

# **EXHIBIT K**

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

1 I, [REDACTED], declare as follows:

2  
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 Guatemala.

6 3. I arrived on the 31<sup>st</sup> of March so I am approaching the thirty-day mark. I came here  
7 by myself.

8  
9 **CBP Custody**

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11 4. It was a difficult trip. When I crossed the border, I was apprehended by  
12 immigration officials. [REDACTED]

13 [REDACTED]  
14 5. I was taken to a cell for three hours, and then after that they took me to the hielera.

15 6. I was in the hielera for 4 days.

16 7. It was always dark. You couldn't tell if it was night or if it was day. They gave us a  
17 mattress pad and an aluminum blanket, and that was it. It was pretty awful being there.  
18 You were not allowed to go outside.

19 8. I was allowed to shower when I arrived, but not again during those four days.

20 9. I was not able to make a phone call there.

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22 **ORR Custody – Houston Emergency Intake Site**

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24 10. After the hielera, I was taken to a facility that looked like a warehouse in Houston.  
25 I took a bus to get to Houston, and that trip was about 13 hours long. There were 26 girls  
26 on the bus.

1 11. I was able to make a phone call several days after I arrived. I spoke with my mom  
2 and she said that immigration officials had never called her to tell her I was in custody  
3 Other than that, I was not allowed any phone calls.

4 12. We all slept in the same huge area of the warehouse. The only thing in the  
5 warehouse were cots and boxes. The cots looked like hospital cots. The boxes were used  
6 to separate the cots. We also ate in that same place on our cots.

7 13. It felt like the place was possessed. At one point, they had priests come in to bless  
8 the place. Girls were fainting every day. I didn't know why. I'm not sure if they were  
9 fainting because they were depressed.

10 14. They only let us shower every six days or so. I think it is because there wasn't  
11 enough clothes there. The clothes we did have were donated from school children.

12 15. There were constant restrictions on the bathrooms. Sometimes they prohibited us  
13 from using the bathrooms even when they were so close. They said we could only use  
14 the bathroom two times a day. They told us that the two times a day was a rule that they  
15 had there. We learned to not ask questions because we wouldn't get answers.

16 16. I thought the food was okay but there was just not enough for everyone. At night  
17 the girls would say they were hungry. I was hungry every single night.

18 17. While I was there, I spoke to a case manager one time about my case.

19 18. We were all curious about why there was so much control over us even to go to the  
20 bathroom. About five days before we left the facility, I asked one of the workers, and she  
21 told me that there is someone who was working there who had been taking information  
22 from the girls and had already taken eight girls away and was trying to take a 9<sup>th</sup> girl, but  
23 I have no way of confirming that story. The girls were talking about this, and we were  
24 scared.

25 19. We were told on April 17 that we would be leaving that place. The supervisor  
26 came in to tell us that we would be moving somewhere else. She said that some would  
27 be moving to another facility because they had been there a long time and that their cases  
28 would move faster at another place. She told us to trust her that it would be okay. To be

1 honest, I never got a truthful response as to why we were moving. I also heard that the  
2 government didn't have enough money for that facility, but I never got a straight answer  
3 about the reason we left.

4 20. Some girls thought the reason we left was because there was bomb threat. We  
5 heard a very loud noise one night, and then no one wanted to explain to us what was  
6 happening. A volunteer told us that it was a bomb, but that it would be okay.

7  
8 **Fort Bliss Emergency Intake Site**  
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10 21. I have been detained at this facility since April 17. We took a plane to get here,  
11 and I was on a bus before and after the plane ride.

12 22. The only differences here from Houston are the food and that we get to shower  
13 daily. Otherwise, it feels about the same. They don't give us very much attention and  
14 they don't treat us well. I was told that if I misbehaved, my social worker would be  
15 notified and my case processing would be delayed.

16 23. I'd really like to leave here. The one thing I am worried about is the pandemic. I  
17 try my best to follow the rules because I would rather do that than have to stay here  
18 longer.

19 24. I have been able to have two calls in the time I have been here.

20 25. Some girls here like to color; other girls do their hair. Others of us sleep all day so  
21 that we don't have to feel the day go by.

22 26. Sometimes the workers here will teach us a bit of English. It's about once a week.

23 27. We are able to go outside two times a week. We can play soccer.

24 28. I have not talked to a case manager since I have been here. I know of other girls  
25 who have. It is hard to get information here. If you ask to talk to a case worker, you are  
26 told no. If you ask how long you will be here, you are told it depends. There are three  
27 categories of girls here. Some girls arrived directly from the border and were gone by  
28

1 Friday. It might be faster for someone else to be released than me because my sponsor is  
2 my uncle and that might take more time.

3 29. My uncle lives in New York, and he will be receiving me. From what I know, they  
4 approved paperwork that my uncle filled out that showed he was my uncle. There was no  
5 issue for me to go with him. He has tried to call them but has not received a response  
6 from anyone.

7 30. I haven't been feeling well here. It has been really hard ever since I got to the U.S.  
8 I am feeling really depressed. There is a psychologist here and counselors, but I haven't  
9 spoken with anyone. It's really hard to speak to someone. I finally have an appointment  
10 to talk to someone after trying several times. I am talking to them today.

11 31. A lot of the girls here cry a lot. A lot of them end up having to talk to someone  
12 because they have thoughts of cutting themselves. They are sad because they don't want  
13 to be here anymore.

14 32. I sleep in a big white tent with about three hundred girls. We sleep on cots that are  
15 stacked on top of each other. Some girls in the bottom bunk are worried that the girl on  
16 the top bunk will fall on them because it has happened. It's also really cold and there is a  
17 lot of dirt coming into the tent. We don't really sleep because of the rattling noise the  
18 metal beams on the tent makes at night.

19 33. We are allowed to shower here every day, but there is not enough clothes here. I  
20 have been wearing the same clothes for eight days. I do not know when I can get clean  
21 clothes.

22 34. When I leave here, I would like to enroll in school and continue my education. I  
23 would also like to get a job because I have a lot of debt to pay off. I would like to be a  
24 nurse or a doctor. Apart from wanting to help people, I would really like to fight for  
25 people's health so that they don't feel hopeless and can get the help they need.

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I declare under penalty of perjury that the foregoing is true and correct. Executed on this 28<sup>th</sup> day of April, 2021, at El Paso, Texas.

[Redacted signature block]

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 28, 2021

Soraya Morales Nuñez  
Soraya Morales Nuñez