

EXHIBIT 88



GEO Group tells shareholders that everything is fine in Karnes family detention center

August 5, 2015

Whistleblower and former GEO employee paints a different picture of “torture” inside and says “this really is a prison”

(AUSTIN, Texas) — Tuesday for-profit private prison company GEO Group reported their second quarter earnings for 2015 on a conference call for shareholders. Despite a federal judge recently ordering the government to release mothers and children from family detention camps, GEO executives confidently spoke about plans to expand the Karnes County family detention camp saying, “In Texas we are on schedule to complete a \$36 million expansion to our company-owned Karnes ICE residential Center by December 1st. The Karnes expansion will add 626 beds, bringing the center’s capacity to 1,1158 beds and generating an additional \$20 million in annual revenues under a fixed monthly payment.”

GEO executives had no choice but to address the judge’s ruling against family detention, telling shareholders, “[w]hile we cannot speculate on pending legal proceedings, we believe that the Department of Homeland Security and ICE have an interest in the continued use of the family residential centers, which comply with ICE’s family residential standards including our Karnes Center.”

What GEO shareholders didn’t hear about were bombshell revelations from former employee and social worker at the Karnes family detention camp, Olivia Lopez, who blew the whistle on what she described as “torture” inside Karnes.

Lopez exposed horrid conditions the families are experiencing while in detention. Lopez revealed several disturbing incidents she witnessed in the Karnes detention camp, including: a five-year-old survivor of sexual assault who suffered severe developmental regression to the point of wearing a diaper; guards putting women on hunger strike in solitary confinement as punishment; and mothers at risk of suicide whose children are isolated for days under the watch of unlicensed and untrained guards. Lopez also said she was pressured to adhere to policies at Karnes that were violations of her social work license.

“What is happening there is tantamount to torture,” Lopez told McClatchy newspapers.

But you wouldn’t hear any of this from GEO executives or shareholders. “It makes your skin crawl to hear how GEO only talks about profits and payments while families are being unlawfully detained in such terrible conditions,” said Cristina Parker, immigration programs director at Grassroots Leadership.

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Grassroots Leadership is an Austin, Texas-based national organization that works to end prison profiteering and reduce reliance on criminalization and detention through direct action, organizing, research, and public education.

Contact:

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(<mailto:cparker@grassrootsleadership.org>), 512-499-8111

Related Programs:

[Family Detention](/programs/family-detention) (</programs/family-detention>)

In 2009, Grassroots Leadership ran a successful campaign to end family detention at the Hutto Detention Center in Taylor Texas. When the Obama administration announced that it would stop detaining families at Hutto, only 100 family detention beds remained at a small facility in Pennsylvania. However, after the wave of Central American families and children seeking refuge at our border in the summer of 2014, the administration reversed its decision, opening facilities at Artesia, New Mexico; Karnes, Texas, and Dilley, Texas - all run by private prison corporations. While Artesia closed at the end of last year, the number of family detention beds has skyrocketed and is expected to reach over 3,000 by this May. Grassroots Leadership is once again working to end the inhumane policy of family

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IN SUPPORT OF PLAINTIFFS' MOTION FOR
CLASS CERTIFICATION**

JANE DOE # 1, et al. V. JOHNSON, et al.

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- **Exhibit 50** Declaration of Cesar Vergara Jimenez

EXHIBIT 1

DECLARATION OF MARIO PABLO LOPEZ RUIZ

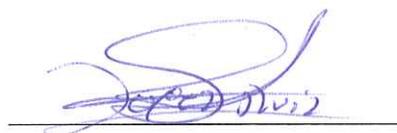
I, Mario Pablo Lopez Ruiz, hereby declare:

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

1. My name is Mario Pablo Lopez Ruiz. I am a Mexican citizen and I am 30 years old.
2. My native language is Spanish. I do not speak English.
3. On June 28, 2014, I was arrested by U. S. Border Patrol agents near Nogales, Arizona. I was arrested around mid-day and driven with five other people to the local Border Patrol station in Nogales, Arizona. The drive lasted about 15 minutes.
4. At the Nogales detention facility, I was placed in a cell that was about 50 feet long and 30 feet wide. There were about 45 people in the cell. I remained in the cell for the next 36 hours, until I was taken to court in Tucson, Arizona on Monday, June 30.
5. The holding cell in which I was detained did not have any chairs or beds, only concrete benches that lined the walls of the cell. Not everyone was able to sit down on the benches and many people were sitting or lying on the floor.
6. There were three toilets in the cell but one of the toilets did not work. Sinks were attached to the tops of the toilets, but there was no soap to wash our hands and no towels. I could not brush my teeth or bathe while I was detained.
7. The cell was cleaned once a day but it was still dirty and smelled terribly.
8. We were fed twice each day that I was detained, once in the morning and once in the afternoon. All we had to eat was a very small burrito and a packet of crackers with a carton of juice. I ate the food but I was still very hungry.
9. Our drinking water came from a cooler. There were no cups in the cell so we drank from our used juice containers.
10. The temperature in the cell was extremely cold and I became sick while I was detained. All we were given to keep warm was a thin aluminum blanket; we were not given any other bedding or extra layers of clothing. I was only wearing a t-shirt and the aluminum blanket was not enough to keep warm. Someone asked an official to change the temperature but it remained very cold. I asked an official if I could have medicine for my cold and he ignored me.
11. I could not sleep at night because the air conditioning was so cold and because I was lying on the floor, which was extremely cold and hard. I did not sleep at all while I was detained in Nogales.

12. We were only removed from the cell for a few minutes each day for the cell to be cleaned; otherwise, we were not allowed to leave the cell or go outside.
13. I asked if I could make a phone call and a Border Patrol official told me I could not make any calls. I was not given the opportunity to call my consulate and I did not see any visitation area or anywhere to meet with attorneys or consular officials in private.
14. Before I left Nogales, a Border Patrol official told me to sign some documents. I was not given the opportunity to read the papers and they were not translated for me. He told me "If you don't sign, I'll sign for you."

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



Mario Pablo Lopez Ruiz

CERTIFICATE OF TRANSLATION

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

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



EXHIBIT 2

DECLARATION OF JULIO JIMENEZ TUCUM

I, Julio Jimenez Tucum, hereby declare:

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

1. My name is Julio Jimenez Tucum. I am a national of Mexico. I am 28 years of age.
2. I speak and read Spanish. I do not speak or read English.
3. I was picked up by U. S. Border Patrol agents while crossing around Sasabe, Arizona on June 28, 2014.
4. I was transported to the Tucson Border Patrol station. The trip lasted more than an hour. I was driven there in a Border Patrol van. There were about five of us total in the van.
5. Once at the Tucson Border Patrol station, there were a lot of cells, about 15 or so. I was placed in a cell that was about 20 meters by 8 meters large. There were 52 people in the cell, they would count us about every two hours. The others were only men.
6. The only furniture in the cell consisted of concrete benches along the sides of the room and ~~down~~ in the center of the room. There were about four of these benches in the cell. This was enough space for approximately 50 people to sit down. There were enough benches for everyone in the cell to sit on them at the same time.
7. I was kept in this cell for two days. I spent one night in this cell. There were no beds in the cell and we were not provided any blankets or other bedding, I was only given an aluminum sheet to cover myself. I had to try and sleep on the concrete floor because the benches were taken up and we were too many to fit on them to sleep. The whole floor and benches were full of bodies sleeping. The light was kept on all night. I was kept a total of one night in this cell.
8. The temperature in the cell was very cold. The Border Patrol agents took my sweater from me before putting me in the cell, so all I was wearing was a short sleeve shirt. I was not able to get warm. There were no blankets other than the thin aluminum sheet given to us. Nobody asked for the temperature to be changed, they wouldn't have listened anyway. All they gave us to stay warm were aluminum sheets that did not keep us warm. I was very cold at night.
9. There were three toilets in the cell. The toilets were only partially screened from view. There was enough toilet paper for everyone. Two of the three toilets worked, one didn't.
10. There were three sinks in the cell but no soap or paper or cloth towels. There also were no toothbrushes, toothpaste, or shower facilities.
11. There was a water container in the cell and but no cups for drinking water. We would reuse the juice boxes they would give us and use them as cups.

12. We were given something to eat three times a day. The food consisted of a small cookie and a bean and ground beef burrito for breakfast, a small cookie for lunch, and a burrito for dinner. We would get one small cookie a couple of times a day. Sometimes we would get a small grape juice box. I didn't like the burritos, they didn't taste good but I had to eat them because I was hungry. It was too little to keep me from being hungry before the next meal. I was hungry between meals.
13. I asked to use the phone to call my family and tell them where I was and was told that I could not make any phone calls at all and was not allowed to make one phone call.
14. I was informed that I had a right to call the Mexican consulate when I went to court.
15. During my time in detention, I had a lot of headaches, probably from the stress, but I didn't ask for medical treatment because I saw that they didn't do anything to help.
16. I was kept in this cell for about two days.
17. I was never permitted to go outside or even to leave my cell. I was not handcuffed while in detention, only when they took us into court.
18. While I was detained, a Border Patrol agent told me to sign some documents, I asked what they were. He told me that the documents said that because crossing the line was illegal and I had no documents that I had to be deported, and that I knew that. That's all he told me. He did not give me a copy of the documents.

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



Julio Jimenez Tucum

CERTIFICATE OF TRANSLATION

1. My name is NOZA PRECIADO, and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, JULIO JIMENEZ TUCUM, in Spanish.
3. JULIO JIMENEZ TUCUM affirmed that the contents of the declaration were true and correct to the best of his knowledge.

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



EXHIBIT 3

DECLARATION OF ADRIAN TAPIA RASCON

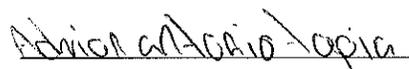
I, Adrian Tapia Rascon, hereby declare:

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

1. My name is Adrian Tapia Rascon. I am a national of Mexico. I am 19 years of age.
2. I speak and read Spanish. I do not speak or read English.
3. I was picked up by U. S. Border Patrol agents in Sierra Vista, Arizona on June 28, 2014, around 10:00 a.m.
4. I was transported to the Naco Border Patrol station. The trip lasted about 30 minutes. I was driven there in a Border Patrol van. There were about five other men in the van with me.
5. Once at the Naco Border Patrol station, I was placed in a cell that was about 15 feet by 25 feet large. There were about 50 or 60 other people in the cell. The others were only men.
6. There were two concrete benches that ran along the sides of the room. Since it was so many of us, there was not enough space to sit on the benches, only about 30 people could sit down. Because there was not enough room on the benches for everyone to sit at one time, some people had to stand or to sit on the floor.
7. I was kept in this cell for 24 hours. I spent one night in this cell. We had no beds in the cell and we only got a thin plastic sheet. I had to try and sleep on the concrete floor curled into a little ball because it was so many of us and we did not fit and it was cold. The light was kept on all night which made it more difficult to sleep. I was kept a total of one night in this cell.
8. The temperature in the cell was freezing cold. The Border Patrol agents took my extra shirts and coat from me before putting me in the cell, so all I was wearing was a short sleeve shirt. I could not keep ^{myself} warm. Some people in the cell did ask for the guards to change the temperature, but the guards did not listen to them. The little plastic sheet they gave us was not enough to keep us warm.
9. There were two toilets in the cell. The toilets were only partially screened from view. It was embarrassing to use the toilet in front of everyone, it was so many of us.
10. There were two sinks in the cell but no soap or paper or cloth towels; we used the toilet paper to clean our hands. There also were no toothbrushes, toothpaste, or shower facilities. The cell smelled bad.
11. There was no water fountain, we had to drink water from the sinks on top of the toilets. It was gross to have to drink from there. We had no cups for drinking water.

12. We were given something to eat once a day. The food consisted of a burrito and cookies. The food was no good at all. I ate the cookies but I gave the burrito to another guy to eat. I did not want the burrito because it looked like it was bad. I was very hungry, it was not enough food for me.
13. I was never told we could use the phone, but I saw a sign when I was being processed. The sign said you could call your consulate. However, when you ask to call your consulate, they would not let you call. I asked to use the phone to call my mom to tell her where I was and I was told that I could not make any phone calls at all until I went to court.
14. I was kept in this cell for 24 hours. I was then moved to another Border Patrol station.
15. I was never permitted to go outside or even to leave my cell. I was not handcuffed while in detention.
16. I was moved to another Border Patrol station in Tucson after spending 24 hours in the first station. I spent a total of 24 hours in a cell in the second Border Patrol station in Tucson. The condition of the cell in the second station were like the first, except that it was not as cold or crowded when I got there, maybe 20 people in the cell. I only ate once in Tucson as well. There were no beds. We got the same little plastic sheet as a blanket.
17. I spent one night in the second cell. Like the first, there were no beds or bedding and I had to sleep on the floor to get any sleep at all.
18. While I was detained, a Border Patrol agent asked me to sign documents in both facilities in Naco and Tucson but I do not know what I signed because they did not tell me what I was signing. I was only allowed to read one document that said something about my rights. They did not give me a copy of the documents.

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



Adrian Tapia Rascon

CERTIFICATE OF TRANSLATION

1. My name is NORA PRECIADO, and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, Adrian Tapia Rascon, in Spanish.
3. Adrian Tapia Rascon affirmed that the contents of the declaration were true and correct to the best of his knowledge.

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

Nora Preciado

EXHIBIT 4

DECLARATION OF AURELIO IGNACIO MORALES-SOTO

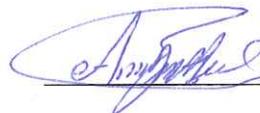
I, Aurelio Ignacio Morales-Soto, hereby declare:

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

1. My name is Aurelio Ignacio Morales Soto and I am Guatemalan. I am 32 years old.
2. I speak and read Spanish. I do not speak or read English.
3. I was picked up by U. S. Border Patrol agents near Douglas, Arizona. I know it was Douglas because I entered through Agua Prieta, Mexico, a town near Douglas. I had only been walking for about 15 minutes after we crossed the border when Border Patrol picked us up. It was June 28, 2014. It was around 4:00 a.m. when they picked us up.
4. I was transported to the Douglas Border Patrol station. The trip from where I was picked up in the desert to the Border Patrol station lasted only about 10 minutes. I was driven there in a pick-up truck. There was one other person in the truck with me.
5. When I got to the Douglas station, the first thing they did was put me in a cell for a few hours. Then they took my prints. They asked me my name, where I was from, and other personal questions. After that, they put me in a different cell. I stayed in that other cell for about half a day.
6. The second cell I was in in Douglas was really cold. We were all freezing and trembling. They did not give us anything but these shiny plastic blankets. Those did not really help, though. Even with those plastic blankets, it was still really cold. When people asked the guards to make it warmer, they made it colder. Sometimes they laughed at us when we complained about the temperature. A few people looked like they wanted to sleep but it was so cold.
7. I did not ask to use a phone. Some of the others asked to use a phone, but they were not allowed to. The guards just told them that they would get to use one later. Some people told the guards they wanted to contact a lawyer and the guards said they just had to wait, that they could do that later on.
8. After a few hours in the second cell, they brought me into a room with a few guards. They asked me to sign papers. They did not ask me if I was scared to go back to Guatemala.
9. Altogether, I was in the Douglas station from Saturday morning until Saturday night, when they transported me to Tucson. The drive from Douglas to Tucson took about three hours.
10. When we got to Tucson, they took our fingerprints again. After that, they put me in a cell where I spent the next two nights.

11. The cell was not very big. It was about 25 feet by 20 feet. There were about 60 people in the cell. It felt very crowded and uncomfortable. You could not really move around. It remained that crowded the entire time I was there – they even added a few people during my time there.
12. There were concrete benches in the cell. That was it, as far as furniture. There were no chairs and no beds. I would say you could fit about 30 people on the benches. Since there were closer to 60 people there, there was not enough room for everyone to sit. Some people had to stand. People were lying on the benches and on the floors.
13. The temperature in the cell was very cold – I think it was as cold as in Douglas. All I had was a t-shirt to stay warm, but it was not enough. I had my arms inside my shirt. They gave us shiny plastic blankets again. But I was not able to get warm.
14. There were three toilets in the cell but one was not working. They had a small enclosure but it was so short that if someone was standing nearby, they could see into the stall.
15. There were three sinks in the cell but one was not working. They did not have soap. We dried our hands on our clothes. My hands felt dirty.
16. They did not give us toothpaste or toothbrushes. I did not brush my teeth while I was there.
17. There was nowhere to shower.
18. I ate a few times when I was in Tucson. They gave us a small burrito and a packet of crackers. I think I got two juice boxes there too. There was not enough food. I felt weak and hungry the whole time I was in the Tucson facility.
19. I didn't see anyone using a phone. There was no phone in the Tucson cell. I did not see any place where someone could have a legal visit.
20. Border Patrol never told me that I could call the Guatemalan consulate.
21. On Monday morning, the bus ride from the Tucson facility to the courthouse took around 20 minutes.

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



Aurelio Ignacio Morales Soto

CERTIFICATE OF TRANSLATION

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

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



EXHIBIT 5

DECLARATION OF ANSELMA ANGELA AMBROSIO DIAZ

I, Anselma Angela Ambrosio Diaz, hereby declare:

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

1. My name is Anselma Angela Ambrosio Diaz. I am a national of Guatemala. I am twenty-four years old. I have a son who is seven-years-old.
2. I speak and read Mam and Spanish. I do not speak English.
3. My son and I were picked up by Border Patrol agents near Douglas, Arizona on the night of Wednesday, January 14, along with another young mother and her six-year-old son. The four of us were driven to a Border Patrol facility in Douglas, Arizona. The trip lasted about thirty minutes and we arrived around nine p.m.
4. At the Border Patrol station, the officials made me and the other woman remove our outer layers of clothing and our shoes. The children did not have to remove their jackets or shoes.
5. We were very hungry and thirsty, but we did not receive food or water. We did not speak to a doctor or undergo any medical evaluation.
6. The four of us were placed in a cell that was about four by five meters in size. There was no furniture in the cell other than a concrete bench running along the wall.
7. There were no beds. We sat on the bench, which was very cold, but there was nowhere for anyone to lie down other than the floor, which was also very cold.
8. We were not given blankets, bedding, or anything to keep warm. It was extremely cold in the cell. We huddled together to try to keep ourselves warm, but it was impossible to sleep because of the cold and because the lights were left on all night.
9. Even if we had been able to sleep, we would not have been able to sleep very much. During the night, the officials kept calling us out to fill out paperwork or take fingerprints. I was told to sign documents, but they were not explained to me and I did not understand what I was signing.
10. The six-year-old boy became sick during the night and was vomiting, but there was no way to get anyone's attention to ask for help. Both boys were crying through the night because it was so cold they could not sleep.
11. There was one toilet in the cell with a sink on top of it. It was behind a short wall that did not give us much privacy.

12. There was no soap and there were no towels. We had no way to wash our hands and could not bathe while we were detained. There was no waste basket.
13. There was no drinking water and we were not given any food. We were very hungry and very thirsty. The next morning, officials gave each of us two small juice boxes, but they did not give us anything to eat.
14. The next day, around noon, officials took us out the cell and put us on a bus. We were taken to a Border Patrol facility in Tucson.
15. My son and I, along with the other woman and her son were again detained in a cell by ourselves. There was no furniture and no beds, only a couple of concrete benches. There were two toilets and sinks but again there was no soap, no towels, and no way for us to bathe or shower. As in Douglas, the cell was extremely cold.
16. We were held in this room for a couple of hours before we were finally released around six or seven p.m. I was never offered the opportunity to make a phone call.
17. We did not receive any food for the entire time we were detained in Border Patrol custody.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 16th day of January 2015 in Tucson, Arizona.



A handwritten signature in black ink, appearing to be "A. [unclear]", written over a horizontal line.

CERTIFICATE OF TRANSLATION

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

I declare under penalty of perjury that the foregoing is true and correct. Executed this 16th day of January 2015 in Tucson, Arizona.

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

EXHIBIT 6

DECLARATION OF FERNANDO MUNGUILLA ERASNO

I, Fernando Munguilla Erasno, hereby declare:

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

1. My name is Fernando Munguilla Erasno. I am a national of Honduras. I am 22 years of age.
2. I speak and do not read Spanish. I do not speak or read English.
3. I was picked up by U.S. Border Patrol agents at a ranch in Arizona, I do not know the name of the place in Arizona but I crossed through Caborca, Sonora, Mexico, so it must be close by on the other side. I was caught Saturday, June 28, 2014 around 1:00 p.m.
4. I was transported to the Douglas Border Patrol station. The trip lasted about two hours. I was driven there in a Border Patrol van. In the van it was only me and another man.
5. Once at the Douglas Border Patrol station, I was placed in a cell that was too small for all of us. There were about 30 other people in the cell when I got there, it was crowded. The others were men and women. About 10 more people arrived around 11:00 p.m. at night.
6. The only things in the cell were some concrete benches that ran along the sides of the room and also ran down the center of the room. There were about three of these benches in the cell, two alongside two walls and one in the middle. This was enough space for approximately 20 people to sit down. There were not enough benches for everyone in the cell to sit on them at the same time. Because there was not enough room on the benches for everyone to sit at one time, some people had to stand, lay down or to sit on the floor.
7. I knew there were about 40 people total in the cell by the time I left because the agents would count and write the number on the window of the cell.
8. I was kept in this cell for 24 hours. I spent one night in this cell. There were no beds in the cell and we were not provided any real blankets, they only gave us an aluminum sheet. I had to try and sleep standing. I gave my place on the concrete floor to another man who was hurt when he was chased by Border Patrol agent, and he hurt his foot so I let him take my spot to sleep on the floor. I did not sleep all night because I was standing. I was one of 15 people standing that night. The light was kept on all night which also made it very hard to sleep. I was kept a total of one night in this cell.
9. The temperature in the cell was very cold, we call it the "hielera" (freezer) because they turn on the air high and it's so cold. I think they messed with the air all the time, the other detainees who spoke English would translate for us and tell us that the guards said that if we talked too much or complained that they would turn on the air even colder. The Border Patrol agents took my hooded sweatshirt from me before putting me in the cell, so all I was wearing was a long sleeve shirt. But even with the long sleeves, I was not able to stay warm. We did tell the guards it was cold, but the guards would not change the

temperature. All they gave us to stay warm was an aluminum sheet that did not keep us warm, it was not enough.

10. There was one toilet in the cell. The toilet was only partially screened from view. There was toilet paper for everyone, but when we ran out of toilet paper and asked for more, the guards would get mad and would not bring us more for 15 to 20 minutes. The toilet was not working so well, it was hard to flush, it took a long time to flush and there were many of us needing to use it.
11. There was one sink in the cell but no soap or paper or cloth towels so we had to use the toilet paper. There also were no toothbrushes, toothpaste, or shower facilities.
12. There was no drinking water except for the sink water. It was disgusting that I had to drink water from the sink right on top of the toilet, I thought it might be the same water, but I had to drink it because I was thirsty. There were no cups for drinking water.
13. We were given something to eat twice a day. The food consisted of a very cold burrito and an apple juice box for breakfast around 6:00 a.m., and around 4:00 p.m. we could get the same for dinner. The food was hard to eat because it was all cold and it was not enough food. I was hungry.
14. I was never informed that I had a right to call the Honduran consulate.
15. I take medicine for a heart ailment, I have heart problems, I get attacks where my hurt ~~hurts~~ ^{heart} and my left arm goes numb. I have a prescription for this heart ailment. I take three pills twice a day. I did not have this prescription with me when I was picked up by the Border Patrol agents. I told the agents I had this heart ailment but the agents told me that they could not prescribe anything there.
16. I was never permitted to go outside or even to leave my cell. I was not handcuffed while in detention.
17. While I was detained in Douglas, a male Border Patrol agent told me that if I didn't sign the documents he showed me that I would be detained longer. Then the same agent took a picture of me with his cell phone and he said he was going to send it to the Zetas. When I asked why, the agent told me it was because I did not want to give him information about drugs. But I did not know what he was talking about because I did not have any drugs or anything like that. By saying all of this, he forced me to sign documents I did not understand. The agent did not read them to me and I ~~can~~ ^{cannot} read. The agent did not give me a copy of the documents.
18. I was kept in this cell for 24 hours. I was then moved to another Border Patrol station in Sonoita, Arizona.
19. I was moved to another Border Patrol station after spending 24 hours in the first station. I spent a total of 24 hours in a cell in the second Border Patrol station in Sonoita. The conditions of the cell at the second station were similar to the first, except that the cell in Sonoita was smaller and there were about 25 people. It was also crowded.

20. I spent one night in the second cell. Like the first, there were no beds or bedding and I had to sleep on the floor, but again I did not get any sleep. In this place, we all fit on the benches on the floor to sleep.
21. At the Sonoita Border Patrol station, I also told the guards about my heart ailment and they told me that they could not give me anything because a doctor had to see me first.

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

mFE_____

Fernando Munguilla Erasno

CERTIFICATE OF TRANSLATION

1. My name is NORA PRECIADO, and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, Fernando Munquilla Erasno, in Spanish.
3. Fernando Munquilla Erasno affirmed that the contents of the declaration were true and correct to the best of his knowledge.

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



EXHIBIT 7

DECLARATION OF JUAN JESUS PADRON RIOS

I, Juan Jesus Padron Rios, hereby declare:

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

1. My name is Juan Jesus Padron Rios. I am a Mexican national and I am 24 years old.
2. I speak Spanish. I do not speak or read English.
3. On Saturday, June 28, 2014, I was apprehended by U.S. Border Patrol agents near Naco, Arizona. I was arrested in the morning.
4. After I was arrested, I was driven to the Naco Border Patrol station in a Border Patrol truck. There were about five other people in the truck with me and we drove for about 15 minutes before we arrived at the station.
5. At the Naco Border Patrol station, I was detained in a holding cell for about eight hours. The cell was approximately 30 square feet. When I first arrived, there were about 10 other people in the cell. Over the course of the day, more people arrived until there were about 20 of us in the cell.
6. The only place to sit or lie down in the cell was the concrete bench that lined the walls of the cell. As more people arrived, there was not enough room for everyone to sit or lie down, so some people had to sit on the floor. The floor was dirty with lots of wrappers and litter scattered around.
7. There was only one toilet and it had a sink attached to it and was located behind a short wall. There was a water cooler but no cups in the cell; we had to drink out the water of our used milk cartons. We received a small burrito to eat but I was still very hungry.
8. After about eight hours, on the night of June 28, Border Patrol officials transferred us by bus to a detention center in Tucson. It was still dark out when we arrived in Tucson.
9. In Tucson, we were placed in another holding cell. The cell was about the size of the cell in Naco, about 30 square feet. There were approximately 40 people in cell when I first arrived, but within a few hours more people arrived until there were about 60 of us. There was not enough room for that many people and it was extremely crowded. There was no room to move and most people were sitting on the floor which was dirty and covered with discarded wrappers.
10. I was kept in this cell for the next 36 hours, until I went to court on the morning of Monday, June 30. I was never permitted to go outside or even to leave my cell.
11. There were concrete benches lining the walls and in the center of the room, but no other furniture. There were no beds, no pillows, and no bedding apart from the thin aluminum covers they gave us. I was detained in this cell for 2 nights.

12. It was very cold in the cell at all times. My extra clothing had been confiscated by Border Patrol, so I was only wearing a t-shirt and was always cold. The aluminum cover was not enough to keep warm or stop me from shivering. Some of the people in the cell asked officials to turn up the temperature but we were ignored.
13. It was impossible to sleep. There was not enough room to lie down so I tried to sleep sitting upright, but it was too cold and the lights were left on at night. It was also very noisy – the aluminum blankets made noise whenever anyone moved. As a result of these conditions, I was never able to sleep more than a couple of hours while I was detained.
14. The cell had two toilets and sinks that were behind a short wall but only partially obscured from view. There was no soap or towels and no way to bathe or brush my teeth. With so many people in such a small cell and no way to bathe or clean ourselves, the smell was overpowering.
15. We received small portions of food about three times a day – small burritos or packets of crackers. I was extremely hungry but I could not eat the burrito because the smell in the cell was so bad.
16. I asked a Border Patrol official if I could use the phone to call my family but the official told me I could not make any calls.
17. Someone in the cell was suffering from an allergy attack and when he asked Border Patrol officials for help they did not do anything to help him.
18. Before I went to court, a Border Patrol agent forced me to sign some documents. The documents were in English and I did not know what they said. I asked the official what the documents were but he did not tell me and just told me to sign them.

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

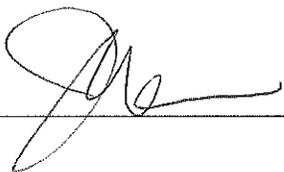


Juan Jesus Padron Rios

CERTIFICATE OF TRANSLATION

1. My name is SAMUEL LYALL, and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, SUAN JESUS PADRON KLOS, in Spanish.
3. SUAN JESUS PADRON KLOS affirmed that the contents of the declaration were true and correct to the best of his knowledge.

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



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

EXHIBIT 8

DECLARATION OF GUADALUPE FELIPE GASPAR

I, Guadalupe Felipe Gaspar, hereby declare:

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

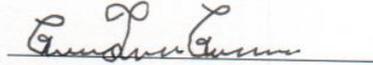
1. My name is Guadalupe Felipe Gaspar. I am a national of Guatemala. I am 20 years of age.
2. I speak and read Spanish. I do not speak or read English.
3. I and my 6 month old baby were picked up by U. S. Border Patrol agents around Douglas, Arizona around 8 pm on Saturday, February 21st, 2015.
4. We were transported to the Douglas Border Patrol station. The trip lasted about 15 minutes. We were driven there in a Border Patrol van. There were about 6 other people in the van with us.
5. Once at the Douglas Border Patrol station, we were placed in a cell that was approximately 3 meters by 2 meters large. There was only one other mom and her child in the cell.
6. The only furniture in the cell was a concrete bench that ran along one wall and part of another wall.
7. We were kept in this cell for 13 hours. We spent 1 night in this cell. There were no beds in the cell and we were not provided any blankets or other bedding.
8. The temperature in the cell was very cold and we were only given thin aluminum blankets to stay warm. But we did not even use them because they did not keep us warm. My six month old daughter was crying constantly because of the cold.
9. We were not able to sleep at all at night because of the cold. At one point my six month daughter did fall asleep briefly and I laid her down on the cold concrete floor. She was able to sleep a little bit but she was shivering from the cold as she slept.
10. It was also difficult to sleep because we were called out four times for interviews over the course of the night. One of those times we had to wait five and a half hours. The chairs were too high for us to sit on them so we had to stand for those five and a half hours. We were already tired from walking in the desert and I was exhausted from standing and holding my daughter for so long.
11. The cell was very dirty for our entire time there. There were diapers, toilet paper and other trash strewn around the bathroom area when we arrived. No one came to clean the cell and the smell was terrible. We were not able to clean because there was no trash can.

12. There was one toilet in the cell. The toilet was mostly open to the view, only screened by about a foot of concrete wall.
13. There was one sink in the cell but no soap or paper or cloth towels. We could not wash our hands well after using the toilet because there was no soap. There also were no toothbrushes, and no bathing or shower facilities.
14. I had diapers in my bag for my six month old daughter but I had to ask permission to take them out. I did not have any wipes to clean her though when I changed her so she got dirty over the course of our time in detention.
15. We were very hungry we were detained and exhausted. We hadn't eaten since Thursday afternoon, so over 48 hours before our detention. Over the course of our time in detention, I was not able to give much milk to my daughter because I had not eaten.
16. There was no water container in the cell. Above the toilet there was a sign that said "drinking water" in Spanish and an arrow pointing down. But we did not understand the sign because we thought that the sign was pointing to the toilet bowl. So we did not drink water for the duration of our time there and we were very thirsty.
17. When we arrived, a Border Patrol agent asked us if we were healthy or not and we said we were fine. In reality, my legs were very bruised from crossing the fence. But I was worried that I would have to pay money to a doctor if I mentioned my problem. So neither I nor my six month old daughter were given a medical exam by a doctor or nurse.
18. I signed various papers without understanding what they said. The agents did not explain them but told me to sign.
19. After spending 13 hours in this cell, we were transferred to the Tucson Border Patrol Station.
20. The cell in Tucson was similar to that in Douglas. There were four other women and seven children with us in the cell. We spent a total of three hours in the cell.
21. The cell in Tucson was just as cold as in Douglas. I asked for my child's scarf when we entered the cell so that I could keep her warm, but the agents refused to give it to me. So my daughter continued to cry while we were detained in Tucson.
22. In the Tucson the bathrooms were similar to those in Douglas except that there were two toilets and two sinks.
23. We were given food once in Tucson, and the food was the same as in Douglas. There was also a water container in Tucson, but no cups. So we did not drink the water.
24. When we arrived in Tucson a Border Patrol agent asked about our health and I said that we were fine. We were not given any formal medical exam.

25. I was very afraid while I was detained because I wasn't sure what would happen to us. I also felt terrible because of the cold and the hunger.

26. I am afraid of returning to my country.

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



CERTIFICATE OF TRANSLATION

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

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



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

EXHIBIT 9

DECLARATION OF MARIA DE JESUS LOPEZ MAGDALENO

I, Maria de Jesus Lopez Magdaleno, hereby declare:

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

1. My name is Maria de Jesus Lopez Magdaleno. I am a national of Mexico. I am 29 years of age.
2. I speak and read Spanish. I do not speak or read English.
3. I was picked up by U. S. Border Patrol agents at Nogales on December 5, 2014.
4. I was transported to the Nogales Border Patrol station. The trip lasted about 5 minutes. I was driven there in a Border Patrol van. There were about 3 other people in the van with me. MJLM
5. Once at the Nogales Border Patrol station, I was placed in a cell that was about 15 feet by 10 feet large. There were 2 other people in the cell. Both were women.
6. I was kept in this cell for 12 hours. I spent one night in the cell.
7. The temperature in the cell was very cold. The Border Patrol agents took one of my shirts but left me my light sweatshirt before putting me in the cell.
8. They only gave us aluminum sheets but these did not keep us warm. Due to the temperature in the cell, I was not able to sleep.
9. It was also difficult to sleep because the guards would talk with us or hit the windows to get our attention. The light was always on so it was also hard to sleep.
10. There was one toilet. The toilet was in a corner and only partially screened from view.
11. There was a sink, but there was no soap or paper or cloth towels. I could not wash my hands after going to the bathroom because there was no soap. There also were no toothbrushes, and no bathing or shower facilities. I brought a toothbrush, soap with me but they were taken away from me.
12. The cold made me sick. I felt like I had a fever. My body hurt and I had a headache. My lip started blistering as well.
13. I told a guard that I had a bad headache and I was sick and he said "I am not a doctor." He said that even if he had pills he wouldn't give them to me.
14. I had medicine in my belongings when I was detained but a guard took them away and said he wouldn't give them to me. I was taking medication for an ovarian cyst that I had been diagnosed with. The guards did not let me take the medication. I also had the

prescription in my bag. I was supposed to take the medicine for five days but I had only taken two or three days of the medicine when I was detained and they didn't let me take any more.

15. When I was detained I was dehydrated because I had not had water for many hours.
16. There was a water cooler in the cell but no cups for drinking the water. I did not drink the water because it was from the sink and I wasn't sure if it was clean.
17. We were given something to eat once. They only gave me a burrito. I felt so sick that I did not want to eat.
18. I told the Border Patrol agent that I would not sign papers that stopped me from seeing a judge, but later on he gave me documents to sign and I am not sure what it was that I signed.
19. After 12 hours in the Nogales Station I was transferred to the Tucson Border Patrol Station.
20. The cell in Tucson was smaller. Maybe 8 feet by 8 feet. There were three of us there when I arrived and by the time I left, there were 12 people. There was not enough space for all of us.
21. There were concrete benches along the sides of the cells. There were not enough benches for everyone to sit down, so some people sat on the ground.
22. The cell was very cold. We huddled together to keep warm. They only gave us one aluminum blanket each to keep warm. They also made me take off my sweatshirt, leaving me with only a single layer of clothing.
23. I was in this cell for 48 hours. I spent two nights there. There was no bedding and I could only lie down on the ground. I did not sleep at all because it was uncomfortable and cold.
24. My aluminum blanket ripped and I asked a guard if I could get another one and he said no. I even showed him how it had ripped but he said he wouldn't give me another one.
25. I had to ask the guard permission to take an aluminum blanket from the trash because I was afraid he would yell at me if I did it without permission.
26. The light also kept me up at night and stopped me from sleeping. They only turned it off once, Saturday night, for a few hours.
27. I still had medical needs but since they had not given me my medicine in Nogales I decided it was not even worth asking in Tucson.
28. There were two toilets in the cell. The toilet was only partially covered and the guards were able to see us as we went to the bathroom. There was toilet paper but no trash can so many people just threw the dirty toilet paper on the ground.

29. There was a sink but no soap or towels. There was no way to wash my hands or other way clean up.
30. There were cleaning staff but they did not clean the cell. They made us clean up the trash and just took it once we had gathered it.
31. There was a water cooler in the room but no cup. We asked for cups but they said there were not any. When they gave us juice boxes we would reuse them to drink water.
32. They gave us burritos once or twice a day and occasionally would also give us crackers. I was hungry, but once I ate the burrito it made my stomach hurt and swell. Another elderly women had a similar problem. I was not able to eat the last burrito that they gave me because I was so sick.
33. If we stood up and looked out the window they would make fun of us and tell us that they would punish us if we stood there.
34. We had to pressure the officials for about 24 hours before they would let us speak with the consulate.
35. While I was detained I felt sick and tired from walking. As time went by I felt sicker and sicker because of the conditions.
36. I have two US citizen children.

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

Maria de Jesus Lopez M

CERTIFICATE OF TRANSLATION

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

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



EXHIBIT 10

DECLARATION OF JULIO CELSO CHAVEZ ORTIZ

I, Julio Celso Chavez Ortiz, hereby declare:

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

1. My name is Julio Celso Chavez Ortiz. I am a national of Mexico. I am twenty-three years of age.
2. I speak Spanish. I do not speak English.
3. On or around December 5, 2014 I was picked up by U. S. Border Patrol agents near Douglas, Arizona.
4. I was put in a Border Patrol truck with four other people and driven to the Douglas Border Patrol station. The trip lasted only about fifteen or twenty minutes and we arrived there shortly after noon.
5. Once at the Douglas Border Patrol station, I was placed in a cell that was about five by six meters.
6. I saw a "maximum capacity" sign outside the room that indicated forty people was the maximum number the cell could hold.
7. There were about thirty other people in the cell when I arrived. Over time, more people arrived until there were close to sixty people in the cell. With that many people, there was no room to move and people were lying on the floor, including in the bathroom.
8. The only furniture in the cell were five concrete benches along the sides of the room and in the center of the room. This was enough space for approximately half the people in the cell to sit down and so many people, myself included, had to stand or to sit on the floor.
9. I was kept in this cell for about three days, until I was taken to court in Tucson on December 9. I spent four nights in this cell.
10. There were no beds in the cell and we were not provided any blankets or other bedding, other than aluminum blankets. If someone's blanket was damaged, or if someone took another person's blanket from them, agents would not provide a replacement.
11. The temperature in the cell was very cold. I was wearing a t-shirt because the Border Patrol agents took my extra layers of clothing from me before putting me in the cell. With only the thin blanket, I was very cold. We asked agents to turn off the air-conditioning but they would not.
12. With so many people crammed into this cold cell, it was very hard to sleep. I curled up on the floor but only slept a few hours at night. The lights were left on the whole time which

also made sleeping difficult; it was very disorienting and the only way to tell night from day was with the clock on the wall.

13. There were four toilets in the cell, with sinks attached to the tops of the toilets. There were no hand towels and no soap, however, so we had no way to wash up before or after eating or using the bathroom. The toilet was partially screened from view by a short wall, but there was very little privacy.
14. There was not enough toilet paper for everyone. When we ran out of toilet paper, the guards did not bring us more right away, sometimes we had to wait for hours for more. The bathroom was filthy and there was no garbage receptacle, so trash was strewn all over the floor.
15. There were no toothbrushes, and no bathing or shower facilities. Many people had been in the desert for days and needed to wash themselves but they had no way to do so. Some people were sick, but they did not receive any attention or help.
16. There was a cooler with drinking water but no cups, so we had to re-use our discarded cardboard juice boxes. When we ran out of water, we had to ask for more.
17. We were given snacks every few hours, some crackers and juice or a small burrito, but were never fed a full meal. I asked for more food and was refused. I was always hungry.
18. I asked to use the phone to call a family member and was told that I could not make any phone calls at all.
19. At one point an agent presented me with documents to sign, but did not explain what I was signing.
20. Some of the agents were nice but others would mock us in English. One of the agents threatened to send me to prison, where he said I could "rape" someone.
21. After about three days, I was put on a bus and driven to Tucson where I was taken to court.
22. The conditions in Border Patrol custody were truly inhumane and degrading. It felt like we were prisoners of war.

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



CERTIFICATE OF TRANSLATION

1. My name is JAMES LAY, and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, JULIO CHAVEZ^{OPTA} in Spanish.
3. JULIO CHAVEZ^{OPTA} affirmed that the contents of the declaration were true and correct to the best of his knowledge.

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



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

EXHIBIT 11

DECLARATION OF JOSE BUELNA CAMACHO

I, Jose Buelna Camacho, hereby declare:

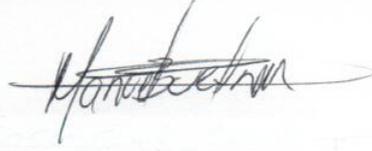
I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

1. My name is Jose Buelna Camacho. I am a national of Mexico. I am 44 years of age.
2. I speak and read Spanish. I also speak or read proficiently English.
3. I was picked up by U. S. Border Patrol agents around December 6, 2014 after walking for about 10 days and after entering through Sonoita, AZ. Mexico.
4. They detained me around midnight on December 6, 2014 and we were kept in the van for more than twenty four hours. The agents drove around with us and then parked overnight while we slept in the van. There were five of us in the van for the duration of the time.
5. The van was cold and they didn't give us covers.
6. They did not give us food or water in that whole time. I was already thirsty and hungry because I had not had water for an entire day. In fact, I had turned myself in because I was out of water. I asked for water and they responded that they did not have any.
7. There was very little room in the van for the five of us and we were crowded in the space, especially when we tried to lie down to sleep.
8. After 24 hours in the van, I was transported to the Casa Grande Border Patrol station. The trip lasted about two hours. I was driven there in a Border Patrol van with the four other people.
9. Once at the Casa Grande Border Patrol station, I was placed in a cell that was about 10 by 8 feet large. There were 40 other people in the cell.
10. I saw a sign on the wall of the cell that said 36 people were allowed to be in the cell. I noticed the sign because I realized that they were breaking that regulation, since the Border Patrol agents put approximately 40 people in my cell.
11. The only furniture in the cell consisted of concrete benches that ran along the sides of the room. There were about 2 of these benches in the cell. This was enough space for approximately 20 people to sit down. There were not enough benches for everyone in the cell to sit on them at the same time. Because there was not enough room on the benches for everyone to sit at one time, some people had to stand or to sit on the floor.
12. I was kept in this cell for 76 hours. I spent three nights in this cell. There were no beds in the cell and we were not provided any blankets or other bedding. I had to try and sleep on

the concrete floor. Some people had to sleep in the bathroom because there was not space for everyone to lie down.

13. The temperature in the cell was very cold. The Border Patrol agents took my sweater from me before putting me in the cell, so all I was wearing was a long sleeve shirt.
14. They gave us aluminum emergency blankets, but they did not keep us warm. Other people asked them to increase the temperature but they ignored them. Due to the temperature in the cell, I was only able to sleep for 4 hours each night.
15. It was very difficult to sleep because the floor was hard and because there were so many people. It was also very loud because the emergency blankets made a lot of noise when people moved. The light was kept on all night which also made it very hard to sleep.
16. There were four toilets in the cell. There were four sinks in the cell but no soap or paper or cloth towels. It was impossible to wash your hands or clean yourself after using the toilet. There also were no toothbrushes, and no bathing or shower facilities. I brought a toothbrush, soap with me and but it was taken away from me and thrown away.
17. There was a water cooler in the cell but no paper cups. We had to fill up our old juice boxes in order to drink the water.
18. We were given something to eat every four hours. Often that food was only crackers and other times they gave us burritos and juice. It was too little food to fill me up. At the time I was detained I hadn't eaten for two days so I was already quite hungry.
19. They did not tell me that I had a right to make a phone call. I did not see a telephone that would indicate I had an opportunity to make a phone call.
20. I hurt my shoulder because my backpack was so heavy but I was not given the opportunity to access medical care.
21. The Border Patrol agents said that if we were not quiet they were going to take away our food. So we stayed very quiet because we were afraid of losing the food.
22. I felt humiliated by the treatment that I received. Especially because as I was handcuffed. This treatment is unnecessary.
23. I lived in California for twenty years and I have two U.S. citizen children and a U.S. citizen wife.

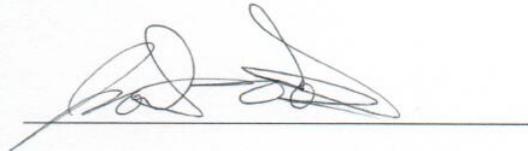
I declare under penalty of perjury that the foregoing is true and correct. Executed this 16th day of December 2014 in Florence, Arizona.

A handwritten signature in black ink, appearing to read "Monte Carlo", is written over a horizontal line. The signature is stylized and cursive.

CERTIFICATE OF TRANSLATION

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

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



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

EXHIBIT 12

DECLARATION OF JOSE CRUZ RUVALCABA MARTINEZ

I, Jose Cruz Ruvalcaba Martinez, hereby declare:

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

1. My name is Jose Cruz Ruvalcaba Martinez. I am a national of Mexico and I am twenty-five years old.
2. I speak Spanish, but I do not speak English.
3. On December 6, 2014, I was arrested by U. S. Border Patrol agents near Sonoita, Arizona. I was driven with another person to the Border Patrol station in Ajo, Arizona. The trip lasted about forty minutes and we arrived around ten o'clock in the evening.
4. In Ajo, I was placed in a cell about three or four square meters in dimension with a few other people. There were a few concrete benches and a toilet, but no other furniture of any kind. It was extremely cold in the room and my extra clothing had been confiscated when I was arrested. I was dressed in a t-shirt and pants and was not given a blanket or anything else to keep warm.
5. After two or three hours, we were taken out of the cell and put on a bus. We were driven to the Tucson Border Patrol Station and arrived early in the morning on December 7.
6. I was placed in a cell roughly the same size. After a few hours, I was taken out for processing and fingerprinting. Afterwards, I was put in a different cell, roughly the same size but with nearly fifty people. It was extremely crowded.
7. The cell had only four or five concrete benches, which was not enough for that many people. Many people, including myself, sat on the concrete floor, which was extremely cold.
8. There were four toilets and three sinks. There was no soap so we could not wash our hands. There were no towels. We were not given toothpaste or toothbrushes and could not brush our teeth.
9. Most of the people in the cell were detained while crossing the desert. Almost everyone was very dirty and was not allowed to bathe or even wash their hands properly.
10. We were hungry because the food we received, some crackers and small burritos, was not enough. We drank water from a cooler but no cups were provided so we had to save the juice boxes they gave us and re-use them to drink water.
11. As in Ajo, the cell was very cold. I was given a thin metallic blanket but it did not keep me warm. There were no beds or other bedding, and it was very hard to sleep in these conditions, lying on the cold floor with so many people.

12. The lights were left on all the time and we were not allowed to go outside, so it was difficult to tell night from day, but I estimated that I was kept in this cell for about forty-eight hours, including two nights.
13. After two days, on the morning of December 9, I was finally taken to court.
14. The experience in Border Patrol custody made me feel awful. The lack of food and sleep, and the cold and overcrowding were constant and punishing. They told us they were going to take us to court, but they did not say when, and so I was left to wait and wonder what was going to happen.

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

JOSE CUE PUNICABA MTZ

CERTIFICATE OF TRANSLATION

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

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



EXHIBIT 13

DECLARATION OF BRENDA CHILEL LOPEZ

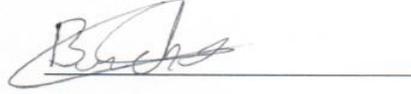
I, Brenda Chilel Lopez, hereby declare:

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

1. My name is Brenda Chilel Lopez. I am a national of Guatemala. I am 29 years of age.
2. I speak Spanish and can read basic Spanish. I only speak very little English.
3. My five year old US citizen daughter and I were detained by U. S. Border Patrol agents around Douglas, Arizona on March 14, 2015 around 11pm.
4. We were transported to the Douglas Border Patrol station. The trip lasted about 30 minutes. I was driven there in a Border Patrol van. There were about 4 other people in the van. There was one woman and three men.
5. Once at the Douglas Border Patrol station, we were placed in a cell that was about 3 meters by 3 meters large. There were no other people in the cell.
6. The only furniture in the cell consisted of one concrete bench that ran along one side of the room.
7. We were kept in this cell for 14 hours. We spent 1 night in this cell. There were no beds in the cell and we were not provided any blankets or other bedding. My daughter tried to sleep on the bench and I sat up so that she could at least rest her head on my lap.
8. I was not able to sleep at all because my daughter would have fallen off the bench if I had moved. My daughter could only sleep a little bit.
9. I asked why they left us in the cell without beds because my daughter was very uncomfortable. The agents said that they could take my daughter to the detention center for children where she would have a bed, but I said that I did not want to be separated from her.
10. The temperature in the cell was very cold. The Border Patrol agents took my jacket from me before putting me in the cell, so all I was wearing was a sleeveless shirt.
11. We were only given thin aluminum sheets to stay warm. The sheets only helped a little bit. I wanted to ask the agents to turn off the cold air but we were locked in and could not see any agents to make requests.
12. The light was kept on all night which also made it very hard to sleep. The guards were also yelling all night, which made it difficult to sleep.
13. There was one toilet in the cell. The toilet was only partially screened from view by a short wall.

14. There was one sink in the cell but no soap or paper or cloth towels. It was impossible to wash your hands or clean yourself after using the toilet. There also were no toothbrushes, and no bathing or shower facilities.
15. When we were detained we were very tired from our journey.
16. There was no water container in the cell. Above the sink was a sign that said drinking water, but the water smelled bad so we did not drink it. We were very thirsty.
17. We were given something to eat two times. The food consisted of crackers, juice and burritos.
18. When I arrived the agents saw that I was seven months pregnant. So they took me to a medical facility. The doctor who saw me did not give me an ultrasound – he just took my temperature and checked my ear and released me.
19. Agents never asked about the health of my child.
20. One official knocked on the door and yelled at me and said “what do you want to do here?” I told him that I came to work and he said “take this shit out”
21. After spending 14 hours in this cell, we were transferred to the Tucson Border Patrol station.
22. We were in the Tucson Border Patrol station 24 hours and one night.
23. The facilities in Tucson were similar to those in Douglas except that there were thin pads on the ground.
24. Neither of us were able to sleep well in Tucson because of the noise.
25. There were two toilets in the cell. The toilets were open to the view and one of the two toilets was backed up and smelled terrible.
26. The sinks were similar to those in the Douglas station, except that we could not use the second sink because it was above the dirty toilet.
27. Staff came twice to clean, but they never cleaned the bathroom.
28. There was a water container in the cell but no cups for drinking water. We had to ask for cups every time we wanted to drink water.
29. The food was similar to that in the Douglas station.
30. My daughter cried constantly in Tucson because she said “why are we trapped here?”
31. I felt very bad while I was detained because of the bad conditions.
32. My five year old daughter was born in the US and is a US citizen.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 17 day of March, 2015 in Tucson, Arizona.

A handwritten signature in cursive script, appearing to read "Beck", is written above a horizontal line.

CERTIFICATE OF TRANSLATION

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

I declare under penalty of perjury that the foregoing is true and correct. Executed this 17 day of March in Tucson, Arizona.

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

EXHIBIT 14

DECLARATION OF MARIO ROBERTO ZAMORA DIAZ

I, Mario Roberto Zamora Diaz, hereby declare:

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

1. My name is Mario Roberto Zamora Diaz. I am from Hondruas and I am 24 years old.
2. I speak Spanish. I do not speak or understand English.
3. I crossed the border near Sonoyta, Mexico on the afternoon of Saturday, June 28, 2014, after escaping from kidnappers in Sonoyta. I was arrested by U. S. Border Patrol agents shortly after crossing the border.
4. I was transported to the Tucson Border Patrol station with another man in a Border Patrol truck. The trip lasted about an hour.
5. In Tucson, I was placed in a small cell. It was about 30 feet by 30 feet and had no furniture other than the concrete benches that lined the walls and one bench in the center of the room. When I first arrived, there was only one other person in the cell, but more people arrived gradually until there were about 20 people in the cell.
6. It was extremely cold in the holding cell and we did not have any blankets or sufficient clothes to stay warm. We only had the aluminum blankets Border Patrol provides, but they were not enough to keep warm. I did not ask the officials to change the temperature because everyone knows that when you ask that officials will turn the temperature down even more.
7. There was one toilet behind a short wall and a sink. There was no soap or towels and we could not brush our teeth or shower. The odor in the room was very strong because no one was able bathe.
8. We received a little food, a small cheese cracker and a box of juice. I tried to eat but I could not stomach the food.
9. There was not enough room to sleep on the benches and it was very uncomfortable. I could not sleep at night because of the extreme cold and because I was lying on the floor. I had a cold and felt very sick, and the conditions of the holding cell only made me feel worse.
10. The next morning I was moved to another cell. The second cell was a little bigger than the first, approximately 50 feet by 30 feet, but there were now about 50 of us in the cell. All of the people in the cell were eventually taken to court together the following day in two buses.
11. In this second cell there were the same concrete benches along the wall and in the center of the room. There were four toilets with sinks attached to them, but one of them did not

work. It was still very cold and we still only had the thin aluminum covers that were not enough to stay warm. Again I had to try to sleep on the floor but I still could not sleep because of the cold. It was like trying to sleep on ice.

12. We did not receive enough food – small burritos and juice boxes – and I was hungry the entire time I was detained.
13. I was not able to make a phone call and was not given the opportunity to call my consulate. I did not see any telephones or any visitation areas in the Tucson facility. I was never allowed to leave the cell or go outside.
14. I spent the night in the second cell and left for court the next morning.

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

Mario Roberto Zamora Diaz

Mario Roberto Zamora Diaz

CERTIFICATE OF TRANSLATION

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

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

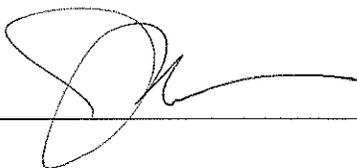


EXHIBIT 15

DECLARATION OF DOLORES GONZALEZ MARTIN

I, Dolores Gonzalez Martin, hereby declare:

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

1. My name is Dolores Gonzalez Martin. I am a national of Guatemala. I am 35 years of age.
2. I speak and read Spanish. I do not speak or read English.
3. I was travelling with my 16 year old son, my 15 year old daughter and my 12 year old daughter when we were detained by U. S. Border Patrol agents around 6 hours walking north of Sonoita, Mexico around 10am on Tuesday, March 10th, 2015.
4. We were transported to the Ajo Border Patrol station. The trip lasted about 30 minutes. We were driven there in a Border Patrol truck. There was no one else in the vehicle with us.
5. Once at the Ajo Border Patrol station, my two daughters and I were placed in one cell and my son was placed in another cell. Our cell was approximately 3 meters by 2 meters large. There was no one else in the cell with us.
6. The only furniture in the cell consisted of one concrete bench that ran along one side of the room.
7. We were kept in this cell for 10 hours.
8. We were very tired when we arrived at the station because we had spent the whole night lost in the desert. But there were no blankets nor other bedding. We had to try to sleep on the concrete bench.
9. The temperature in the cell was very cold. The Border Patrol agents took away my sweater and my daughters' sweaters before putting me in the cell, so all we were wearing were short sleeve shirts.
10. For several hours we were not given any sheets or blankets. Only late in the afternoon were we given thin aluminum sheets to stay warm. The sheets only helped a little bit, but because the concrete floor was so cold that we were unable to stay warm. Due to the temperature in the cell, I was not able to sleep at all and my daughters only slept a little bit.
11. There was one toilet in the cell. The toilet was only partially screened from view so the guards could see us when we went to the bathroom.

12. There was one sink in the cell but no soap or paper or cloth towels. We could only rinse our hands after using the toilet. There also were no toothbrushes, and no bathing or shower facilities. We brought toothbrushes but they were taken away from me.
13. At the time we were detained, we were exhausted from our time in the desert. We had not eaten for over 14 hours and we were hungry.
14. There was no water in our cell. We were very thirsty. We were carrying water when we were detained but the agents took it away from us.
15. We were given something to eat once in our ten hours in the cell. The food consisted of a burrito and a packet of crackers and a juice. We ate the food the first time it was given to us because we were very hungry but it gave us diarrhea and made my daughters vomit. We also noticed that the juices were already expired.
16. We were not told that we could make a phone call. I asked to make a phone call to my family members and they responded that they would give me one, but then they never gave it to me.
17. When we arrived at the station, a Border Patrol agent asked us how we felt and whether we were healthy. We said that we were fine. But we were never given a formal medical evaluation.
18. When my daughters were vomiting and I had diarrhea the agents did not notice our problems and did not offer help. We were afraid to ask for help because we thought that we would be detained for longer if we made any requests.
19. After 10 hours at the Ajo Border Patrol Station, we were transferred to the Tucson Border Patrol station. We spent 17 hours and one night in that station.
20. When we arrived at the Tucson station, my son was placed in one cell and my daughters were taken away to another cell and I was put in another cell. I was very worried because I did not know where they had taken my daughters. The agents did not explain why they separated us.
21. The first cell in which the agents placed me did not have any beds or bedding. It was already nighttime and I wanted to sleep but I was not able to because the floor was so cold.
22. The first cell was just as cold as the cell at the Ajo station and I was only given an aluminum sheet to keep warm.
23. There was no water container in the first cell in which I was placed in the Tucson station.
24. After about two or three hours of being separated from my daughters, I was transferred to the cell where they were.

25. The cell in the Tucson Border Patrol station was smaller than in the Ajo station. It was about two meters by two meters. There was no one else in the cell with us.
26. The only furniture in the second cell was a concrete bench that ran along the sides of the room.
27. In the second cell at the Tucson station, there were two inch thick pads where we could lay down. At this point it was probably three in the morning and I was exhausted.
28. The toilets and sinks in the Tucson station were similar to those in the Ajo station.
29. There was a water container in the second cell in the Tucson station.
30. We were given food to eat three times in the Tucson station. The food consisted of burritos, crackers and juice. We did not eat the food because we were afraid it would make us vomit and give us diarrhea again. We were very hungry because by the time we were released from the Tucson station we had not eaten edible food for almost two days.
31. When we arrived at the Tucson station one agent asked how our health was and we replied that we were fine. I did not tell the agent that my daughters had been vomiting and I had diarrhea because I was afraid that we would be detained longer. We were not given a formal medical exam.
32. In the Tucson station, one agent told me that we would likely be detained for months or even two years to fight our immigration case.
33. While I was detained, I felt very bad because I was afraid that we would be deported or held for even longer. The poor conditions also made me more afraid of what might happen.
34. I am afraid of returning to my country.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 12 day of March, 2015 in Tucson, Arizona.



CERTIFICATE OF TRANSLATION

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

I declare under penalty of perjury that the foregoing is true and correct. Executed this 12 day of March in Tucson, Arizona.

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

EXHIBIT 16

DECLARATION OF MARIA MAGDALENA ORDOÑEZ ORTIZ

I, Maria Magdalena Ordoñez Ortiz, hereby declare:

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

1. My name is Maria Magdalena Ordoñez Ortiz. I am a national of Guatemala. I am 29 years of age.
2. I speak and read Spanish. I speak and read Mam. I do not speak or read English.
3. I was travelling with my ten year old daughter and eight year old son when we were detained by U. S. Border Patrol agents at 6pm on February 12th, 2015 near Douglas, Arizona. We had been in the desert for approximately one day. We had not eaten for an entire day and we were already hungry.
4. We were transported to the Douglas Border Patrol station in a Border Patrol van. The trip lasted about 15 minutes in total. There were two other women and 11 other men in the van with us.
5. Once at the Douglas Border Patrol station, we were placed in a cell that was about 2 meters by 2 meters large. There were four women and three children in the cell. Two of the women were minors and travelling alone.
6. The only furniture in the cell consisted of one concrete bench that ran along the side of the room.
7. We were kept in this cell for 12 hours. We spent 1 night in this cell. There were no beds in the cell and we were not provided any blankets or other bedding. We had to try and sleep on the concrete floor.
8. The temperature in the cell was very cold. The Border Patrol agents took my shirt from me before putting me in the cell, so all I was wearing was a thin sweater.
9. We were only given several thin aluminum sheets. We put two thin sheets on the cold concrete floor and another on top of us but even then it was still cold. I gave one of the sheets to the other women because the agents had only given them one sheet.
10. Even with the blankets, we were very cold because the floor was so cold. My children and I could not sleep because our only option was to lay on the hard and cold concrete floor.
11. It was also difficult to sleep because throughout the night they called me twice for interviews.

12. There was one toilet in the cell. It was only partially covered by a short wall. The toilet was backed up and did not work. So for that night I told my children to only urinate in the toilet. The toilet was very dirty because it did not flush.
13. There was one sink in the cell but there was no soap nor towels. It was impossible to clean our hands well and we did not want to use the sink anyway because it was directly above the dirty toilet. There were no bathing or shower facilities.
14. There was a water container in the cell but there were no cups so we did not drink the water.
15. We were given food three times during the night. The food consisted of crackers and juice and burritos but my children were not accustomed to that type of food so they only ate the packet of crackers and the juice. We were very hungry because we had not eaten for the entire previous day.
16. When I arrived at the Douglas Border Patrol station, I was not asked about my physical health. I am five months pregnant but they did not ask me any questions about my well-being.
17. The other two women in our group felt nauseous when they were detained. They both had hurt their arms and legs from when they crossed the wall, but they had to put up with the pain and nausea. The agents did not ask how they felt or if they needed any medicine or medical attention.
18. My children and I were all very tired, hungry, and dehydrated because of the day that we had spent in the desert. The kids had very dry lips because they had not had sufficient water.
19. After spending 12 hours at the Douglas Border Patrol station, at 6am we were transferred to the Tucson Border Patrol Station.
20. When we arrived in Tucson, we were put in a cell that was approximately 3 meters by 3 meters. There were four mothers in the cell and six children.
21. We were in this cell for 8 hours.
22. The accommodations in the cell were similar to those in Douglas, except that there were thin mattresses on the floor.
23. Like the Douglas station, it was cold in the cell in Tucson. In Tucson, they took away the sweater that I was wearing and my daughter's sweater and made us wear only a thin, short-sleeve shirt. We were only given thin aluminum sheets to keep warm.
24. There were two toilets in the cell and two sinks. Like the Douglas station, they were only partially covered from view. There were no bathing nor shower facilities in Tucson either.

25. There were no waste bins in the cell and there was garbage on the floor. So we had to gather our own trash and give it to the agents when they entered to sweep.
26. Like in the Douglas station, there was a water container in the cell but no cups.
27. The food was similar to that of Douglas and we were only given food twice during our time in Tucson. We were very hungry.
28. After 8 hours at the Tucson Border Patrol station we were released.
29. I was very afraid while I was detained because I didn't know what would happen to my family.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 12 day of February, 2015 in Tucson, Arizona.

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

CERTIFICATE OF TRANSLATION

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

I declare under penalty of perjury that the foregoing is true and correct. Executed this 13 day of February 2015 in Tucson, Arizona.

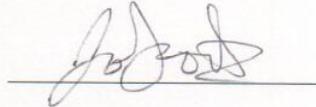
A handwritten signature in black ink, appearing to read 'Joanna Foote', is written over a horizontal line.

EXHIBIT 17

DECLARATION OF JOSE LUIS VERGARA JIMENEZ

I, Jose Luis Vergara Jimenez, hereby declare:

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

1. My name is Jose Luis Vergara Jimenez. I am 43 years old and I am from Mexico.
2. I speak a little English. My first language is Spanish. I can read and write in Spanish.
3. I was picked up close to Naco, Arizona. We were only walking about 40 minutes after crossing the border when Border Patrol picked us up. We left Mexico late Friday night on June 27, 2014. So Border Patrol either picked us up late on the 27th or early in the morning on the 28th.
4. Border Patrol took us to the Naco station. It took around 30 minutes for Border Patrol to take us from the place they arrested us in the desert to the station. We stopped once to pick up more people. They transported us in a truck. I was with my brother when I tried to come in, so he was with me in the truck and then, as I said, they picked up one other person.
5. Once we got to Naco, they put us in a cell. We sat there for about three hours, and then they took our fingerprints. When we were fingerprinted, we were given documents to sign in English. They told me where to sign and I signed but I did not know what the forms said. I asked what these forms were about and they just told me to sign. It all happened fast.
6. After they took our prints, they moved me into a different cell. This cell was about 20 feet by 25 feet. There were a lot of people in this cell – maybe 60 to 70 people. They kept adding people. There was not enough room to walk.
7. People were sitting on the floor and some were on cement benches. The cement benches ran around two of the walls and there were benches in the middle of the room. Some people were sleeping under the concrete benches because it was a little warmer there. Some people were sleeping and sitting in the bathroom.
8. There was enough room for about 30 people to sit down. That was not enough room for everyone to have a seat. The people who could not fit on the benches either sat or lied down on the floor, or they stood.
9. I was kept in this cell from very early in the morning on Saturday until Sunday morning. I spent the night between Saturday and Sunday in that cell in Naco.
10. The cell did not have beds. Some people had normal blankets but there were not enough for everyone. People who did not get normal blankets got shiny plastic ones. I was lucky because I had a blanket and I was on a bench. Some others though, had nothing but plastic blankets and had to sleep on the floor, which was very cold. The lights were on

the entire time I was there. I had a very hard time sleeping. I may have slept an hour or an hour and a half the whole time I was there.

11. I think the temperature was something like 60 degrees Fahrenheit. It was really cold. All I had to wear were my pants, which were ripped from when I crossed the border, and a t-shirt. Border Patrol took a tank top I had on underneath. Even with the clothes I had and the blanket they gave me, I was still very cold. My arms were in my t-shirt, clenched. Some people were trembling.
12. Other people asked the Border Patrol to make it warmer. They ignored the requests. They pretended not to hear.
13. There were four toilets in the cell but two were not working. There were little doors around each toilet but they were so low that anyone standing up could see you if you were on the toilet.
14. There were sinks in each little stall. There was no soap. There were no towels.
15. They did not give us anything to clean our teeth with – no toothbrushes or toothpaste.
16. There was no shower.
17. We were given very little food. I was there around 24 hours and they only gave us food two times. They gave us a little packet of crackers and a kind of small burrito that tasted old. The burrito had beans in it. They gave us a little juice box too. I was very hungry when I was there.
18. I asked to use the phone to call my wife who lives in the United States. They said no. Many people asked to use the phone but they told them no, too. Some people said they wanted to call lawyers, but Border Patrol said no. There was no phone in the cell but I saw one in the area where the guards were. I didn't see a place where a person could have a visitor.
19. I was not told by Border Patrol that I could call the Mexican Consulate.
20. When I was in Naco, I didn't go outside.
21. On Sunday morning, they put me and about 25 others on a bus. We rode for two hours to the Tucson Border Patrol facility. I stayed there about a day and a night. I was there from Sunday morning until Monday morning.

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22. What happened in Tucson was basically the same as in Naco. The cell looked pretty much the same. It was full, like the one in Naco. There wasn't enough space for people to sit. There were no beds. The temperature was really cold. Again, people asked the guards to make it warmer and the guards again ignored the requests. The food was the same. No one was allowed to use a phone. And I couldn't leave my cell. In Tucson, though, I didn't have a blanket – all I got was one of those shiny plastic ones. I was very cold.

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

Jose Luis Vergara J

Jose Luis Vergara Jimenez

CERTIFICATE OF TRANSLATION

1. My name is Alejandro D. Bañuelos Bayles, and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, Jose Luis Vergara Jimenez, in Spanish.
3. Jose Luis Vergara Jimenez affirmed that the contents of the declaration were true and correct to the best of his knowledge.

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

