

DECLARATION OF DAVID R. BLACKBURN, PH.D.

David R. Blackburn, Ph.D., makes the following declaration under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Dr. David R. Blackburn. I am a clinical psychologist licensed to practice in the State of Texas, and I am certified by the Texas State Board of Psychologists. I have been licensed in Texas since 1990. I practice at the Scott & White Clinic, part of the Scott & White Memorial Hospital in Temple, Texas. My current curriculum vita is attached to this Declaration. I am over 18 years of age and have never been convicted of a felony or crime involving moral turpitude. I am of sound mind, and competent to make this Declaration. The facts stated in this Declaration are within my personal knowledge and are true and correct.

2. For a number of years, my practice has focused on working with children and families who have experienced a variety of psychological problems. I have experience with the trauma experienced by children separated from their parents, such as Russian children who were separated from their parents at an early age and later adopted by families in the United States. I also have experience working with families and children who were displaced by Hurricanes Katrina and Rita and who were housed in various types of large group shelters in Houston, and I am therefore familiar with the trauma experienced by children in that situation.

3. I am aware that U.S. Immigration and Customs Enforcement ("ICE") operates a detention facility for families with children at the former Hutto state prison in Taylor, Texas ("Hutto"), and that these children range in age from a few months old through teens. I have been asked to provide my professional opinion as to whether the children detained at Hutto would likely suffer any psychological harm if they were to be involuntarily separated from their parents.

4. In my opinion, children who are detained in a prison-like setting will very likely suffer psychological harm and trauma from that event. For example, experiencing this type of trauma might later contribute to childhood depression, anxiety, and/or stress. Inadequately managed stress can lead to withdrawal, aggression, physical illness, or poor coping skills such as drug and/or alcohol use. To reduce this trauma, it will be necessary to minimize the effects of any traumatic experience, that is, to normalize it as much as possible. In this case, keeping the children and parents together would help normalize an otherwise traumatic situation.

5. If these children are then involuntarily removed from their parents, they will most likely suffer severe and long-lasting psychological trauma. As mentioned above, the separation of children from their parents would exacerbate the potential for more severe psychological difficulties and make the situation worse for those in charge of caring for these children. The severity of the trauma cannot be quantified, because it may be irreversible and it might take years of treatment and counseling to discover the full extent of the trauma. Therefore, it is my professional opinion that involuntarily separating the children detained in Hutto from their parents would likely cause immediate and likely irreparable psychological harm to those children.

6. I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on March 1, 2007.

A handwritten signature in black ink, appearing to read 'David R. Blackburn', is written over a horizontal line.

David R. Blackburn, Ph.D.

Bell County, Texas