecuted.  
13  
14

15 b. A mother, D.G.M.Z. (AXXXXXX171), was separated from her 12-year-  
16 old daughter, D.A.S.S. She was also separated from her 1-year-old  
17 grandson, Y.D.S.S., 12-year-old granddaughter, K.A.M.S., and 10-year-  
18 old grandson, A.B.C.H. D.G.M.Z. presented at a port of entry on April  
19 15, 2018. The government did not provide D.G.M.Z. information  
20 regarding her separated daughter's or grandchildren's locations. Upon  
21 information and belief, D.G.M.Z. had not been criminally prosecuted.  
22  
23

24 11. The week of April 30 to May 6, we encountered through our Project three (3)  
25 mothers separated from children, including the following:  
26  
27  
28

- 1 a. A mother, M.M.C.B. (XXXXXXX143), was separated from her 3-year-  
2 old daughter, M.N.P.C. The mother and child presented at the border on  
3 April 18, 2018. The government did not provide M.M.C.B. information  
4 regarding her separated daughter's location. M.M.C.B. had not been  
5 criminally prosecuted.  
6  
7  
8 b. A mother, A.M.B.A. (XXXXXXX503), was separated from her 1-year-  
9 old son, E.D.M.P. The government did not provide A.M.B.A.  
10 information regarding her separated son's location. Upon information  
11 and belief, A.M.B.A. had not been criminally prosecuted.  
12  
13 c. A mother, S.M.L.M. (XXXXXXX050), was separated from her 15-year-  
14 old daughter, M.O.F.L., and her 17-year-old daughter, H.G.F.L. The  
15 government did not provide S.M.L.M. information regarding her  
16 separated daughters' location(s). Upon information and belief, S.M.L.M.  
17 had not been criminally prosecuted.  
18  
19

20 12. The week of May 7 to May 13, we encountered through our Project two (2)  
21 mothers separated from their children, including the following:  
22

- 23 a. A mother, C.C.D.H. (XXXXXXX869), was separated from her 3-year-  
24 old daughter, A.V.C.D. The government did not provide C.C.D.H.  
25 information regarding her separated daughter's location. Upon  
26 information and belief, C.C.D.H. had not been criminally prosecuted.  
27  
28

1           b. A mother, M.M.S.N. (AXXXXXX081), was separated from her 12-year-  
2           old son, H.Y.P.S. The government did not provide M.M.S.N.  
3           information regarding her separated son's location. Upon information  
4           and belief, M.M.S.N. had not been criminally prosecuted.

5  
6       13. The week of May 14 to May 20, we encountered through our Project three (3)  
7  
8       mothers separated from their children, including the following:

9           a. A mother, M.S.R.M. (AXXXXXX334), was separated from her 17-year-  
10           old daughter, S.M.R.M. The government did not provide M.S.R.M.  
11           information regarding her separated daughter's location. Upon  
12           information and belief, M.S.R.M. had not been criminally prosecuted.

13  
14           b. A mother, R.M.A.V. (AXXXXXX036), was separated from her 5-year-  
15           old son, O.M.R.A., on or about May 8, 2018. The government did not  
16           provide R.M.A.V. information regarding her separated son's location.  
17           R.M.A.V. was criminally prosecuted. At the time of her apprehension by  
18           Border Patrol agents, R.M.A.V. reported to us that the agents told her  
19           that she would be separated from her son and she would be deported  
20           while he would remain in the United States. As of May 15, 2018, the  
21           mother still had no contact with her son.

22  
23           c. A mother, L.N.A.N. (AXXXXXX095), was separated from her 4-year-  
24           old son, L.A.R.A. The government did not provide L.N.A.N.  
25  
26  
27  
28

1 information regarding her separated son's location. Upon information  
2 and belief, L.N.A.N. had not been criminally prosecuted.

3  
4 14. The week of May 21 to May 27, we encountered through our Project five (5)  
5 mothers separated from their children, including the following:

- 6  
7 a. A mother, D.I.P.R. (AXXXXXX758), was separated from her minor  
8 daughter. The government did not provide D.I.P.R. information  
9 regarding her separated daughter's location. Upon information and  
10 belief, D.I.P.R. had not been criminally prosecuted.  
11  
12 b. A mother, D.D.M.P. (AXXXXXX487), was separated from her 5-year-  
13 old son, J.A.S.M. The government did not provide D.D.M.P. information  
14 regarding her separated son's location. Upon information and belief,  
15 D.D.M.P. had not been criminally prosecuted.  
16  
17 c. A mother, M.L.R.Q.R. (AXXXXXX849), was separated from her 9-year-  
18 old daughter, L.S.R.R. The government did not provide M.L.R.Q.R.  
19 information regarding her separated daughter's location. Upon  
20 information and belief, M.L.R.Q.R. had not been criminally prosecuted.  
21  
22 d. A mother, E.X.M.Y. (AXXXXXX818), was separated from her 7-year-  
23 old son, V.A.Y.M. The government did not provide E.X.M.Y.  
24 information regarding her separated son's location. Upon information  
25 and belief, E.X.M.Y. had not been criminally prosecuted.  
26  
27  
28

- 1 e. A mother, A.V.B.G. (AXXXXXX810), was separated from her 11-year-  
2 old son, O.D.G.B. The government did not provide A.V.B.G.  
3 information regarding her separated son's location. Upon information  
4 and belief, A.V.B.G. had not been criminally prosecuted.  
5

6 15. The week of May 28 to June 3, we encountered through our Project twelve (12)  
7 mothers separated from their children, including the following:  
8

- 9 a. A mother, J.I.C.M. (AXXXXXX335), was separated from her 8-year-old  
10 son, M.J.C.M. The government did not provide J.I.C.M. information  
11 regarding her separated son's location. Upon information and belief,  
12 J.I.C.M. had not been criminally prosecuted.  
13  
14 b. A mother, L.M.V.V. (AXXXXXX953), was separated from her 10-year-  
15 old son, D.Y.G.V. The government did not provide L.M.V.V.  
16 information regarding her separated son's location. Upon information  
17 and belief, L.M.V.V. had not been criminally prosecuted.  
18  
19 c. A mother, M.C.B. (AXXXXXX709), was separated from her 8-year-old  
20 son, J.A.L.B. The government did not provide M.C.B. information  
21 regarding her separated son's location. Upon information and belief,  
22 M.C.B. had not been criminally prosecuted.  
23  
24 d. A mother, D.I.L.O. (AXXXXXX628), was separated from her 15-year-  
25 old son, S.R.V.L. The government did not provide D.I.L.O. information  
26  
27  
28

1 regarding her separated son's location. Upon information and belief,  
2 D.I.L.O. had not been criminally prosecuted.

3  
4 e. A mother, P.M.D. (AXXXXXX354), was separated from her 5-year-old  
5 son, E.O.C.M. The government did not provide P.M.D. information  
6 regarding her separated son's location. Upon information and belief,  
7 P.M.D. had not been criminally prosecuted.

8  
9 f. A mother, M.A.M.M. (AXXXXXX114), was separated from her 12-  
10 year-old son, J.E.B.M., and 6-year-old son, A.E.B.M. The government  
11 did not provide M.A.M.M. information regarding her separated sons'  
12 locations. Upon information and belief, M.A.M.M. had not been  
13 criminally prosecuted.

14  
15 g. A mother, L.M.M.S. (AXXXXXX038), was separated from her 10-year-  
16 old daughter, B.M.H.M., and 6-year-old son, B.D.H.M. The government  
17 did not provide L.M.M.S. information regarding her separated children's  
18 locations. Upon information and belief, L.M.M.S. had not been  
19 criminally prosecuted.

20  
21 h. A mother, N.C.C.O. (AXXXXXX853), was separated from her 10-year-  
22 old son, A.A.L.C., and 7-year-old son, S.N.L.C. The government did not  
23 provide N.C.C.O. information regarding her separated sons' location.  
24  
25  
26  
27  
28



1 Upon information and belief, N.C.C.O. had not been criminally  
 2 prosecuted.

- 3
- 4 i. A mother, D.M.A.P. (AXXXXXXX680), was separated from her 7-year-  
 5 old daughter, E.A.V.A.P. The government did not provide D.M.A.P.  
 6 information regarding her separated daughter's location. Upon  
 7 information and belief, D.M.A.P. had not been criminally prosecuted.
- 8
- 9 j. A mother, M.A.A.M. (AXXXXXXX542), was separated from her 9-year-  
 10 old daughter, E.E.H.A. The government did not provide M.A.A.M.  
 11 information regarding her separated daughter's location. Upon  
 12 information and belief, M.A.A.M. had not been criminally prosecuted.
- 13
- 14 k. A mother, S.M.R.C. (AXXXXXXX179), was separated from her 9-year-  
 15 old son, J.S.A.R. The government did not provide S.M.R.C. information  
 16 regarding her separated son's location. Upon information and belief,  
 17 S.M.R.C. had not been criminally prosecuted.
- 18
- 19 l. A mother, M.E.D.M. (AXXXXXXX110), was separated from her 11-year-  
 20 old son, D.N.M.D. The government did not provide M.E.D.M.  
 21 information regarding her separated son's location. Upon information  
 22 and belief, M.E.D.M. had not been criminally prosecuted.
- 23
- 24
- 25

26 16. The week of June 4 to 10, we encountered through our Project nineteen (19)  
 27 mothers separated from their children, including:  
 28

- 1 a. A mother, D.Y.S.G. (AXXXXXX114), was separated from her 13-year-  
2 old daughter, M.Y.M.S. The government did not provide D.Y.S.G.  
3 information regarding her separated daughter's location. D.Y.S.G. was  
4 criminally prosecuted.  
5
- 6 b. A mother, M.S.H.A. (AXXXXXX496), was separated from her minor  
7 son, E.J.E.H. The government did not provide M.S.H.A. information  
8 regarding her separated son's location. M.S.H.A. was criminally  
9 prosecuted.  
10
- 11 c. A mother, M.L.C.R. (AXXXXXX052), was separated from her 6-year-  
12 old son, A.Y.B.C. The government did not provide M.L.C.R.  
13 information regarding her separated son's location. M.L.C.R. was  
14 criminally prosecuted.  
15
- 16 d. A mother, S.P.C.L. (AXXXXXX969), was separated from her 5-year-old  
17 daughter, A.M.M.L.C. The government did not provide S.P.C.L.  
18 information regarding her separated daughter's location. Upon  
19 information and belief, S.P.C.L. had not been criminally prosecuted.  
20
- 21 e. A mother, C.M.G.N. (AXXXXXX199), was separated from her 8-year-  
22 old-son J.E.A.G. The government did not provide C.M.G.N. information  
23 regarding her separated son's location. C.M.G.N. has been criminally  
24 prosecuted.  
25  
26  
27  
28



- 1 f. A mother, M.P.M. (AXXXXXX224), was separated from her 5-year-old  
2 son, J.J.P.M. The government did not provide M.P.M. information  
3 regarding her separated son's location. Upon information and belief,  
4 M.P.M. had not been criminally prosecuted.  
5
- 6 g. A mother, A.G.H. (AXXXXXX222), was separated from her 9-year-old  
7 daughter, N.J.H.G. The government did not provide A.G.H. information  
8 regarding her separated daughter's location. A.G.H. was criminally  
9 prosecuted.  
10
- 11 h. A mother, Y.C.R.L. (AXXXXXX080), was separated from her 15-year-  
12 old daughter, S.F.C.R. The government did not provide Y.C.R.L.  
13 information regarding her separated daughter's location. Upon  
14 information and belief, Y.C.R.L. had not been criminally prosecuted.  
15
- 16 i. A mother, K.W.R.A. (AXXXXXX071) was separated from her six-year-  
17 old son, K.A.M.R. The government did not provide K.W.R.A.  
18 information regarding her separated son's location. Upon information  
19 and belief, K.W.R.A. had not been criminally prosecuted.  
20
- 21 j. A mother, N.X.B. (AXXXXXX082), was separated from her 12-year-old  
22 daughter, D.C.G.B. The government did not provide N.X.B. information  
23 regarding her separated son. N.X.B. was criminally prosecuted.  
24  
25  
26  
27  
28

1 k. A mother, E.J.O.E. (AXXXXXX510), was separated from her 8-year-old  
2 son, A.T.B.O. E.J.O.E. reported to us that, after she was separated from  
3 her son, the government told her that she would be reunited with her son  
4 if she renounced her statement of fear. E.J.O.E. did so, but before  
5 boarding the plane she informed us that ICE officials told her that she  
6 was misinformed and that her deportation would go forward without her  
7 son.  
8

9  
10 l. A mother, S.L.G.M. (AXXXXXX097), was separated from her 12-year-  
11 old son, R.A.M.G. The government did not provide S.L.G.M.  
12 information regarding her separated son's location. Upon information  
13 and belief, S.L.G.M. had not been criminally prosecuted.  
14

15  
16 m. A mother, L.N.F.A. (AXXXXXX271), was separated from her 11-year-  
17 old daughter, O.S.F.A. The government did not provide L.N.F.A.  
18 information regarding her separated daughter's location. Upon  
19 information and belief, L.N.F.A. had not been criminally prosecuted.  
20

21  
22 n. A mother, M.U.P. (AXXXXXX435), was separated from her 11-year-old  
23 son, E.F.C.U. The government did not provide M.U.P. with information  
24 regarding her son. Upon information and belief, M.U.P. had not been  
25 criminally prosecuted.  
26  
27  
28

- 1 o. A mother, G.C.H. (AXXXXXX203), was separated from her 7-year-old  
2 son, A.E.M.C. The government did not provide G.C.H. with information  
3 regarding her son. Upon information and belief, G.C.H. had not been  
4 criminally prosecuted.  
5
- 6 p. A mother, R.V.A.L. (AXXXXXX636), was separated from her 9-year-  
7 old daughter, K.M.C.A. The government did not provide R.V.A.L. with  
8 information regarding her daughter. Upon information and belief,  
9 R.V.A.L. had not been criminally prosecuted.  
10
- 11 q. A mother, W.T.H.P. (AXXXXXX212), was separated from her 9-year-  
12 old daughter, E.H.O.P. The government did not provide W.T.H.P.  
13 information regarding her daughter. W.T.H.P. was criminally  
14 prosecuted.  
15
- 16 r. A mother, E.R.M.D. (AXXXXXX025), was separated from her 12-year-  
17 old son, J.A.C.M. The government did not provide E.R.M.D. with  
18 information regarding her son. Upon information and belief, E.R.M.D.  
19 had not been criminally prosecuted.  
20
- 21 s. A mother, M.M.Z.C. (AXXXXXX325), was separated from her 6-year-  
22 old daughter, M.D.C.Z.C. The government did not provide M.M.Z.C.  
23 with information about her daughter. Upon information and belief,  
24 M.M.Z.C. had not been criminally prosecuted.  
25  
26  
27  
28

17. The week of June 11 to 17, we encountered through our Project nine (9) mothers separated from their children, including the following:

- a. A mother, S.M.C.G. (AXXXXXXX620), was separated from her 6-year-old daughter, G.M.C.C. S.M.C.G. was criminally prosecuted. S.M.C.G. reported to us that she was taken to court and told that her daughter would be waiting for her when she returned. When S.M.C.G. returned from court, however, her daughter was gone. The government did not provide S.M.C.G. information regarding her separated daughter's location.
- b. A mother, B.Y.M.T. (AXXXXXXX535), was separated from her 5-year-old daughter, V.A.R.M. B.Y.M.T. was still breastfeeding V.A.R.M. The government did not provide B.Y.M.T. information regarding her separated daughter's location. B.Y.M.T. was criminal prosecuted.
- c. A mother, M.C.M.Z. (AXXXXXXX855), was separated from her 9-year-old daughter, G.V.Z.M. The government did not provide M.C.M.Z. information regarding her separated daughter's location. M.C.M.Z. was criminally prosecuted.
- d. A mother, M.S.A. (AXXXXXXX271), was separated from her 15-year-old daughter, G.M.R.S. The government did not provide M.S.A. information

1 regarding her separated daughter's location. M.S.A. was criminally  
2 prosecuted.

3  
4 e. A mother, C.E.C.S. (AXXXXXXX001), was separated from her 15-year-  
5 old son, J.A.C.C. The government did not provide C.E.C.S. information  
6 regarding her separated son's location. C.E.C.S. was criminally  
7 prosecuted.

8  
9 f. A mother, R.F.C.B. (AXXXXXXX464), was separated from her 5-year-old  
10 daughter, C.M.R.C. R.F.C.B. was told she would see her daughter again  
11 after her court hearing. The government did not provide R.F.C.B.  
12 information regarding her separated daughter's location. R.F.C.B. was  
13 criminally prosecuted.

14  
15 g. A mother, E.I.C.V. (AXXXXXXX398), was separated from her 15-year-  
16 old son, R.J.C.C. The government did not provide E.I.C.V. information  
17 regarding her separated son's location. E.I.C.V. was criminally  
18 prosecuted.

19  
20  
21 h. A mother, L.M.M. (AXXXXXXX589), was separated from her 7-year-old  
22 son, E.N.C.M. The government did not provide L.M.M. information  
23 regarding her separated son's location. L.M.M. was criminally  
24 prosecuted.

1 i. A mother, M.C.C. (AXXXXXX099), was separated from her 8-year-old  
2 daughter, K.E.P.C. M.C.C. informed us that she was taken to see a  
3 judge, and her daughter was gone when she returned. The government  
4 did not provide M.D.C. information regarding her separated daughter's  
5 location. M.D.C. was criminally prosecuted.  
6  
7

8 18. I declare under penalty of perjury under the laws of the United States of  
9 America that the foregoing is true and correct, based on my personal knowledge.  
10

11 Executed in Laredo, Texas, on June 24, 2018.  
12

13   
14 Laura K. Tuell  
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27  
28

# Exhibit 33

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*\*Admitted Pro Hac Vice*

14 **UNITED STATES DISTRICT COURT**  
15 **SOUTHERN DISTRICT OF CALIFORNIA**

16 Ms. L., et al.,

17 *Petitioners-Plaintiffs,*

18 v.

19 U.S. Immigration and Customs Enforcement  
20 ("ICE"); et al.,

21 *Respondents-Defendants.*

Case No. 18-cv-00428-DMS-MDD

**SUPPLEMENTAL  
DECLARATION OF ROBERT  
CAREY**

**CLASS ACTION**



1 I, Robert Carey, make the following declaration based on my personal  
2 knowledge and declare under the penalty of perjury pursuant to 28 U.S.C. § 1746 that  
3 the following is true and correct:

4 2. I previously served as Director of the Office of Refugee Resettlement (“ORR”)  
5 in the Department of Health and Human Services (“HHS”) from March, 2015 to  
6 January, 2017.

7 3. As Director of ORR, I oversaw all of ORR’s programs, including the  
8 Unaccompanied Immigration Minor (“UC”) program. In my capacity as Director, I  
9 became deeply familiar with the ORR policies and procedures for identifying, vetting  
10 and approving sponsors for UCs in the legal custody of ORR, and how this process  
11 operates in practice. I am also deeply familiar with ORR’s policies and procedures for  
12 communicating and exchanging information with other government agencies,  
13 including the Department of Homeland Security (“DHS”), concerning children who  
14 come into ORR custody.

15 4. ORR’s existing process for releasing children from custody is called the  
16 “reunification” process. It involves identifying, contacting, vetting and approving a  
17 qualified “sponsor” for a child, meaning an individual in the community who can  
18 provide care and custody for the child.

19 5. ORR’s reunification policies are publicly available on the ORR website. *See*  
20 *ORR, Children Entering the United States Unaccompanied: Section 2, Safe and*  
21 *Timely Release from ORR Care, (hereinafter, “ORR Policies”), available at*  
22 *[https://www.acf.hhs.gov/orr/resource/children-entering-the-united-states-](https://www.acf.hhs.gov/orr/resource/children-entering-the-united-states-unaccompanied-section-2)*  
23 *unaccompanied-section-2.*

24 6. ORR’s reunification process was designed to address the situation of children  
25 who come to the border or are apprehended outside the company of a parent or legal  
26 guardian. In such circumstances, it is important to engage in a careful process of  
27 identifying and vetting potential sponsors to ensure that the child is being released to a  
28

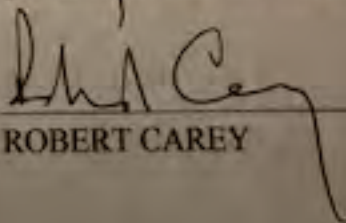
1 safe and secure environment. That process can take weeks, and sometimes months,  
2 depending on the minor's individual facts and circumstances.

3 7. However, ORR's reunification process was not designed to deal with the  
4 situation of children who come to the United States with their parents, and then are  
5 removed from their parents' care by DHS. My understanding is that such parents are  
6 then detained in adult DHS facilities or federal criminal custody. ORR's reunification  
7 processes were not set up to reunify parents with children in such circumstances.  
8 Similarly, any information-sharing policies between ORR and DHS are not designed  
9 for this situation.

10 8. For example, ORR previously had no policies or systems designed to flag a  
11 child as having been separated from a parent at or near the time of the family's arrest;  
12 track the identity and detention location of the separated child's parent after the  
13 separation; ensure regular contact between a separated detained child and his or her  
14 detained parent; or reunify the child and parent in an ICE family detention facility.

15 9. If a separated parent is released from DHS custody, but the separated child  
16 remains in ORR custody, the parent can request to have the child released to his or her  
17 care. But they would have to go through ORR's regular reunification processes, which  
18 could take weeks or months to finish. And again, those processes are not designed to  
19 deal with the special situation of children separated from their accompanying parents  
20 by DHS.

21 10. I declare under penalty of perjury under the laws of the United States of  
22 America and New Jersey that the foregoing is true and correct, based on my  
23 personal knowledge. Executed in South Orange, New Jersey on June 25, 2018.

24  
25  
26  
27  
28  
  
ROBERT CAREY

# Exhibit 34

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Judy Rabinovitz\*  
Anand Balakrishnan\*  
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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

Ms. L., et al.,

*Petitioners-Plaintiffs,*

v.

U.S. Immigration and Customs Enforcement  
("ICE"); et al.,

*Respondents-Defendants.*

Case No. 18-cv-00428-DMS-MDD

**SUPPLEMENTAL  
DECLARATION OF MARTIN  
GUGGENHEIM**

**CLASS ACTION**

No Hearing Date

---

Spencer E. Amdur (SBN 320069)  
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*samdur@aclu.org*

I, Martin Guggenheim, hereby declare, pursuant to 28 U.S.C. § 1746:

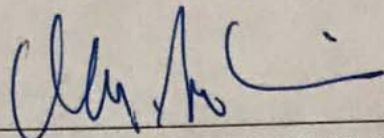
1. I am the Fiorello LaGuardia Professor of Clinical Law at New York University School of Law and a Founding Board Member of the Center for Family Representation. I have already submitted a declaration in this case, Dkt. No. 48-1, and incorporate my educational and professional background and opinions as set out there.
2. I write to address the impact of a criminal record on custodial rights.
3. Children and parents are commonly separated when parents are convicted of crimes, but only because the parent is sentenced to a prison.
4. When a defendant who is a parent does not receive a sentence of incarceration after a conviction, or after the parent has completed serving any sentence, the only way under state or federal law to separate a child from the parent because of the criminal act is to bring a separate proceeding in juvenile court charging the parent with maltreatment of the child based on the criminal behavior itself. In that new proceeding, the question would be whether the state can prove that the child would be endangered if permitted to remain in the parent's custody.
5. As this indicates, the only basis for separating children from parents in American law is when it is done to protect them from imminent danger that could result from being allowed to continue to reside with the parent. And as I explained in my previous declaration, this generally can only be the case when the parent is abusing or neglecting the child. It may also occur when the parent has a very serious and contagious disease that is likely to harm the child.
6. Thus, the presence of a criminal record does not displace the general rule that “[a]bsent a finding of unfitness, it is presumed that children are best served by remaining with their natural parents.” *In re Termination of Parental Rights to Max G.W.*, 716 N.W.2d 845, 857 (Wis. 2006) (citing *Santosky v. Kramer*, 455 U.S. 745, 760 (1982)). Criminal convictions are relevant only insofar as they bear on the

fitness of the parent, and even then must be considered in combination with a totality of the factors that go to the best interests of the child.

7. State law confirms this principle. “[A] parent's criminal history is not an absolute bar to custody and must, as with any other factor, be considered in the totality of the circumstances.” *Jones v. Pagan*, 947 N.Y.S.2d 580, 582 (N.Y. App. Div. 2012) (internal citations and quotations omitted). The mere “existence of a felony conviction or even the existence of multiple felony convictions” is insufficient to render the parent unfit to raise the child. *In re Baby Girl M.*, 135 Cal. App. 4th 1528, 1542 (Cal. Ct. App. 2006) (finding three felony drug and burglary convictions did not warrant termination of parental rights); *see also In re C.T.E.*, 95 S.W.3d 462, 466 (Tex. App. 2002) (“Although appellant's criminal history is a factor in determining the best interest of the children, it is not dispositive.”)
8. This principle holds even where a criminal conviction is for the most serious crimes. *See, e.g., In re James M.*, 65 Cal. App. 3d 254 (Cal. Ct. App. 1976) (finding a conviction for murder did not necessarily demonstrate that a father was an unfit parent); *In re Terry E.*, 180 Cal. App. 3d 932 (Cal. Ct. App. 1986) (convictions for false imprisonment and sex crimes did not provide sufficient grounds for termination of a mother’s parental rights nearly four years later).
9. In conclusion, criminal history is not a dispositive factor in determining whether remaining with a parent is in the best interest of a child. Determining what is in the best interest of a child requires a fact-specific, individualized inquiry.



I declare under penalty of perjury under the laws of the United States of America and New York State that the foregoing is true and correct, based on my personal knowledge. Executed in NYC, on June 23, 2018.

  
\_\_\_\_\_  
MARTIN GUGGENHEIM

# Exhibit 35



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 Judy Rabinovitz\*  
 Anand Balakrishnan\*  
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*\*Admitted Pro Hac Vice*

**UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF CALIFORNIA**

Ms. L., et al.,

*Petitioners-Plaintiffs,*

v.

U.S. Immigration and Customs Enforcement  
 ("ICE"); et al.,

*Respondents-Defendants.*

Case No. 18-cv-00428-DMS-MDD

**DECLARATION OF  
 LISETTE DIAZ**

**CLASS ACTION**

1 I, Lisette Diaz, make the following declaration based on my personal knowledge  
2 and declare under the penalty of perjury pursuant to 28 U.S.C. § 1746 that the  
3 following is true and correct:  
4

5 1. I am a paralegal at the American Civil Liberties Union Immigrants'  
6 Rights Project.

7 2. I visited J.I.L. shortly after she was reunited with her kids. Her  
8 declaration was filed in this case as Exhibit 24, attached to Dkt. 62, pages 28-34.  
9

10 3. During the visit, J.I.L. said that her children are still feeling the effects of  
11 the separation. Both of her children constantly ask if and when someone will be  
12 coming to take them away from their mother again. Her youngest child, 4 year-old  
13 D.A.P.L., continues to suffer from nightmares. He often wakes up in the middle of  
14 the night and begins nervously searching for his mother in the bedroom they share.  
15  
16

17  
18 Executed in New York, NY, on June 25, 2018.  
19

20  
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22 \_\_\_\_\_  
23 LISETTE DIAZ  
24  
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28

# Exhibit 36

1 Lee Gelernt\*  
 2 Judy Rabinovitz\*  
 3 Anand Balakrishnan\*  
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 5 UNION FOUNDATION  
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8 *Attorneys for Petitioners-Plaintiffs*  
 9 *Additional counsel on next page*

*\*Admitted Pro Hac Vice*

10 **UNITED STATES DISTRICT COURT**  
 11 **SOUTHERN DISTRICT OF CALIFORNIA**

12 Ms. L. et al.,

13 *Petitioners-Plaintiffs,*

14 v.

15 U.S. Immigration and Customs Enforcement  
 16 ("ICE"); U.S. Department of Homeland Security  
 17 ("DHS"); U.S. Customs and Border Protection  
 18 ("CBP"); U.S. Citizenship and Immigration  
 19 Services ("USCIS"); U.S. Department of Health  
 20 and Human Services ("HHS"); Office of  
 21 Refugee Resettlement ("ORR"); Thomas  
 22 Homan, Acting Director of ICE; Greg  
 23 Archambeault, San Diego Field Office Director,  
 24 ICE; Joseph Greene, San Diego Assistant Field  
 25 Office Director, ICE; Adrian P. Macias, El Paso  
 26 Field Director, ICE; Frances M. Jackson, El Paso  
 27 Assistant Field Office Director, ICE; Kirstjen  
 28 Nielsen, Secretary of DHS; Jefferson Beauregard  
 Sessions III, Attorney General of the United  
 States; L. Francis Cissna, Director of USCIS;  
 Kevin K. McAleenan, Acting Commissioner of  
 CBP; Pete Flores, San Diego Field Director,  
 CBP; Hector A. Mancha Jr., El Paso Field  
 Director, CBP; Alex Azar, Secretary of the  
 Department of Health and Human Services;  
 Scott Lloyd, Director of the Office of Refugee  
 Resettlement,

*Respondents-Defendants.*

Case No. 18-cv-00428-DMS-  
 MDD

Date Filed: June 25, 2018

**DECLARATION OF MANOJ  
 GOVINDAIAH**

Class Action

**NO HEARING DATE**

1  
2 Stephen Kang (SBN 292280)  
3 Spencer E. Amdur (SBN 320069)  
4 AMERICAN CIVIL LIBERTIES UNION FOUNDATION  
5 IMMIGRANTS' RIGHTS PROJECT  
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9 F: (415) 395-0950  
10 *skang@aclu.org*  
11 *samdur@aclu.org*  
12  
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1 1. I, Manoj Govindaiah, make the following declaration based on my personal  
2 knowledge and declare under the penalty of perjury pursuant to 28 U.S.C. § 1746  
3 that the following is true and correct:

4 2. I am an attorney licensed and admitted in the State of Texas since April  
5 2015. Since 2006 and 2012, respectively, I have also been licensed in Illinois and in  
6 Florida. I have been practicing law for twelve years.

7 3. In August 2014, I began working at the Refugee and Immigrant Center for  
8 Education and Legal Services ("RAICES") based in San Antonio, Texas, and have  
9 served at the Director of Family Detention Services since January 2016. I oversee a  
10 staff of approximately 10 employees and supervise all of RAICES' immigrant  
11 family detention work. Due to the nature of the work, I am also heavily involved in  
12 case strategy and supervision of cases involving detained adults and detained  
13 unaccompanied children.

14 4. Since January 2017, RAICES has been tracking separations of immigrant  
15 children from their parents.

16 5. When we meet with children classified as unaccompanied and in ORR  
17 custody, we track those that indicate they were separated from a parent. We have  
18 identified approximately 330 children placed in ORR detention centers served by  
19 RAICES that were separated from their parents. When we meet with children, we  
20 receive limited information about their parents (typically because either the child is  
21 too young to provide the information, or the ORR detention center staff does not  
22 have it) and so we cannot always be certain of the cause, nature, or details of the  
23 separation. However we believe that at least 150 of those children identified as  
24 being separated were separated by U.S. Department of Homeland Security officials  
25 at or around the time of apprehension.

26 6. Through our work in adult detention centers, we have also seen a high  
27 volume of separated families. Since May 24, 2018, we are aware of approximately  
28 390 parents who were separated from their children upon entry to the United States

1 by Department of Homeland Security officials. Many of these parents were  
2 criminally prosecuted and separated during their criminal proceeding.

3 7. The following are examples of family separation cases where RAICES has  
4 provided legal services.

- 5 a. In March 2018, a RAICES attorney visited a gentleman at the South  
6 Texas Detention Complex in Pearsall, Texas. At that time, he indicated  
7 that upon entry to the United States, he and his four-month-old child  
8 were separated and that he wanted to be removed from the United  
9 States as quickly as possible. We confirmed that the baby was in ORR  
10 custody and informed the father. On or about June 11, 2018, we  
11 confirmed that the father had been removed but the baby remained in  
12 ORR custody. Our understanding is that the baby has since been  
13 removed.
- 14 b. On June 6, 2018, I met with a Salvadoran man who was detained at the  
15 Rio Grande Detention Center in Laredo, Texas. He had been separated  
16 from his 16-year-old son on or about May 24, 2018 upon entry to the  
17 United States. He began crying as he relayed to me that he had not  
18 received any information about the whereabouts of his child and had  
19 been unable to communicate with his son. At that visit, he retained me  
20 to represent him in his immigration case. The following day I located  
21 his son in ORR custody in South Texas. When I attempted to speak  
22 with my client at the detention center, I learned that he been  
23 transferred to a detention center in Lumpkin, Georgia. I have since  
24 been attempting to locate a local attorney to continue representing him,  
25 and provide him information on his son's whereabouts.
- 26 c. On or about June 19, 2018, two RAICES staff members visited with  
27 approximately seven parents at the South Texas Detention Complex in  
28 Pearsall, Texas. All parents reported that they had been separated from





# Exhibit 37

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 Judy Rabinovitz\*  
 Anand Balakrishnan\*  
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 skang@aclu.org

*\*Admitted Pro Hac Vice*

**UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF CALIFORNIA**

Ms. L., et al.,

*Petitioners-Plaintiffs,*

v.

U.S. Immigration and Customs Enforcement  
 ("ICE"); et al.,

*Respondents-Defendants.*

Case No. 18-cv-00428-DMS-MDD

**DECLARATION OF CARLOS  
 HOLGUIN**

**CLASS ACTION**

1 I, Carlos Holguin, make the following declaration based on my personal  
2 knowledge and declare under the penalty of perjury pursuant to 28 U.S.C. § 1746 that  
3 the following is true and correct:

4 I am General Counsel for the Center for Human Rights and Constitutional Law,  
5 and a member of the State Bar of California.

6 I am counsel for Plaintiffs in *Flores v. Sessions*, No. 85-04544 (C.D. Cal.), a  
7 long running class action concerning the rights of immigrant children held in  
8 government custody. I have been counsel for the *Flores* class since the mid-1980s. As  
9 counsel for the *Flores* class, I am versed with the history of the litigation and the  
10 terms of the *Flores* Settlement Agreement. The *Flores* Settlement Agreement is  
11 attached as Exhibit A.

12 *Flores* was initially brought to insure that minors would not be detained for  
13 lengthy periods in subpar conditions, and that they would be released promptly to  
14 parents and other reputable custodians. The Ninth Circuit has held that the settlement  
15 applies to all minors, including those who are apprehended with their parents. *See*  
16 *Flores v. Lynch*, 828 F.3d 898 (9th Cir. 2016).

17 The settlement requires that minors who are not released to a parent, family  
18 member, or other responsible custodian must generally be held in “licensed facilities,”  
19 meaning that a state child welfare agency must license them to provide care and  
20 custody for dependent, as opposed to delinquent, children. *See* Ex. A, ¶¶ 6, 12.A, 14,  
21 19.

22 The agreement generally requires federal immigration authorities to place  
23 children in a licensed dependent care facility within 72 hours following arrest. The  
24 consent decree allows juvenile to be detained longer in unlicensed facilities in the  
25 event of an unexpected influx of minors entering immigration-related custody, but  
26 even then requires that a child be transferred to a licensed facility “as expeditiously as  
27 possible.” *Id.*, ¶ 12.A.  
28

1 7. In the case of class members apprehended with a parent, the district court  
2 overseeing the *Flores* settlement held that ICE does not necessarily breach ¶ 12A of  
3 the agreement if, in good faith and in the exercise of due diligence, it keeps class  
4 members in unlicensed facilities for longer than 72 hours while screening family  
5 members for reasonable or credible fear of persecution should they be returned to their  
6 countries of origin. *See Flores v. Lynch*, 212 F. Supp. 3d 907, 913-14 (C.D. Cal.  
7 2015). Upon establishing a reasonable or credible fear, class members' parents  
8 become eligible for release on bond, and ICE would thereafter generally release the  
9 family together.

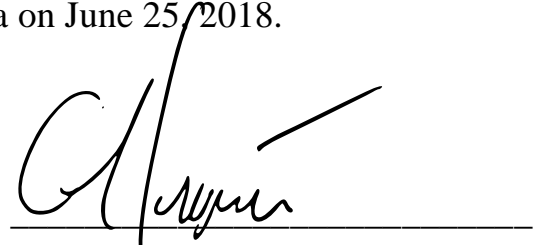
10 8. To the best of my knowledge, ICE's principal and largest family detention  
11 centers, which are located in Karnes and Dilley in Texas, are not licensed to care for  
12 dependent minors. Accordingly, the settlement generally obliges ICE to exercise due  
13 diligence and good faith efforts to make a licensed placement available to juveniles  
14 detained in such facilities as quickly as possible.

15 9. In practice, ICE has been releasing most families detained at Karnes and Dilley  
16 within 20 days. This is because the federal government is able to determine within that  
17 time whether families have a credible or reasonable fear of being persecuted should  
18 they be returned to their countries of origin. However, the apposite standard for  
19 making licensed placements available to class members under the settlement remains  
20 the same: ICE must exercise good faith and due diligence to make licensed  
21 placements available to class members as promptly as practicable, which may be more  
22 or fewer than 20 days under prevailing circumstances.

23 10. When parents are detained more than 20 days, I know of nothing in the *Flores*  
24 settlement that stops families from waiving their rights under the agreement and  
25 electing to remain in an unlicensed family detention center together. The settlement  
26 was intended to promote family reunification and give children the right to placement  
27 in a licensed dependent care facility. It was not intended to usurp the right of parents  
28

1 to decide that it would be better to waive that right than suffer the trauma of family  
2 separation.

3 I declare under penalty of perjury under the laws of the United States of  
4 America and California that the foregoing is true and correct, based on my personal  
5 knowledge. Executed in Santa Clarita, California on June 25, 2018.  
6

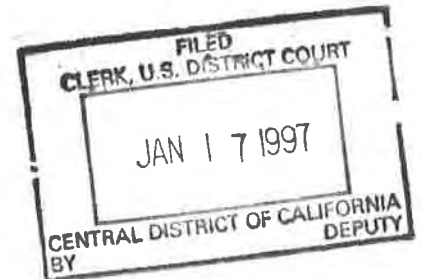
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9 CARLOS HOLGUIN  
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# Exhibit A

8/12/96

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Allen Hausman  
Office of Immigration Litigation  
Civil Division  
U.S. Department of Justice  
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Attorneys for Defendants

Additional counsel listed next page

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

JENNY LISETTE FLORES, et al.,	)	Case No. CV 85-4544-RJK(Px)
	)	
Plaintiffs,	)	Stipulated Settlement
	)	Agreement
-vs-	)	
	)	
JANET RENO, Attorney General	)	
of the United States, et al.,	)	
	)	
Defendants.	)	



Plaintiffs' Additional Counsel

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Defendants' Additional Counsel:

Arthur Strathern  
Mary Jane Candaux  
Office of the General Counsel  
U.S. Immigration & Naturalization Service  
425 I St. N.W.  
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/ / /

STIPULATED SETTLEMENT AGREEMENT

WHEREAS, Plaintiffs have filed this action against Defendants, challenging, *inter alia*, the constitutionality of Defendants' policies, practices and regulations regarding the detention and release of unaccompanied minors taken into the custody of the Immigration and Naturalization Service (INS) in the Western Region; and

WHEREAS, the district court has certified this case as a class action on behalf of all minors apprehended by the INS in the Western Region of the United States; and

WHEREAS, this litigation has been pending for nine (9) years, all parties have conducted extensive discovery, and the United States Supreme Court has upheld the constitutionality of the challenged INS regulations on their face and has remanded for further proceedings consistent with its opinion; and

WHEREAS, on November 30, 1987, the parties reached a settlement agreement requiring that minors in INS custody in the Western Region be housed in facilities meeting certain standards, including state standards for the housing and care of dependent children, and Plaintiffs' motion to enforce compliance with that settlement is currently pending before the court; and

WHEREAS, a trial in this case would be complex, lengthy and costly to all parties concerned, and the decision of the district court would be subject to appeal by the losing parties with the final outcome uncertain; and

WHEREAS, the parties believe that settlement of this action is in their best interests and best serves the interests of justice by avoiding a complex, lengthy and costly trial, and subsequent appeals which could last several more years;

NOW, THEREFORE, Plaintiffs and Defendants enter into this Stipulated Settlement Agreement

(the Agreement), stipulate that it constitutes a full and complete resolution of the issues raised in this action, and agree to the following:

I DEFINITIONS

As used throughout this Agreement the following definitions shall apply:

1. The term "party" or "parties" shall apply to Defendants and Plaintiffs. As the term applies to Defendants, it shall include their agents, employees, contractors and/or successors in office. As the term applies to Plaintiffs, it shall include all class members.
2. The term "Plaintiff" or "Plaintiffs" shall apply to the named plaintiffs and all class members.
3. The term "class member" or "class members" shall apply to the persons defined in Paragraph 10 below.
4. The term "minor" shall apply to any person under the age of eighteen (18) years who is detained in the legal custody of the INS. This Agreement shall cease to apply to any person who has reached the age of eighteen years. The term "minor" shall not include an emancipated minor or an individual who has been incarcerated due to a conviction for a criminal offense as an adult. The INS shall treat all persons who are under the age of eighteen but not included within the definition of "minor" as adults for all purposes, including release on bond or recognizance.
5. The term "emancipated minor" shall refer to any minor who has been determined to be emancipated in an appropriate state judicial proceeding.
6. The term "licensed program" shall refer to any program, agency or organization that is licensed by an appropriate State agency to provide residential, group, or foster care services for dependent children, including a program operating group homes, foster homes, or facilities for special needs minors. A licensed program must also meet those standards for licensed programs set forth in

Exhibit 1 attached hereto. All homes and facilities operated by licensed programs, including facilities for special needs minors, shall be non-secure as required under state law; provided, however, that a facility for special needs minors may maintain that level of security permitted under state law which is necessary for the protection of a minor or others in appropriate circumstances, *e.g.*, cases in which a minor has drug or alcohol problems or is mentally ill. The INS shall make reasonable efforts to provide licensed placements in those geographical areas where the majority of minors are apprehended, such as southern California, southeast Texas, southern Florida and the northeast corridor.

7. The term "special needs minor" shall refer to a minor whose mental and/or physical condition requires special services and treatment by staff. A minor may have special needs due to drug or alcohol abuse, serious emotional disturbance, mental illness or retardation, or a physical condition or chronic illness that requires special services or treatment. A minor who has suffered serious neglect or abuse may be considered a minor with special needs if the minor requires special services or treatment as a result of the neglect or abuse. The INS shall assess minors to determine if they have special needs and, if so, shall place such minors, whenever possible, in licensed programs in which the INS places children without special needs, but which provide services and treatment for such special needs.

8. The term "medium security facility" shall refer to a facility that is operated by a program, agency or organization licensed by an appropriate State agency and that meets those standards set forth in Exhibit 1 attached hereto. A medium security facility is designed for minors who require close supervision but do not need placement in juvenile correctional facilities. It provides 24-hour awake supervision, custody, care, and treatment. It maintains stricter security measures, such as intensive staff supervision, than a facility operated by a licensed program in order to control problem behavior and to prevent escape. Such a facility may have a secure perimeter but shall not be equipped internally with

major restraining construction or procedures typically associated with correctional facilities.

## II SCOPE OF SETTLEMENT, EFFECTIVE DATE, AND PUBLICATION

9. This Agreement sets out nationwide policy for the detention, release, and treatment of minors in the custody of the INS and shall supersede all previous INS policies that are inconsistent with the terms of this Agreement. This Agreement shall become effective upon final court approval, except that those terms of this Agreement regarding placement pursuant to Paragraph 19 shall not become effective until all contracts under the Program Announcement referenced in Paragraph 20 below are negotiated and implemented. The INS shall make its best efforts to execute these contracts within 120 days after the court's final approval of this Agreement. However, the INS will make reasonable efforts to comply with Paragraph 19 prior to full implementation of all such contracts. Once all contracts under the Program Announcement referenced in Paragraph 20 have been implemented, this Agreement shall supersede the agreement entitled Memorandum of Understanding Re Compromise of Class Action: Conditions of Detention (hereinafter "MOU"), entered into by and between the Plaintiffs and Defendants and filed with the United States District Court for the Central District of California on November 30, 1987, and the MOU shall thereafter be null and void. However, Plaintiffs shall not institute any legal action for enforcement of the MOU for a six (6) month period commencing with the final district court approval of this Agreement, except that Plaintiffs may institute enforcement proceedings if the Defendants have engaged in serious violations of the MOU that have caused irreparable harm to a class member for which injunctive relief would be appropriate. Within 120 days of the final district court approval of this Agreement, the INS shall initiate action to publish the relevant and substantive terms of this Agreement as a Service regulation. The final regulations shall not be inconsistent with the terms of this Agreement. Within 30 days of final court approval of this

Agreement, the INS shall distribute to all INS field offices and sub-offices instructions regarding the processing, treatment, and placement of juveniles. Those instructions shall include, but may not be limited to, the provisions summarizing the terms of this Agreement, attached hereto as Exhibit 2.

### III CLASS DEFINITION

10. The certified class in this action shall be defined as follows: "All minors who are detained in the legal custody of the INS."

### IV STATEMENTS OF GENERAL APPLICABILITY

11. The INS treats, and shall continue to treat, all minors in its custody with dignity, respect and special concern for their particular vulnerability as minors. The INS shall place each detained minor in the least restrictive setting appropriate to the minor's age and special needs, provided that such setting is consistent with its interests to ensure the minor's timely appearance before the INS and the immigration courts and to protect the minor's well-being and that of others. Nothing herein shall require the INS to release a minor to any person or agency whom the INS has reason to believe may harm or neglect the minor or fail to present him or her before the INS or the immigration courts when requested to do so.

### V PROCEDURES AND TEMPORARY PLACEMENT FOLLOWING ARREST

12.A. Whenever the INS takes a minor into custody, it shall expeditiously process the minor and shall provide the minor with a notice of rights, including the right to a bond redetermination hearing if applicable. Following arrest, the INS shall hold minors in facilities that are safe and sanitary and that are consistent with the INS's concern for the particular vulnerability of minors. Facilities will provide access to toilets and sinks, drinking water and food as appropriate, medical assistance if the minor is in need of emergency services, adequate temperature control and ventilation, adequate supervision to

protect minors from others, and contact with family members who were arrested with the minor. The INS will segregate unaccompanied minors from unrelated adults. Where such segregation is not immediately possible, an unaccompanied minor will not be detained with an unrelated adult for more than 24 hours. If there is no one to whom the INS may release the minor pursuant to Paragraph 14, and no appropriate licensed program is immediately available for placement pursuant to Paragraph 19, the minor may be placed in an INS detention facility, or other INS-contracted facility, having separate accommodations for minors, or a State or county juvenile detention facility. However, minors shall be separated from delinquent offenders. Every effort must be taken to ensure that the safety and well-being of the minors detained in these facilities are satisfactorily provided for by the staff. The INS will transfer a minor from a placement under this paragraph to a placement under Paragraph 19, (i) within three (3) days, if the minor was apprehended in an INS district in which a licensed program is located and has space available; or (ii) within five (5) days in all other cases; except:

1. as otherwise provided under Paragraph 13 or Paragraph 21;
2. as otherwise required by any court decree or court-approved settlement;
3. in the event of an emergency or influx of minors into the United States, in which case the INS shall place all minors pursuant to Paragraph 19 as expeditiously as possible; or
4. where individuals must be transported from remote areas for processing or speak unusual languages such that the INS must locate interpreters in order to complete processing, in which case the INS shall place all such minors pursuant to Paragraph 19 within five (5) business days.

B. For purposes of this paragraph, the term "emergency" shall be defined as any act or event that prevents the placement of minors pursuant to Paragraph 19 within the time frame provided. Such



emergencies include natural disasters (e.g., earthquakes, hurricanes, etc.), facility fires, civil disturbances, and medical emergencies (e.g., a chicken pox epidemic among a group of minors). The term "influx of minors into the United States" shall be defined as those circumstances where the INS has, at any given time, more than 130 minors eligible for placement in a licensed program under Paragraph 19, including those who have been so placed or are awaiting such placement.

C. In preparation for an "emergency" or "influx," as described in Subparagraph B, the INS shall have a written plan that describes the reasonable efforts that it will take to place all minors as expeditiously as possible. This plan shall include the identification of 80 beds that are potentially available for INS placements and that are licensed by an appropriate State agency to provide residential, group, or foster care services for dependent children. The plan, without identification of the additional beds available, is attached as Exhibit 3. The INS shall not be obligated to fund these additional beds on an ongoing basis. The INS shall update this listing of additional beds on a quarterly basis and provide Plaintiffs' counsel with a copy of this listing.

13. If a reasonable person would conclude that an alien detained by the INS is an adult despite his claims to be a minor, the INS shall treat the person as an adult for all purposes, including confinement and release on bond or recognizance. The INS may require the alien to submit to a medical or dental examination conducted by a medical professional or to submit to other appropriate procedures to verify his or her age. If the INS subsequently determines that such an individual is a minor, he or she will be treated as a minor in accordance with this Agreement for all purposes.

## VI GENERAL POLICY FAVORING RELEASE

14. Where the INS determines that the detention of the minor is not required either to secure his or her timely appearance before the INS or the immigration court, or to ensure the minor's safety or that

of others, the INS shall release a minor from its custody without unnecessary delay, in the following order of preference, to:

- A. a parent;
- B. a legal guardian;
- C. an adult relative (brother, sister, aunt, uncle, or grandparent);
- D. an adult individual or entity designated by the parent or legal guardian as capable and willing to care for the minor's well-being in (i) a declaration signed under penalty of perjury before an immigration or consular officer or (ii) such other document(s) that establish(es) to the satisfaction of the INS, in its discretion, the affiant's paternity or guardianship;
- E. a licensed program willing to accept legal custody; or
- F. an adult individual or entity seeking custody, in the discretion of the INS, when it appears that there is no other likely alternative to long term detention and family reunification does not appear to be a reasonable possibility.

15. Before a minor is released from INS custody pursuant to Paragraph 14 above, the custodian must execute an Affidavit of Support (Form I-134) and an agreement to:

- A. provide for the minor's physical, mental, and financial well-being;
- B. ensure the minor's presence at all future proceedings before the INS and the immigration court;
- C. notify the INS of any change of address within five (5) days following a move;
- D. in the case of custodians other than parents or legal guardians, not transfer custody of the minor to another party without the prior written permission of the District Director;

- E. notify the INS at least five days prior to the custodian's departing the United States of such departure, whether the departure is voluntary or pursuant to a grant of voluntary departure or order of deportation; and
- F. if dependency proceedings involving the minor are initiated, notify the INS of the initiation of such proceedings and the dependency court of any immigration proceedings pending against the minor.

In the event of an emergency, a custodian may transfer temporary physical custody of a minor prior to securing permission from the INS but shall notify the INS of the transfer as soon as is practicable thereafter, but in all cases within 72 hours. For purposes of this paragraph, examples of an "emergency" shall include the serious illness of the custodian, destruction of the home, etc. In all cases where the custodian, in writing, seeks written permission for a transfer, the District Director shall promptly respond to the request.

16. The INS may terminate the custody arrangements and assume legal custody of any minor whose custodian fails to comply with the agreement required under Paragraph 15. The INS, however, shall not terminate the custody arrangements for minor violations of that part of the custodial agreement outlined at Subparagraph 15.C above.

17. A positive suitability assessment may be required prior to release to any individual or program pursuant to Paragraph 14. A suitability assessment may include such components as an investigation of the living conditions in which the minor would be placed and the standard of care he would receive, verification of identity and employment of the individuals offering support, interviews of members of the household, and a home visit. Any such assessment should also take into consideration the wishes and concerns of the minor.

18. Upon taking a minor into custody, the INS, or the licensed program in which the minor is placed, shall make and record the prompt and continuous efforts on its part toward family reunification and the release of the minor pursuant to Paragraph 14 above. Such efforts at family reunification shall continue so long as the minor is in INS custody.

## VII INS CUSTODY

19. In any case in which the INS does not release a minor pursuant to Paragraph 14, the minor shall remain in INS legal custody. Except as provided in Paragraphs 12 or 21, such minor shall be placed temporarily in a licensed program until such time as release can be effected in accordance with Paragraph 14 above or until the minor's immigration proceedings are concluded, whichever occurs earlier. All minors placed in such a licensed program remain in the legal custody of the INS and may only be transferred or released under the authority of the INS; provided, however, that in the event of an emergency a licensed program may transfer temporary physical custody of a minor prior to securing permission from the INS but shall notify the INS of the transfer as soon as is practicable thereafter, but in all cases within 8 hours.

20. Within 60 days of final court approval of this Agreement, the INS shall authorize the United States Department of Justice Community Relations Service to publish in the Commerce Business Daily and/or the Federal Register a Program Announcement to solicit proposals for the care of 100 minors in licensed programs.

21. A minor may be held in or transferred to a suitable State or county juvenile detention facility or a secure INS detention facility, or INS-contracted facility, having separate accommodations for minors whenever the District Director or Chief Patrol Agent determines that the minor:

A. has been charged with, is chargeable, or has been convicted of a crime, or is the subject

of delinquency proceedings, has been adjudicated delinquent, or is chargeable with a delinquent act; provided, however, that this provision shall not apply to any minor whose offense(s) fall(s) within either of the following categories:

- i. Isolated offenses that (1) were not within a pattern or practice of criminal activity and (2) did not involve violence against a person or the use or carrying of a weapon (Examples: breaking and entering, vandalism, DUI, etc. This list is not exhaustive.);
- ii. Petty offenses, which are not considered grounds for stricter means of detention in any case (Examples: shoplifting, joy riding, disturbing the peace, etc. This list is not exhaustive.);

As used in this paragraph, "chargeable" means that the INS has probable cause to believe that the individual has committed a specified offense;

- B. has committed, or has made credible threats to commit, a violent or malicious act (whether directed at himself or others) while in INS legal custody or while in the presence of an INS officer;
- C. has engaged, while in a licensed program, in conduct that has proven to be unacceptably disruptive of the normal functioning of the licensed program in which he or she has been placed and removal is necessary to ensure the welfare of the minor or others, as determined by the staff of the licensed program (Examples: drug or alcohol abuse, stealing, fighting, intimidation of others, etc. This list is not exhaustive.);
- D. is an escape-risk; or
- E. must be held in a secure facility for his or her own safety, such as when the INS has

reason to believe that a smuggler would abduct or coerce a particular minor to secure payment of smuggling fees.

22. The term "escape-risk" means that there is a serious risk that the minor will attempt to escape from custody. Factors to consider when determining whether a minor is an escape-risk or not include, but are not limited to, whether:

- A. the minor is currently under a final order of deportation or exclusion;
- B. the minor's immigration history includes: a prior breach of a bond; a failure to appear before the INS or the immigration court; evidence that the minor is indebted to organized smugglers for his transport; or a voluntary departure or a previous removal from the United States pursuant to a final order of deportation or exclusion;
- C. the minor has previously absconded or attempted to abscond from INS custody.

23. The INS will not place a minor in a secure facility pursuant to Paragraph 21 if there are less restrictive alternatives that are available and appropriate in the circumstances, such as transfer to (a) a medium security facility which would provide intensive staff supervision and counseling services or (b) another licensed program. All determinations to place a minor in a secure facility will be reviewed and approved by the regional juvenile coordinator.

24.A. A minor in deportation proceedings shall be afforded a bond redetermination hearing before an immigration judge in every case, unless the minor indicates on the Notice of Custody Determination form that he or she refuses such a hearing.

B. Any minor who disagrees with the INS's determination to place that minor in a particular type of facility, or who asserts that the licensed program in which he or she has been placed does not comply with the standards set forth in Exhibit 1 attached hereto, may seek judicial review in any

United States District Court with jurisdiction and venue over the matter to challenge that placement determination or to allege noncompliance with the standards set forth in Exhibit 1. In such an action, the United States District Court shall be limited to entering an order solely affecting the individual claims of the minor bringing the action.

C. In order to permit judicial review of Defendants' placement decisions as provided in this Agreement, Defendants shall provide minors not placed in licensed programs with a notice of the reasons for housing the minor in a detention or medium security facility. With respect to placement decisions reviewed under this paragraph, the standard of review for the INS's exercise of its discretion shall be the abuse of discretion standard of review. With respect to all other matters for which this paragraph provides judicial review, the standard of review shall be *de novo* review.

D. The INS shall promptly provide each minor not released with (a) INS Form I-770, (b) an explanation of the right of judicial review as set out in Exhibit 6, and (c) the list of free legal services available in the district pursuant to INS regulations (unless previously given to the minor).

E. Exhausting the procedures established in Paragraph 37 of this Agreement shall not be a precondition to the bringing of an action under this paragraph in any United District Court. Prior to initiating any such action, however, the minor and/or the minors' attorney shall confer telephonically or in person with the United States Attorney's office in the judicial district where the action is to be filed, in an effort to informally resolve the minor's complaints without the need of federal court intervention.

#### VIII TRANSPORTATION OF MINORS

25. Unaccompanied minors arrested or taken into custody by the INS should not be transported by the INS in vehicles with detained adults except:

A. when being transported from the place of arrest or apprehension to an INS office, or



B. where separate transportation would be otherwise impractical.

When transported together pursuant to Clause B, minors shall be separated from adults. The INS shall take necessary precautions for the protection of the well-being of such minors when transported with adults.

26. The INS shall assist without undue delay in making transportation arrangements to the INS office nearest the location of the person or facility to whom a minor is to be released pursuant to Paragraph 14. The INS may, in its discretion, provide transportation to minors.

#### IX TRANSFER OF MINORS

27. Whenever a minor is transferred from one placement to another, the minor shall be transferred with all of his or her possessions and legal papers; provided, however, that if the minor's possessions exceed the amount permitted normally by the carrier in use, the possessions will be shipped to the minor in a timely manner. No minor who is represented by counsel shall be transferred without advance notice to such counsel, except in unusual and compelling circumstances such as where the safety of the minor or others is threatened or the minor has been determined to be an escape-risk, or where counsel has waived such notice, in which cases notice shall be provided to counsel within 24 hours following transfer.

#### X MONITORING AND REPORTS

28A. An INS Juvenile Coordinator in the Office of the Assistant Commissioner for Detention and Deportation shall monitor compliance with the terms of this Agreement and shall maintain an up-to-date record of all minors who are placed in proceedings and remain in INS custody for longer than 72 hours. Statistical information on such minors shall be collected weekly from all INS district offices and Border Patrol stations. Statistical information will include at least the following: (1)



biographical information such as each minor's name, date of birth, and country of birth, (2) date placed in INS custody, (3) each date placed, removed or released, (4) to whom and where placed, transferred, removed or released, (5) immigration status, and (6) hearing dates. The INS, through the Juvenile Coordinator, shall also collect information regarding the reasons for every placement of a minor in a detention facility or medium security facility.

B. Should Plaintiffs' counsel have reasonable cause to believe that a minor in INS legal custody should have been released pursuant to Paragraph 14, Plaintiffs' counsel may contact the Juvenile Coordinator to request that the Coordinator investigate the case and inform Plaintiffs' counsel of the reasons why the minor has not been released.

29. On a semi-annual basis, until two years after the court determines, pursuant to Paragraph 31, that the INS has achieved substantial compliance with the terms of this Agreement, the INS shall provide to Plaintiffs' counsel the information collected pursuant to Paragraph 28, as permitted by law, and each INS policy or instruction issued to INS employees regarding the implementation of this Agreement. In addition, Plaintiffs' counsel shall have the opportunity to submit questions, on a semi-annual basis, to the Juvenile Coordinator in the Office of the Assistant Commissioner for Detention and Deportation with regard to the implementation of this Agreement and the information provided to Plaintiffs' counsel during the preceding six-month period pursuant to Paragraph 28. Plaintiffs' counsel shall present such questions either orally or in writing, at the option of the Juvenile Coordinator. The Juvenile Coordinator shall furnish responses, either orally or in writing at the option of Plaintiffs' counsel, within 30 days of receipt.

30. On an annual basis, commencing one year after final court approval of this Agreement, the INS Juvenile Coordinator shall review, assess, and report to the court regarding compliance with the

terms of this Agreement. The Coordinator shall file these reports with the court and provide copies to the parties, including the final report referenced in Paragraph 35, so that they can submit comments on the report to the court. In each report, the Coordinator shall state to the court whether or not the INS is in substantial compliance with the terms of this Agreement, and, if the INS is not in substantial compliance, explain the reasons for the lack of compliance. The Coordinator shall continue to report on an annual basis until three years after the court determines that the INS has achieved substantial compliance with the terms of this Agreement.

31. One year after the court's approval of this Agreement, the Defendants may ask the court to determine whether the INS has achieved substantial compliance with the terms of this Agreement.

#### XI ATTORNEY-CLIENT VISITS

32.A. Plaintiffs' counsel are entitled to attorney-client visits with class members even though they may not have the names of class members who are housed at a particular location. All visits shall occur in accordance with generally applicable policies and procedures relating to attorney-client visits at the facility in question. Upon Plaintiffs' counsel's arrival at a facility for attorney-client visits, the facility staff shall provide Plaintiffs' counsel with a list of names and alien registration numbers for the minors housed at that facility. In all instances, in order to memorialize any visit to a minor by Plaintiffs' counsel, Plaintiffs' counsel must file a notice of appearance with the INS prior to any attorney-client meeting. Plaintiffs' counsel may limit any such notice of appearance to representation of the minor in connection with this Agreement. Plaintiffs' counsel must submit a copy of the notice of appearance by hand or by mail to the local INS juvenile coordinator and a copy by hand to the staff of the facility.

B. Every six months, Plaintiffs' counsel shall provide the INS with a list of those attorneys who

may make such attorney-client visits, as Plaintiffs' counsel, to minors during the following six month period. Attorney-client visits may also be conducted by any staff attorney employed by the Center for Human Rights & Constitutional Law in Los Angeles, California or the National Center for Youth Law in San Francisco, California, provided that such attorney presents credentials establishing his or her employment prior to any visit.

C. Agreements for the placement of minors in non-INS facilities shall permit attorney-client visits, including by class counsel in this case.

D. Nothing in Paragraph 32 shall affect a minor's right to refuse to meet with Plaintiffs' counsel. Further, the minor's parent or legal guardian may deny Plaintiffs' counsel permission to meet with the minor.

## XII FACILITY VISITS

33. In addition to the attorney-client visits permitted pursuant to Paragraph 32, Plaintiffs' counsel may request access to any licensed program's facility in which a minor has been placed pursuant to Paragraph 19 or to any medium security facility or detention facility in which a minor has been placed pursuant to Paragraphs 21 or 23. Plaintiffs' counsel shall submit a request to visit a facility under this paragraph to the INS district juvenile coordinator who will provide reasonable assistance to Plaintiffs' counsel by conveying the request to the facility's staff and coordinating the visit. The rules and procedures to be followed in connection with any visit approved by a facility under this paragraph are set forth in Exhibit 4 attached, except as may be otherwise agreed by Plaintiffs' counsel and the facility's staff. In all visits to any facility pursuant to this Agreement, Plaintiffs' counsel and their associated experts shall treat minors and staff with courtesy and dignity and shall not disrupt the normal functioning of the facility.

### XIII TRAINING

34. Within 120 days of final court approval of this Agreement, the INS shall provide appropriate guidance and training for designated INS employees regarding the terms of this Agreement. The INS shall develop written and/or audio or video materials for such training. Copies of such written and/or audio or video training materials shall be made available to Plaintiffs' counsel when such training materials are sent to the field, or to the extent practicable, prior to that time.

### XIV DISMISSAL

35. After the court has determined that the INS is in substantial compliance with this Agreement and the Coordinator has filed a final report, the court, without further notice, shall dismiss this action. Until such dismissal, the court shall retain jurisdiction over this action.

### XV RESERVATION OF RIGHTS

36. Nothing in this Agreement shall limit the rights, if any, of individual class members to preserve issues for judicial review in the appeal of an individual case or for class members to exercise any independent rights they may otherwise have.

### XVI NOTICE AND DISPUTE RESOLUTION

37. This paragraph provides for the enforcement, in this District Court, of the provisions of this Agreement except for claims brought under Paragraph 24. The parties shall meet telephonically or in person to discuss a complete or partial repudiation of this Agreement or any alleged non-compliance with the terms of the Agreement, prior to bringing any individual or class action to enforce this Agreement. Notice of a claim that a party has violated the terms of this Agreement shall be served on plaintiffs addressed to:

/ / /

CENTER FOR HUMAN RIGHTS & CONSTITUTIONAL LAW

Carlos Holguín  
Peter A. Schey  
256 South Occidental Boulevard  
Los Angeles, CA 90057

NATIONAL CENTER FOR YOUTH LAW

Alice Bussiere  
James Morales  
114 Sansome Street, Suite 905  
San Francisco, CA 94104

and on Defendants addressed to:

Michael Johnson  
Assistant United States Attorney  
300 N. Los Angeles St., Rm. 7516  
Los Angeles, CA 90012

Allen Hausman  
Office of Immigration Litigation  
Civil Division  
U.S. Department of Justice  
P.O. Box 878, Ben Franklin Station  
Washington, DC 20044

XVII PUBLICITY

38. Plaintiffs and Defendants shall hold a joint press conference to announce this Agreement.

The INS shall send copies of this Agreement to social service and voluntary agencies agreed upon by the parties, as set forth in Exhibit 5 attached. The parties shall pursue such other public dissemination of information regarding this Agreement as the parties shall agree.

XVIII ATTORNEYS' FEES AND COSTS

39. Within 60 days of final court approval of this Agreement, Defendants shall pay to Plaintiffs the total sum of \$374,110.09, in full settlement of all attorneys' fees and costs in this case.

/ / /

XIX TERMINATION

40. All terms of this Agreement shall terminate the earlier of five years after the date of final court approval of this Agreement or three years after the court determines that the INS is in substantial compliance with this Agreement, except that the INS shall continue to house the general population of minors in INS custody in facilities that are licensed for the care of dependent minors.

XX REPRESENTATIONS AND WARRANTY

41. Counsel for the respective parties, on behalf of themselves and their clients, represent that they know of nothing in this Agreement that exceeds the legal authority of the parties or is in violation of any law. Defendants' counsel represent and warrant that they are fully authorized and empowered to enter into this Agreement on behalf of the Attorney General, the United States Department of Justice, and the Immigration and Naturalization Service, and acknowledge that Plaintiffs enter into this Agreement in reliance on such representation. Plaintiffs' counsel represent and warrant that they are fully authorized and empowered to enter into this Agreement on behalf of the Plaintiffs, and acknowledge that Defendants enter into this Agreement in reliance on such representation. The undersigned, by their signatures on behalf of the Plaintiffs and Defendants, warrant that upon execution of this Agreement in their representative capacities, their principals, agents, and successors of such principals and agents shall be fully and unequivocally bound hereunder to the full extent authorized by law.

For Defendants: Signed: Louis Meissner Title: Commissioner, INS

Dated: 7/16/96

For Plaintiffs: Signed: per next page Title: \_\_\_\_\_

Dated: \_\_\_\_\_

The foregoing stipulated settlement is approved as to form and content:

CENTER FOR HUMAN RIGHTS AND  
CONSTITUTIONAL LAW

Carlos Holguin

Peter Schey

NATIONAL CENTER FOR YOUTH LAW

Alice Bussiere

James Morales

ACLU FOUNDATION OF SOUTHERN CALIFORNIA

Mark Rosenbaum

Sylvia Argueta

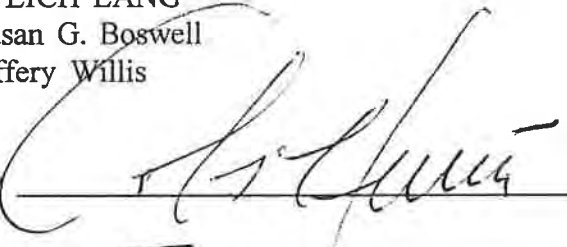
STEICH LANG

Susan G. Boswell

Jeffery Willis

Date: 1/13/97

By



Date: 11/13/96

By







EXHIBIT 1

MINIMUM STANDARDS FOR LICENSED PROGRAMS

A. Licensed programs shall comply with all applicable state child welfare laws and regulations and all state and local building, fire, health and safety codes and shall provide or arrange for the following services for each minor in its care:

1. Proper physical care and maintenance, including suitable living accommodations, food, appropriate clothing, and personal grooming items.
2. Appropriate routine medical and dental care, family planning services, and emergency health care services, including a complete medical examination (including screening for infectious disease) within 48 hours of admission, excluding weekends and holidays, unless the minor was recently examined at another facility; appropriate immunizations in accordance with the U.S. Public Health Service (PHS), Center for Disease Control; administration of prescribed medication and special diets; appropriate mental health interventions when necessary.
3. An individualized needs assessment which shall include: (a) various initial intake forms; (b) essential data relating to the identification and history of the minor and family; (c) identification of the minors' special needs including any specific problem(s) which appear to require immediate intervention; (d) an educational assessment and plan; (e) an assessment of family relationships and interaction with adults, peers and authority figures; (f) a statement of religious preference and practice; (g) an assessment of the minor's personal goals, strengths and weaknesses; and (h) identifying information regarding immediate family members, other relatives, godparents or friends who may be

residing in the United States and may be able to assist in family reunification.

4. Educational services appropriate to the minor's level of development, and communication skills in a structured classroom setting, Monday through Friday, which concentrates primarily on the development of basic academic competencies and secondarily on English Language Training (ELT). The educational program shall include instruction and educational and other reading materials in such languages as needed. Basic academic areas should include Science, Social Studies, Math, Reading, Writing and Physical Education. The program shall provide minors with appropriate reading materials in languages other than English for use during the minor's leisure time.
5. Activities according to a recreation and leisure time plan which shall include daily outdoor activity, weather permitting, at least one hour per day of large muscle activity and one hour per day of structured leisure time activities (this should not include time spent watching television). Activities should be increased to a total of three hours on days when school is not in session.
6. At least one (1) individual counseling session per week conducted by trained social work staff with the specific objectives of reviewing the minor's progress, establishing new short term objectives, and addressing both the developmental and crisis-related needs of each minor.
7. Group counseling sessions at least twice a week. This is usually an informal process and takes place with all the minors present. It is a time when new minors are given the opportunity to get acquainted with the staff, other children, and the rules of the program. It is an open forum where everyone gets a chance to speak. Daily program management

is discussed and decisions are made about recreational activities, etc. It is a time for staff and minors to discuss whatever is on their minds and to resolve problems.

8. Acculturation and adaptation services which include information regarding the development of social and inter-personal skills which contribute to those abilities necessary to live independently and responsibly.
9. Upon admission, a comprehensive orientation regarding program intent, services, rules (written and verbal), expectations and the availability of legal assistance.
10. Whenever possible, access to religious services of the minor's choice.
11. Visitation and contact with family members (regardless of their immigration status) which is structured to encourage such visitation. The staff shall respect the minor's privacy while reasonably preventing the unauthorized release of the minor.
12. A reasonable right to privacy, which shall include the right to: (a) wear his or her own clothes, when available; (b) retain a private space in the residential facility, group or foster home for the storage of personal belongings; (c) talk privately on the phone, as permitted by the house rules and regulations; (d) visit privately with guests, as permitted by the house rules and regulations; and (e) receive and send uncensored mail unless there is a reasonable belief that the mail contains contraband.
13. Family reunification services designed to identify relatives in the United States as well as in foreign countries and assistance in obtaining legal guardianship when necessary for the release of the minor.
14. Legal services information regarding the availability of free legal assistance, the right to be represented by counsel at no expense to the government, the right to a deportation or

exclusion hearing before an immigration judge, the right to apply for political asylum or to request voluntary departure in lieu of deportation.

B. Service delivery is to be accomplished in a manner which is sensitive to the age, culture, native language and the complex needs of each minor.

C. Program rules and discipline standards shall be formulated with consideration for the range of ages and maturity in the program and shall be culturally sensitive to the needs of alien minors. Minors shall not be subjected to corporal punishment, humiliation, mental abuse, or punitive interference with the daily functions of living, such as eating or sleeping. Any sanctions employed shall not: (1) adversely affect either a minor's health, or physical or psychological well-being; or (2) deny minors regular meals, sufficient sleep, exercise, medical care, correspondence privileges, or legal assistance.

D. A comprehensive and realistic individual plan for the care of each minor must be developed in accordance with the minor's needs as determined by the individualized need assessment. Individual plans shall be implemented and closely coordinated through an operative case management system.

E. Programs shall develop, maintain and safeguard individual client case records. Agencies and organizations are required to develop a system of accountability which preserves the confidentiality of client information and protects the records from unauthorized use or disclosure.

F. Programs shall maintain adequate records and make regular reports as required by the INS that permit the INS to monitor and enforce this order and other requirements and standards as the INS may determine are in the best interests of the minors.



## EXHIBIT 2

INSTRUCTIONS TO SERVICE OFFICERS RE:  
PROCESSING, TREATMENT, AND PLACEMENT OF MINORS

These instructions are to advise Service officers of INS policy regarding the way in which minors in INS custody are processed, housed and released. These instructions are applicable nationwide and supersede all prior inconsistent instructions regarding minors.

**(a) Minors.** A minor is a person under the age of eighteen years. However, individuals who have been “emancipated” by a state court or convicted and incarcerated for a criminal offense as an adult are not considered minors. Such individuals must be treated as adults for all purposes, including confinement and release on bond.

Similarly, if a reasonable person would conclude that an individual is an adult despite his claims to be a minor, the INS shall treat such person as an adult for all purposes, including confinement and release on bond or recognizance. The INS may require such an individual to submit to a medical or dental examination conducted by a medical professional or to submit to other appropriate procedures to verify his or her age. If the INS subsequently determines that such an individual is a minor, he or she will be treated as a minor for all purposes.

**(b) General policy.** The INS treats, and will continue to treat minors with dignity, respect and special concern for their particular vulnerability. INS policy is to place each detained minor in the least restrictive setting appropriate to the minor's age and special needs, provided that such setting is consistent with the need to ensure the minor's timely appearance and to protect the minor's well-being and that of others. INS officers are not required to release a minor to any person or agency whom they have reason to believe may harm or neglect the minor or fail to present him or her before the INS or the immigration courts when requested to do so.

**(c) Processing.** The INS will expeditiously process minors and will provide a Form I-770 notice of rights, including the right to a bond redetermination hearing, if applicable.

Following arrest, the INS will hold minors in a facility that is safe and sanitary and that is consistent with the INS's concern for the particular vulnerability of minors. Such facilities will have access to toilets and sinks, drinking water and food as appropriate, medical assistance if the minor is in need of emergency services, adequate temperature control and ventilation, adequate supervision to protect minors from others, and contact with family members who were arrested with the minor. The INS will separate unaccompanied minors from unrelated adults whenever possible. Where such segregation is not immediately possible, an unaccompanied minor will not be detained with an unrelated adult for more than 24 hours.

If the juvenile cannot be immediately released, and no licensed program (described below) is available to care for him, he should be placed in an INS or INS-contract facility that has separate accommodations for minors, or in a State or county juvenile detention facility that separates minors in

INS custody from delinquent offenders. The INS will make every effort to ensure the safety and well-being of juveniles placed in these facilities.

**(d) Release.** The INS will release minors from its custody without unnecessary delay, unless detention of a juvenile is required to secure her timely appearance or to ensure the minor's safety or that of others. Minors shall be released, in the following order of preference, to:

- (i) a parent;
- (ii) a legal guardian;
- (iii) an adult relative (brother, sister, aunt, uncle, or grandparent);
- (iv) an adult individual or entity designated by the parent or legal guardian as capable and willing to care for the minor's well-being in (i) a declaration signed under penalty of perjury before an immigration or consular officer, or (ii) such other documentation that establishes to the satisfaction of the INS, in its discretion, that the individual designating the individual or entity as the minor's custodian is in fact the minor's parent or guardian;
- (v) a state-licensed juvenile shelter, group home, or foster home willing to accept legal custody; or
- (vi) an adult individual or entity seeking custody, in the discretion of the INS, when it appears that there is no other likely alternative to long term detention and family reunification does not appear to be a reasonable possibility.

**(e) Certification of custodian.** Before a minor is released, the custodian must execute an Affidavit of Support (Form I-134) and an agreement to:

- (i) provide for the minor's physical, mental, and financial well-being;
- (ii) ensure the minor's presence at all future proceedings before the INS and the immigration court;
- (iii) notify the INS of any change of address within five (5) days following a move;
- (iv) if the custodian is not a parent or legal guardian, not transfer custody of the minor to another party without the prior written permission of the District Director, except in the event of an emergency;
- (v) notify the INS at least five days prior to the custodian's departing the United States of such departure, whether the departure is voluntary or pursuant to a grant of voluntary departure or order of deportation; and



(vi) if dependency proceedings involving the minor are initiated, notify the INS of the initiation of a such proceedings and the dependency court of any deportation proceedings pending against the minor.

In an emergency, a custodian may transfer temporary physical custody of a minor prior to securing permission from the INS, but must notify the INS of the transfer as soon as is practicable, and in all cases within 72 hours. Examples of an "emergency" include the serious illness of the custodian, destruction of the home, etc. In all cases where the custodian seeks written permission for a transfer, the District Director shall promptly respond to the request.

The INS may terminate the custody arrangements and assume legal custody of any minor whose custodian fails to comply with the agreement. However, custody arrangements will not be terminated for minor violations of the custodian's obligation to notify the INS of any change of address within five days following a move.

**(f) Suitability assessment.** An INS officer may require a positive suitability assessment prior to releasing a minor to any individual or program. A suitability assessment may include an investigation of the living conditions in which the minor is to be placed and the standard of care he would receive, verification of identity and employment of the individuals offering support, interviews of members of the household, and a home visit. The assessment will also take into consideration the wishes and concerns of the minor.

**(g) Family reunification.** Upon taking a minor into custody, the INS, or the licensed program in which the minor is placed, will promptly attempt to reunite the minor with his or her family to permit the release of the minor under Paragraph (d) above. Such efforts at family reunification will continue as long as the minor is in INS or licensed program custody and will be recorded by the INS or the licensed program in which the minor is placed.

**(h) Placement in licensed programs.** A "licensed program" is any program, agency or organization licensed by an appropriate state agency to provide residential, group, or foster care services for dependent children, including a program operating group homes, foster homes, or facilities for special needs minors. Exhibit 1 of the *Flores v. Reno* Settlement Agreement describes the standards required of licensed programs. Juveniles who remain in INS custody must be placed in a licensed program within three days if the minor was apprehended in an INS district in which a licensed program is located and has space available, or within five days in all other cases, except when:

- (i) the minor is an escape risk or delinquent, as defined in Paragraph (i) below;
- (ii) a court decree or court-approved settlement requires otherwise;
- (iii) an emergency or influx of minors into the United States prevents compliance, in which case all minors should be placed in licensed programs as expeditiously as possible; or
- (iv) the minor must be transported from remote areas for processing or speaks an unusual



language such that a special interpreter is required to process the minor, in which case the minor must be placed in a licensed program within five business days.

**(i) Secure and supervised detention.** A minor may be held in or transferred to a State or county juvenile detention facility or in a secure INS facility or INS-contracted facility having separate accommodations for minors, whenever the District Director or Chief Patrol Agent determines that the minor —

(i) has been charged with, is chargeable, or has been convicted of a crime, or is the subject of delinquency proceedings, has been adjudicated delinquent, or is chargeable with a delinquent act, unless the minor's offense is

(a) an isolated offense not within a pattern of criminal activity which did not involve violence against a person or the use or carrying of a weapon (Examples: breaking and entering, vandalism, DUI, etc.); or

(b) a petty offense, which is not considered grounds for stricter means of detention in any case (Examples: shoplifting, joy riding, disturbing the peace, etc.);

(ii) has committed, or has made credible threats to commit, a violent or malicious act (whether directed at himself or others) while in INS legal custody or while in the presence of an INS officer;

(iii) has engaged, while in a licensed program, in conduct that has proven to be unacceptably disruptive of the normal functioning of the licensed program in which he or she has been placed and removal is necessary to ensure the welfare of the minor or others, as determined by the staff of the licensed program (Examples: drug or alcohol abuse, stealing, fighting, intimidation of others, etc.);

(iv) is an escape-risk; or

(v) must be held in a secure facility for his or her own safety, such as when the INS has reason to believe that a smuggler would abduct or coerce a particular minor to secure payment of smuggling fees.

"Chargeable" means that the INS has probable cause to believe that the individual has committed a specified offense.

The term "escape-risk" means that there is a serious risk that the minor will attempt to escape from custody. Factors to consider when determining whether a minor is an escape-risk or not include, but are not limited to, whether:

(a) the minor is currently under a final order of deportation or exclusion;

(b) the minor's immigration history includes: a prior breach of a bond; a failure to appear before the INS or the immigration court; evidence that the minor is indebted to organized smugglers for his transport; or a voluntary departure or a previous removal from the United States pursuant to a final order of deportation or exclusion;

(c) the minor has previously absconded or attempted to abscond from INS custody.

The INS will not place a minor in a State or county juvenile detention facility, secure INS detention facility, or secure INS-contracted facility if less restrictive alternatives are available and appropriate in the circumstances, such as transfer to a medium security facility that provides intensive staff supervision and counseling services or transfer to another licensed program. All determinations to place a minor in a secure facility will be reviewed and approved by the regional Juvenile Coordinator.

**(j) Notice of right to bond redetermination and judicial review of placement.** A minor in deportation proceedings shall be afforded a bond redetermination hearing before an immigration judge in every case, unless the minor indicates on the Notice of Custody Determination form that he or she refuses such a hearing. A juvenile who is not released or placed in a licensed placement shall be provided (1) a written explanation of the right of judicial review as set out in Exhibit 6 of the *Flores v. Reno* Settlement Agreement, and (2) the list of free legal services providers compiled pursuant to INS regulations (unless previously given to the minor).

**(k) Transportation and transfer.** Unaccompanied minors should not be transported in vehicles with detained adults except when being transported from the place of arrest or apprehension to an INS office or where separate transportation would be otherwise impractical, in which case minors shall be separated from adults. INS officers shall take all necessary precautions for the protection of minors during transportation with adults.

When a minor is to be released, the INS will assist him or her in making transportation arrangements to the INS office nearest the location of the person or facility to whom a minor is to be released. The INS may, in its discretion, provide transportation to such minors.

Whenever a minor is transferred from one placement to another, she shall be transferred with all of her possessions and legal papers; provided, however, that if the minor's possessions exceed the amount permitted normally by the carrier in use, the possessions must be shipped to the minor in a timely manner. No minor who is represented by counsel should be transferred without advance notice to counsel, except in unusual and compelling circumstances such as where the safety of the minor or others is threatened or the minor has been determined to be an escape-risk, or where counsel has waived notice, in which cases notice must be provided to counsel within 24 hours following transfer.

**(l) Periodic reporting.** Statistical information on minors placed in proceedings who remain in INS custody for longer than 72 hours must be reported to the Juvenile Coordinator by all INS district offices and Border Patrol stations. Information will include: (a) biographical information, including the minor's name, date of birth, and country of birth, (b) date placed in INS custody, (c) each date placed, removed or released, (d) to whom and where placed, transferred, removed or released, (e) immigration

status, and (f) hearing dates. INS officers should also inform the Juvenile Coordinator of the reasons for placing a minor in a medium-security facility or detention facility as described in paragraph (i).

**(m) Attorney-client visits by Plaintiffs' counsel.** The INS will permit the lawyers for the *Flores v. Reno* plaintiff class to visit minors, even though they may not have the names of minors who are housed at a particular location. A list of Plaintiffs' counsel entitled to make attorney-client visits with minors is available from the district Juvenile Coordinator. Attorney-client visits may also be conducted by any staff attorney employed by the Center for Human Rights & Constitutional Law of Los Angeles, California, or the National Center for Youth Law of San Francisco, California, provided that such attorney presents credentials establishing his or her employment prior to any visit.

Visits must occur in accordance with generally applicable policies and procedures relating to attorney-client visits at the facility in question. Upon Plaintiffs' counsel's arrival at a facility for attorney-client visits, the facility staff must provide Plaintiffs' counsel with a list of names and alien registration numbers for the minors housed at that facility. In all instances, in order to memorialize any visit to a minor by Plaintiffs' counsel, Plaintiffs' counsel must file a notice of appearance with the INS prior to any attorney-client meeting. Plaintiffs' counsel may limit the notice of appearance to representation of the minor in connection with his placement or treatment during INS custody. Plaintiffs' counsel must submit a copy of the notice of appearance by hand or by mail to the local INS juvenile coordinator and a copy by hand to the staff of the facility.

A minor may refuse to meet with Plaintiffs' counsel. Further, the minor's parent or legal guardian may deny Plaintiffs' counsel permission to meet with the minor.

**(n) Visits to licensed facilities.** In addition to the attorney-client visits, Plaintiffs' counsel may request access to a licensed program's facility (described in paragraph (h)) or to a medium-security facility or detention facility (described in paragraph (i)) in which a minor has been placed. The district juvenile coordinator will convey the request to the facility's staff and coordinate the visit. The rules and procedures to be followed in connection with such visits are set out in Exhibit 4 of the *Flores v. Reno* Settlement Agreement, unless Plaintiffs' counsel and the facility's staff agree otherwise. In all visits to any facility, Plaintiffs' counsel and their associated experts must treat minors and staff with courtesy and dignity and must not disrupt the normal functioning of the facility.



### EXHIBIT 3

#### CONTINGENCY PLAN

In the event of an emergency or influx that prevents the prompt placement of minors in licensed programs with which the Community Relations Service has contracted, INS policy is to make all reasonable efforts to place minors in programs licensed by an appropriate state agency as expeditiously as possible. An "emergency" is an act or event, such as a natural disaster (e.g. earthquake, fire, hurricane), facility fire, civil disturbance, or medical emergency (e.g. a chicken pox epidemic among a group of minors) that prevents the prompt placement of minors in licensed facilities. An "influx" is defined as any situation in which there are more than 130 minors in the custody of the INS who are eligible for placement in licensed programs.

1. The Juvenile Coordinator will establish and maintain an Emergency Placement List of at least 80 beds at programs licensed by an appropriate state agency that are potentially available to accept emergency placements. These 80 placements would supplement the 130 placements that the INS normally has available, and whenever possible, would meet all standards applicable to juvenile placements the INS normally uses. The Juvenile Coordinator may consult with child welfare specialists, group home operators, and others in developing the List. The Emergency Placement List will include the facility name; the number of beds potentially available at the facility; the name and telephone number of contact persons; the name and telephone number of contact persons for nights, holidays, and weekends if different; any restrictions on minors accepted (e.g. age); and any special services that are available.

2. The Juvenile Coordinator will maintain a list of minors affected by the emergency or influx, including (1) the minor's name, (2) date and country of birth, (3) date placed in INS custody, and (4)

place and date of current placement.

3. Within one business day of the emergency or influx the Juvenile Coordinator or his or her designee will contact the programs on the Emergency Placement List to determine available placements. As soon as available placements are identified, the Juvenile Coordinator will advise appropriate INS staff of their availability. To the extent practicable, the INS will attempt to locate emergency placements in geographic areas where culturally and linguistically appropriate community services are available.

4. In the event that the number of minors needing emergency placement exceeds the available appropriate placements on the Emergency Placement List, the Juvenile Coordinator will work with the Community Relations Service to locate additional placements through licensed programs, county social services departments, and foster family agencies.

5. Each year the INS will reevaluate the number of regular placements needed for detained minors to determine whether the number of regular placements should be adjusted to accommodate an increased or decreased number of minors eligible for placement in licensed programs. However, any decision to increase the number of placements available shall be subject to the availability of INS resources. The Juvenile Coordinator shall promptly provide Plaintiffs' counsel with any reevaluation made by INS pursuant to this paragraph.

6. The Juvenile Coordinator shall provide to Plaintiffs' counsel copies of the Emergency Placement List within six months after the court's final approval of the Settlement Agreement.





## EXHIBIT 4

### AGREEMENT CONCERNING FACILITY VISITS UNDER PARAGRAPH 33

The purpose of facility visits under paragraph 33 is to interview class members and staff and to observe conditions at the facility. Visits under paragraph 33 shall be conducted in accordance with the generally applicable policies and procedures of the facility to the extent that those policies and procedures are consistent with this Exhibit.

Visits authorized under paragraph 33 shall be scheduled no less than seven (7) business days in advance. The names, positions, credentials, and professional association (e.g., Center for Human Rights and Constitutional Law) of the visitors will be provided at that time.

All visits with class members shall take place during normal business hours.

No video recording equipment or cameras of any type shall be permitted. Audio recording equipment shall be limited to hand-held tape recorders.

The number of visitors will not exceed six (6) or, in the case of a family foster home, four (4), including interpreters, in any instance. Up to two (2) of the visitors may be non-attorney experts in juvenile justice and/or child welfare.

No visit will extend beyond three (3) hours per day in length. Visits shall minimize disruption to the routine that minors and staff follow.





EXHIBIT 5

LIST OF ORGANIZATIONS TO RECEIVE INFORMATION RE: SETTLEMENT AGREEMENT

Eric Cohen, Immig. Legal Resource Center, 1663 Mission St. Suite 602, San Francisco, CA 94103

Cecilia Munoz, Nat'l Council Of La Raza, 810 1st St. NE Suite 300, Washington, D.C. 20002

Susan Alva, Immig. & Citiz. Proj Director, Coalition For Humane Immig Rights of LA, 1521 Wilshire Blvd., Los Angeles, CA 90017

Angela Cornell, Albuquerque Border Cities Proj., Box 35895, Albuquerque, NM 87176-5895

Beth Persky, Executive Director, Centro De Asuntos Migratorios, 1446 Front Street, Suite 305, San Diego, CA 92101

Dan, Kesselbrenner, , National Lawyers Guild, National Immigration Project, 14 Beacon St.,#503, Boston, MA 02108

Lynn Marcus , SWRRP, 64 E. Broadway, Tucson, AZ 85701-1720

Maria Jimenez, , American Friends Service Cmte., ILEMP, 3522 Polk Street, Houston, TX 77003-4844

Wendy Young, , U.S. Cath. Conf., 3211 4th St. NE, , Washington, DC, 20017-1194

Miriam Hayward , International Institute Of The East Bay, 297 Lee Street , Oakland, CA 94610

Emily Goldfarb, , Coalition For Immigrant & Refugee Rights, 995 Market Street, Suite 1108 , San Francisco, CA 94103

Jose De La Paz, Director, California Immigrant Workers Association, 515 S. Shatto Place , Los Angeles, CA, 90020

Annie Wilson, LIRS, 390 Park Avenue South, First Asylum Concerns, New York, NY 10016

Stewart Kwoh, Asian Pacific American Legal Center, 1010 S. Flower St., Suite 302, Los Angeles, CA 90015

Warren Leiden, Executive Director, AILA, 1400 Eye St., N.W., Ste. 1200, Washington, DC, 20005

Frank Sharry, Nat'l Immig Ref & Citiz Forum, 220 I Street N.E., Ste. 220, Washington, D.C. 20002

Reynaldo Guerrero, Executive Director, Center For Immigrant's Rights, 48 St. Marks Place , New York, NY 10003

Charles Wheeler , National Immigration Law Center, 1102 S. Crenshaw Blvd., Suite 101 , Los Angeles, CA 90019

Deborah A. Sanders, Asylum & Ref. Rts Law Project, Washington Lawyers Comm., 1300 19th Street, N.W., Suite 500 , Washington, D.C. 20036

Stanley Mark, Asian American Legal Def.& Ed.Fund, 99 Hudson St, 12th Floor, New York, NY 10013

Sid Mohn, Executive Director, Travelers & Immigrants Aid, 327 S. LaSalle Street, Suite 1500, Chicago, IL, 60604

Bruce Goldstein, Attornet At Law, Farmworker Justice Fund, Inc., 2001 S Street, N.W., Suite 210, Washington, DC 20009

Ninfa Krueger, Director, BARCA, 1701 N. 8th Street, Suite B-28, McAllen, TX 78501

John Goldstein, , Proyecto San Pablo, PO Box 4596,, Yuma, AZ 85364

Valerie Hink, Attorney At Law, Tucson Ecumenical Legal Assistance, P.O. Box 3007 , Tucson, AZ 85702

Pamela Mohr, Executive Director, Alliance For Children's Rights, 3708 Wilshire Blvd. Suite 720, Los Angeles, CA 90010

Pamela Day, Child Welfare League Of America, 440 1st St. N.W., , Washington, DC 20001

Susan Lydon, Esq., Immigrant Legal Resource Center, 1663 Mission St. Ste 602, San Francisco, CA 94103

Patrick Maher, Juvenile Project, Centro De Asuntos Migratorios, 1446 Front Street, # 305, San Diego, CA 92101

Lorena Munoz, Staff Attorney, Legal Aid Foundation of LA-IRO, 1102 Crenshaw Blvd., Los Angeles, CA 90019

Christina Zawisza, Staff Attorney, Legal Services of Greater Miami, 225 N.E. 34th Street, Suite 300, Miami, FL 33137

Miriam Wright Edelman, Executive Director, Children's Defense Fund, 122 C Street N.W. 4th Floor, Washington, DC 20001

Rogelio Nunez, Executive Director, Proyecto Libertad, 113 N. First St., Harlingen, TX 78550



EXHIBIT 6  
NOTICE OF RIGHT TO JUDICIAL REVIEW

“The INS usually houses persons under the age of 18 in an open setting, such as a foster or group home, and not in detention facilities. If you believe that you have not been properly placed or that you have been treated improperly, you may ask a federal judge to review your case. You may call a lawyer to help you do this. If you cannot afford a lawyer, you may call one from the list of free legal services given to you with this form.”

PROOF OF SERVICE BY MAIL

I, Sonia Fuentes, declare and say as follows:

1. I am over the age of eighteen years and am not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 256 South Occidental Boulevard, Los Angeles, California 90057, in said county and state.

2. On January \_\_, 1997, I served the attached STIPULATED SETTLEMENT AGREEMENT on defendants in this proceeding by placing a true copy thereof in a sealed envelope addressed to their attorneys of record as follows:

Mr. Michael Johnson  
Assistant U.S. Attorney  
300 N. Los Angeles St. #7516  
Los Angeles, CA 90012

and by then sealing said envelope and depositing the same, with postage thereon fully prepaid, in the mail at Los Angeles, California; that there is regular delivery of mail between the place of mailing and the place so addressed.

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

Executed this \_\_th day of January, 1997, at Los Angeles, California.



///

LODGED

CENTER FOR HUMAN RIGHTS & CONSTITUTIONAL LAW

Carlos Holguín

Peter A. Schey

Charles Song

256 South Occidental Boulevard

Los Angeles, CA 90057

Telephone: (213) 388-8693; Fax: (213) 386-9484

LATHAM & WATKINS

Steven Schulman

555 Eleventh St., NW, Suite 1000

Washington, DC 20004

Telephone: (202) 637-2184

*Of counsel:*

YOUTH LAW CENTER

Alice Bussiere

417 Montgomery Street, Suite 900

San Francisco, CA 94104

Telephone: (415) 543-3379 x 3903

*Attorneys for plaintiffs*

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

JENNY LISETTE FLORES, et al ,

Plaintiffs,

-vs-

JANET RENO, Attorney General  
of the United States, et al.

Defendants

Case No. CV 85-4544-RJK(Px)

STIPULATION EXTENDING  
SETTLEMENT AGREEMENT AND FOR  
OTHER PURPOSES; AND ORDER  
THEREON

1  
2 IT IS HEREBY STIPULATED by and between the parties as follows:

3 1. Paragraph 40 of the Stipulation filed herein on January 17, 1997, is modified to read  
4 as follows:

5 "All terms of this Agreement shall terminate ~~the earlier of five years after the date of~~  
6 ~~final court approval of this Agreement or three years after the court determines that~~  
7 ~~the INS is in substantial compliance with this Agreement,~~ 45 days following defendants'  
8 publication of final regulations implementing this Agreement  
9 ~~except that~~ Notwithstanding the foregoing, the INS shall continue to house the general  
10 population of minors in INS custody in facilities that are state-licensed for the care of  
11 dependent minors."

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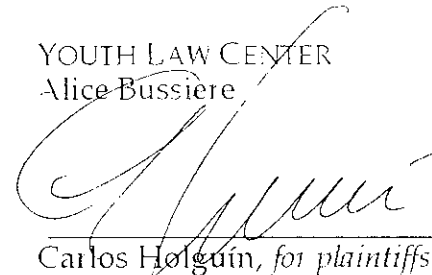
2 For a period of six months from the date this Stipulation is filed, plaintiffs shall not  
 initiate legal proceedings to compel publication of final regulations implementing this  
 Agreement. Plaintiffs agree to work with defendants cooperatively toward resolving  
 disputes regarding compliance with the Settlement. The parties agree to confer regularly no  
 less frequently than once monthly for the purpose of discussing the implementation of and  
 compliance with the settlement agreement. However, nothing herein shall require plaintiffs  
 to forebear legal action to compel compliance with this Agreement where plaintiff class  
 members are suffering irreparable injury.

Dated: December 7, 2001.

CENTER FOR HUMAN RIGHTS &  
 CONSTITUTIONAL LAW  
 Carlos Holguín  
 Peter A. Schey

LATHAM & WATKINS  
 Steven Schulman

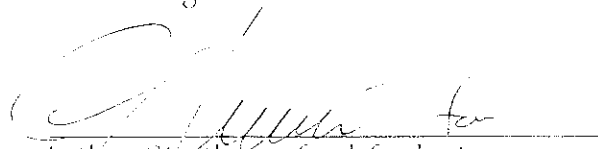
YOUTH LAW CENTER  
 Alice Bussiere



Carlos Holguín, for plaintiffs.

Dated: December 7, 2001

Arthur Strathern  
 Office of the General Counsel  
 U.S. Immigration & Naturalization Service



Arthur Strathern, for defendants  
 Per fax authorization

IT IS SO ORDERED

Dated: December \_\_\_\_\_ 2001

UNITED STATES DISTRICT JUDGE

1           2 For a period of six months from the date this Stipulation is filed, plaintiffs shall not  
2 initiate legal proceedings to compel publication of final regulations implementing this  
3 Agreement. Plaintiffs agree to work with defendants cooperatively toward resolving  
4 disputes regarding compliance with the Settlement. The parties agree to confer regularly no  
5 less frequently than once monthly for the purpose of discussing the implementation of and  
6 compliance with the settlement agreement. However, nothing herein shall require plaintiffs  
7 to forebear legal action to compel compliance with this Agreement where plaintiff class  
8 members are suffering irreparable injury.

9       Dated: December 7, 2001.

CENTER FOR HUMAN RIGHTS &  
CONSTITUTIONAL LAW  
Carlos Holguín  
Peter A. Schey

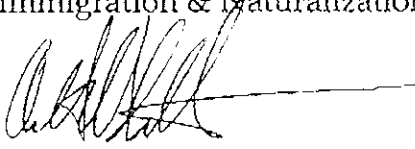
LATHAM & WATKINS  
Steven Schulman

YOUTH LAW CENTER  
Alice Bussiere

17  
18       Dated: December 7, 2001.

\_\_\_\_\_  
Carlos Holguín, *for plaintiffs*

Arthur Strathern  
Office of the General Counsel  
U.S. Immigration & Naturalization Service

  
\_\_\_\_\_  
Arthur Strathern, *for defendants*  
Per fax authorization

25       IT IS SO ORDERED

26       Dated: December 7, 2001.

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE

PROOF OF SERVICE BY MAIL.

I, Carlos Holguin, declare and say as follows:

1 I am over the age of eighteen years and am not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 256 South Occidental Boulevard, Los Angeles, California 90057, in said county and state

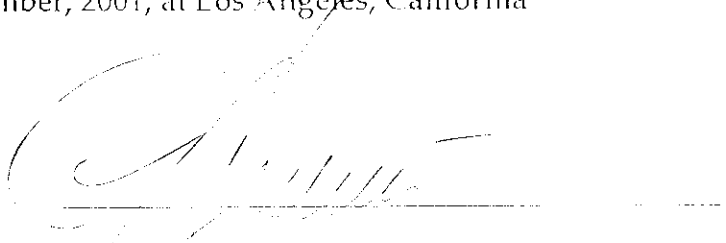
2 On December 7, 2001, I served the attached STIPULATION on defendants in this proceeding by placing a true copy thereof in a sealed envelope addressed to their attorneys of record as follows:

Arthur Strathern  
Office of the General Counsel  
U.S. Immigration & Naturalization Service  
425 I St. N.W.  
Washington, DC 20536

and by then sealing said envelope and depositing the same, with postage thereon fully prepaid, in the mail at Los Angeles, California; that there is regular delivery of mail between the place of mailing and the place so addressed.

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

Executed this 7th day of December, 2001, at Los Angeles, California



///

# Exhibit 38

1 Lee Gelernt\*  
Judy Rabinovitz\*  
2 Anand Balakrishnan\*  
AMERICAN CIVIL LIBERTIES  
3 UNION FOUNDATION  
125 Broad St., 18th Floor  
4 New York, NY 10004  
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5 F: (212) 549-2654  
*lgelernt@aclu.org*  
6 *jrabinovitz@aclu.org*  
*abalakrishnan@aclu.org*  
7

8 *Attorneys for Petitioners-Plaintiffs*  
9 *\*Admitted Pro Hac Vice*  
10  
11

Bardis Vakili (SBN 247783)  
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DIEGO & IMPERIAL COUNTIES  
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Stephen B. Kang (SBN 292280)  
Spencer E. Amdur (SBN 320069)  
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*samdur@aclu.org*

12 **UNITED STATES DISTRICT COURT**  
13 **SOUTHERN DISTRICT OF CALIFORNIA**

14 Ms. L., et al.,  
15 *Petitioners-Plaintiffs,*  
v.  
16 U.S. Immigration and Customs Enforcement  
17 (“ICE”), et al.,  
18 *Respondents-Defendants.*  
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Case No. 18-cv-00428-DMS-MDD

**DECLARATION OF STEPHEN B.  
KANG**

**CLASS ACTION**

1 I, Stephen B. Kang, make the following declaration based on my personal  
2 knowledge and declare under the penalty of perjury pursuant to 28 U.S.C. § 1746 that  
3 the following is true and correct:

4 2. I am a Detention Attorney for the ACLU Immigrants' Rights Project, and a  
5 member of the State Bar of California. I am counsel for Plaintiffs in this case.

6 3. Attached as Exhibit A is an April 20, 2018 article from the *New York Times*  
7 titled "Hundreds of Immigrant Children Have Been Taken from Parents at U.S.  
8 Border," available at [https://www.nytimes.com/2018/04/20/us/immigrant-children-](https://www.nytimes.com/2018/04/20/us/immigrant-children-separation-ice.html)  
9 [separation-ice.html](https://www.nytimes.com/2018/04/20/us/immigrant-children-separation-ice.html). This article reported that government data showed that "more  
10 than 700 children have been taken from adults claiming to be their parents since  
11 October, including more than 100 children under the age of 4."

12 4. Attached as Exhibit B is a May 7, 2018 announcement from Attorney General  
13 Jefferson B. Sessions III, titled "U.S. Dep't of Justice, Attorney General Sessions  
14 Delivers Remarks to the Association of State Criminal Investigative Agencies 2018  
15 Spring Conference," available at [https://www.justice.gov/opa/speech/attorney-](https://www.justice.gov/opa/speech/attorney-general-sessions-delivers-remarks-association-state-criminal-investigative)  
16 [general-sessions-delivers-remarks-association-state-criminal-investigative](https://www.justice.gov/opa/speech/attorney-general-sessions-delivers-remarks-association-state-criminal-investigative).

17 5. Attached as Exhibit C is a May 30, 2018, Los Angeles Times article titled  
18 "Trump's zero tolerance at U.S.-Mexico border is filling child shelters," available at  
19 [http://www.latimes.com/nation/la-na-trump-zero-tolerance-migrant-children-](http://www.latimes.com/nation/la-na-trump-zero-tolerance-migrant-children-20180530-story.html?utm_source=Recent%20Postings%20Alert&utm_medium=Email&utm_campaign=RP%20Daily)  
20 [20180530-](http://www.latimes.com/nation/la-na-trump-zero-tolerance-migrant-children-20180530-story.html?utm_source=Recent%20Postings%20Alert&utm_medium=Email&utm_campaign=RP%20Daily)  
21 [story.html?utm\\_source=Recent%20Postings%20Alert&utm\\_medium=Email&utm\\_ca](http://www.latimes.com/nation/la-na-trump-zero-tolerance-migrant-children-20180530-story.html?utm_source=Recent%20Postings%20Alert&utm_medium=Email&utm_campaign=RP%20Daily)  
22 [mpaign=RP%20Daily](http://www.latimes.com/nation/la-na-trump-zero-tolerance-migrant-children-20180530-story.html?utm_source=Recent%20Postings%20Alert&utm_medium=Email&utm_campaign=RP%20Daily). This article quotes a Customs and Border Protection official's  
23 testimony to the Senate Judiciary Committee, which confirmed that between May 6  
24 and May 19 alone, a total of 658 children were separated from their family members.<sup>1</sup>  
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26  
27 <sup>1</sup> The video of the relevant Senate Judiciary Committee hearing testimony is available  
28 at [https://www.judiciary.senate.gov/meetings/tvpra-and-exploited-loopoles-affecting-](https://www.judiciary.senate.gov/meetings/tvpra-and-exploited-loopoles-affecting-unaccompanied-alien-children)  
[unaccompanied-alien-children](https://www.judiciary.senate.gov/meetings/tvpra-and-exploited-loopoles-affecting-unaccompanied-alien-children).

1 6. Attached as Exhibit D is a June 16, 2018, CNN article titled “2,000 children  
2 separated from parents at border,” available at  
3 <https://www.cnn.com/2018/06/15/politics/dhs-family-separation-numbers/index.htm>.  
4 This article states that “[t]he US government has separated at least 2,000 children  
5 from parents at the border since implementing a policy that results in such family  
6 separations, the Department of Homeland Security confirmed Friday.”

7 7. Attached as Exhibit E is a June 18, 2018, Associated Press article titled  
8 “Hundreds of Children Wait in Border Patrol Facility in Texas,” available at  
9 <https://www.apnews.com/9794de32d39d4c6f89fbefaea3780769>.

10 8. Attached as Exhibit F is a June 19, 2018, Reuters article titled “Hurdles facing  
11 parents and children separated at U.S. border,” available at  
12 [https://www.reuters.com/article/us-usa-immigration-reunification-explain/hurdles-](https://www.reuters.com/article/us-usa-immigration-reunification-explain/hurdles-facing-parents-and-children-separated-at-us-border-idUSKBN1JF39I)  
13 [facing-parents-and-children-separated-at-us-border-idUSKBN1JF39I](https://www.reuters.com/article/us-usa-immigration-reunification-explain/hurdles-facing-parents-and-children-separated-at-us-border-idUSKBN1JF39I). This article  
14 reports that “[o]ver 2,300 children were separated from their parents at the U.S.-  
15 Mexico border between May 5 and June 9 under the Trump administration’s ‘zero  
16 tolerance’ policy, U.S. Customs and Border Protection said . . . .”

17 9. Attached as Exhibit G is an Executive Order dated June 20, 2018, titled  
18 “Affording Congress an Opportunity to Address Family Separation.”

19 10. Attached as Exhibit H is a DHS-HHS Fact Sheet titled “Zero-Tolerance  
20 Prosecution and Family Reunification,” available at  
21 [https://www.dhs.gov/news/2018/06/23/fact-sheet-zero-tolerance-prosecution-and-](https://www.dhs.gov/news/2018/06/23/fact-sheet-zero-tolerance-prosecution-and-family-reunification)  
22 [family-reunification](https://www.dhs.gov/news/2018/06/23/fact-sheet-zero-tolerance-prosecution-and-family-reunification).

23 11. Attached as Exhibit I is a June 14, 2018 Letter from Physicians for Human  
24 Rights to Secretary Nielsen and Attorney General Sessions, available at  
25 [https://s3.amazonaws.com/PHR\\_other/Separation\\_Letter\\_FINAL.pdf](https://s3.amazonaws.com/PHR_other/Separation_Letter_FINAL.pdf). Over 5000  
26 medical professionals and experts signed this letter, which urges the administration to  
27 “immediately end the practice of family separation and take all measures to ensure  
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1 that currently separated families are reunited without delay” on the basis of evidence  
2 that the “practice is profoundly harmful to children and to families.”

3 12. Attached as Exhibit J is a June 14, 2018 Letter from the American  
4 Psychological Association to President Trump, available at  
5 [http://www.apa.org/advocacy/immigration/separating-families-](http://www.apa.org/advocacy/immigration/separating-families-letter.pdf?utm_content=1529093770&utm_medium=social&utm_source=multiple)  
6 [letter.pdf?utm\\_content=1529093770&utm\\_medium=social&utm\\_source=multiple](http://www.apa.org/advocacy/immigration/separating-families-letter.pdf?utm_content=1529093770&utm_medium=social&utm_source=multiple).  
7 The Letter urges an end to family separation and cites “empirical evidence of the  
8 psychological harm that children and parents experience when separated.”

9 13. Attached as Exhibit K is a June 19, 2018, Letter from the American Medical  
10 Association, June 19 Letter to Secretary Nielsen, Secretary Azar, and Attorney  
11 General Sessions, available at [https://searchlf.ama-](https://searchlf.ama-assn.org/undefined/documentDownload?uri=%2Funstructured%2Fbinary%2Fletter%2FLETTERS%2F2018-6-19-Final-Letter-to-The-Administrations-zero-tolerance-prosecution-policy.pdf)  
12 [assn.org/undefined/documentDownload?uri=%2Funstructured%2Fbinary%2Fletter%2](https://searchlf.ama-assn.org/undefined/documentDownload?uri=%2Funstructured%2Fbinary%2Fletter%2FLETTERS%2F2018-6-19-Final-Letter-to-The-Administrations-zero-tolerance-prosecution-policy.pdf)  
13 [FLETTERS%2F2018-6-19-Final-Letter-to-The-Administrations-zero-tolerance-](https://searchlf.ama-assn.org/undefined/documentDownload?uri=%2Funstructured%2Fbinary%2Fletter%2FLETTERS%2F2018-6-19-Final-Letter-to-The-Administrations-zero-tolerance-prosecution-policy.pdf)  
14 [prosecution-policy.pdf](https://searchlf.ama-assn.org/undefined/documentDownload?uri=%2Funstructured%2Fbinary%2Fletter%2FLETTERS%2F2018-6-19-Final-Letter-to-The-Administrations-zero-tolerance-prosecution-policy.pdf). The Letter explains that “childhood trauma and adverse  
15 childhood experiences created by inhumane treatment often create negative health  
16 impacts that can last an individual’s entire lifespan.”

17 14. Attached as Exhibit L is a May 31, 2018 Statement by the American College of  
18 Physicians, titled ACP Objects to Separation of Children from their Parents at Border,  
19 available at [https://www.acponline.org/acp-newsroom/acp-objects-to-separation-of-](https://www.acponline.org/acp-newsroom/acp-objects-to-separation-of-children-from-their-parents-at-border)  
20 [children-from-their-parents-at-border](https://www.acponline.org/acp-newsroom/acp-objects-to-separation-of-children-from-their-parents-at-border). The Statement urges an end to the separation  
21 practice because inflicting separation on children will “create negative health impacts  
22 that will last an individual’s entire lifespan.”

23 15. Attached as Exhibit M is a June 19, 2018 Statement by the American College of  
24 Emergency Physicians, “ACEP Opposes Current DHS ‘Zero Tolerance’ Immigration  
25 Policy,” available at [https://www.acep.org/federal-advocacy/federal-advocacy-](https://www.acep.org/federal-advocacy/federal-advocacy-overview/children-immigration-statement/#sm.0000xos7uy5dpe7x112vqpxa33tqr)  
26 [overview/children-immigration-statement/#sm.0000xos7uy5dpe7x112vqpxa33tqr](https://www.acep.org/federal-advocacy/federal-advocacy-overview/children-immigration-statement/#sm.0000xos7uy5dpe7x112vqpxa33tqr). It  
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1 states that “separations will significantly escalate mental and physical health risks for  
2 both children and their parents.”

3 16. Attached as Exhibit N is a May 30, 2018 Statement by the American  
4 Psychiatric Association Opposing Separation of Children from Parents at the Border,  
5 available at [https://www.psychiatry.org/newsroom/news-releases/apa-statement-](https://www.psychiatry.org/newsroom/news-releases/apa-statement-opposing-separation-of-children-from-parents-at-the-border)  
6 [opposing-separation-of-children-from-parents-at-the-border](https://www.psychiatry.org/newsroom/news-releases/apa-statement-opposing-separation-of-children-from-parents-at-the-border). The statement urges an  
7 end to separations because the “evidence is clear that this level of trauma also results  
8 in serious medical and health consequences for these children and their caregivers.”

9 17. Attached as Exhibit O is a May 8, 2018 Statement by the American Academy of  
10 Pediatrics Opposing Separation of Children and Parents at the Border, available at  
11 [https://www.aap.org/en-us/about-the-aap/aap-press-](https://www.aap.org/en-us/about-the-aap/aap-press-room/Pages/StatementOpposingSeparationofChildrenandParents.aspx)  
12 [room/Pages/StatementOpposingSeparationofChildrenandParents.aspx](https://www.aap.org/en-us/about-the-aap/aap-press-room/Pages/StatementOpposingSeparationofChildrenandParents.aspx). The statement  
13 urges an end to separations, and explains that the practice “can cause irreparable harm,  
14 disrupting a child's brain architecture and affecting his or her short- and long-term  
15 health.”

16 18. Attached as Exhibit P is a American Public Health Association, Separating  
17 parents and children at US border is inhumane and sets the stage for a public health  
18 crisis, available at [https://www.apha.org/news-and-media/news-releases/apha-news-](https://www.apha.org/news-and-media/news-releases/apha-news-releases/2018/parent-child-separation)  
19 [releases/2018/parent-child-separation](https://www.apha.org/news-and-media/news-releases/apha-news-releases/2018/parent-child-separation). The statement urges an end to separations and  
20 explains that the practice places children at heightened risk of experiencing adverse  
21 childhood events and trauma, which research has definitively linked to poorer long-  
22 term health.”

23 19. Attached as Exhibit Q is a Statement by the National Academy of Science,  
24 Engineering, and Medicine on the Harmful Consequences of Separating Families at  
25 the U.S. Border, available at  
26 [http://www8.nationalacademies.org/onpinews/newsitem.aspx?RecordID=06202018&](http://www8.nationalacademies.org/onpinews/newsitem.aspx?RecordID=06202018&_ga=2.158375806.559449867.1529328563-861433489.1524492203)  
27 [\\_ga=2.158375806.559449867.1529328563-861433489.1524492203](http://www8.nationalacademies.org/onpinews/newsitem.aspx?RecordID=06202018&_ga=2.158375806.559449867.1529328563-861433489.1524492203). The statement  
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1 urges an immediate end to separations based on “an extensive body of evidence” that  
2 “points to the danger of current immigration enforcement actions that separate  
3 children from their parents.”

4 20. Attached as Exhibit R is a June 9, 2018 Washington Post article titled “A family  
5 was separated at the border, and this distraught father took his own life,” available at  
6 [https://www.washingtonpost.com/world/national-security/a-family-was-separated-at-](https://www.washingtonpost.com/world/national-security/a-family-was-separated-at-the-border-and-this-distraught-father-took-his-own-life/2018/06/08/24e40b70-6b5d-11e8-9e38-24e693b38637_story.html?utm_term=.38a3e92283df)  
7 [the-border-and-this-distraught-father-took-his-own-life/2018/06/08/24e40b70-6b5d-](https://www.washingtonpost.com/world/national-security/a-family-was-separated-at-the-border-and-this-distraught-father-took-his-own-life/2018/06/08/24e40b70-6b5d-11e8-9e38-24e693b38637_story.html?utm_term=.38a3e92283df)  
8 [11e8-9e38-24e693b38637\\_story.html?utm\\_term=.38a3e92283df](https://www.washingtonpost.com/world/national-security/a-family-was-separated-at-the-border-and-this-distraught-father-took-his-own-life/2018/06/08/24e40b70-6b5d-11e8-9e38-24e693b38637_story.html?utm_term=.38a3e92283df). It tells the story of  
9 a 39-year old Honduran father who, after separation from his family, committed  
10 suicide while detained.

11 21. Attached as Exhibit S is a June 23, 2018 Washington Post article titled “U.S.  
12 officials separated him from his child. Then he was deported to El Salvador,”  
13 available at [https://www.washingtonpost.com/world/the\\_americas/u-s-officials-](https://www.washingtonpost.com/world/the_americas/u-s-officials-separated-him-from-his-child-then-he-was-deported-to-el-salvador/2018/06/23/37b6940a-7663-11e8-bda1-18e53a448a14_story.html?noredirect=on&utm_term=.801ab72b4426)  
14 [separated-him-from-his-child-then-he-was-deported-to-el-](https://www.washingtonpost.com/world/the_americas/u-s-officials-separated-him-from-his-child-then-he-was-deported-to-el-salvador/2018/06/23/37b6940a-7663-11e8-bda1-18e53a448a14_story.html?noredirect=on&utm_term=.801ab72b4426)  
15 [salvador/2018/06/23/37b6940a-7663-11e8-bda1-](https://www.washingtonpost.com/world/the_americas/u-s-officials-separated-him-from-his-child-then-he-was-deported-to-el-salvador/2018/06/23/37b6940a-7663-11e8-bda1-18e53a448a14_story.html?noredirect=on&utm_term=.801ab72b4426)  
16 [18e53a448a14\\_story.html?noredirect=on&utm\\_term=.801ab72b4426](https://www.washingtonpost.com/world/the_americas/u-s-officials-separated-him-from-his-child-then-he-was-deported-to-el-salvador/2018/06/23/37b6940a-7663-11e8-bda1-18e53a448a14_story.html?noredirect=on&utm_term=.801ab72b4426). The article tells  
17 the story of a father separated from his six-year old daughter after entering the United  
18 States who was deported without her, and without knowing where she had been  
19 placed. The first time he spoke to her was after his deportation.

20 22. Attached as Exhibit T are excerpts from the transcript of the status conference  
21 the Court held in this case on Friday, June 22, 2018.

22 23. Attached as Exhibit U is a June 24, 2018, New York Times article titled “Torn  
23 Apart by Zero Tolerance, Kept Apart by Red tape, available at  
24 [https://www.nytimes.com/2018/06/24/us/family-separation-](https://www.nytimes.com/2018/06/24/us/family-separation-brazil.html?hp&action=click&pgtype=Homepage&clickSource=story-heading&module=first-column-region&region=top-news&WT.nav=top-news)  
25 [brazil.html?hp&action=click&pgtype=Homepage&clickSource=story-](https://www.nytimes.com/2018/06/24/us/family-separation-brazil.html?hp&action=click&pgtype=Homepage&clickSource=story-heading&module=first-column-region&region=top-news&WT.nav=top-news)  
26 [heading&module=first-column-region&region=top-news&WT.nav=top-news](https://www.nytimes.com/2018/06/24/us/family-separation-brazil.html?hp&action=click&pgtype=Homepage&clickSource=story-heading&module=first-column-region&region=top-news&WT.nav=top-news). The  
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1 article describes the case of a separated parent who is attempting to reunite with her  
2 son through the ORR reunification process.

3 24. I declare under penalty of perjury under the laws of the United States of  
4 America and California that the foregoing is true and correct, based on my personal  
5 knowledge. Executed in San Francisco, California on June 25, 2018.  
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8 /s/Stephen B. Kang  
9 STEPHEN B. KANG  
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# Exhibit A

## The New York Times

# *Hundreds of Immigrant Children Have Been Taken From Parents at U.S. Border*

By Caitlin Dickerson

April 20, 2018

On Feb. 20, a young woman named Mirian arrived at the Texas border carrying her 18-month-old son. They had fled their home in Honduras through a cloud of tear gas, she told border agents, and needed protection from the political violence there.

She had hoped she and her son would find refuge together. Instead, the agents ordered her to place her son in the back seat of a government vehicle, she said later in a sworn declaration to a federal court. They both cried as the boy was driven away.

For months, members of Congress have been demanding answers about how many families are being separated as they are processed at stations along the southwest border, in part because the Trump administration has in the past said it was considering taking children from their parents as a way to deter migrants from coming here.

Officials have repeatedly declined to provide data on how many families have been separated, but suggested that the number was relatively low.

But new data reviewed by The New York Times shows that more than 700 children have been taken from adults claiming to be their parents since October, including more than 100 children under the age of 4.

The data was prepared by the Office of Refugee Resettlement, a division of the Department of Health and Human Services that takes custody of children who have been removed from migrant parents. Senior officials at the Department of Homeland Security, which processes migrants at the border, initially denied that the numbers were so high. But after they were confirmed to The Times by three federal officials who work closely with these cases, a spokesman for the health and human services department on Friday acknowledged in a statement that there were “approximately 700.”

Homeland security officials said the agency does not separate families at the border for deterrence purposes. “As required by law, D.H.S. must protect the best interests of minor children crossing our borders, and occasionally this results in separating children from an adult they are traveling with if we cannot ascertain the parental relationship, or if we think the child is otherwise in danger,” a spokesman for the agency said in a statement.

But Trump administration officials have suggested publicly in the past that they were, indeed, considering a deterrence policy. Last year, John F. Kelly, President Trump's chief of staff, floated the idea while he was serving as homeland security secretary.

If approved, the plan would have closed detention facilities that are designed to house families and replaced them with separate shelters for adults and children. The White House supported the move and convened a group of officials from several federal agencies to consider its merits. But the Department of Homeland Security has said the policy was never adopted.

Children removed from their families are taken to shelters run by nongovernmental organizations. There, workers seek to identify a relative or guardian in the United States who can take over the child's care. But if no such adult is available, the children can languish in custody indefinitely. Operators of these facilities say they are often unable to locate the parents of separated children because the children arrive without proper records.

Once a child has entered the shelter system, there is no firm process to determine whether they have been separated from someone who was legitimately their parent, or for reuniting parents and children who had been mistakenly separated, said a Border Patrol official, who was not authorized to discuss the agency's policies publicly.

"The idea of punishing parents who are trying to save their children's lives, and punishing children for being brought to safety by their parents by separating them, is fundamentally cruel and un-American," said Michelle Brané, director of the Migrant Rights and Justice program at the Women's Refugee Commission, an advocacy group that conducts interviews and monitoring at immigration detention centers, including those that house children. "It really to me is just a horrific 'Sophie's Choice' for a mom."

Mirian has pinballed across Texas, held at various times in three other detention centers. She is part of a lawsuit filed by the American Civil Liberties Union on behalf of many immigrant parents seeking to prohibit family separations at the border.

Her son's name, along with Mirian's surname, are being withheld for their safety. But in a declaration she filed in that case, she said she was never told why her son was being taken away from her. Since February, the only word she has received about him has come from a case manager at the facility in San Antonio where he is being held. Her son asked about her and "cried all the time" in the days after he arrived at the facility, the case worker said, adding that the boy had developed an ear infection and a cough.



A woman was reunited with her 7-year-old daughter in Chicago in March after they had been separated for four months in immigration detention. Hope Hall/Aclu

“I had no idea that I would be separated from my child for seeking help,” Mirian said in her sworn statement. “I am so anxious to be reunited with him.”

Protecting children at the border is complicated because there have, indeed, been instances of fraud. Tens of thousands of migrants arrive there every year, and those with children in tow are often released into the United States more quickly than adults who come alone, because of restrictions on the amount of time that minors can be held in custody. Some migrants have admitted they brought their children not only to remove them from danger in such places as Central America and Africa, but because they believed it would cause the authorities to release them from custody sooner.

Others have admitted to posing falsely with children who are not their own, and Border Patrol officials say that such instances of fraud are increasing.

As the debate carries on, pressure from the White House to enact a separation policy has continued. In conversations this month with Kirstjen Nielsen, the homeland security secretary, Mr. Trump has repeatedly expressed frustration that the agency has not been aggressive enough in policing the border, according to a person at the White House who is familiar with the discussions.



Officials presented Mr. Trump with a list of proposals, including the plan to routinely separate immigrant adults from their children. The president urged Ms. Nielsen to move forward with the policies, the person said.

But even groups that support stricter immigration policies have stopped short of endorsing a family separation policy. Jessica M. Vaughan, the director of policy studies for the Center for Immigration Studies, one such group, said that family separation should only be used as a “last resort.”

However, she said that some migrants were using children as “human shields” in order to get out of immigration custody faster.

“It makes no sense at all for the government to just accept these attempts at fraud,” Ms. Vaughan said. “If it appears that the child is being used in this way, it is in the best interest of the child to be kept separately from the parent, for the parent to be prosecuted, because it’s a crime and it’s one that has to be deterred and prosecuted.”

Ron Nixon and Michael D. Shear contributed reporting.

A version of this article appears in print on April 21, 2018, on Page A1 of the New York edition with the headline: Over 700 Children Taken From Parents at Border



# Exhibit B

## JUSTICE NEWS

### **Attorney General Sessions Delivers Remarks to the Association of State Criminal Investigative Agencies 2018 Spring Conference**

Scottsdale, AZ ~ Monday, May 7, 2018

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#### **Remarks as prepared for delivery**

Thank you, Mark, for that kind introduction. And thank you for your more than 30 years of service in law enforcement.

I also want to thank Bob McConnell for putting on this event, and the Arizona Department of Public Safety for hosting us. The Association of State Criminal Investigative Agencies and its members are an essential part of the law enforcement community, and this conference is an opportunity for more collaboration and information sharing. That makes all of us better at our shared task of protecting our country from violence and crime.

I want to thank Bob and the Association for your friendship and for your strong support for me personally going back to my days in the Senate. I also appreciate the support you have given for a number of the initiatives that I have taken as Attorney General.

I'm pleased to see that my home state of Alabama is well-represented here today. Clay Barnes is here, the Chief of the Investigation Division at the Alabama Bureau of Investigation. I worked with the Investigation Division a lot during my 14 years as a prosecutor and I was always impressed with their professionalism and their dedication.

The chief executives of 39 other state investigative agencies are here in this room, as well.

Tom Homan and David Bowdich are also here with us. I'll be brief so that we can get to their remarks.

But before I say anything else, I want to take a moment to remember an officer this community is mourning right now. Officer Jesus Cordova of the Nogales Police Department was pursuing an alleged carjacker last Friday when he was shot to death. He was an 11-year veteran of the force. He left behind two daughters and a son, all under the age of 8. His wife is five months pregnant—with a son who has already been named in honor of his dad.

That son will never know his father. But he will know that his father was a man of courage and dedicated to service — for law, peace and order.

My thoughts and prayers are with his family at this difficult time and I know that yours are, too.

Officer Cordova's passing is a tragic reminder of what is at stake in law enforcement.

And so I am here today on behalf of President Trump to say to each one of you: thank you for your service to this country.

In this administration, we know whose side we are on. We're on the side of law-and-order.

We understand the risks you take and the tools you need to be effective.

This is not business as usual. This is the Trump era.

Our explicit goals for 2018 are to bring down violent crime, homicides, opioid prescriptions, and overdose deaths.

**Exhibit 38, Page 139**

And with your help, that's what we're going to do.

The key to our success now will be the same as it was over those more than 20 years of declining crime: the 85 percent of law enforcement officers who serve at the state, local, and tribal level.

They use the investigative work that you do to take violent criminals off of our streets. And so it is no exaggeration to say that we are counting on you.

That's why we need to ensure that you remain successful.

I understand that you've got a backlog right now and that some of you are probably feeling overwhelmed.

This has been an important issue to me for many years.

That's why over the past year I have taken a number of steps to bring down the backlog at our crime labs.

In 2018, we will invest more than \$100 million in state and local labs to make you faster, more efficient, and more effective. These funds will help reduce the backlog and free up other resources we can use to reduce violent crime and drug abuse.

We will also provide grant funding to identify previously un-submitted Sexual Assault Kits, test them, and then assign personnel to pursue any new investigative leads. This will help provide closure for sexual assault victims throughout the country and help put their assailants behind bars.

It is also critical that we deal with the growing encryption or the "going dark" problem.

And the stakes are high. Last year the FBI was unable to access investigation-related content on more than \*\* devices—even though they had the legal authority to do so. Each of those devices was tied to a threat to the American people.

This is a large number, but it is small compared to the number that your agencies are unable to access because of encryption.

That's why we are working with stakeholders in the private sector, in law enforcement, and in Congress to find a solution to this problem. Ultimately, we may need Congress to take action on this issue. I would appreciate your valuable input as we continue this process.

Reducing the backlog, improving Sexual Assault Kits, and solving the encryption problem will help you succeed.

We are also restoring the rule of law with regard to immigration. That will reduce crime.

Eleven million people are already here illegally. That's more than the population of Portugal or the state of Georgia.

But, right now we are dealing with a massive influx of illegal aliens across our Southwest Border. In April we saw triple the number from last April.

But we're not going to stand for this. We are not going to let this country be invaded. We will not be stampeded. We will not capitulate to lawlessness.

President Trump has made that clear to every agency and to Congress – and we need a wall.

Last month, I put in place a "zero tolerance" policy for illegal entries on our Southwest border referred by the Department of Homeland Security.

Today, the Department of Homeland Security is partnering with us and will begin a new initiative that will result in referring 100 percent of illegal Southwest Border crossings to the Department of Justice for prosecution. And the Department of Justice will take up as many of those cases as humanly possible until we get to 100 percent.

If you cross this border unlawfully, then we will prosecute you. It's that simple.

If you smuggle illegal aliens across our border, then we will prosecute you.

If you are smuggling a child, then we will prosecute you and that child will be separated from you as required by law. If you don't like that, then don't smuggle children over our border.

If you make false statements to an immigration officer or commit fraud in our system to obtain an immigration benefit, that's a felony. We will put you in jail.

If you help others to do so, that's a felony, too.

In order to carry out these important new enforcement policies, I have sent 35 prosecutors to the Southwest and moved 18 immigration judges to the border. These are supervisory judges that don't have existing caseloads and will be able to function full time on moving these cases. That will be about a 50 percent increase in the number of immigration judges who will be handling the asylum claims.

Everything we do at the Department of Justice is dedicated to reducing crime in America. Perhaps the most important thing we can do toward that end is to improve our relationships with state and local partners like you.

We want to be a force-multiplier for you. We can help you—because we can reach defendants across state lines, across national borders, and even across oceans.

The work that you do – that you have dedicated your lives to – is essential. I believe it. The Department of Justice believes it. And President Trump believes it.

And so I want to close by thanking each of you once again for your service.

You can be certain about this: we have your back and you have our thanks.

\*\* Due to an error in the FBI's methodology, an earlier version of this speech incorrectly stated that the FBI had been unable to access 7,800 devices. The correct number will be substantially lower.

---

**Speaker:**

Attorney General Jeff Sessions

**Topic(s):**

Immigration

**Component(s):**

Office of the Attorney General

*Updated May 23, 2018*

# Exhibit C

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NATION

# Trump's 'zero tolerance' at U.S.-Mexico border is filling child shelters



By MOLLY HENNESSY-FISKE  
MAY 30, 2018 | HOUSTON



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STADT TRIAL Exhibit 38, Page 143

A U.S. Border Patrol agent detains juvenile immigrants in L  
in 2015. (John Moore / Getty)

START TRIAL



Family separations on the southern border due to President Trump’s “zero-tolerance” policy increased the number of immigrant children in government shelters 22% during the last month, officials said.

As of Wednesday, 10,852 migrant children were being held at shelters run by the Department of Health and Human Services, compared with 8,886 at the end of last month, said agency spokesman Kenneth Wolfe. The average time such children spent at government shelters has also increased, from 51 to 56 days.



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START TRIAL

Exhibit 38, Page 144



The new zero-tolerance policy piloted in Arizona and west Texas last year was extended border-wide last month. Under the policy, migrants who enter the United States illegally face misdemeanor charges in federal criminal court, felony charges if they have crossed illegally before; parents are sent to federal detention, their children to shelters. In the past, such cases were often handled administratively, not in criminal court.

Trump tweeted inaccurately over the weekend that a “horrible law” was prompting the migrant family separations. Immigrant advocates insisted the administration was to blame for pursuing criminal charges against migrants, instead of handling their cases administratively.

Health and Human Services has 100 shelters in 14 states, and “additional temporary housing is only sought as a last resort when current locations are reaching capacity,” said Wolfe, a spokesman for the department’s Administration for Children and Families.

That’s what’s happening now that the shelters are 95% full, he said. The agency has

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Unaccompanied minors now include children who cross the border without an adult and those separated from adults charged in federal criminal court under the new policy. At least 638 migrants who crossed with 658 children were charged under the policy between May 6 and May 19, a U.S. Customs and Border Protection official told a Senate committee last week.

Last year, Health and Human Services assumed custody of more than 40,000 immigrant children, releasing 93% to family members and other sponsors (half were parents, 40% close relatives). The department has a responsibility to assume custody within 72 hours and try to place children, but it is not required to track sponsors.



Last week, Health and Human Services drew criticism after reports that 1,475 of the children they placed last year were "missing," according to a phone survey 30 days later. Trump administration officials responded by announcing an agreement by Health and Human Services to give the Department of Homeland Security access to information about sponsors they're still vetting, and to improve the process, fingerprinting parents who attempt to claim children. Homeland Security officials said the new coordination will better protect migrant children, but some migrant advocates worry it could deter families from claiming children.



"If somebody is unwilling to claim their child from custody because they're concerned about their own immigration status, I think that de facto calls into question whether they're an adequate sponsor and whether we should be releasing a child to that person," Steven Wagner, acting assistant secretary of the Administration for Children and Families, told reporters in a telephone briefing Tuesday.

Wagner added that the department plans to increase sponsor screening because "we have the problem of people fraudulently claiming to be parents when, in fact, they're not."

Immigrants advocates said the added oversight could increase the number of

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“Their workload has grown significantly, and they’re not equipped to be handling children who have been orphaned by these new policies,” said Ben Johnson, executive director of the Washington-based American Immigration Lawyers Assn.



Johnson also criticized the department’s short-term solution to the space crunch.

“Commandeering these military bases to house children has never turned out well,” Johnson said. “It’s resulted in more lawsuits and more inhumane conduct and treatment of people housed there. ... Those facilities are not designed for these kinds of people.”

Migrant parents already appear less willing to claim their children, according to Leah Chavla, a policy advisor at the Washington-based Women’s Refugee Commission.



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Three years ago, 60% of unaccompanied youths were claimed by parents, but that dropped to 41% this fiscal year following immigration crackdowns by the administration, including raids on sponsors last summer that resulted in 400 people being detained in the Midwest and southern United States. Chavla’s group and other advocates filed a complaint about the raids with Homeland Security’s Office for Civil Rights and Civil Liberties and its Office of inspector general alleging unlawful

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START TRIAL

Exhibit 38, Page 147

“Families are more reluctant to come forward, reluctant to identify their parents to Health and Human Services for fear they will be deported.

“They’re going to languish in custody. We’re going to see the length of stay creep up” for unaccompanied children, she said.

Lee Gelernt, an immigration attorney with the American Civil Liberties Union, filed a lawsuit to force the government to stop separating families at the border, and a federal judge in California is considering it.

Gelernt was in El Paso on Wednesday meeting with one of the plaintiffs, a Brazilian mother charged and jailed near the border and separated last August from her 14-year-old son, who was sent to Illinois. They are still not reunited.

“There’s just going to be hundreds of parents and kids that fall into the Brazilian mom’s situation,” Gelernt said. She asserts that the government is separating families to deter immigration.

In March and April, more than 50,000 people were detained per month trying to cross the southwest border illegally, levels similar to those during the Obama administration, according to U.S. government figures. During those two months about 8,400 unaccompanied minors were caught on the border.

Soon after Trump’s inauguration in January 2017, border crossings briefly dropped to record lows before creeping back up again at the end of last year. The increase has frustrated the president, who has repeatedly called for more action to seal the border.

**5:10 p.m.:** This article was updated with comments from Lee Gelernt of the ACLU.

**3:55 p.m.:** This article was updated throughout with Los Angeles Times staff reporting and comments from Leah Chavla of the Women’s Refugee Commission.

*This article was originally published at 9:20 a.m.*

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## Molly Hennessy-Fiske



Molly Hennessy-Fiske is a staff writer for the Los Angeles Times, where she has spent a dozen years covering foreign, national, metro and business news, including reporting rotations in Afghanistan, Egypt, Iraq and Lebanon. She won an Overseas Press Club award in 2015, a Dart award from Columbia University in 2014, was a finalist for the Livingston Awards and Casey Medal and won state awards for her work in California, Florida, New York and North Carolina. She completed a Thomson Reuters fellowship in Lebanon in 2006 and a Pew fellowship reporting from Mexico in 2004. She has reported for newspapers in Boston, Miami, Raleigh, Schenectady, Syracuse, Washington and West Palm Beach. Hennessy-Fiske grew up in Upstate New York before attending Harvard College, graduating with a bachelor's degree in social studies in 1999. She spent last year as Middle East bureau chief before returning to cover foreign/national news as Houston bureau chief.

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COMMENTS (23)

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Exhibit 38, Page 149

# Exhibit D

# DHS: 2,000 children separated from parents at border

By [Tal Kopan](#), CNN

Updated 2:44 AM ET, Sat June 16, 2018

## Surge in family separation at border 01:52

**Washington (CNN)** — The US government has separated at least 2,000 children from parents at the border since implementing a policy that results in such family separations, the Department of Homeland Security confirmed Friday.

From April 19 through May 31 of this year, 1,995 minors traveling with 1,940 adults who said they were the children's guardians were separated due to the policy, Department of Homeland Security spokesman Jonathan Hoffman told reporters on a conference call.



The call was largely to defend the administration's decision to charge every adult caught crossing the border illegally with federal crimes, as opposed to referring those with children mainly to immigration courts, as previous administrations did. The officials used the opportunity, otherwise on the condition of anonymity, to accuse the press of spreading falsehoods about the policy.

Because the government is charging the parents in the criminal justice system, children are separated from them, with no clear procedure for their reunification aside from

**Exhibit 38, Page151**

**Related Article:** Sessions cites Bible to defend immigration policies resulting in family separations

hotlines the parents can call to try to track their children down.

The policy to refer all adults for charges was publicly announced May 7, though the Justice Department announced it would prosecute 100% of the cases referred to it at the beginning of April.

On the call, Department of Homeland Security also said that prosecutions have more than doubled, but acknowledges they are not currently at 100%. Asked why they are prioritizing families in this effort as opposed to single adults, as they get closer to 100%, officials declined to explain how they choose whom to refer.



**Related Article:** Trump again falsely blames the Democrats for his administration's family separations

"We make decisions based on the ability to detain and the ability of courts to take these cases, but we no longer exempt categories or classes of individuals," a Department of Homeland Security official said.

"By and large, we are accepting nearly all of the referrals that we get from our counterparts at DHS, we continue to work with the federal judiciary on practical solutions to differing caps that they have," said a Justice Department official. "In terms of declining prosecution, we're not going to get into specifics."



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# Exhibit E



**AP**

# Hundreds of children wait in Border Patrol facility in Texas

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By NOMAAN  
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McALLEN, Texas (AP) — Inside an old warehouse in South Texas, hundreds of children wait in a series of cages created by metal fencing. One cage had 20 children inside. Scattered about are bottles of water, bags of chips and large foil sheets intended to serve as blankets.

One teenager told an advocate who visited that she was helping care for a young child she didn't know because the child's aunt was somewhere else in the facility. She said she had to show others in her cell how to change the girl's diaper.

The U.S. Border Patrol on Sunday allowed reporters to visit the facility where it holds families arrested at the southern border, responding to new criticism and protests over the "zero tolerance" policy and resulting separation of children from their parents.



More than 1,100 people were inside the large, dark facility that's divided into separate wings for unaccompanied children, adults on their own, and mothers and fathers with children. The cages in each wing open out into common areas to use portable restrooms. The overhead lighting in the warehouse stays on around the clock.

The Border Patrol said close to 200 people inside the facility were minors unaccompanied by a parent. Another 500 were "family units," parents and children. Many adults who crossed the border without legal permission could be charged with illegal entry and placed in jail, away from their children.

Reporters were not allowed by agents to interview any of the detainees or take photos.

Nearly 2,000 children have been taken from their parents since Attorney General Jeff Sessions announced the policy, which directs Homeland Security officials to refer all cases of illegal entry into the United States for prosecution. Church groups and human rights advocates have sharply criticized the policy, calling it inhumane.

Stories have spread of children being torn from their parents' arms, and parents not being able to find where their kids have gone. A group of congressional lawmakers visited the same facility Sunday and were set to visit a longer-term shelter holding around 1,500 children — many of whom were separated from their parents.

"Those kids inside who have been separated from their parents are already being traumatized," said Democratic Sen. Jeff Merkley of Oregon, who was denied entry earlier this month to children's shelter. "It doesn't matter whether the floor is swept and the bedsheets tucked in tight."



In Texas' Rio Grande Valley, the busiest corridor for people trying to enter the U.S., Border Patrol officials argue that they have to crack down on migrants and separate adults from children as a deterrent to others.

"When you exempt a group of people from the law ... that creates a draw," said Manuel Padilla, the Border Patrol's chief agent here. "That creates the trends right here."

Agents running the holding facility — generally known as "Ursula" for the name of the street it's on — said everyone detained is given adequate food, access to showers and laundered clothes, and medical care. People are supposed to move through the facility quickly. Under U.S. law, children are

required to be turned over within three days to shelters funded by the Department of Health and Human Services.

Padilla said agents in the Rio Grande Valley have allowed families with children under the age of 5 to stay together in most cases.

An advocate who spent several hours in the facility Friday said she was deeply troubled by what she found.

Michelle Brane, director of migrant rights at the Women's Refugee Commission, met with a 16-year-old girl who had been taking care of a young girl for three days. The teen and others in their cage thought the girl was 2 years old.

"She had to teach other kids in the cell to change her diaper," Brane said.

Brane said that after an attorney started to ask questions, agents found the girl's aunt and reunited the two. It turned out that the girl was actually 4 years old. Part of the problem was that she didn't speak Spanish, but K'iche, a language indigenous to Guatemala.

"She was so traumatized that she wasn't talking," Brane said. "She was just curled up in a little ball."

Brane said she also saw officials at the facility scold a group of 5-year-olds for playing around in their cage, telling them to settle down. There are no toys or books.

But one boy nearby wasn't playing with the rest. According to Brane, he was quiet, clutching a piece of paper that was a photocopy of his mother's ID card.

"The government is literally taking kids away from their parents and leaving them in inappropriate conditions," Brane said. "If a parent left a child in a cage with no supervision with other 5-year-olds, they'd be held accountable."

Dr. Colleen Kraft, the head of the American Academy of Pediatrics, said that she visited a small shelter in Texas recently, which she declined to identify. A toddler inside the 60-bed facility caught her eye — she was crying uncontrollably and pounding her little fists on mat.

Staff members tried to console the child, who looked to be about 2 years old, Kraft said. She had been taken from her mother the night before and brought to the shelter.

The staff gave her books and toys — but they weren't allowed to pick her up, to hold her or hug her to try to calm her. As a rule, staff aren't allowed to touch the children there, she said.

“The stress is overwhelming,” she said. “The focus needs to be on the welfare of these children, absent of politics.”

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by Taboola

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## WORLD NEWS

JUNE 19, 2018 / 6:50 PM / 5 DAYS AGO

# Hurdles facing parents and children separated at U.S. border

Reuters Staff



(Reuters) - Over 2,300 children were separated from their parents at the U.S.-Mexico border between May 5 and June 9 under the Trump administration's "zero tolerance" policy, U.S. Customs and Border Protection said on Tuesday, and immigration advocates and legal experts say there is no clear system in place to reunite them.

A flyer released by the U.S. Department of Homeland Security (DHS) June 19, 2018, shows information being distributed in U.S.-Mexico border facilities at which immigrant parents are being detained. U.S. Department of Homeland Security/Handout via REUTERS

The policy directs border officials to refer for prosecution all immigrants apprehended while crossing the U.S.-Mexico border illegally.

Parents who are no longer detained “are entitled to get their kids back through a documented process,” U.S. Department of Homeland Security Secretary Kirstjen Nielsen said.

When are children and parents separated?

Immigrants arrested near the southwestern border are taken to processing centers where officials refer some to federal court to be prosecuted under the U.S. criminal entry statute. Parents referred for prosecution are transferred into U.S. Marshals custody and separated from their children.

Immigrants charged with the misdemeanor crime of illegal entry often plead guilty in group hearings and receive a sentence of a few days in prison or “time served,” at which point they are transferred back to a processing facility and quickly deported unless they claim a “credible fear” of returning to their home country.

Meanwhile, their children are transferred into the custody of the Office of Refugee Resettlement (ORR), part of the Department of Health and Human Services, which manages facilities that care for minors. There are 100 sites scattered across 17 states and they can be on the other side of the country from their parents.

Children get their own case in immigration court and are entitled to a full hearing by an immigration judge, a process that can take months.

How can parents contact their children?

U.S. Immigration and Customs Enforcement (ICE) said it has posted information in all facilities at which parents are detained for over 72 hours, advising them to call a hotline for assistance in finding their child. The agency said it will work together with ORR to locate separated children, verify the relationship and set up regular communication and removal coordination if necessary.

There are two hotlines, one run by ICE and one by ORR. Advocates say the wait times on these calls can be upwards of 30 minutes and parents are required to call back when a child cannot immediately be located.

How can the parents be reunited with their children?

ICE said it “will make every effort to reunite the child with the parent” once the parent’s case has been adjudicated.

If the parent is being deported, ICE said it will work with ORR to reunite them with their child at the time of deportation and with the consulate representing their country to assist the parent with obtaining a travel document for the child.

In some cases, the parent may decide they want their child to stay in the United States to pursue their own asylum claim, or the child may themselves choose to seek asylum. In other cases, children may ask to return to their home countries to be reunited with their parents.

Advocates said the reunification process is ad hoc.

Anthony Enriquez, director of the unaccompanied minors program for Catholic Charities Community Services in New York said there was no systematic effort in place to ensure the children and their parents are reunited.

“I go to court to tell the judges this under oath,” Enriquez said. “There’s no process.”

He said reunification relies on individual government officials who go above and beyond their duties to help the families reunite or a lawyer from a non-governmental legal organization doing that work.



Robert Carey, who ran the Office for Refugee Resettlement under President Barack Obama said he would be surprised if systems were in place for reunifying families as the new zero tolerance policy was put in place quickly and “it takes time to coordinate across multiple agencies.”

Have parents been deported without their children?

Immigration attorneys say there have been many cases of parents deported without their children. The advocacy group Kids In Need of Defense (KIND) said of the 40 case referrals involving family separation they have received since July 2017 through their child migrant return and reintegration project, 32 involved parents deported before their children and 15 of those cases involved children who were five years old or younger.

In some cases, parents are deported before finding their children in ORR custody, said Lisa Frydman, a KIND attorney.

“We’ve had other cases where the child goes to ORR and they do not know where parent is, and the parent doesn’t know where child is,” Frydman said.

Some children remain in the United States months after their parents are being deported, she said. Parents who have been deported back to countries such as Guatemala and Honduras without their children are reaching out to local organizations asking for help locating them.

Reporting by Kristina Cooke in San Francisco, Reade Levinson in New York and Yeganeh Torbati in Washington; editing by Grant McCool

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# Exhibit G



## EXECUTIVE ORDERS

# Affording Congress an Opportunity to Address Family Separation

## IMMIGRATION

Issued on: June 20, 2018



By the authority vested in me as President by the Constitution and the laws of the United States of America, including the Immigration and Nationality Act (INA), 8 U.S.C. 1101 *et seq.*, it is hereby ordered as follows:

Section 1. Policy. It is the policy of this Administration to rigorously enforce our immigration laws. Under our laws, the only legal way for an alien to enter this country is at a designated port of entry at an appropriate time. When an alien enters or attempts to enter the country anywhere else, that alien has committed at least the crime of improper entry and is subject to a fine or imprisonment under section 1325(a) of title 8, United States Code. This Administration will initiate proceedings to enforce this and other criminal provisions of the INA until and unless Congress directs otherwise. It is also the policy of this Administration to maintain family unity, including by detaining alien families together where appropriate and consistent with law and available resources. It is unfortunate that Congress's failure to act and court orders have put the Administration in the position of separating alien families to effectively enforce the law.

Sec. 2. Definitions. For purposes of this order, the following definitions apply:

(a) "Alien family" means

(i) any person not a citizen or national of the United States who has not been admitted into, or is not authorized to enter or remain in, the United States, who entered this country with an

alien child or alien children at or between designated ports of entry and who was detained;  
and

(ii) that person's alien child or alien children.

(b) "Alien child" means any person not a citizen or national of the United States who

(i) has not been admitted into, or is not authorized to enter or remain in, the United States;

(ii) is under the age of 18; and

(iii) has a legal parent-child relationship to an alien who entered the United States with the alien child at or between designated ports of entry and who was detained.

Sec. 3. Temporary Detention Policy for Families Entering this Country Illegally. (a) The Secretary of Homeland Security (Secretary), shall, to the extent permitted by law and subject to the availability of appropriations, maintain custody of alien families during the pendency of any criminal improper entry or immigration proceedings involving their members.

(b) The Secretary shall not, however, detain an alien family together when there is a concern that detention of an alien child with the child's alien parent would pose a risk to the child's welfare.

(c) The Secretary of Defense shall take all legally available measures to provide to the Secretary, upon request, any existing facilities available for the housing and care of alien families, and shall construct such facilities if necessary and consistent with law. The Secretary, to the extent permitted by law, shall be responsible for reimbursement for the use of these facilities.

(d) Heads of executive departments and agencies shall, to the extent consistent with law, make available to the Secretary, for the housing and care of alien families pending court proceedings for improper entry, any facilities that are appropriate for such purposes. The Secretary, to the extent permitted by law, shall be responsible for reimbursement for the use of these facilities.

(e) The Attorney General shall promptly file a request with the U.S. District Court for the Central District of California to modify the Settlement Agreement in *Flores v. Sessions*, CV 85-4544 ("*Flores* settlement"), in a manner that would permit the Secretary, under present resource constraints, to

Exhibit 38, Page 165

detain alien families together throughout the pendency of criminal proceedings for improper entry or any removal or other immigration proceedings.

Sec. 4. Prioritization of Immigration Proceedings Involving Alien Families. The Attorney General shall, to the extent practicable, prioritize the adjudication of cases involving detained families.

Sec. 5. General Provisions. (a) Nothing in this order shall be construed to impair or otherwise affect:

- (i) the authority granted by law to an executive department or agency, or the head thereof; or
- (ii) the functions of the Director of the Office of Management and Budget relating to budgetary, administrative, or legislative proposals.

(b) This order shall be implemented in a manner consistent with applicable law and subject to the availability of appropriations.

(c) This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

DONALD J. TRUMP

THE WHITE HOUSE,

June 20, 2018.

# Exhibit H



U.S. Department of  
Homeland Security

# Fact Sheet: Zero-Tolerance Prosecution and Family Reunification

**Release Date:** June 23, 2018

The Department of Homeland Security (DHS) and Health and Human Services (HHS) have a process established to ensure that family members know the location of their children and have regular communication after separation to ensure that those adults who are subject to removal are reunited with their children for the purposes of removal. The United States government knows the location of all children in its custody and is working to reunite them with their families.

As part of the apprehension, detention and prosecution process, illegal aliens, adults and children, are initially detained by U.S. Customs and Border Protection (CBP) before the children are sent to HHS' Office of Refugee Resettlement (ORR) and parents to Immigration and Customs Enforcement (ICE) custody. Each entity plays a role in reunification. This process is well coordinated.

## U.S. Customs and Border Protection

- CBP has reunited 522 Unaccompanied Alien Children (UAC) in their custody who were separated from adults as part of the Zero Tolerance initiative. The reunions of an additional 16 UAC who were scheduled to be reunited on June 22, 2018 were delayed due to weather affecting travel and we expect they will all be reunited with their parents within the next 24 hours. There will be a small number of children who were separated for reasons other than zero tolerance that will remain separated: generally only if the familial relationship cannot be confirmed, we believe the adult is a threat to the safety of the child, or the adult is a criminal alien.
- Because of the speed in which adults completed their criminal proceedings, some children were still present at a United States Border Patrol (USBP) station at the time

their parent(s) returned from court proceedings. In these cases, the USBP reunited the family and transferred them, together, to ICE custody as a family unit.

## U.S. Immigration and Customs Enforcement

- ICE has dedicated the [Port Isabel Service Processing Center](https://www.ice.gov/detention-facility/port-isabel-service-processing-center) (<https://www.ice.gov/detention-facility/port-isabel-service-processing-center>) as the primary family reunification and removal center for adults in their custody.
- A parent who is ordered removed from the U.S. may request that his or her minor child accompany them. It should be noted that in the past many parents have elected to be removed without their children.
- ICE has posted information in all of its facilities advising detained parents who are trying to locate, and/or communicate with, a child in the custody of HHS to call the Detention Reporting and Information Line for assistance, which is staffed by live operators Monday through Friday from 8 AM to 8 PM.
- The information provided by these parents to the call operators will be forwarded to HHS for action. ICE and HHS will coordinate a review of their custodial data to identify where each child is located, verify the parent/child relationship, and set up regular communication and removal coordination, if necessary.
- Each ICE Field Office has Juvenile Coordinators who manage these cases throughout the immigration court proceedings.
- Further, ICE maintains a publicly available online detainee locator which can be used to locate adults detained by ICE. This site can be accessed at: <https://locator.ice.gov/odls/#/index> (<https://locator.ice.gov/odls/#/index>).

ICE has completed the following steps toward reunification:

- Implemented an identification mechanism to ensure on-going tracking of linked family members throughout the detention and removal process;
- Designated detention locations for separated parents and will enhance current processes to ensure communication with children in HHS custody;
- Worked closely with foreign consulates to ensure that travel documents are issued for both the parent and child at time of removal; and
- Coordinated with HHS for the reuniting of the child prior to the parents' departure from the United States.



# U.S. Health and Human Services Office of Refugee Resettlement

- Minors come into HHS custody with information provided by DHS regarding how they illegally entered the country and whether or not they were with a parent or adult and, to the extent possible, the parent(s) or guardian(s) information and location. There is a central database which HHS and DHS can access and update when a parent(s) or minor(s) location information changes.
- As of June 20th HHS has 2,053 separated minors being cared for in HHS funded facilities, and is working with relevant agency partners to foster communications and work towards reuniting every minor and every parent or guardian via well-established reunification processes. Currently only 17% of minors in HHS funded facilities were placed there as a result of Zero Tolerance enforcement, and the remaining 83% percent arrived to the United States without a parent or guardian.
- Parent(s) or guardian(s) attempting to determine if their child is in the custody of the Office of Refugee Resettlement (ORR) in HHS Administration for Children and Families should contact the ORR National Call Center ([www.acf.hhs.gov/orr/resource/orr-national-call-center](http://www.acf.hhs.gov/orr/resource/orr-national-call-center) (<http://www.acf.hhs.gov/orr/resource/orr-national-call-center>)) at 1-800-203-7001, or via email [information@ORRNCC.com](mailto:information@ORRNCC.com) (<mailto:information@ORRNCC.com>). Information will be collected and sent to HHS funded facility where minor is located. The ORR National Call Center has numerous resources available for children, parent(s), guardian(s) and sponsors.
- Within 24 hours of arriving at an HHS funded facility minors are given the opportunity to communicate with a vetted parent, guardian or relative. While in HHS funded facilities' care, every effort is made to ensure minors are able to communicate (either telephonic or video depending on the circumstances) with their parent or guardian (at least twice per week). However, reasonable safety precautions are in place to ensure that an adult wishing to communicate with a minor is in fact that minor's parent or guardian.
- Minors in HHS funded facilities are permitted to call both family members and/or sponsors living in the United States and abroad. Attorneys representing minors have unlimited telephone access and the minor may speak to other appropriate stakeholders, such as their consulate, the case coordinator, or child advocate. Additional information on telephone calls, visitation, and mail policies are available in the [policy guide](https://www.acf.hhs.gov/orr/resource/children-entering-the-united-states-unaccompanied). (<https://www.acf.hhs.gov/orr/resource/children-entering-the-united-states-unaccompanied>)

- Under HHS' [publicly available \(https://www.acf.hhs.gov/orr/resource/children-entering-the-united-states-unaccompanied\)](https://www.acf.hhs.gov/orr/resource/children-entering-the-united-states-unaccompanied) policy guide for Unaccompanied Alien Children, the Office of Refugee Resettlement (ORR) releases minors to sponsors in the following order of preference: parent; legal guardian; an adult relative (brother, sister, aunt, uncle, grandparent or first cousin); an adult individual or entity designated by the parent or legal guardian (through a signed declaration or other document that ORR determines is sufficient to establish the signatory's parental/guardian relationship); a licensed program willing to accept legal custody; or an adult individual or entity seeking custody when it appears that there is no other likely alternative to long term ORR care and custody.

Topics: [Border Security \(/topics/border-security/\)](/topics/border-security/), [Immigration Enforcement \(/topics/immigration-enforcement/\)](/topics/immigration-enforcement/).

Keywords: [Border Security \(/keywords/border-security/\)](/keywords/border-security/), [Family detention \(/keywords/family-detention/\)](/keywords/family-detention/), [immigration enforcement \(/keywords/immigration-enforcement/\)](/keywords/immigration-enforcement/), [UAC \(/keywords/uac/\)](/keywords/uac/), [Unaccompanied Alien Children \(/keywords/unaccompanied-alien-children/\)](/keywords/unaccompanied-alien-children/).

Last Published Date: June 24, 2018

# Exhibit I

June 14, 2018

The Honorable Kirstjen Nielsen  
Secretary  
U.S. Department of Homeland Security  
245 Murray Lane, S.W.  
Washington, D.C. 20528

The Honorable Jeff Sessions  
Attorney General  
U.S. Department of Justice  
950 Pennsylvania Avenue, N.W.  
Washington, D.C. 20530

Dear Secretary Nielsen and Attorney General Sessions,

As medical and mental health professionals and researchers working in the United States, we are gravely concerned about the Trump administration's practice of separating migrant and asylum-seeking families at the U.S.-Mexico border. Such a practice is profoundly harmful to children and to families, in addition to violating fundamental human rights. We urge you to immediately end forced separation of families at the border, and instead keep families together in community-based settings while their immigration proceedings are pending.

The Trump administration has stated that its goal in separating children from their parents is to deter people from crossing the border between ports of entry. According to statements by Attorney General Jeff Sessions, this policy is intended to be punitive, to serve as such deterrence.<sup>1</sup> The child welfare implications appear to be secondary at best. White House Chief of Staff and former Department of Homeland Security secretary John Kelly has stated, "The children will be taken care of — put into foster care or whatever. But the big point is they elected to come illegally into the United States and this is a technique that no one hopes will be used extensively or for very long."<sup>2</sup> Media reports indicate that government mechanisms for ensuring that parents and children are in contact and know each other's whereabouts are non-functional.<sup>3</sup>

Using children as leverage to punish their parents is unconscionable, both with respect to the health and well-being of children and as treatment of migrants and asylum seekers. The right to family unity is enshrined in U.S. and international law, which recognize that families are the foundation of society. The relationship of children and parents is the strongest social tie most people experience, and a threat to that tie is among the most traumatic events people can experience.

Forced separation of children and parents, especially in connection with the detention of a parent, can constitute an adverse childhood experience (ACE). ACEs are linked with disrupted

<sup>1</sup> Attorney General Jeff Sessions, "Attorney General Sessions Delivers Remarks Discussing the Immigration Enforcement Actions of the Trump Administration," Speech, May 7, 2018, <https://www.justice.gov/opa/speech/attorney-general-sessions-delivers-remarks-discussing-immigration-enforcement-actions>.

<sup>2</sup> Transcript: White House Chief Of Staff John Kelly's Interview with NPR, NPR, May 11, 2018, <https://www.npr.org/2018/05/11/610116389/transcript-white-house-chief-of-staff-john-kellys-interview-with-npr>.

<sup>3</sup> Michael E. Miller, "They just took them?" Frantic parents separated from their kids fill courts on the border," *Washington Post*, June 11, 2018, [https://www.washingtonpost.com/local/they-just-took-them-frantic-parents-separated-from-their-kids-fill-courts-on-the-border/2018/06/09/e3f5170c-6aa9-11e8-bea7-c8eb28bc52b1\\_story.html](https://www.washingtonpost.com/local/they-just-took-them-frantic-parents-separated-from-their-kids-fill-courts-on-the-border/2018/06/09/e3f5170c-6aa9-11e8-bea7-c8eb28bc52b1_story.html).

neurodevelopment, resulting in social, emotional, and cognitive impairment,<sup>4</sup> and have even been linked with negative intergenerational effects.<sup>5</sup> Extreme and repetitive stress -- known as toxic stress -- such as that experienced when a person is suddenly separated from parents, adversely affects brain development and is correlated with increased risk of developing chronic mental health conditions, such as depression and post-traumatic stress disorder (PTSD) and even physical conditions such as cancer, stroke, diabetes, and heart disease.<sup>6</sup>

Separation from parents has been shown to be linked with higher rates of PTSD in the affected children.<sup>7</sup> For children, separation results in a low-support environment which places them at increased risk of PTSD and depressive disorders.<sup>8</sup> The negative impact on the cognitive and emotional functioning of the affected children can continue into adulthood, and contribute to lower academic achievement, attachment difficulties, and poor mental health.<sup>9</sup>

Among refugees, one research study shows that individuals separated from their families had worse mental health outcomes in terms of depression, PTSD, and psychological quality of life than those who remained with their families, after controlling for trauma. After testing the contribution of 26 types of trauma to these outcomes, only the experience of being beaten and tortured had a similar impact on all three mental health measures as family separation.<sup>10</sup>

According to the new U.S. policy, children arriving with their parents will be placed in the custody of the Office of Refugee Resettlement in foster families after separation. However, foster care is not an appropriate substitute to a child remaining with his or her parents, and studies of refugee children in foster care have shown that children fare worse when placed in foster families than when cared for by their parents.<sup>11</sup> Placing these children into foster care will strain the U.S. child welfare system and set these children up for worsened health and social outcomes.<sup>12</sup>

The best interests of the child is the recognized legal standard for the treatment of children across a range of domains, including parental custody and immigration proceedings. This standard requires that children not be separated from their parents except in extreme circumstances, if required for the child's protection. Indeed, the literature shows that parents

<sup>4</sup> Vincent J. Felitti et al., "Relationship of Childhood Abuse and Household Dysfunction to Many of the Leading Causes of Death in Adults: The Adverse Childhood Experiences (ACE) Study," *American Journal of Preventive Medicine* 14, no. 4 (1998); Debora L. Oh et al., "Systematic Review of Pediatric Health Outcomes Associated with Adverse Childhood Experiences," *Pediatrics* 141, no. 1 (2018).

<sup>5</sup> Felice Le-Scherban et al. "Intergenerational Associations of Parent Adverse Childhood Experiences and Child Health Outcomes," *Pediatrics* 141, no. 6 (2018).

<sup>6</sup> Vincent J. Felitti et al. "Relationship of Childhood Abuse and Household Dysfunction to Many of the Leading Causes of Death in Adults," *American Journal of Preventive Medicine* 14, no. 4 (1998).

<sup>7</sup> Paul L. Geltman et al. "The 'lost boys of Sudan': functional and behavioral health of unaccompanied refugee minors re-settled in the United States," *Archives of Pediatric and Adolescent Medicine* 159, no. 6 (2005).

<sup>8</sup> Matthew Hodes, "Psychopathology in refugee and asylum seeking children," in Michael Rutter et al. (eds.), *Rutter's Child and Adolescent Psychiatry* (Wiley-Blackwell, 2009).

<sup>9</sup> Israel Bronstein and Paul Montgomery, "Psychological distress in refugee children: a systematic review," *Clinical Child and Family Psychology Review* 14, no. 1 (2010).

<sup>10</sup> Alexander Miller et al. "Understanding the mental health consequences of family separation for refugees: Implications for policy and practice," *American Journal of Orthopsychiatry*, 88, no. 1 (2018).

<sup>11</sup> Amy Holtan et al. "A comparison of mental health problems in kinship and nonkinship foster care," *European Child & Adolescent Psychiatry* 14, no. 4 (2005); Geltman et al., "The 'Lost Boys of Sudan'."

<sup>12</sup> Kym R. Ahrens, Michelle M. Garrison, and Mark E. Courtney. "Health outcomes in young adults from foster care and economically diverse backgrounds," *Pediatrics* 134, no. 6 (2014); Amy Dworsky, Laura Napolitano, and Mark E. Courtney. "Homelessness during the transition from foster care to adulthood," *American Journal of Public Health*, 103, no. S2 (2013).

are a vital buffer for children coping with severe stress.<sup>13</sup> A strong predictor of successful adaptation for children is family support.<sup>14</sup> Separation from their parents denies these children this vital resource, leaving them alone to face extremely stressful and likely frightening conditions. It increases the risk that these children will experience severe and long-lasting psychological problems, and may even contribute to the development of physical health issues.<sup>15</sup>

The United States should follow the “best interests of the child” standard and immediately stop the practice of forced separation. It should not be U.S. policy to traumatize children, especially not as a form of indirect punishment of their parents. The intentional infliction of pain on children and their families is not just inhumane, it also fails to meet the stated goals of deterrence. Punishing parents with family separation may cause damage to their children, and it will not change the realities that drove the parents to seek safe haven in the United States.

As experts committed to promoting health and well-being, including of children, we ask you to immediately end the practice of family separation and take all measures to ensure that currently separated families are reunited without delay.

Sincerely,

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<sup>13</sup> John Bowlby, *A secure base: Parent-child attachment and healthy human development* (New York: Basic Books, 1988); Steven M. Weine et al. “Fostering resilience; protective agents, resources, and mechanisms for adolescent refugees’ psychosocial well-being,” *Adolescent Psychiatry* 4, no. 4 (1988).

<sup>14</sup> Tammy Bean et al. “Comparing psychological distress, traumatic stress reactions, and experiences of unaccompanied refugee minors with experiences of adolescents accompanied by parents,” *Journal of Nervous and Mental Disease* 195, no. 4 (2007).

<sup>15</sup> Shanta R. Dube et al. “The impact of adverse childhood experiences on health problems: evidence from four birth cohorts dating back to 1900,” *Preventive Medicine* 37, no. 3 (2003).

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 Laura Yahr Nelson M.D. Psychiatrist  
 Inna Yalovetskaya, Physician  
 Stephanie Yamout, Physician  
 Lanbo Yang  
 Yvonne Yang, Psychiatrist  
 Susan Yanow, Social Work  
 Margaret Yard Ph.D. Psychologist  
 Sarah Yasmin, Psychiatrist  
 Joannie Yeh M.D. Physician  
 Mary Yerkes Ph.D. Psychologist  
 Brooke Yetter Psy.D. Psychologist  
 Alexis Yetwin Ph.D. Psychologist  
 Katie Yoast  
 Rachel Yoder, Psychiatrist

Eva Young  
 Catherine Young  
 Jackie Young LMHC  
 Janine Young, M.D. Physician  
 Stuart Youngner, Psychiatrist  
 Sidra Younus M.D. Physician  
 Aisha Yousafzai Ph.D. Public Health  
 Albert Yu, Physician  
 Doris Yu M.D. Physician  
 Kate Yun, Physician  
 Ilana Zablow, Social Work  
 Rachel Zack Ishikawa Ph.D. Psychologist  
 Alexandra Zagoloff, Psychologist  
 Hengameh Zahed, Physician  
 Sarah Zaheer M.D. Physician  
 Nora Zaizar LPC  
 Amy Zajakowski Uhl LCPC, Psychologist  
 Angela Zallen M.D. Physician  
 Ellen Zaltzberg, Public Health  
 Tauheed Zaman M.D. Psychiatrist  
 Moneeka Zaman M.D. Physician  
 Milagros Zambrano-Rishel Psy.D. Psychologist  
 Eleana Zamora M.D. Physician  
 Anuradha Zangri  
 Ana Luiza Zaninotto Ph.D. Psychologist  
 Cassidy Zanko M.D. Physician  
 Mary Zanko, Social Work  
 Andrea Zanko  
 Robert Zannoni  
 Lela Zaphiropoulos LCSW, Social Work  
 Michael Zaretsky LCSW-R, Social Work  
 MichellZarowitz Psy.D. Psychologist

Rebecca Zash M.D. Physician  
 Lynne Zeavin Psy.D. Psychologist  
 Miriam Zehavi, Social Work  
 Paula Zerfoss, Social Work  
 Sarah Zerull  
 Heidi Zetzer Ph.D. Psychologist  
 Judith Zevin Psy.D. Social Work  
 Cindy Zhao, Physician  
 Emily Zhou  
 Elaine Zickler LCSW, Social Work  
 Christine Zidell, Scientist  
 Denise Zielinski  
 Suzanne Zilber Ph.D. Psychologist  
 Carol Zimmer  
 Anna Zimmer, Physician  
 Linda Zimmerman  
 Randi Zimmerman, Social Work  
 Ellen Zimmerman, Social Work  
 Kathleen Zimmerman, Nurse  
 Peter Zimmermann Ph.D.  
 Alissa Zingman M.D. Physician  
 Nancy Zintak, Administrator  
 Ruth Zitner, Psychologist  
 Kate Zona Ph.D. Psychologist  
 Jeannine Zoppi Ph.D. Psychologist  
 Cindy Zou  
 Laura Zucker  
 Amy Zuckerman LCSW-R, Social Work  
 Lauren Zurenda Ph.D. Psychologist  
 Fiona True, Social Work

# Exhibit J



June 14, 2018

President Donald Trump  
The White House  
1600 Pennsylvania Avenue  
Washington, DC 20500

Dear President Trump:

On behalf of the American Psychological Association (APA), we are writing to express our deep concern and strong opposition to the Administration's new policy of separating immigrant parents and children who are detained while crossing the border. We previously wrote to then Secretary of Homeland Security John Kelly on April 5, 2017, about this matter. Based on empirical evidence of the psychological harm that children and parents experience when separated, we implore you to reconsider this policy and commit to the more humane practice of housing families together pending immigration proceedings to protect them from further trauma.

APA is the leading scientific and professional organization representing psychology in the United States. Our membership includes researchers, educators, clinicians, consultants, and students. APA works to advance the creation, communication, and application of psychological knowledge to benefit society and improve people's lives. We have 115,700 members and affiliates across the United States and in many other countries, many of whom serve immigrant youth and adults in a wide range of settings, including schools, community centers, hospitals and refugee resettlement centers.

The current policy calls for children to be removed from their parents and placed for an often indeterminate period of time in the custody of the Office of Refugee Resettlement. Decades of psychological research have determined that it is in the best interest of the child and the family to keep families together. Families fleeing their homes to seek sanctuary in the United States are already under a tremendous amount of stress.<sup>1</sup> Sudden and unexpected family separation, such as separating families at the border, can add to that stress, leading to emotional trauma in children.<sup>2</sup> Research also suggests that the longer that parents and children are separated, the greater the reported symptoms of anxiety and depression are for children.<sup>3</sup> Adverse childhood experiences, such as parent-

<sup>1</sup> Chaudry, A. (2011). Children in the aftermath of immigration enforcement. *The Journal of the History of Childhood and Youth*, 4 (1), 137-154.

<sup>2</sup> Dreby, J. (2012). The burden of deportation on children in Mexican immigrant families. *Journal of Marriage and Family*, 74, 829-845. Doi:10.1111/j.1741-3737.2012.00989x

<sup>3</sup> Suárez-Orozco, C., Bang, H.J. & Kim, H.Y (2010). I felt like my heart was staying behind: Psychological implications of family separations and reunifications for immigrant youth. *Journal of Adolescent Research* 26(2), 222-257.



child separation, are important social determinants of mental disorders. For children, traumatic events can lead to the development of post-traumatic stress disorder and other mental health disorders that can cause long lasting effects.<sup>4</sup> Furthermore, immigration policies, such as separating families at the border, can also adversely impact those immigrants who are already in the United States. They can suffer from feelings of stigmatization, social exclusion, anger, and hopelessness, as well as fear for the future.<sup>5</sup>

As a tragic example of the current policy's serious potential for harm, a Honduran man who was separated from his wife and 3-year-old son after he crossed the border into Texas recently took his own life while detained in a holding cell, according to the Customs and Border Protection officials, public records, and media reports.<sup>6</sup> There are also reports of detained immigrants foregoing legitimate claims for asylum by pleading guilty to expedite the return of their separated children and reports of parents being deported while their children, including infants, remain in custody. These incidents serve to highlight the mental health crisis for many families caused by the Administration's policy.

Given these considerations, a change in immigration policy regarding the detention of immigrant families at the border is desperately needed – from separating parents and children to housing them together and providing needed physical and mental health services. As psychologists, we have documented multiple harmful effects of parent-child separation on children's emotional and psychological development and well-being and urge that the current policy of family separation be reversed. Should you have any questions regarding these comments, please contact Serena Dávila, J.D., with our Public Interest Directorate at [sdavila@apa.org](mailto:sdavila@apa.org) or 202-336-6061.

Sincerely,



Jessica Henderson Daniel, Ph.D., ABPP  
President



Arthur C. Evans, Jr., Ph. D.  
Chief Executive Officer

cc: U.S. Attorney General Jeff Sessions  
U.S. Secretary of Homeland Security Kirstjen Nielsen

<sup>4</sup> Rojas-Flores, L., Clements, M., Koo, J. London, J. (2017). Trauma and Psychological Distress in Latino Citizen Children Following Parental Detention and Deportation. *Psychological Trauma: Theory, Research, Practice, and Policy*, Vol 9, No. 3, 352.

<sup>5</sup> Suárez-Orozco, C., (2017). Conferring Disadvantage: Behavioral and Developmental Implications for Children Growing up in the Shadow of Undocumented Immigration Status. *Wolters Kluwer Health, Inc.*, 426.

<sup>6</sup> Mays J. & Stevens M. (2018, June 10). Honduran Man Kills Himself After Being Separated From Family at U.S. Border, Reports Say. *The New York Times*. Retrieved from <https://www.nytimes.com/2018/06/10/us/border-patrol-texas-family-separated-suicide.html>.

# Exhibit K



JAMES L. MADARA, MD  
EXECUTIVE VICE PRESIDENT, CEO

ama-assn.org  
t (312) 464-5000

June 19, 2018

The Honorable Kirstjen M. Nielsen  
Secretary of Homeland Security  
3801 Nebraska Avenue, NW  
Washington, DC 20528

The Honorable Jefferson B. Sessions, III  
Attorney General of the United States  
U.S. Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, DC 20530

The Honorable Alex M. Azar, II  
Secretary  
U.S. Department of Health & Human Services  
Hubert H. Humphrey Building  
200 Independence Avenue, SW  
Washington, DC 20201

Dear Secretary Nielsen, Secretary Azar, and Attorney General Sessions:

On behalf of the physician and medical student members of the American Medical Association (AMA), I am writing to strongly urge the federal government to withdraw its “zero tolerance” policy that requires the separation of migrating children from their parents or caregivers. Instead, we urge the Administration to give priority to supporting families and protecting the health and well-being of the children within those families.

The Administration’s “zero tolerance” policy was a topic recently discussed at the AMA’s Annual Meeting, which includes delegates representing over 170 state and national medical specialty societies. During this meeting we heard from delegates that the Administration’s policy will do great harm to children and their parents or caregivers, who felt compelled to make a dangerous and uncertain journey because of safety concerns in their own countries. Families seeking refuge in the U.S. already endure emotional and physical stress, which is only exacerbated when they are separated from one another. It is well known that childhood trauma and adverse childhood experiences created by inhumane treatment often create negative health impacts that can last an individual’s entire lifespan. Therefore, the AMA believes strongly that, in the absence of immediate physical or emotional threats to the child’s well-being, migrating children should not be separated from their parents or caregivers.

We urge you to take prompt action on this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "James L. Madara", is written over a light blue horizontal line.

James L. Madara, MD

cc: Office of Refugee Resettlement, U.S. Department of Health & Human Services

# Exhibit L



[HOME](#) > [ACP NEWSROOM](#) > ACP OBJECTS TO SEPARATION OF CHILDREN FROM THEIR PARENTS AT BORDER

# ACP Objects to Separation of Children from their Parents at Border

*Statement attributable to:*

*Ana María López, MD, MPH, FACP*

*President, American College of Physicians*

Washington, DC (May 31, 2018)—The American College of Physicians strongly objects to the Department of Homeland Security's "[zero tolerance](#) [PDF](#)" policy that requires that all unlawful border crossers be referred to the Department of Justice for prosecution as a misdemeanor of illegal entry, *including parents seeking asylum from persecution who enter the U.S. with their children*. Their children will be treated as if they were "unaccompanied minors," separated from their parents and sent into facilities administered by the federal government.

In a 2017 [position statement](#) [PDF](#) on U.S. immigration policy, ACP expressed our concern about immigration policies that would split up families. While ACP policy recognizes the right of the U.S. to control who enters its borders, a policy of universally separating children from their parents entering U.S. borders will do great harm to children, their parents, and their families.

Childhood trauma and adverse childhood experiences create [negative health impacts](#) [PDF](#) that will last an individual's entire lifespan. Separating a child from his or her parents triggers a level of stress consistent with trauma. Families seeking refuge in the U.S. already endure emotional and physical stress, and separating family members from each other only serves to dramatically exacerbate that stress.

The American College of Physicians calls on the Department of Homeland Security, Attorney General Sessions, and President Trump to withdraw its new policy to require separation of children from their parents, and instead, give priority to supporting families and protecting the health and well-being of the children within those families.

\*\*\*

## ***About the American College of Physicians***

*The [American College of Physicians](#) is the largest medical specialty organization in the United States with members in more than 145 countries worldwide. ACP membership includes 152,000 internal medicine physicians (internists), related subspecialists, and medical students. Internal medicine physicians are specialists*

*who apply scientific knowledge and clinical expertise to the diagnosis, treatment, and compassionate care of adults across the spectrum from health to complex illness. Follow ACP on [Twitter](#) and [Facebook](#).*

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# Exhibit M





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## ACEP Opposes Current DHS “Zero Tolerance” Immigration Policy

Jun 19, 2018

WASHINGTON — In response to a Department of Homeland Security (DHS) “zero tolerance” policy for addressing illegal border crossings in the Southern United States, Paul Kivela, MD, FACEP, president of the American College of Emergency Physicians (ACEP) released the following statement opposing the federal policy:

“ACEP recognizes the right of the United States to regulate immigration and secure its borders, but as emergency physicians, a policy of separating children and parents suspected of entering the U.S. illegally is cruel and will do great harm to the children.

“These separations result in significant health risks for both children and their parents. Children without criminal records or increased security concerns whose parents seek haven in the United States should never be placed in detention facilities.

“We join other professional medical organizations in opposing this current policy and call on the federal government to immediately change course regarding separation of immigrant families with children, and instead, give priority to protecting the health and well-being of the vulnerable

children within these families.”

ACEP is the national medical specialty society representing emergency medicine. ACEP is committed to advancing emergency care through continuing education, research and public education. Headquartered in Dallas, Texas, ACEP has 53 chapters representing each state, as well as Puerto Rico and the District of Columbia. A Government Services Chapter represents emergency physicians employed by military branches and other government agencies.

For further information: Mike Baldyga | 202-370-9288 | mbaldyga@acep.org | newsroom.acep.org

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**Annals of Emergency Medicine (<http://www.annemergmed.com/>) | EMAF Website**

**(<http://www.acep.org/emactionfund/>) | ACEP Policy Statements**

**(<http://www.acep.org/policystatements/>) | ACEP Now (<http://www.acepnow.com/>) | ACEP**

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**(<http://www.acep.org/regulatory/>) | About ACEP (<http://www.acep.org/aboutus/about/>) |**

**Events (<http://www.acep.org/meetings-events/>)**

# Exhibit N



< [News Releases](#)

May 30, 2018

# APA Statement Opposing Separation of Children from Parents at the Border

**WASHINGTON, D.C.** — The American Psychiatric Association issued the following statement from President Altha Stewart, M.D.:

"As physician experts in mental health, the American Psychiatric Association opposes any policy that separates children from their parents at the United States border. Children depend on their parents for safety and support. Any forced separation is highly stressful for children and can cause lifelong trauma, as well as an increased risk of other mental illnesses, such as depression, anxiety, and posttraumatic stress disorder (PTSD). The evidence is clear that this level of trauma also results in serious medical and health consequences for these children and their caregivers. Many families crossing the United States border are fleeing war and violence in their home countries and are already coping with the effects of stress and trauma. These children deserve our protection and should remain with their families as they seek asylum. The APA recommends an immediate halt to the policy of separating children from their parents."

## American Psychiatric Association

The American Psychiatric Association, founded in 1844, is the oldest medical association in the country. The APA is also the largest psychiatric association in the world with more than 37,800 physician members specializing in the diagnosis, treatment, prevention and research of mental illnesses. APA's vision is to ensure access to quality psychiatric diagnosis and treatment. For more information please visit [www.psychiatry.org](http://www.psychiatry.org).

## Media Contacts

Glenn O'Neal, 202-459-9732  
[press@psych.org](mailto:press@psych.org)

Erin Connors, 202-609-7113

[econnors@psych.org](mailto:econnors@psych.org)

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800 Maine Avenue, S.W., Suite 900, Washington, DC 20024

 [202-559-3900](tel:202-559-3900)  [apa@psych.org](mailto:apa@psych.org)

# Exhibit O

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# AAP Statement Opposing Separation of Children and Parents at the Border

5/8/2018 by: Colleen Kraft, MD, MBA, FAAP, President, American Academy of Pediatrics

"As a pediatrician, as a parent, as the president of the American Academy of Pediatrics (AAP), I am appalled by a new policy reportedly signed by Department of Homeland Security that will forcibly separate children from their parents, a practice that this Administration has already been carrying out for months. In fact, during my [recent trip](#) to the border, I saw its impact with my own eyes, and I am not alone in my outrage and dismay at its sweeping cruelty. The AAP is opposed to this policy and will continue to urge the Department of Homeland Security and the Department of Justice to reverse it immediately.

"So many of these parents are fleeing for their lives. So many of these children know no other adult than the parent who brought them here. They can be as young as infants and toddlers.

"Separating children from their parents contradicts everything we stand for as pediatricians – protecting and promoting children's health. In fact, highly stressful experiences, like family separation, can cause irreparable harm, disrupting a child's brain architecture and affecting his or her short- and long-term health. This type of prolonged exposure to serious stress - known as toxic stress - can carry lifelong consequences for children.

"The new policy is the latest example of harmful actions by the Department of Homeland Security against immigrant families, hindering their right to seek asylum in our country and denying parents the right to remain with their children. We can and must do better for these families. We can and must remember that immigrant children are still children; they need our protection, not prosecution."

###

*The American Academy of Pediatrics is an organization of 66,000 primary care pediatricians, pediatric medical subspecialists and pediatric surgical specialists dedicated to the health, safety and well-being of infants, children, adolescents and young adults. For more information, visit [www.aap.org](http://www.aap.org) and follow us on Twitter @AmerAcadPeds.*

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# Exhibit P

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## Separating parents and children at US border is inhumane and sets the stage for a public health crisis

**Date:** Jun 15 2018

APHA Contact: Megan Lowry, 202-777-3913

TFAH Contact: Becky Salay, 202-864-5945

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*Statement from the American Public Health Association and Trust for America's Health*



*Washington, D.C., June 15, 2018* — "The Trump administration's policy of separating parents and children at the U.S.-Mexico border will have a dire impact on their health, both now and into the future.

"As public health professionals we know that children living without their parents face immediate and long-term health consequences. Risks include the acute mental trauma of separation, the loss of critical health information that only parents would know about their children's health status, and in the case of breastfeeding children, the significant loss of maternal child bonding essential for normal development. Parents' health would also be affected by this unjust separation.

"More alarming is the interruption of these children's chance at achieving a stable childhood. Decades of public health research have shown that family structure, stability and environment are key social determinants of a child's and a community's health.

"Furthermore, this practice places children at heightened risk of experiencing adverse childhood events and trauma, which research has definitively linked to poorer long-term health. Negative outcomes associated with adverse childhood events include some of society's most intractable health issues: alcoholism, substance misuse, depression, suicide, poor physical health and obesity.

"There is no law requiring the separation of parents and children at the border. This policy violates fundamental human rights. We urge the administration to immediately stop the practice of separating immigrant children and parents and ensure those who have been separated are rapidly reunited, to ensure the health and well-being of these children."

###

*APHA champions the health of all people and all communities. We strengthen the public health profession. We speak out for public health issues and policies backed by science. We are the only organization that influences federal policy, has a nearly 150-year perspective and brings together members from all fields of public health. Visit us at [www.apha.org](http://www.apha.org).*

# Exhibit Q

June 20, 2018

### **Statement on Harmful Consequences of Separating Families at the U.S. Border**

We urge the U.S. Department of Homeland Security to immediately stop separating migrant children from their families, based on the body of scientific evidence that underscores the potential for lifelong, harmful consequences for these children and based on human rights considerations.

Reports from the National Academies of Sciences, Engineering, and Medicine contain an extensive body of evidence on the factors that affect the welfare of children – evidence that points to the danger of current immigration enforcement actions that separate children from their parents. Research indicates that these family separations jeopardize the short- and long-term health and well-being of the children involved. In addition, the Committee on Human Rights (<http://www7.nationalacademies.org/humanrights/>) of the National Academies, which has a long history of addressing issues at the intersection of human rights, science, and health, stresses that the practice of separating parents from their children at the border is inconsistent with U.S. obligations under the International Covenant on Civil and Political Rights.

Parents' impact on their children's well-being may never be greater than during the earliest years of life, when a child's brain is developing rapidly and when nearly all of her or his experiences are shaped by parents and the family environment (NASEM, 2016, p. 1 (<https://www.nap.edu/read/21868/chapter/2>)). Young children who are separated from their primary caregivers may potentially suffer mental health disorders and other adverse outcomes over the course of their lives (NASEM, 2016, p. 21-22 (<https://www.nap.edu/read/21868/chapter/3#21>)). Child development involves complex interactions among genetic, biological, psychological, and social processes (NRC and IOM, 2009, p. 74 (<https://www.nap.edu/read/12480/chapter/7#74>)), and a disruption in any of these – such as family disruption – hinders healthy development and increases the risk for future disorders (NRC and IOM, 2009, p.102-104 (<https://www.nap.edu/read/12480/chapter/7#102>)). Young children are capable of deep and lasting sadness, grief, and disorganization in response to trauma and loss (NRC and IOM, 2000, p. 387 (<https://www.nap.edu/read/9824/chapter/20#387>)). Indeed, most mental, emotional, and behavioral disorders have their roots in childhood and adolescence (NRC and IOM, 2009, p. 1 (<https://www.nap.edu/read/12480/chapter/2>)), and childhood trauma has emerged as a strong risk factor for later suicidal behavior (IOM, 2002, p. 3 (<https://www.nap.edu/read/10398/chapter/2#3>)).

Decades of research have demonstrated that the parent-child relationship and the family environment are at the

foundation of children's well-being and healthy development. We call upon the Department of Homeland Security to stop family separations immediately based on this evidence.

**Marcia McNutt**

President, National Academy of Sciences

**C. D. Mote, Jr.**

President, National Academy of Engineering

**Victor J. Dzau**

President, National Academy of Medicine

- *Parenting Matters: Supporting Parents of Children Ages 0-8* (<https://www.nap.edu/catalog/21868/parenting-matters-supporting-parents-of-children-ages-0-8>) (2016)
- *Preventing Mental, Emotional, and Behavioral Disorders Among Young People: Progress and Possibilities* (<https://www.nap.edu/catalog/12480/preventing-mental-emotional-and-behavioral-disorders-among-young-people-progress>) (2009)
- *Psychosocial Concepts in Humanitarian Work with Children: A Review of the Concepts and Related Literature* (<https://www.nap.edu/catalog/10698/psychosocial-concepts-in-humanitarian-work-with-children-a-review-of>) (2003)
- *Reducing Suicide: A National Imperative* (<https://www.nap.edu/catalog/10398/reducing-suicide-a-national-imperative>) (2002)
- *Early Childhood Development and Learning: New Knowledge for Policy* (<https://www.nap.edu/catalog/10067/early-childhood-development-and-learning-new-knowledge-for-policy>) (2001)
- *From Neurons to Neighborhoods: The Science of Early Childhood Development* (<https://www.nap.edu/catalog/9824/from-neurons-to-neighborhoods-the-science-of-early-childhood-development>) (2000)

**Contact:**

Jennifer Walsh, Director of Media Relations  
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# Exhibit R

The Washington Post

National Security

A family was separated at the border, and this distraught father took his own life

by Nick Miroff June 9  Email the author

A Honduran father separated from his wife and child suffered a breakdown at a Texas jail and killed himself in a padded cell last month, according to Border Patrol agents and an incident report filed by sheriff's deputies. The death of Marco Antonio Muñoz, 39, has not been publicly disclosed by the Department of Homeland Security, and it did not appear in any local news accounts. But according to a copy of a sheriff's department report obtained by The Washington Post, Muñoz was found on the floor of his cell May 13 in a pool of blood with an item of clothing twisted around his neck.

Starr County sheriff's deputies recorded the incident as a "suicide in custody."

Muñoz's death occurred not long after the Trump administration began implementing its "zero-tolerance" crackdown on illegal migration, measures that include separating parents from their children and the threat of criminal prosecution for anyone who enters the United States unlawfully.

*[Trump's 'zero tolerance' at the border is causing child shelters to fill up fast]*

Much of the controversy generated by the approach has centered on its potentially traumatic impact for migrant children, but the government has said little about how it handles parents who become mentally unstable or violent after authorities split up their families.

Officials at U.S. Customs and Border Protection in Washington, which oversees border enforcement, had no immediate comment on Muñoz's death nor the whereabouts of his wife and child. Starr County authorities refused to provide a copy of Muñoz's autopsy report and did not respond to several phone messages requesting more information about the cause of death.

An official at the Embassy of Honduras in Washington, Assunta Garcia, said the nation's ambassador was the only person authorized to comment on Muñoz's death. But Garcia said he was too busy attending to a visit from President Juan Orlando Hernández.

According to Border Patrol agents with detailed knowledge of what occurred, Muñoz crossed the Rio Grande with his wife and 3-year-old son on May 12 near the tiny town of Granjeno, Tex. The area is a popular crossing point for Central American families and teenagers who turn themselves in to apply for asylum in the United States.

Soon after Muñoz and his family were taken into custody, they arrived at a processing station in nearby McAllen and said they wanted to apply for asylum. Border Patrol agents told the family they would be separated. That's when Muñoz "lost it," according to one agent, speaking on the condition of anonymity to discuss the incident.

"The guy lost his s—," the agent said. "They had to use physical force to take the child out of his hands."

Muñoz was placed in a chain-link detention cell, but he began punching the metal and shaking it violently, agents said.

*[Illegal border crossings remained high in May despite Trump's crackdown]*

Though Muñoz did not attempt to assault Border Patrol staff, he was at that point considered to be "pre-assault" because he was so agitated. As one agent described it, Muñoz "had the look of a guy at a bar who wanted to fight someone."

"We had to get him out," the agent said. "Those cells are about as secure as a dog kennel. He could have hurt someone."

Unruly detainees typically are taken to local jails, where they can be placed in more secure settings or isolation cells, known as administrative segregation. Border Patrol agents found a vacant cell for Muñoz 40 miles away at

the Starr County Jail in Rio Grande City. When they attempted to place Muñoz in the van, he tried to run away and had to be captured and restrained.

"He yelled and kicked at the windows on the ride to the jail," an agent said. Shackled and handcuffed, Muñoz attempted to escape again upon arrival and once more had to be restrained.

According to the sheriff's department report, Muñoz was booked into the jail at 9:40 p.m. He remained combative and was placed in a padded isolation cell, it says.


Guards said they checked on Muñoz every 30 minutes and observed him praying in a corner of his cell the following morning.

A guard who walked by the cell at 9:50 a.m. said he noticed Muñoz lying in the center of the floor, unresponsive and without a pulse. The guard "noticed a small pool of blood by his nose" and "a piece of clothing twisted around his neck which was tied to the drainage location in the center of the cell," according to the incident report filed by the sheriff's department that morning.

Paramedics found Muñoz dead, his electrocardiogram showing a "flat line," according to the report. The sheriff's department said it attempted to contact Honduran authorities who could reclaim Muñoz's body, but they received no answer at a consulate. Muñoz's wife and son were later released from Border Patrol custody, according to one agent.

Another agent familiar with what happened said he couldn't understand why Muñoz "would choose to separate himself from his family forever" by taking his own life. Homeland Security officials say they are doing more to explain the separation process to parents and have set up a special hotline to help them locate their children after several reports of migrants being sent back to Central America while their children remain in U.S. foster care thousands of miles away.

## 2274 Comments

Nick Miroff covers immigration enforcement, drug trafficking and the Department of Homeland Security on The Washington Post's National Security desk. He was a Post foreign correspondent in Latin America from 2010 to 2017, and has been a staff writer since 2006.  Follow @NickMiroff

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# Exhibit S

The Washington Post

The Americas

U.S. officials separated him from his child. Then he was deported to El Salvador.

by Joshua Partlow June 23 at 11:25 PM ✉Email the author

CORRAL DE MULAS, El Salvador — Arnovis Guidos Portillo remembers the authorities in green uniforms telling him that this would only be temporary.

They told him that his 6-year-old daughter, Meybelin, should really go with them, he recalled. The holding cell was cold, he said he was told, and the child was not sleeping well. Don't worry, he was assured, she would take the first bus, and he would follow soon.

"What's best is we take her to another place," he recalled a U.S. official telling him.

It's a conversation this 26-year-old farmer from El Salvador has replayed for nearly a month. His daughter was taken from him on his second day in U.S. immigration custody in Texas, he and his lawyers said, and she remains somewhere in the United States.

Guidos was deported Thursday back to this small Central American nation, where he lives in a one-room, dirt-floor shack with no electricity and two goats in the yard.

He and his daughter are one of more than 2,000 migrant families who have firsthand experience with President Trump's "zero tolerance" immigration policy. The decision to prosecute all those caught crossing illegally into the United States meant that parents and children were sent to separate detention centers and shelters. Although Trump ended family separations in an executive order last week, many parents are still trapped in a bureaucratic nightmare, far from their children and unsure how they will be reunited.

*[The chaotic effort to reunite immigrant parents with their separated kids]*

"I would advise anyone who wants to travel to the United States with their children not to do it," he said. "I would never want them to have to walk in my shoes."

And yet, Guidos is ready to travel again, if he cannot find Meybelin soon, even if he must retrace his recent 1,500-mile journey: crossing Mexico crammed in the back of a refrigerated cargo truck after weeks in U.S. detention with frigid rooms and scalding showers and mocking guards.

Details of Guidos's case were confirmed by court documents and his lawyers.

A U.S. Customs and Border Protection spokesman said in a statement that the agency takes all allegations of mistreatment seriously and that its men and women "perform their duties professionally and treat everyone equally with dignity and respect."

"Children represent the most vulnerable population and as such every CBP employee carries the fundamental ethical and moral belief as well as a legal obligation to put the welfare of any child first," the statement said.

A spokeswoman for ICE, Sarah Rodriguez, said that Guidos, on June 19, "submitted a written request that he be removed to El Salvador without his child."

Parents in ICE custody "have the opportunity to wait in detention for a coordinated removal with a child or may waive their right to such coordination," she said.

Guidos arrived home Friday evening in the coastal province of Usulután, far out on a remote peninsula jutting into the Pacific Ocean. He works on a corn farm, earning \$7 a day, and helps a local organization hatch baby sea turtles from eggs laid on the beach.

He built his house from scrap wood his brother gave him. It has two mattresses — one for him, one for Meybelin — a hammock, a pink dresser for her clothes. A few minutes after arriving home, he had taken her best white dress out

of its plastic bag, a reminder of her, when his cellphone rang and Meybelin's tiny voice, from wherever she was, entered the room.

Guidos was holding back tears from the first moments. He asked her how she was, whether she had eaten. Was she playing or studying or going to church? Despite endless requests over the past month, no one had told him her location or when she might be freed, and she was too young to know.

Had the people there bathed her, he asked? Combed her hair? Given her toys?

"Papa," she said. "When are you going to take me out of here?"

And that's when he really began to cry.

### **Years of troubles**

Guidos's problems began two years ago on a soccer field cut out of the jungle behind his house, he said. He got into a fight with a player whose brother was a top member of the Barrio 18 gang in Puerto El Triunfo, the town across the bay.

In recent years, gangs seized control of the one paved road running down this rural peninsula. Teenagers manned checkpoints with rifles slung over their shoulders and extorted passersby. It could cost \$100 in \$5 and \$10 payments just to get off the peninsula, he said.

Two years ago, El Salvador had one of the highest murder rates in the world. Gang violence has displaced hundreds of thousands of Salvadorans, many of whom seek refuge in the United States. But Attorney General Jeff Sessions said in a ruling earlier this month that immigration judges generally cannot consider gang violence as grounds for asylum.

After the fight on the soccer field, Guidos went into hiding. Gang members lived within sight of his shack, and they hauled away a brother-in-law at one point and put a pistol in his mouth, he said.

Twice Guidos fled north, hoping for asylum, but was deported once from Mexico and once from Louisiana. By then, he had separated from Meybelin's mother. He decided to take his daughter out of kindergarten and make one more try. His brother lived in Kansas, and he hoped to make it there.

"It's hard to hide here," he said of Corral de Mulas. "Everyone knows you."

On May 26, after nearly a week of travel, Guidos and Meybelin boarded a raft, floated the Rio Grande, and walked into the scrub near Hidalgo, Tex., to turn themselves in to the Border Patrol and ask for asylum.

He did not know exactly where they were taken, but normally migrants are processed at CBP facilities before going to court and moving on to a longer-term detention center. On their first day in detention, they were given Mylar blankets and ham sandwiches every six hours, he said.

Now, he considers this his best day in detention because Meybelin was still with him.

Once she was taken away, yelling and crying, he could get no answers about where she had gone. On May 29, three days after arriving, he pleaded guilty to crossing the border illegally and was sentenced to time served, according to federal court documents.

Afterward, he begged for information about his daughter. He recalled one U.S. official telling him: "They may have taken her to Florida or New York."

"That's when I really felt hell come down on me," he said.

Guidos was transferred to an ICE detention center outside of Laredo, Tex., after his court appearance, according to paperwork he was given. Authorities there would regularly ask migrants if they wanted to sign papers approving their own deportation, he said. For two weeks, he declined, insisting he would not leave the United States without Meybelin. Eventually, he said, he was told that nothing would change. He lost all hope and signed the document for his removal.



"He told me, 'You're never going to get information about your daughter here,' " Guidos recalled one official saying. "It's better to go back to your country."

### **A sorrowful arrival**

Guidos was in tears when he walked out of the deportee processing center in San Salvador on Thursday afternoon, carrying his belongings in a plastic bag.

"Imagine, all of her life she's been with me and now she's not," he said of his daughter. "And I don't even know where she is."

He got into the bed of a pickup truck with his other relatives for the three-hour drive to his village.

The day he arrived in El Salvador, he received his first call from Meybelin since their separation. It's unclear whether she knew her relatives' phone numbers or was given them by shelter staff.

When Meybelin called again the next evening, she used a phone number that is associated with a shelter in Phoenix, run by Southwest Key Programs, a Texas-based nonprofit organization that has received \$1.1 billion in federal contracts to house migrant children since 2014.

A Southwest Key Programs spokeswoman said she could not confirm if Meybelin was at the Phoenix shelter and referred queries to the Office of Refugee Resettlement, part of the Department of Health and Human Services. An HHS spokesman said it would take days to confirm her location and, even then, the department might not be able to speak about her case because of privacy concerns.

Immigration lawyers working with detained families say that family reunification is an expensive process that can take years due to the difficulty of obtaining information across various government agencies.

"There is no clear path made by the administration to reunite the 2,300 children already taken from their parents," said Jennifer Falcon, communications director at RAICES, an organization that is representing Meybelin through her family. "And every day, it gets more difficult as they continue mass deportation of their parents."

Falcon spoke before a late Saturday announcement by the Trump administration about a plan to reunify the migrant families.

Meybelin has been able to periodically call relatives in the United States and El Salvador, but the family has had trouble getting answers from shelter staff.

"They won't let her pass the phone to anyone," said her grandmother, Sonia de Jesus Portillo. "I've run out of tissues, I've been crying so much. We're desperate."

When Meybelin called on Friday evening, Guidos tried to stay calm.

"How are you, mi amor?" he asked.

"Good."

"What are you doing?"

"I don't know."

She told him she wanted her clothes and didn't like the food. She said she had tried to call her mother twice but no one answered.

"Mi amor, don't worry. We're going to get you, do you hear?"

He promised to take her to the park when she was home.

"Meybelin," he said as the tears ran down his face. "I love you, mi amor."

"Me too, papa."

When the call ended, he sat down on his mattress, three countries away from this 6-year-old girl, and cried into his hands.


*Anna-Catherine Brigida in San Salvador, Kevin Sieff in Brownsville, Tex., and Michael Miller in Nogales, Ariz., contributed to this report.*

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The story behind the girl in the recording who begs for her aunt after being separated from her migrant mother  
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Joshua Partlow is The Washington Post's bureau chief in Mexico. He has served previously as the bureau chief in Kabul and as a correspondent in Brazil and Iraq.  Follow @partlowj

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# Exhibit T

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

BEFORE HONORABLE DANA M. SABRAW, JUDGE PRESIDING

MS. L. AND MS. C.,

PETITIONERS-PLAINTIFFS,

VS.

U.S. IMMIGRATION AND CUSTOMS  
ENFORCEMENT ("ICE"); U.S. DEPARTMENT  
OF HOMELAND SECURITY ("DHS"); U.S.  
CUSTOMS AND BORDER PROTECTION ("CBP");  
U.S. CITIZENSHIP AND IMMIGRATION  
SERVICES ("USCIS"); U.S. DEPARTMENT  
OF HEALTH AND HUMAN SERVICES ("HHS");  
OFFICE OF REFUGEE RESETTLEMENT ("ORR");  
THOMAS HOMAN, ACTING DIRECTOR OF ICE;  
GREG ARCHAMBEAULT, SAN DIEGO FIELD  
OFFICE DIRECTOR, ICE; ADRIAN P. MACIAS,  
EL PASO FIELD DIRECTOR, ICE; FRANCES M.  
JACKSON, EL PASO ASSISTANT FIELD  
OFFICE DIRECTOR, ICE; KIRSTJEN NIELSEN,  
SECRETARY OF DHS; JEFFERSON BEAUREGARD  
SESSIONS III, ATTORNEY GENERAL OF THE  
UNITED STATES; L. FRANCIS CISSNA,  
DIRECTOR OF USCIS; KEVIN K.  
MCALEENAN, ACTING COMMISSIONER OF  
CBP; PETE FLORES, SAN DIEGO FIELD  
DIRECTOR, CBP; HECTOR A. MANCHA JR.,  
EL PASO FIELD DIRECTOR, CBP;  
ALEX AZAR, SECRETARY OF THE  
DEPARTMENT OF HEALTH AND HUMAN  
SERVICES; SCOTT LLOYD, DIRECTOR  
OF THE OFFICE OF REFUGEE RESETTLEMENT,

RESPONDENTS-DEFENDANTS.

REPORTER'S TRANSCRIPT OF PROCEEDINGS  
TELEPHONIC STATUS CONFERENCE

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SAN DIEGO, CALIFORNIA 92101

SAN DIEGO, CALIFORNIA - FRIDAY, JUNE 22, 2018 - 12:10 P.M.

\* \* \*

**THE CLERK:** NO. 12 ON CALENDAR, CASE NO. 18CV0428, MS. L. VERSUS U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT; ON FOR A STATUS CONFERENCE.

**THE COURT:** GOOD AFTERNOON. THIS IS JUDGE SABRAW. IF COUNSEL CAN HEAR ME, CAN YOU ENTER YOUR APPEARANCES, PLEASE.

**MR. GELERNT:** YES, YOUR HONOR. THIS IS LEE GELERNT FROM THE ACLU FOR PLAINTIFFS.

**MR. VAKILI:** GOOD AFTERNOON, YOUR HONOR. THIS IS BARDIS VAKILI FROM THE ACLU SAN DIEGO FOR PLAINTIFFS.

**MS. FABIAN:** GOOD AFTERNOON, YOUR HONOR. SARAH FABIAN WITH THE DEPARTMENT OF JUSTICE FOR DEFENDANTS.

**MR. BETTWY:** GOOD AFTERNOON, YOUR HONOR. SAM BETTWY WITH THE U.S. ATTORNEY'S OFFICE FOR DEFENDANTS.

**THE COURT:** OKAY. IS THAT ALL COUNSEL?

**MR. GELERNT:** YOUR HONOR, WE HAVE SOME COUNSEL HERE BUT THEY ARE NOT GOING TO BE SPEAKING. I DON'T KNOW WHETHER YOU WOULD LIKE US TO ANNOUNCE ALL OF THEM.

**THE COURT:** NO, THAT'S OKAY.

**MR. GELERNT:** OKAY.

**THE COURT:** I JUST WANTED A RECORD FOR TODAY'S APPEARANCES.

AND I KNOW WE HAVE A NUMBER OF MEDIA ONLINE, AND I

JUNE 22, 2018

1 THE BEGINNING, THE TEN DOCTORS' AFFIDAVITS. THEY SHOW THE  
2 HARM ACUTELY AND THEY PREDICTED WHAT WAS GOING TO HAPPEN, AND  
3 SO WHAT HAS HAPPENED AFTER IS JUST CONSISTENT WITH WHAT THEY  
4 TOLD YOU.

5 **THE COURT:** WITH REGARD TO ONE OF THE FORMS OF  
6 RELIEF YOU ARE REQUESTING, AND THAT IS INJUNCTIVE RELIEF TO  
7 REUNIFY THE CHILDREN WHO HAVE ALREADY BEEN SEPARATED SO THAT  
8 THE FAMILIES CAN BE DETAINED TOGETHER; IF THAT RELIEF WERE  
9 GRANTED, WOULDN'T THAT BE GOOD FOR ONLY A 20-DAY PERIOD IN  
10 LIGHT OF THE FLORES SETTLEMENT, ABSENT JUDGE GEE MODIFYING.

11 **MR. GELERNT:** RIGHT. YOUR HONOR, I AM GLAD YOU  
12 ASKED ABOUT THAT, BECAUSE I DO THINK THE GOVERNMENT HAS BEEN  
13 PUSHING THAT NARRATIVE AND I THINK THERE IS SOME CONFUSION IN  
14 THE MEDIA. SO I WANT TO BE AS ABSOLUTELY CLEAR AS POSSIBLE  
15 ABOUT THE FLORES SETTLEMENT.

16 AND I THINK, YOU KNOW, AS A LEGAL MATTER I AM NOT  
17 SURE THAT THE GOVERNMENT FULLY BELIEVES IT, AND I THINK THAT  
18 IS WHY THEY RELEGATED THE FLORES DISCUSSION IN THEIR PAPERS  
19 BEFORE YOU TO ONE SENTENCE IN A FOOTNOTE.

20 BUT HERE IS, I THINK, THE SITUATION WITH FLORES.

21 FIRST OF ALL, AT A MINIMUM THEY SHOULD BE DETAINING  
22 THE CHILDREN FOR THE 20 DAYS. SO EVEN UNDER THE GOVERNMENT'S  
23 UNDERSTANDING OF FLORES THE FAMILIES NEED TO BE REUNITED, AND  
24 THEN PEOPLE CAN SEE WHAT HAPPENS AT 20 DAYS. BUT I DON'T EVEN  
25 THINK THE 20 DAYS WILL ULTIMATELY BE RELEVANT FOR THE

JUNE 22, 2018

1 FOLLOWING REASONS.

2 MOST FAMILIES ARE RELEASED BEFORE 20 DAYS BECAUSE  
3 THEY ARE NOT A FLIGHT RISK OR A DANGER. AS YOUR HONOR  
4 PROPERLY NOTED IN HIS OPINION, THESE ARE ASYLUM SEEKERS, THEY  
5 ARE CREDIBLE FEAR, SO MOST ARE GOING TO BE RELEASED.

6 THE OTHER CRITICAL POINT THAT I THINK HAS GOTTEN  
7 LOST IN THE MEDIA ACCOUNTS AND GOVERNMENT'S NARRATIVE IS  
8 FLORES IS ULTIMATELY, AT THE END OF THE DAY, A SETTLEMENT FOR  
9 THE BEST INTEREST OF THE CHILD. IF A MOTHER IS GOING TO HAVE  
10 HER BOND HEARING AT THE 34TH DAY SHE CAN SAY, I DON'T WANT MY  
11 TWO-YEAR-OLD CHILD SENT TO SOME FACILITY IN CHICAGO, I WOULD  
12 RATHER HAVE MY CHILD STAY WITH ME IN THIS FACILITY.

13 THE FACT THAT THE FACILITY IN CHICAGO MAY HAVE  
14 BETTER CRAYONS AND TOYS DOES NOT MEAN SHE HAS TO ALLOW HER  
15 CHILD, UNDER FLORES, TO BE FORCED -- TO BE SENT TO CHICAGO,  
16 SHE CAN KEEP HER CHILD WITH HER. I THINK THAT IS SORT OF  
17 BASIC SETTLEMENT LAW. AND THAT THE PARENT CAN ALWAYS SAY,  
18 LOOK, THE BEST INTEREST OF MY CHILD IS TO REMAIN WITH ME.

19 FLORES WAS SET UP FOR SITUATIONS WHERE KIDS ARE  
20 UNACCOMPANIED OR THE PARENT SAYS, LOOK, THE CHILD IS 15 YEARS  
21 OLD AND HE KNOWS HIS UNCLE VERY WELL IN ST. LOUIS, I AM FINE  
22 WITH HIM GOING IN 19 DAYS.

23 BUT NOTHING ABOUT FLORES REQUIRED THE RELEASE OF A  
24 CHILD AT 19 DAYS OVER A PARENT'S OBJECTION, SO THAT AGAIN  
25 BABIES WILL BE RIPPED OUT OF THEIR PARENT'S ARMS AT THE 19TH

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1 DAY IN THE DETENTION CENTER.

2 **THE COURT:** BUT HOW DOES FLORES PROVIDE PARENTS WITH  
3 ANY RIGHTS. AS I UNDERSTAND IT, IT IS A DOCUMENT CREATED FOR  
4 THE MINOR ONLY.

5 **MR. GELERT:** YOUR HONOR, I THINK THAT IS A GOOD  
6 QUESTION. WHAT I UNDERSTAND FLORES TO DO, I MEAN WHAT, YOU  
7 KNOW -- AND THE NINTH CIRCUIT HAS SAID THIS, HAS SAID IT  
8 DOESN'T PROVIDE THE PARENT WITH ANY RELEASE RIGHTS. BUT IT  
9 CERTAINLY DOESN'T TAKE AWAY THE PARENT'S RIGHT TO MAKE  
10 DECISIONS FOR THE CHILD, YOU KNOW, ESPECIALLY FOR YOUNG  
11 CHILDREN.

12 SO THERE IS NO QUESTION THE PARENT CAN SAY, YEAH,  
13 MAYBE I CAN'T CITE FLORES TO GET OUT MYSELF, BUT I CERTAINLY  
14 CAN SAY, I HAVE -- I MAKE THE DECISIONS FOR MY CHILD AND KNOW  
15 WHAT IS IN THE BEST INTEREST OF MY CHILD, AND CAN WAIVE THE  
16 FLORES RIGHT TO RELEASE AT THE 19TH DAY.

17 SO YOUR HONOR IS ABSOLUTELY RIGHT, IT DOESN'T  
18 PROVIDE RELEASE FOR THE PARENTS, BUT IT DOESN'T REMOTELY  
19 SUGGEST A PARENT IS STILL NOT MAKING DECISIONS FOR THE CHILD'S  
20 BEST INTEREST SO THAT THE CHILD DOESN'T HAVE TO BE TORN AWAY.

21 AND AGAIN I WOULD CIRCLE BACK, YOUR HONOR, TO WHAT I  
22 SAID IN THE BEGINNING, IS THAT WE ARE NOT EVEN AT THAT  
23 SITUATION. I MEAN, THE GOVERNMENT IS NOT SAYING, WE ARE  
24 SENDING KIDS TO BE REUNITED FOR 19 DAYS AND THEN THERE IS THE  
25 PROBLEM.

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1 I THINK THIS WHOLE -- THIS WHOLE IDEA OF FLORES IS  
2 REALLY TO GET RID OF FLORES' OTHER PROTECTIONS FOR KIDS, THAT  
3 FACILITIES HAVE TO BE LICENSED AND ALL OF THAT, AND THEY ARE  
4 USING THE 19-DAY THING AS SORT OF A TRANSPARENT LOOPHOLE.

5 SO AGAIN, BECAUSE THE PARENT CAN WAIVE THE 19-DAY  
6 RELEASE, ESPECIALLY WHEN IT IS A YOUNG CHILD, BECAUSE THE  
7 GOVERNMENT DOES AND CAN RELEASE PARENTS WHO ARE NOT A FLIGHT  
8 RISK OR A DANGER, ESPECIALLY THE PARENTS WHO HAVE PASSED THE  
9 INITIAL ASYLUM SCREENING, I DON'T THINK FLORES IS AN  
10 IMPEDIMENT.

11 **THE COURT:** WITH REGARD TO THE RELIEF THAT YOU ARE  
12 REQUESTING AND THE CLASS CERTIFICATION, IF WE CAN MOVE TO THAT  
13 FOR A MOMENT.

14 DO YOU CONCEDE THAT THE GOVERNMENT CAN PROPERLY  
15 SEPARATE A PARENT FROM A CHILD IF THERE ARE OTHER LEGITIMATE  
16 CONSIDERATIONS BEYOND DANGER TO THE CHILD. THOSE COULD  
17 INCLUDE, FOR EXAMPLE, CRIMINAL HISTORY, CONTAGIOUS OR  
18 COMMUNICABLE DISEASES, THINGS LIKE THAT. DO YOU CONCEDE THAT?

19 **MR. GELERT:** WELL, YOUR HONOR, I THINK WHAT THAT  
20 WOULD DO IS -- I THINK THOSE THINGS, YOU WOULD PUT THEM UNDER  
21 THE BEST INTEREST OF THE CHILD OR IF THERE IS A DANGER TO THE  
22 CHILD. SO IF THE PARENT, YOU KNOW, IN THE RARE CASE, HAD A  
23 CONTAGIOUS DISEASE THAT WAS GOING TO BE HARMFUL TO THE CHILD  
24 AND THERE WAS, YOU KNOW, CLEAR EVIDENCE OF THAT, THEN I THINK  
25 OF COURSE, YOUR HONOR.

JUNE 22, 2018

1           WHAT WE WOULD SAY IS, THE PARENT AND CHILD HAVE TO  
2 BE REUNITED, AND THEN ULTIMATELY THE PARENT WILL HAVE TO PASS  
3 THEIR PAROLE OR BOND HEARING. AND CRIMINAL CONVICTIONS ARE  
4 TAKEN INTO ACCOUNT, AND OTHER INDICIA OF FLIGHT RISK ARE TAKEN  
5 INTO ACCOUNT, AND THOSE WILL BE INDIVIDUALIZED. WE ARE SIMPLY  
6 SAYING THAT MOST PARENTS WILL GET OUT.

7           BUT I DON'T THINK YOUR INJUNCTION HAS TO GO ANYWHERE  
8 NEAR DECIDING WHETHER THE GOVERNMENT HAS TO RELEASE A  
9 PARTICULAR PARENT. I THINK THERE ARE GUIDELINES IN PLACE, AND  
10 THOSE GUIDELINES WILL GOVERN WHETHER ANY PARTICULAR PARENT  
11 GETS OUT. WE ARE SIMPLY SAYING THAT MOST PARENTS, ESPECIALLY  
12 ASYLUM SEEKERS, WILL GET OUT BECAUSE THEY ARE AT LEAST SHOWN  
13 NOT TO BE A FLIGHT RISK OR A DANGER. BUT I DON'T THINK YOU  
14 NEED TO GO SAY ANYTHING ONE WAY OR THE OTHER ABOUT EXACTLY  
15 WHAT TYPE OF CRIMINAL CONVICTION MAY LEAD THE GOVERNMENT TO  
16 DENY PAROLE OR NOT.

17           **THE COURT:** WHAT ABOUT CLASS DEFINITION PURPOSES.  
18 DO YOU ARGUE THAT IT SHOULD REMAIN AS DEFINED WHICH COULD  
19 INCLUDE PARENTS WITH SOME CRIMINAL HISTORY OR COMMUNICABLE  
20 DISEASES. IT COULD INCLUDE NON ASYLUM SEEKERS WITHIN THE  
21 INTERIOR OF THE COUNTRY. DO YOU STAND ON THE PRESENT  
22 DEFINITION?

23           **MR. GELERT:** YOUR HONOR, IF I COULD TAKE THOSE ONE  
24 AT A TIME. I THINK I AM JUST STARTING FROM THE LAST ONE,  
25 ABOUT ASYLUM SEEKERS.

JUNE 22, 2018

1           YOU ARE RIGHT, WE DID NOT DEFINE THE CLASS AS ONLY  
2 ASYLUM SEEKERS. WE THINK THAT MOST OF THESE INDIVIDUALS ARE  
3 ASYLUM SEEKERS. WE WOULD ASK YOUR HONOR NOT TO LIMIT IT TO  
4 ASYLUM SEEKERS ONLY.

5           WE UNDERSTAND THAT YOU FEEL THAT THE ASYLUM SEEKERS  
6 ARE A PARTICULARLY POWERFUL CASE. WE DO THINK, HOWEVER, THERE  
7 MAY BE PARENTS WITH OTHER TYPES OF CLAIMS. AND, YOU KNOW,  
8 MAYBE THEY ARE GOING TO LOSE, MAYBE THEY ARE GOING TO WIN, BUT  
9 ULTIMATELY TAKING A CHILD AWAY IS ITS OWN DISTINCT HARM.

10           IN TERMS OF THE INJUNCTION NOT ALLOWING YOU -- NOT  
11 ALLOWING THE GOVERNMENT TO SEPARATE WHERE THERE IS A DANGER TO  
12 THE CHILD, I THINK THAT THAT IS SOMETHING, YOU ARE RIGHT,  
13 YOUR HONOR, MAYBE WE DIDN'T DO AS CAREFUL ENOUGH JOB IN  
14 SETTING FORTH THE CLASS DEFINITION. BUT I THINK IF YOUR HONOR  
15 WANTS TO MAKE CLEAR THAT THE PARENT IS A DANGER TO THE CHILD  
16 WHERE THEY MAY BE ABUSIVE OR NEGLECTFUL OR HAVE A CONTAGIOUS  
17 DISEASE OR SOMETHING ALONG THOSE LINES THAT WOULD CONSTITUTE A  
18 PERMISSIBLE BASIS FOR SEPARATION UNDER STANDARD CHILD  
19 PRACTICES EXERCISED BY THE STATES OR THE FEDERAL GOVERNMENT IN  
20 OTHER CONTEXTS, I THINK THAT WOULD BE ABSOLUTELY FINE, YOUR  
21 HONOR.

22           **THE COURT:** ALL RIGHT. AND THEN ON THE CLASS  
23 DEFINITION WITH RESPECT TO CRIMINAL HISTORY, I UNDERSTAND YOU  
24 TO BE ARGUING THAT TO THE EXTENT ANY CLASS DEFINITION INCLUDES  
25 PARENTS WHO HAVE SOME CRIMINAL HISTORY, HOWEVER MINOR, THEY

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1           **THE COURT:** ALL RIGHT.

2           **MR. VAKILI:** MR. VAKILI IS ON, YOUR HONOR. THANK  
3 YOU.

4           **MS. FABIAN:** THIS IS SARAH FABIAN, I AM ON.

5           **THE COURT:** ALL RIGHT. IS MR. BETTWY WITH US?

6           OKAY. THEN WE WILL PROCEED WITH JUST MS. FABIAN.

7           I BELIEVE WE HAVE MOST, IF NOT ALL, OF THE MEDIA  
8 BACK ON, SO I AM GRATEFUL THAT WE WERE ABLE TO GET THE  
9 CONFERENCE CALL BACK IN ORDER.

10           WHERE WE LEFT OFF, MS. FABIAN WAS ADDRESSING SOME  
11 ISSUES. NOW, BEFORE I ASK THE NEXT QUESTION, MS. FABIAN, DID  
12 YOU WANT TO COMPLETE ANYTHING YOU WERE SAYING BEFORE WE WERE  
13 INTERRUPTED?

14           **MS. FABIAN:** NOT THAT I RECALL, YOUR HONOR. I  
15 APOLOGIZE.

16           **THE COURT:** ALL RIGHT.

17           WITH RESPECT TO THE EXECUTIVE ORDER, IT PUTS AN END  
18 TO FAMILY SEPARATION. IT ALSO CONTEMPLATES THAT CRIMINAL  
19 PROSECUTION WILL CONTINUE. AND THAT IF FAMILIES ARE  
20 APPREHENDED AT THE BORDER THAT I AM ASSUMING THE GOVERNMENT IS  
21 SUGGESTING, THROUGH THE EXECUTIVE ORDER, THAT THE FAMILIES  
22 WILL BE DETAINED TOGETHER IN SOME FASHION. IF SO, HOW IS THAT  
23 GOING TO WORK, BECAUSE ONE OF THE CENTRAL ISSUES IN THIS CASE  
24 AND ONE OF THE CENTRAL CONCESSIONS IN THIS CASE AS TO  
25 PLAINTIFF MS. C. WAS THAT SHE WAS NOT CONTESTING HER INITIAL

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1 SEPARATION, CONCEDED THAT UNDER EXISTING LAW IF THE  
2 GOVERNMENT ELECTED TO PROSECUTE FOR CRIMINAL ILLEGAL ENTRY IT  
3 WOULD NECESSARILY EFFECTUATE A SEPARATION BETWEEN PARENT AND  
4 CHILD FOR THE PERIOD OF TIME THAT MS. C. WAS IN CRIMINAL  
5 CUSTODY. AND THEN, OF COURSE, THE ARGUMENT WAS ONCE SHE  
6 COMPLETED HER CRIMINAL SENTENCE AND WAS RETURNED TO  
7 IMMIGRATION DETENTION SHE WAS ENTITLED TO REUNIFICATION.

8 SO I GUESS THE INITIAL QUESTION IS, IS THIS ZERO  
9 TOLERANCE POLICY CONTINUING; AND, IF SO, HOW DOES THE  
10 GOVERNMENT NOT SEPARATE PARENT AND CHILD UNDER THE CURRENT  
11 STATUTORY MECHANISM WHICH PROVIDES, OF COURSE, THAT CHILDREN  
12 CANNOT BE DETAINED IN CUSTODY WITH THEIR PARENTS WHILE THEY  
13 ARE UNDERGOING CRIMINAL PROCEEDINGS.

14 **MS. FABIAN:** I AM NOT SURE I CAN ANSWER ALL OF THOSE  
15 QUESTIONS TODAY, YOUR HONOR. I THINK THAT IS -- SOME OF THE  
16 IMPLEMENTATION QUESTIONS ARE STILL UNDERWAY. AND THAT I JUST  
17 DON'T HAVE THE INFORMATION TO ANSWER ALL OF THOSE QUESTIONS  
18 TODAY.

19 WHAT I WOULD SAY IS THAT TO THE EXTENT THE POLICY  
20 THAT WE ARE TALKING ABOUT WAS IMPLEMENTED SINCE THIS CASE WAS  
21 BRIEFED AND ARGUED THAT THAT IS -- IF THAT IS SOMETHING THAT  
22 THE COURT WANTS PUT BEFORE THE COURT FOR CONSIDERATION, I  
23 THINK THAT THAT NEEDS TO BE BROUGHT INTO THE CASE THROUGH  
24 BRIEFING BY THE PLAINTIFFS AND RESPONSIVE BRIEFING BY THE  
25 DEFENDANT.

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1 BUT I TAKE THE COURT'S POINT THAT AT THE TIME WHEN  
2 WE WERE TALKING ABOUT MS. C.'S CASE, MS. C. WAS SEPARATED DUE  
3 TO A PROSECUTION. MY RECOLLECTION IS THAT SHE WAS SENTENCED  
4 TO A PERIOD OF THREE DAYS, AND THAT AT THAT TIME IT WAS  
5 NECESSARY TO EFFECTUATE A SEPARATION.

6 I JUST CAN'T SPEAK TO THE CHANGES WITH THE NEW  
7 POLICY AND TO THE EXTENT THAT THAT CREATED ADDITIONAL  
8 PROSECUTIONS, AND THEN THE FURTHER EFFECT OF THE EXECUTIVE  
9 ORDER ON THAT DETENTION. I CAN'T SPEAK TO THAT TODAY.

10 **THE COURT:** ALL RIGHT.

11 WITH RESPECT TO THE REUNIFICATION ISSUE, I INQUIRED  
12 LAST TIME WHETHER THERE WAS ANY MECHANISM THAT THE GOVERNMENT  
13 HAS BETWEEN AND AMONG ITS AGENCIES TO AFFIRMATIVELY REUNIFY;  
14 THAT IS H.H.S. AND O.R.R. COMMUNICATING IN SOME INTELLIGENT  
15 MANNER WITH OTHER GOVERNMENT AGENCIES UNDER THE UMBRELLA OF  
16 D.H.S., LIKE ICE OR B.O.P., SUCH THAT THE PARENT IS AWARE  
17 WHERE HIS OR HER CHILD IS. AND THAT THERE IS A MECHANISM UPON  
18 COMPLETION OF HIS OR HER CRIMINAL SENTENCE THAT THE GOVERNMENT  
19 CAN BEGIN A REUNIFICATION PROCESS.

20 SO THERE ARE TWO QUESTIONS HERE. ONE, IS THERE  
21 CURRENTLY ANY COMMUNICATION BETWEEN H.H.S. AND, FOR EXAMPLE,  
22 D.H.S. OR B.O.P.; AND, NUMBER TWO, IS THERE ANY AFFIRMATIVE  
23 REUNIFICATION PROCESS THAT THE GOVERNMENT HAS IN PLACE ONCE  
24 PARENT AND CHILD ARE SEPARATED.

25 **MS. FABIAN:** I WOULD SAY, YOUR HONOR, WHEN WE SPOKE

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1 ABOUT THAT INITIALLY, I THINK MY ANSWER -- I RECALL THAT IT  
2 WAS A MORE NARROW QUESTION; AND THAT WAS, WHEN A PARENT IS  
3 RELEASED FROM CRIMINAL CUSTODY AND TAKEN INTO ICE CUSTODY IS  
4 THE PRACTICE TO REUNITE THEM IN FAMILY DETENTION. AND AT THAT  
5 TIME I SAID NO, THAT THAT WAS NOT THE PRACTICE.

6 I THINK MY ANSWER ON THAT NARROW QUESTION WOULD BE  
7 THE SAME. I THINK WHAT YOU ARE ASKING NOW IS A BROADER  
8 QUESTION. AND ONE THING THAT HAS TO BE CONSIDERED WITH THAT  
9 QUESTION IS THE NUMBER OF DIFFERENT WAYS, AGAIN, THAT A  
10 SEPARATION COULD BE EFFECTED, AND THAT IS A SEPARATION DUE TO  
11 A DETERMINATION OF DANGER AS OPPOSED TO A SEPARATION THAT MAY  
12 RESULT FROM PROSECUTION.

13 ALL OF WHICH GOES TO SAY I STILL THINK ON A BROAD --  
14 AS A BROAD MATTER THERE IS NOT A SINGULAR ACTION OF SEPARATION  
15 THAT -- IN WHICH, THEN, THE RESPONSE FOR PROCEDURALLY WOULD  
16 BE -- WOULD BE THE SAME FOR ALL CASES. SO THAT IS SORT OF THE  
17 PRECURSOR TO MY ANSWER.

18 THERE ARE PROCEDURES BY WHICH O.R.R. THEN RELEASES  
19 MINORS TO THE CUSTODY OF A PARENT WHO HAS BEEN RELEASED FROM  
20 CUSTODY, AND THOSE ARE THE PROCEDURES UNDER THE T.V.P.R.A. FOR  
21 REUNIFICATION. WHETHER THERE IS -- IN LIGHT OF ADDITIONAL  
22 SEPARATIONS WHETHER THERE ARE ADDITIONAL PROCEDURES THAT CAN  
23 BE PUT IN PLACE TO IMPROVE THOSE PROCEDURES OR EXPEDITE THOSE  
24 PROCEDURES, I THINK THAT IS SOMETHING THAT IS THE SUBJECT OF  
25 ONGOING DISCUSSION. BUT AT THE MOMENT THE PROCESS IS THE

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1 SAME, AND IT IS THE RELEASE PROCESS UNDER THE T.V.P.R.A.

2 AS FAR AS COMMUNICATIONS BETWEEN O.R.R. AND D.H.S.,  
3 I THINK -- I KNOW THAT THERE ARE COMMUNICATIONS. I THINK TO  
4 THE EXTENT THAT THAT IS SOMETHING THE COURT WANTS TO CONSIDER,  
5 I THINK -- AS WITH MUCH OF THIS, I THINK THAT THIS IS  
6 SOMETHING THAT THE COURT WOULD -- WHAT THE GOVERNMENT WOULD  
7 SUGGEST IS THAT THE COURT SHOULD TAKE -- GIVE THE OPPORTUNITY  
8 FOR BRIEFING AND PERHAPS THE SUBMISSION OF EVIDENCE OR A  
9 HEARING OR SOMETHING TO THAT EXTENT. BECAUSE I DON'T THINK  
10 THAT I CAN MAKE ANY REPRESENTATIONS TODAY THAT WOULD BE  
11 SUFFICIENT FOR THE COURT TO BE ABLE TO RELY ON.

12 **THE COURT:** YOU MENTIONED THAT THERE IS SOME  
13 COMMUNICATION BETWEEN O.R.R. AND D.H.S. AGENCIES. WHAT ARE  
14 THOSE?

15 **MS. FABIAN:** WHEN A CHILD IS SEPARATED OR IS --  
16 REGARDLESS, WHEN D.H.S. IS GOING TO TRANSFER A CHILD TO THE  
17 CUSTODY OF O.R.R. THERE IS A PORTAL THAT IS USED TO  
18 ESSENTIALLY MAKE THAT REQUEST FOR A SPACE TO BE PROVIDED BY  
19 O.R.R.

20 SO IN THAT D.H.S. WILL PUT THE INFORMATION REGARDING  
21 THE CHILD, REGARDING -- GENERALLY THAT WILL NOTATE THAT. IF  
22 IT HAS BEEN A SEPARATION THE SAME PORTAL WOULD ALSO BE USED  
23 FOR A U.A.C., BUT GENERALLY IN THAT THERE WOULD BE PROVIDED  
24 INFORMATION OF A SEPARATION. SO THAT INFORMATION, THEN, IS  
25 ABLE TO BE SHARED WITH O.R.R. AND O.R.R. IS ABLE TO BE AWARE

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1 OF THAT.

2 I DO KNOW THAT O.R.R. WILL THEN, WHEN THEY TAKE  
3 CUSTODY OF THE CHILD, WHEN THEY ARE AWARE THAT THE CHILD WAS  
4 SEPARATED FROM THE PARENT, FOLLOW UP AND MAKE EFFORTS TO ALLOW  
5 THE CHILD TO COMMUNICATE BACK WITH THEIR PARENT THROUGH D.H.S.

6 **THE COURT:** DO YOU KNOW WHETHER THAT IS OCCURRING?  
7 WHAT YOU HAVE OUTLINED IS A MECHANISM BY WHICH D.H.S.  
8 COMMUNICATES WITH O.R.R., BUT IS THERE COMMUNICATION FROM  
9 O.R.R. TO D.H.S. WHICH WOULD HELP ASSIST REUNIFICATION? DO  
10 YOU KNOW THAT TO BE A FACT?

11 **MS. FABIAN:** THERE IS A RECENT MEMORANDUM OF  
12 UNDERSTANDING BETWEEN O.R.R. AND D.H.S. IN WHICH D.H.S. DOES  
13 ASSIST O.R.R. IN OBTAINING INFORMATION FOR THE SUITABILITY  
14 ANALYSIS WHEN O.R.R. IS RELEASING A MINOR. SO TO SOME EXTENT  
15 THAT DOES PROVIDE SOME AVENUE FOR COMMUNICATION.

16 I DON'T -- TODAY I DON'T WANT TO MISREPRESENT  
17 EXACTLY WHETHER THERE IS A FORMAL POLICY. I BELIEVE THERE IS  
18 COMMUNICATION, BUT WHETHER THERE IS SORT OF A FORMAL AVENUE OF  
19 COMMUNICATION, I CAN'T SPEAK TO THAT TODAY.

20 AGAIN, I WOULD SAY -- ASK FOR THE OPPORTUNITY TO  
21 SUBMIT TO THE COURT SOMETHING IN THE FORM OF BRIEFING OR  
22 ANOTHER EVIDENTIARY SUBMISSION ON THAT.

23 **THE COURT:** BUT WHEN THE O.R.R. CONSIDERS RELEASE TO  
24 THE PARENT OR AN APPROPRIATE GUARDIAN UNDER THE T.V.P.R.A.,  
25 THAT OFTEN OCCURS. AND WITH RESPECT TO RELEASE TO A PARENT IT

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1 ONLY OCCURS, FROM MY UNDERSTANDING, WHEN THE PARENT INITIATES  
2 THE EFFORT TO REUNIFY. IS THAT CORRECT?

3 **MS. FABIAN:** I BELIEVE THAT IS THE TRADITIONAL WAY,  
4 AND IT IS FREQUENTLY THE WAY THAT THAT IS INITIATED.

5 I UNDERSTAND THAT O.R.R. WILL ALSO, IF THEY ARE  
6 AWARE THAT THE CHILD HAS A PARENT, THEY WILL MAKE EFFORTS TO  
7 REACH OUT TO THE PARENTS.

8 NOW, WHETHER O.R.R. HAS THE MECHANISM TO DISCOVER  
9 WHEN THE PARENT IS RELEASED FROM CUSTODY, I DON'T BELIEVE THEY  
10 DO. BUT O.R.R. WILL MAKE EFFORT IF THE CASE WORKER AT O.R.R.  
11 IS AWARE THAT THE CHILD HAS BEEN SEPARATED FROM A PARENT. OR  
12 EVEN THAT, FOR EXAMPLE, IF THE CHILD COMES INTO THE COUNTRY  
13 WITH THE PHONE NUMBER OF A RELATIVE, O.R.R. WILL MAKE EFFORTS  
14 TO REACH OUT TO THAT RELATIVE AND FACILITATE THE  
15 REUNIFICATION.

16 SO I THINK THE SAME PROCESS WOULD BE USED IF O.R.R.  
17 IS AWARE THAT THE CHILD WAS SEPARATED FROM A PARENT, O.R.R.  
18 WILL MAKE SIMILAR EFFORTS TO LOCATE THE PARENTS AND TO  
19 FACILITATE REUNIFICATION THAT WAY.

20 **THE COURT:** O.R.R. IS NOT NOTIFIED BY D.H.S. OR  
21 B.O.P. WHEN A PARENT IS RELEASED FROM CRIMINAL CUSTODY, IS IT?

22 **MS. FABIAN:** NOT TO MY KNOWLEDGE.

23 **THE COURT:** THE REUNIFICATION PROCESS, THEN, OCCURS,  
24 IF AT ALL, BASED ON THE PARENT'S EFFORT TO LOCATE AND TRACK  
25 DOWN THEIR CHILD. AM I CORRECT?

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1 I WANT TO ADD THAT SOME OF THE ISSUES THAT THE COURT  
2 HAS BEEN ASKING ABOUT, THIS ABILITY TO LOCATE, AND I THINK  
3 YOUR HONOR ASKED ABOUT THE QUESTION OF PARENTS BEING REMOVED  
4 WITHOUT THEIR CHILD. WELL, I AGREE THAT THOSE ARE DIFFICULT  
5 ISSUES AND IMPORTANT ISSUES TO TALK ABOUT. I AM NOT SURE THAT  
6 THEY ARE A PART OF THIS CASE IN TERMS OF THEY WERE NOT PLED IN  
7 THE ORIGINAL COMPLAINTS AND THEY ARE NOT SITUATIONS THAT ARE  
8 ENCOMPASSED BY THE NAMED PLAINTIFFS.

9 SO I THINK I WOULD REITERATE MY CONCERNS WITH  
10 ENCOMPASSING TOO MUCH -- WITH BRINGING THESE ISSUES INTO THE  
11 CASE AT THIS TIME AND WITHOUT THE OPPORTUNITY FOR PUTTING IN  
12 SOME EVIDENCE OF THAT TO SORT OF REACH DECISIONS IN THIS CASE  
13 BASED ON NEWS REPORTS. WHILE I UNDERSTAND THAT THE COURT IS  
14 CONCERNED WITH THOSE AND MAY BE INTERESTED IN THOSE, I THINK  
15 WE NEED TO CONSIDER WHAT HAS BEEN BRIEFED IN THIS CASE.

16 **THE COURT:** THAT WAS ONE OF THE CLAIMS FOR RELIEF,  
17 THOUGH, SET OUT EITHER IN THE AMENDED COMPLAINT OR IN THE  
18 MOTION FOR PRELIMINARY INJUNCTION WAS FOR REQUESTING THE COURT  
19 TO ORDER AN INJUNCTION TO PROHIBIT THE REMOVAL OF PARENT AND  
20 CHILD AT SEPARATE TIMES. SO IT SEEMED TO ME THAT IT WAS PART  
21 AND PARCEL OF THIS REUNIFICATION ISSUE AS IT RELATES TO, FOR  
22 EXAMPLE, MS. C.'S CASE. DO YOU DISAGREE?

23 **MS. FABIAN:** NO. I AGREE. AND AS YOUR HONOR SAYS,  
24 I DO RECALL THAT THAT IS -- PART OF THE CHALLENGE HERE IS THAT  
25 THERE WAS NOT -- WITHOUT A PROPOSED ORDER I THINK THERE WAS

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# Exhibit U

## The New York Times

# *Torn Apart by Zero Tolerance, Kept Apart by Red Tape*

By Miriam Jordan

June 24, 2018

Mother and son last spoke on the child's ninth birthday, a week ago. This was no celebratory call.

Lidia Karina Souza had been released from immigration detention nearly two weeks earlier. But she could not tell Diogo, who was separated from her shortly after they reached the United States, when they would see each other again.

"Don't cry. You are going to get a Nintendo, a birthday party. Don't worry," Ms. Souza, who is from Brazil, told her son. The telephone conversation was recorded and later provided to The New York Times.

They had parted ways at the southwest border on May 30. Ms. Souza was locked up. Diogo was flown to Chicago, where he was placed in a shelter. Ms. Souza was released on June 9 and allowed to join relatives in Hyannis, Mass., but it is still not clear when her son will rejoin her.

"I am going to do everything to get you out of there," she told him on the call. "It's so many papers they need."

President Trump has officially ended the policy of separating families when parents are being prosecuted under the "zero tolerance" border enforcement program that took effect in May. But frustrating stories like that of the Souza family are playing out across the country, as parents of more than 2,300 children who were separated after their arrival in the United States now face lengthy bureaucratic delays in recovering them.

While some of the children have been reunited with their parents in recent days, interviews with immigration lawyers and government officials suggest that most of the children are likely to remain parked in group facilities or foster homes for some time to come.

"There was clearly no plan for reuniting the families," said Karen Hoffmann, an immigration attorney at Aldea-The People's Justice Center in Reading, Penn., who is suing the government to reunite three migrants with their children.

Part of the problem is that in many cases, parents and children are being detained thousands of miles apart, and the parents do not know exactly where their children are. Though federal agencies have registered each child with an identification number and set up hotlines for parents,

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immigrant advocates say that many parents have trouble getting through or are not given answers when they call.

Late Saturday, the departments of Homeland Security and Health and Human Services announced that they had a “well-coordinated” process for reuniting families. As of June 20, their statement said, there were 2,053 separated minors in government custody. It said that another 522 children who had not yet been sent by the Border Patrol to a shelter or a foster family were returned to their parents at the border.

“A parent who is ordered removed from the U.S. may request that his or her minor child accompany them,” the statement said. “It should be noted that in the past, many parents have elected to be removed without their children.”

If a parent is released from detention, the authorities say, he or she will be reunited with a separated child once the parent fulfills requirements set by the government. But as Ms. Souza’s case illustrates, the red tape can cause lengthy delays.

Senator Chuck Schumer, Democrat of New York, called on the Trump administration on Sunday to appoint a “czar” to be in charge of coordinating federal agencies to quickly reunite families.

“You don’t need to be a foreign relations expert to know that the situation created by zero tolerance has left many people with zero confidence that the administration will be able to quickly reunite the kids,” Mr. Schumer said at a news conference.

Noting that three different cabinet departments had a role in the situation, Mr. Schumer said, “No one is really in charge if there are three people in charge.”

Shortly before the government officially announced the zero tolerance policy, it issued a memorandum setting stringent new rules for vetting parents, relatives and other potential sponsors who wish to get children from government custody.

For one thing, the memo said that Health and Human Services must obtain the “citizenship, immigration status, criminal history and immigration history” of the potential sponsor. It also said that the department must collect the names, dates of birth, addresses, fingerprints and identification documents of the potential sponsor and “all adult members in the potential sponsor’s household,” and provide that information to Immigration and Customs Enforcement, the agency that oversees deportation.

Previously, Health and Human Services did not share such information with ICE; other members of the household were not typically screened as part of the process; and parents did not have to be fingerprinted to get their children back.

“We have cases of Brazilian minors who remain in a shelter because of the new demands, which ended up intimidating relatives who wanted to bring them home,” said Luisa Lopes, the director of consular affairs for Brazilians abroad. Ms. Lopes said she is aware of 49 Brazilian children who were separated from their parents.

Ms. Souza, 27, and her son turned themselves in to the Border Patrol on May 29, declaring that they had a fear of returning to their home country and wished to obtain asylum in the United States. The following day, an agent used Google Translate, she said, to explain to her — as Diogo erupted in tears — that because she had not presented herself at an official port of entry, she had entered the United States illegally; therefore she would go to jail, and he would go to a shelter. The son saw his mother being handcuffed.

“I told him, I’m not going to jail,” she recalled in an interview conducted in Portuguese. “I am going to a place with other mothers. You are going to a place for children.”

Ms. Souza appeared soon after in federal court in El Paso, where she pleaded guilty to illegal entry, a misdemeanor, and was sentenced to time served. Three detention centers and 10 days later, she was allowed to join a relative in Massachusetts, having passed an interview meant to ascertain whether she had a credible reason to fear returning to Brazil.

Before the authorities dropped her off in Dallas for her flight to Boston, they handed her a toll-free number she could call to locate Diogo.

She tried the number when she reached Massachusetts, but she could not get through to anyone.

“I was devastated, desperate, crazed,” she said.

Ms. Souza, an evangelical Christian, said she sought strength in prayer.

She also searched on Facebook for a Brazilian woman she had met in detention whose child had also been removed from her. The woman, who is now in Pennsylvania, told Ms. Souza that her daughter had been at a shelter in Chicago called Casa Guadalupe and had befriended a Brazilian boy there named Diogo. She gave Ms. Souza the number.

Mother and son spoke for the first time in more than two weeks. She learned that Diogo had contracted chickenpox and, as a result, was isolated from other children. He sobbed, pleading for his mother to come get him.

Since then, they have been allowed to speak to each other by phone twice a week, for 10 minutes at a time.

“It has been 16 days, but don’t worry,” Ms. Souza told her son over one call that was recorded. “It’s coming to an end. Be well. Stay with Jesus. With God on our side, it will all work out.”



To get her son back, Ms. Souza learned, she would have to provide the shelter, which is run by Heartland Alliance, with a mountain of documents.

Assisted by a lawyer, Ms. Souza filled out a 36-page packet and submitted documents attesting to her relationship to Diogo. But “every day, they wanted something else,” Ms. Souza in an interview on Saturday.

For example, the adults in the family with whom she lives in Hyannis also had to submit five pages of personal information for a background check.

On another call, Diogo urged his mother to hurry his release. With his voice breaking, the boy begged, “Ai, Mom, get the papers done fast.”

“It isn’t up to me,” she tried to explain. “I am doing everything, but it’s a lot of paperwork to handle.”

But more days passed, and more requirements had to be met.

The last straw, she said, was the fingerprint request last week. A case worker notified Ms. Souza that she and two other adults in the household would have to visit a designated location in their area to be fingerprinted — on July 6. Her request to get back her son would then take 22 days to be approved, she was told.

“They said she can only get the child in August,” said Jesse Bless, her lawyer. “That is completely unacceptable. What kind of process for reunification is this?”

“It was zero tolerance, zero planning, zero thought,” said Mr. Bless, a senior counsel at Jeff Goldman Immigration, based in Boston, who has taken Ms. Souza’s case pro bono.

He expressed outrage to shelter managers, telling them that Ms. Souza had already been fingerprinted at the border. In response, a Health and Human Services official emailed Mr. Bless, saying: “Policy and Procedures recently changed and requires all household members and sponsor’s to fingerprint. I can assure you that while at Heartland, Diogo is not isolated.

“Case Managers at Heartland truly care about our children and are working diligently to ensure all of our minors are safely released.”

Mr. Bless said that after he threatened to sue the shelter, “they agreed to a more expedited, but undefined schedule.” Unsatisfied, he said on Sunday that he intended to travel to Chicago to press the matter further.

Meanwhile, Ms. Souza is next scheduled to speak with her son on Wednesday.

Her last words to him on his tear-filled birthday were: “Don’t cry. I want you to be okay. Please be strong. O.K., son? Stay with Jesus, my son. Tchau. I love you.”

“I love you too,” the boy responded.

**Correction:** June 23, 2018

*Because of an editing error, a picture caption with an earlier version of this article misspelled Lidia Souza’s middle name. It is Karina, not Karine.*

Nikita Stewart contributed reporting.

A version of this article appears in print on June 24, 2018, on Page A14 of the New York edition with the headline: Torn Apart at the Border, Kept Apart by Red Tape