



CENTER FOR HUMAN RIGHTS AND CONSTITUTIONAL LAW

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To: Pro bono and legal services attorneys interested in monitoring the detention of immigrant children

From: Peter Schey, Carlos Holguin, Flores Class Counsel

Re: Court-approved detention site inspection

Date: November 8, 2017

Please feel free to forward this email to attorneys and paralegals who may be interested.

Pursuant to Paragraph 33 of the nationwide class action settlement in *Flores v. Johnson*, 85-cv-04544-DMG-AGR, Central District of California, *class counsel and attorneys and paralegals they designate have the right of "access" to any facility where immigrant children class members are detained. The purpose of site visits is "to interview class members, staff and observe conditions at the facility."*

We are writing to invite lawyers and paralegals to join visits to detention centers holding immigrant minors in Dilley and Karnes, Texas, border patrol facilities in the Rio Grande Sector (McAllen and Rio Grande City), and a detention facility in Berks, Pennsylvania.

The primary purpose of the visits is to monitor compliance with the *Flores* Settlement, dealing with conditions of detention and release of immigrant minors. A full copy of the Flores Settlement is available [through this link](#). Monitors may prepare declarations about their observations and collect declarations while interviewing class members. Declarations may be used in enforcement proceedings before the District Court.

Court appointed Government monitors must file reports with the District Court on or before December 1, 2017 reporting on the Customs and Border Protection's (CBP) and the Immigration and Customs Enforcement's (ICE) compliance with the Settlement and the Court's most recent Order regarding compliance with the Settlement. A copy of the Court's compliance Order, issued on June 27, 2017, is available [through this link](#). Plaintiffs may then file a response to the Court appointed monitor's reports by December 15, 2017. *To gather evidence for our report, we plan to conduct detention site inspections the end of November and early December.*

Memorandum to Pro Bono and Legal Services Attorneys and Paralegals

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Our inspection team members may visit one or several facilities. Inspections are usually completed in one day. Being bilingual in Spanish is very helpful but not necessary if accompanied by an interpreter.

We tentatively plan to conduct the 4 or 5 site visits between Monday, November 27th and Friday, December 8th.

Attorneys or paralegals possibly interested in participating in one or more inspections in Dilley, TX (ICE), Karnes, TX (ICE), Berks, PA (ICE), or CBP stations in the Rio Grand, TX [please use this link](#) to identify the sites you may wish to visit and the dates on which you may be available. Upon your registration, we will email you additional information and be in touch by telephone to decide you are able to participate in a site inspection.

If you have any questions please feel free to email

Peter Schey at pschey@centerforhumanrights.org

Carlos Holguin crholguin@centerforhumanrights.org and

Chapman Noam chapmannoam@centerforhumanrights.org.

Thank you.

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