

EXHIBIT L

**REDACTED
VERSION OF
DOCUMENT
PROPOSED TO BE
FILED UNDER SEAL**

1 I, [REDACTED], declare as follows:

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3 1. This declaration is based on my personal knowledge. If called to testify in this
4 case, I would testify competently about these facts.

5 2. I am 17 years old. I am from Honduras. I have been in the U.S. for one month and
6 two days. I came here by myself.

7 3. I crossed the river and walked a bit, and then a car with immigration officials
8 showed up. They took me to the immigration center where they took my belongings and
9 checked my papers. Then they took me to the processing center.

10 4. I was in border patrol facilities for 18 days. They took me to three different places.
11 At the first facility, there were kids and adults. I was not able to shower the five days I
12 was there.

13 5. At the second facility, it was just kids. It was a little better. I was able to shower
14 more frequently and I was allowed to go outside. I wasn't feeling well, so I asked for a
15 doctor. But, every time you would ask for a doctor, they would say you are not allowed
16 to have that because this country is not yours. I had a headache and stomachache for
17 about three days, but I was never able to see a doctor. I stayed at that place for about
18 thirteen days and then they told me it was too crowded and they took me to another place.

19 6. At the third facility, there were adults and kids again. I was able to shower there. It
20 was better than the first. But, when I was there a girl was asking over and over for a
21 doctor and they wouldn't let her see one. At night, she was crying and in pain. She said
22 she could not feel half her body. The doctor finally showed up to take a look at her.

23 7. I was allowed to make a phone call to my sponsor at the second place, but that was
24 my only call during my time in the border facilities.
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Houston Emergency Intake Site

8. When I got to the third facility, I was told that I was moving to a shelter – a better place. I left the facility around 7 in the morning and arrived at the shelter at about 4 in the afternoon.

9. There were about 470-something girls at this shelter. It was better than where I had been in immigration, but some of the staff did not treat us well. I was there for fourteen days.

10. Sometimes when we wanted to chat amongst ourselves during the day, the staff wouldn't let us. They would make us sleep during the day and confine us to our cots. Because we slept during the day, we weren't sleepy at night and that made them angry. Sometimes when you asked for a new change of clothes to take a shower, they would not let you have it. Sometimes, if you needed to use the restroom, the staff members wouldn't let you. If you asked for more food, they wouldn't let you have it but they would sit at tables where we could see them and they would eat and laugh at us.

11. I was able to shower there once every other day. Sometimes they would give you a change of clothes, but sometimes only clean underwear. I don't know why.

12. At night, if we needed to use the bathroom, they would tell us "no" – that no one could use the bathroom at that time. Sometimes during the day, to make us stay on our cots, they would tell us that no one could use the bathroom. Girls would have to hold it for long periods of time.

13. The food was sometimes good and other times not. There were times when I felt hungry because there wasn't enough food. We had to eat the food on our cots.

14. We would spend most of the day on the cots. They made us stay on the cots all the time.

15. There was not much to do, but sometimes people would show up with coloring books for us.

1 16. I was able to talk to my cousin once on video when I had my interview about my
2 case and then one other time on the phone.

3 17. A few days ago, they told us we were leaving because we were not safe there. It
4 was because the day before a girl had a problem there. Late on Thursday, we were all
5 going to bed. Lights were out; it was around midnight. There was a woman who was not
6 staff or security. She was calling out for girls to see who was awake. She was lurking
7 near the bathroom. One girl was awake and the woman approached her. She told her to
8 get up from the cot. The woman then opened the door to go outside. There was no one
9 there manning the door and the door was not locked. There was a woman and a man and
10 two cars outside. The girl didn't know if she was going to be kidnapped. The way she
11 was able to be taken outside was concerning. When they were bringing her back inside,
12 they told her they would come for her the next day.

13 18. I spoke to this girl. She was a friend from my section of the warehouse. She was
14 really worried. She didn't know who the women or man were or why she was being
15 taken outside. She didn't want to tell anyone at the shelter because she didn't want
16 anything bad to happen to her, but she eventually spoke up. From what I know, when she
17 spoke up, the staff asked her questions about why she had gone outside. Then the
18 director of the shelter came, and he also asked her questions to try to figure out what had
19 happened. They told the girl not to tell other staff members or girls what had happened
20 or else the girls would get scared.

21 19. I also spoke to a girl who was in the cot next to the girl who was taken outside.
22 She was scared, too. She saw this woman approach the girl, lean over and whisper "come
23 with me" and then take the girl outside.

1 20. I don't know why staff didn't see this happen. In our section, there was one staff
2 member. But she wasn't there when the girl was taken away. I heard she was passing out
3 cookies to other kids. But that staff saw when the girl came back to her cot. The staff
4 saw the girl return to her cot by herself and she asked her why she had left her cot, but the
5 girl didn't say anything. She was too scared.

6 21. The next day, they prepared us to leave the facility and then we left the day after
7 that - on Saturday. The workers said they thought we were being moved because of this
8 incident and we were told not to say anything to anyone about it when we were
9 transferred.

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11 Carrizo Springs Influx Shelter
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13 22. I am doing better here at this shelter. I feel good and safe.

14 23. The living situation here is much better. In our area, I share a bedroom with four
15 girls and then there are four girls in the adjoining room.

16 24. My cousin is my sponsor. He lives in Montana. I spoke to him on Sunday, the day
17 after I got here. I don't know the status of my case. My cousin told me that he has
18 turned in all of the paperwork that was asked of him.

19 25. I would like to study and learn English. When I was in Honduras, I was studying
20 accounting and finance and I'd like to do that. I also would like to be a lawyer. I would
21 like to help people like myself someday.

1 I declare under penalty of perjury that the foregoing is true and correct. Executed on this
2 20th day of April, 2021, at Carrizo Springs, TX.

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A large black rectangular redaction box covers the signature area, spanning from approximately line 4 to line 6 and across the right half of the page.

CERTIFICATE OF TRANSLATION

My name is Soraya Morales Nuñez and I swear that I am fluent in both the English and Spanish languages and I translated the foregoing declaration from English to Spanish to the best of my abilities.

Dated:

April 20, 2021

Soraya Morales Nuñez
Soraya Morales Nuñez