

EXHIBIT S

**REDACTED
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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 13 years old. I am from Honduras.

6 3. I left Honduras on March 15. My journey was sometimes hard and sometimes
7 easy. I came here by myself. My Dad and my sister are here, and I wanted to be with
8 them.

9 4. I crossed the Rio Bravo on a raft and then walked for about forty minutes. I then
10 turned myself in to immigration officials. They asked me questions and then took me to
11 what I believe is called McAllen.

12
13 CBP Custody – McAllen
14

15 5. I was at McAllen for about five days. Being there was different from what it's like
16 here. They gave us one burrito for breakfast, lunch and dinner. We were locked up all
17 day.

18 6. I slept on a mattress pad on the ground. It was only the length of my torso and I
19 didn't have cushioning below my torso. They gave us aluminum blankets. They would
20 turn the light off around midnight and turn them back on around 5 or 6 in the morning.

21 7. There were about 74 other kids with me in my cell. There were a lot of cells there.
22 Some had 70 or 80 kids. In the area that I was in, there were 8 other cells, but I know
23 there were more cells in different areas.

24 8. During the day, we would do nothing. I would just sit in the cell all day and try to
25 layer up because it was very cold. We were inside all day.

26 9. I was able to take one shower time while I was there for about five minutes. I was
27 never able to brush my teeth while I was there.

28 10. I was not allowed to make any phone calls while I was there.

1 11. It was very horrible. There were kids in other cells who were yelling or screaming
2 and immigration officials would laugh at them. They were yelling because many had
3 been there a long time – some for 20 days and they were desperate. It was really hard to
4 be there.

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6 ORR Custody – San Antonio Emergency Intake Site
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8 12. After 5 days at McAllen, I came here. I was not told ahead of time that I would be
9 moved. I was woken up and told I would be leaving. There were about 500 kids who
10 were going. My name was called out to leave, but I didn't know where I would be going.
11 I spent all day in a soccer field that was fenced in. I was there until about 7 in the
12 evening. I received a COVID test. My test was negative and I was then put on a bus to
13 come here. The bus ride took from about 7 in the evening to about 5 in the morning. The
14 bus had about 70 kids and there were 6 buses. They did not tell me anything - not where
15 I was going or how long the trip was going to take. Once we arrived, we stayed on the
16 bus for about 2 or 3 more hours.

17 13. When I got off the bus that morning, I wasn't feeling well. I had a runny nose and
18 was coughing. There were other kids who also had cold-like symptoms. I was given three
19 rapid COVID tests and they all came back negative.

20 14. After the three negative tests, they brought the kids who had also tested negative
21 into the facility. They did not give us an orientation. They just took us to the cots.

22 15. I think there about 1900 kids here total. I don't know exactly how many kids are in
23 the area where I sleep. There are a lot. But I don't know how many. There are two very
24 large rooms with lots and lots of cots. The cots are set up in lines.

25 16. I have been detained here for 21 days. The social workers here have told me that I
26 will be able to leave soon, but they have not given me a specific date.

27 17. I had physical exam after I arrived here. They gave me a shot about fifteen days
28 into my stay here. I think it was either for varicella or measles.

1 18. This place is okay. Sometimes I do feel desperate, but I am able to calm myself. It
2 is because I want to be with my family. When I am feeling that way, I don't really talk
3 about it but there are some people I feel comfortable talking to about how I am feeling.

4 19. I was recently put into a new pod and a lot of the kids in the new pod have been
5 crying a lot. I have heard that the government decided to group 13 and 14 year olds
6 together because there was bullying happening with the older kids.

7 20. There are some kids who spend the day on their cots. In my pod, there are kids
8 sometimes who will get under the covers and wrap themselves up. Other kids will lift the
9 blanket and ask if they're okay, and they will be crying. I think the primary reason why
10 kids are sad is because they miss their families. But they may also be sad because a lot of
11 kids moved pods and they may not know the other kids. They moved into new pods about
12 five days ago.

13 21. I was able to shower today, but I probably won't tomorrow. I am able to take a
14 shower every other day for about three minutes.

15 22. The food here is good. I think there is sufficient food. For me, it's a lot.

16 23. I have had classes here for English and math. I don't have these classes every day
17 and I don't know how long they last. They do the classes in the cafeteria.

18 24. I have recreation once a day. I like to go outside and get fresh air. I walk around.
19 We get about ten minutes outside. It's once a day, except yesterday and the day before
20 we didn't go outside.

21 25. There are activities for us. There are balls. Kids can play outside if they want to. I
22 like to write. I like to write about what I do here and how I am feeling.

23 26. I am able to make phone calls to my Dad. I have spoken to him four times – about
24 once a week. I was last able to talk to him yesterday.

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1 27. My Dad and sister live in Florida. My Dad is applying to be my sponsor. I know
2 he has received paperwork and been given instructions about how to send it in. I think he
3 will be sending in paperwork tomorrow.

4 28. I know I have a social worker who I can call about my case, but I haven't talked to
5 her. I have been interviewed three times about my case. Every interview has been with a
6 different person. The last interview they asked me uncomfortable questions about my
7 journey. I was also asked sexual questions and questions about if I had any criminal
8 history. The fourth interview they said they had a lot of information and didn't have
9 more questions. I am not certain if they will ask me more questions. The last time I had
10 an interview, I asked if I could be put in touch with my social worker, but I think they
11 forgot because that was more than three days ago and I have not heard from anyone.

12 29. I spend a lot of time on my cot. I usual write and also read, but I also like talking
13 to the kids that I have gotten to know.

14 30. I have not received a list of free legal service providers or talked to an attorney
15 since I have been here.

16 31. When kids here are bad, they have a report written up. That would happen in the
17 pod where I was before. It was only some of the kids. If you get a report written up and
18 your case is up for review, they will see you have reports and they will send you to the
19 back of the line. And it will take longer for you to leave the facility. I've also seen that if
20 kids get in trouble they are asked to go and sit on their cots.

21 32. The first thing I want to do once I see my Dad and sister is to give them a really
22 big hug. I want to continue my schooling and learn English. I would like to be a doctor. I
23 like to be helping other people.

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1 I declare under penalty of perjury that the foregoing is true and correct. Executed on this
2 19th day of April, 2021, at San Antonio, TX.

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CERTIFICATE OF TRANSLATION

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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 19, 2021

Soraya Morales Nuñez
Soraya Morales Nuñez