

EXHIBIT I

DECLARATION OF KRISTIN MACLEOD-BALL

I, Kristin Macleod-Ball, declare as follows:

1. I am a legal fellow with the American Immigration Council. I submit this declaration in support of Plaintiffs' Motion for Class Certification. I have personal knowledge of the facts set forth herein, and, if called as a witness, could and would testify competently as follows:

2. On February 21, 2014, I sent an email requesting Executive Office for Immigration Review ("EOIR") statistics about juveniles in immigration proceedings to PAO.EOIR@usdoj.gov, an email address for EOIR's Office of Legislative and Public Affairs. I requested information including how many juveniles were in proceedings in FY2013 in each EOIR immigration court, how many of those juveniles did and did not have legal representation, how many of those juveniles were and were not detained, and the dispositions of the cases of juveniles in immigration court in FY2013.

3. On February 28, 2014, I received an email from Kathryn.Mattingly@usdoj.gov. The email stated that EOIR derived statistics regarding juveniles' immigration proceedings using a code that is not required by EOIR's case tracking system and, as a result, the information could be changed at any time and the number of juvenile cases would change whenever the code was modified. The email asked for confirmation that my request for statistics should be submitted.

4. On March 4, 2014, I sent an email to Kathryn.Mattingly@usdoj.gov confirming my request for statistics regarding juveniles in immigration proceedings.

5. On March 19, 2014, I received an email from Kathryn.Mattingly@usdoj.gov. A document entitled

"FY2013JuvenileStatisticsbyBaseCity_CustodyRepresentationDisposition_Corrected" was

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attached to the email as a PDF. The PDF included charts indicating the number of EOIR completions with a juvenile case identifier in FY2013, sorted by immigration court, representation status, detention status, and case disposition. A true and correct copy of the PDF is attached hereto as Exhibit I.A.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Executed this 8th day of July, 2014 in Washington, D.C.

/s/ Kristin Macleod-Ball
KRISTIN MACLEOD-BALL

EXHIBIT I.A

Executive Office for Immigration Review

EOIR Cases with a Juvenile Case Identifier for FY 2013

Representation rates for completions with a juvenile¹ case identifier by immigration court, FY 2013.

Of the 7,148 completions with a juvenile case identifier for FY 2013, 509 cases were riders to other cases.

Base City	Represented	Unrepresented	Total
ADELANTO	0	1	1
ARLINGTON	160	43	203
ATLANTA	94	97	191
BALTIMORE	249	238	487
BLOOMINGTON	55	41	96
BOSTON	193	35	228
BUFFALO	16	9	25
CHARLOTTE	185	284	469
CHICAGO	53	66	119
CLEVELAND	15	25	40
DALLAS	139	227	366
DENVER	22	23	45
DETROIT	58	14	72
EL PASO	50	10	60
EL PASO SPC	44	0	44
ELOY	1	10	11
FLORENCE SPC	0	5	5
GUAYNABO (SAN JUAN)	1	0	1
HARLINGEN	245	236	481
HARTFORD	46	32	78
HONOLULU	3	0	3
HOUSTON	269	209	478
HOUSTON SPC	5	18	23
IMPERIAL	0	3	3
KANSAS CITY	25	31	56
KROME NORTH SPC	0	1	1
LAS VEGAS	19	11	30
LOS ANGELES	456	192	648
LOS FRESNOS (PORT ISABEL)	0	2	2
MEMPHIS	85	111	196
MIAMI	156	162	318
NEW ORLEANS	24	25	49
NEW YORK - DET	3	3	6
NEW YORK CITY	513	187	700
NEWARK	138	89	227
OMAHA	46	22	68
ORLANDO	57	80	137
PHILADELPHIA	64	44	108
PHOENIX	53	115	168
PORTLAND	64	28	92
SALT LAKE CITY	5	8	13
SAN ANTONIO	229	80	309
SAN DIEGO	59	24	83
SAN FRANCISCO	217	81	298
SEATTLE	56	16	72
TACOMA	1	0	1
TUCSON	8	8	16
ULSTER	1	0	1
YORK	7	13	20
	4,189	2,959	7,148

¹EOIR derived this information using an information code that is not required to be entered into our case tracking system. This information may be modified or changed at any time, therefore, the information on the number of juvenile proceeding receipts may vary each time this code is modified.

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Custody status of represented completions with a juvenile case identifier, FY 2013

Base City	Detained	Non-Detained	Total
ARLINGTON	28	132	160
ATLANTA	0	94	94
BALTIMORE	1	248	249
BLOOMINGTON	0	55	55
BOSTON	1	192	193
BUFFALO	0	16	16
CHARLOTTE	0	185	185
CHICAGO	16	37	53
CLEVELAND	0	15	15
DALLAS	0	139	139
DENVER	1	21	22
DETROIT	2	56	58
EL PASO	37	13	50
EL PASO SPC	44	0	44
ELOY	1	0	1
GUAYNABO (SAN JUAN)	0	1	1
HARLINGEN	165	80	245
HARTFORD	0	46	46
HONOLULU	0	3	3
HOUSTON	100	169	269
HOUSTON SPC	5	0	5
KANSAS CITY	0	25	25
LAS VEGAS	0	19	19
LOS ANGELES	58	398	456
MEMPHIS	0	85	85
MIAMI	0	156	156
NEW ORLEANS	0	24	24
NEW YORK - DET	1	2	3
NEW YORK CITY	0	513	513
NEWARK	1	137	138
OMAHA	0	46	46
ORLANDO	0	57	57
PHILADELPHIA	0	64	64
PHOENIX	22	31	53
PORTLAND	21	43	64
SALT LAKE CITY	0	5	5
SAN ANTONIO	106	123	229
SAN DIEGO	2	57	59
SAN FRANCISCO	7	210	217
SEATTLE	0	56	56
TACOMA	1	0	1
TUCSON	0	8	8
ULSTER	1	0	1
YORK	7	0	7
	628	3,561	4,189

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Custody status of unrepresented completions with a juvenile case identifier, FY 2013

BASE CITY NAME	Detained	Non-Detained	Total
ADELANTO	1	0	1
ARLINGTON	6	37	43
ATLANTA	1	96	97
BALTIMORE	0	238	238
BLOOMINGTON	0	41	41
BOSTON	0	35	35
BUFFALO	0	9	9
CHARLOTTE	0	284	284
CHICAGO	2	64	66
CLEVELAND	0	25	25
DALLAS	0	227	227
DENVER	0	23	23
DETROIT	0	14	14
EL PASO	1	9	10
ELOY	10	0	10
FLORENCE SPC	5	0	5
HARLINGEN	28	208	236
HARTFORD	0	32	32
HOUSTON	17	192	209
HOUSTON SPC	18	0	18
IMPERIAL	0	3	3
KANSAS CITY	1	30	31
KROME NORTH SPC	1	0	1
LAS VEGAS	0	11	11
LOS ANGELES	8	184	192
LOS FRESNOS (PORT ISABEL)	1	1	2
MEMPHIS	0	111	111
MIAMI	0	162	162
NEW ORLEANS	0	25	25
NEW YORK - DET	2	1	3
NEW YORK CITY	0	187	187
NEWARK	2	87	89
OMAHA	0	22	22
ORLANDO	0	80	80
PHILADELPHIA	0	44	44
PHOENIX	81	34	115
PORTLAND	7	21	28
SALT LAKE CITY	2	6	8
SAN ANTONIO	11	69	80
SAN DIEGO	1	23	24
SAN FRANCISCO	8	73	81
SEATTLE	0	16	16
TUCSON	0	8	8
YORK	13	0	13
	227	2,732	2,959

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Disposition of detained represented completions with a juvenile case identifier, FY 2013

Base City	Administrative Closing - Other	Affirmed - DHS Decision and no Credible Fear	Other Administrative Completion	PD Termination	Relief Granted	Remove	Terminated	Vacate - DHS Decision and Credible Fear	Voluntary Departure
ARLINGTON	0	0	0	0	0	6	10	0	12
BALTIMORE	1	0	0	0	0	0	0	0	0
BOSTON	1	0	0	0	0	0	0	0	0
CHICAGO	0	0	0	0	3	1	0	0	12
DENVER	0	0	0	0	0	1	0	0	0
DETROIT	0	0	0	0	0	2	0	0	0
EL PASO	0	0	2	0	0	8	0	0	27
EL PASO SPC	0	0	0	1	0	43	0	0	0
ELOY	0	0	0	0	0	1	0	0	0
HARLINGEN	5	0	1	0	0	9	32	0	118
HOUSTON	0	0	0	1	0	9	1	0	89
HOUSTON SPC	0	0	0	0	0	5	0	0	0
LOS ANGELES	1	0	0	0	26	11	3	0	17
NEW YORK - DET	0	0	0	0	0	1	0	0	0
NEWARK	0	0	0	0	0	1	0	0	0
PHOENIX	0	0	0	0	20	1	1	0	0
PORTLAND	0	0	0	0	0	5	0	0	16
SAN ANTONIO	0	0	0	0	13	3	72	0	18
SAN DIEGO	0	0	0	0	0	1	0	0	*
SAN FRANCISCO	0	0	0	0	0	0	4	0	*
TACOMA	0	0	0	0	0	0	1	0	0
ULSTER	0	0	0	0	0	1	0	0	0
YORK	0	3	0	0	1	1	0	2	0

Where it necessary to protect privacy interests, EOIR does not report numbers lower than four.

Disposition of non-detained represented completions with a juvenile case identifier, FY 2013

Base City	Administrative Closing - Other	Other Administrative Completion	PD Termination	Relief Granted	Remove	Terminated	Voluntary Departure	PD Administrative Closure	Terminate
ARLINGTON	48	1	0	1	5	3	53	12	9
ATLANTA	5	0	0	3	3	14	42	5	0
BALTIMORE	50	0	0	0	12	48	68	34	0
BLOOMINGTON	17	1	0	0	3	6	9	7	12
BOSTON	35	0	0	5	52	27	47	5	21
BUFFALO	0	0	0	0	4	1	9	0	2
CHARLOTTE	3	0	0	11	3	38	16	36	78
CHICAGO	4	0	0	1	2	11	9	6	4
CLEVELAND	1	0	0	0	0	6	4	*	2
DALLAS	13	0	0	0	0	55	25	43	3
DENVER	3	0	0	0	0	3	8	5	2
DETROIT	2	0	0	0	1	4	45	*	2
EL PASO	1	0	0	0	0	0	11	*	0
GUAYNABO (SAN JUAN)	0	0	0	0	0	0	0	0	1
HARLINGEN	21	0	2	0	1	7	47	*	1
HARTFORD	10	0	0	2	2	23	5	*	4
HONOLULU	0	0	0	0	0	1	1	0	1
HOUSTON	15	1	0	0	30	72	28	22	1
KANSAS CITY	0	0	0	0	1	2	12	6	4
LAS VEGAS	3	0	0	0	1	2	11	*	0
LOS ANGELES	42	0	0	3	26	94	94	9	130
MEMPHIS	14	0	0	0	3	19	17	16	0
MIAMI	47	0	1	0	4	19	68	7	10
NEW ORLEANS	0	0	0	0	1	11	4	*	7
NEW YORK - DET	1	0	0	0	0	0	1	0	0
NEW YORK CITY	142	1	0	2	28	46	244	18	32
NEWARK	26	1	0	0	10	33	58	8	1
OMAHA	2	0	0	1	0	6	16	5	16
ORLANDO	17	0	0	0	4	11	17	*	6
PHILADELPHIA	8	0	1	0	4	12	24	*	12
PHOENIX	12	0	1	0	7	5	3	0	3
PORTLAND	16	0	1	0	11	1	4	4	6
SALT LAKE CITY	0	0	0	0	0	2	2	*	0
SAN ANTONIO	0	0	1	0	4	10	101	*	4
SAN DIEGO	10	0	0	0	2	3	26	4	12

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Disposition of non-detained represented completions with a juvenile case identifier, FY 2013

Base City	Administrative Closing - Other	Other	Administrative Completion	PD Termination	Relief Granted	Remove	Terminated	Voluntary Departure	PD Administrative Closure	Terminate
SAN FRANCISCO	50	0	0	0	3	22	56	9	48	0
SEATTLE	1	0	0	0	0	0	30	4	16	0
TUCSON	0	0	0	0	0	2	2	0	4	0

* Where it necessary to protect privacy interests, EOIR does not report numbers lower than four.

Disposition of detained unrepresented completions with a juvenile case identifier, FY 2013

Base City	Administrative Closing - Other	Affirmed - DHS Decision and no Credible Fear	Other Administrative Completion	Relief Granted	Remove	Terminated	Varate - DHS Decision and Credible Fear	Voluntary Departure	DHS Decision and No Reasonable Fear
ADELANTO	0	0	0	0	1	0	0	0	0
ARLINGTON	0	0	0	0	4	2	0	0	0
ATLANTA	0	0	0	0	1	0	0	0	0
CHICAGO	0	0	0	0	1	0	0	*	0
EL PASO	0	0	0	0	1	0	0	0	0
ELOY	0	0	1	0	8	1	0	0	0
FLORENCE SPC	0	0	0	0	5	0	0	0	0
HARLINGEN	5	0	1	0	8	3	0	11	0
HOUSTON	2	0	0	0	11	1	0	*	0
HOUSTON SPC	0	0	0	0	18	0	0	0	0
KANSAS CITY	0	0	0	0	1	0	0	0	0
KROME NORTH SPC	0	0	0	0	1	0	0	0	0
LOS ANGELES	0	0	0	0	7	0	0	*	0
LOS FRESNOS (PORT ISABEL)	0	0	0	0	1	0	0	0	0
NEW YORK - DET	0	0	0	0	1	0	0	*	0
NEWARK	2	0	0	0	0	0	0	0	0
PHOENIX	0	0	0	12	13	2	0	54	0
PORTLAND	0	0	0	0	6	0	0	*	0
SALT LAKE CITY	0	0	0	0	2	0	0	0	0
SAN ANTONIO	1	1	0	0	7	0	1	*	0
SAN DIEGO	0	0	0	0	1	0	0	0	0
SAN FRANCISCO	1	0	0	0	6	0	0	*	0
YORK	0	7	0	0	0	0	2	*	2

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Disposition of non-detained unrepresented completions with a juvenile case identifier, FY 2013

BASE CITY NAME	Administrative Closing - Other	Other	PD Termination	Relief Granted	Remove	Terminated	Voluntary Departure	PD Administrative Closure
ARLINGTON	8	1	0	0	22	5	*	0
ATLANTA		0	0	0	87	2	7	0
BALTIMORE	20	0	0	0	191	5	8	14
BLOOMINGTON	3	0	0	0	35	0	*	0
BOSTON	1	0	0	2	30	2	0	0
BUFFALO	0	0	0	0	9	0	0	0
CHARLOTTE	6	0	0	0	182	2	68	26
CHICAGO	5	0	1	0	49	4	4	1
CLEVELAND	1	0	0	0	24	0	0	0
DALLAS	1	0	0	0	188	17	20	1
DENVER	0	0	0	0	23	0	0	0
DETROIT	0	0	0	0	8	1	5	0
EL PASO	0	0	0	0	9	0	0	0
HARLINGEN	0	0	0	0	204	4	0	0
HARTFORD	0	0	0	0	31	0	*	0
HOUSTON	0	0	0	0	189	0	*	0
IMPERIAL	2	0	0	0	1	0	0	0
KANSAS CITY	1	0	0	0	27	0	*	0
LAS VEGAS	0	0	0	0	10	1	0	0
LOS ANGELES	6	0	1	0	155	13	6	3
LOS FRESNOS (PORT ISABEL)	0	0	0	0	1	0	0	0
MEMPHIS	0	0	0	0	102	0	8	1
MIAMI	63	0	0	0	81	17	*	0
NEW ORLEANS	0	0	0	0	25	0	0	0
NEW YORK - DET	1	0	0	0	0	0	0	0
NEW YORK CITY	17	1	0	1	155	10	*	1
NEWARK	12	0	0	0	73	1	*	0
OMAHA	1	0	0	0	19	1	*	0
ORLANDO	2	0	0	0	75	2	0	1
PHILADELPHIA	2	0	0	0	36	2	4	0
PHOENIX	0	0	0	1	33	0	0	0
PORTLAND	13	0	0	0	6	1	*	0
SALT LAKE CITY	0	0	0	0	6	0	0	0
SAN ANTONIO	0	0	0	1	62	5	*	0
SAN DIEGO	1	0	0	1	13	7	0	1

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Base City	Administrative Closing - Other	Other	PD Termination	Relief Granted	Remove	Terminated	Voluntary Departure	PD Administrative Closure
SAN FRANCISCO	10	0	0	0	50	8	*	2
SEATTLE	1	0	0	0	12	2	*	0
TUCSON	2	0	0	0	5	1	0	0

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