

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS

SHERONA VERDIEU, by and through her)
next friend and mother, Delourdes Verdieu)

Plaintiff)

v.)

MICHAEL CHERTOFF, Secretary of)
U.S. Department of Homeland Security)
(DHS); JULIE L. MYERS, Assistant)
Secretary, U.S. Immigration and Customs)
Enforcement (ICE); JOHN P. TORRES,)
Director, Office of Detention and Removal)
Operations, ICE; MARC MOORE,)
ICE Field Office Director; GARY MEAD,)
Assistant Director of Detention and Removal)
Operations at ICE, SIMONA COLON, ICE)
Officer in Charge; JOHN POGASH, ICE)
National Juvenile Coordinator,)
Defendants.)

Civil Action
No.:

DECLARATION OF SHERONA VERDIEU

Sherona Verdieu makes the following declaration under penalty of perjury pursuant to 28 U.S.C.

§ 1746:

1. My name is Sherona Verdieu and I am 16 years old. My mother is Delourdes Verdieu. We are from Haiti. We came to the United States after my father was kidnapped and killed because we couldn't pay ransom and the kidnappers said they would kill my mother too. We have been detained in Hutto since September 12, 2006. I only speak Creole, French and Spanish.
2. I feel very sad because I don't want to be here, this isn't a place for children

3. I have heard that sometimes the guards will separate us from our mothers if we complain too much. When I was at recreation time, a Haitian woman called Cheli Rose told me that one of the officials menaced her with the threat of separation from her child if she continued to cry. They said that she'd be placed in another cell away from her child. Cheli Rose is gone now.
4. When she told me this I felt very bad because I think that they could separate me from my mother as well, because I also cry sometimes. I want to be free from here because I cannot get adequate sleep here, and the food is bad and the school is not satisfactory nor are the clothes I wear. Sometimes I cannot sleep and I also cry because I think that my life will end here because my court date is very far away.
5. I don't ever want to be separated from my mother because I don't think that I can live separated from her. I want to be free and home at my aunt's with my mother. The reason that I am scared is that I love my mother very much and I can't live without her. Also if they separate me from my mother I won't be able to live happily because I love her very much. I don't think that I would be able to eat if she were taken away from me because she is very important in my life.
6. When I am free from this place I want to be with my mother and go to a school with my cousin, go to the cinema, the beach. When I finish school I want to learn how to be a nurse so that I can buy a house for me and my mother on the beach where we can watch the sharks and me and my mother will never go hungry.

This declaration has been read back to me in Spanish, and it is a true and accurate transcription of my statements. I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on March 1, 2007.

Sherona Verdieu
Sherona Verdieu
Williamson County, Texas