

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS

MOHAMMED IBRAHIM,)	Civil Action
BAHJA IBRAHIM,)	No.
and AISHA IBRAHIM,)	
by and through their next friend and)	:
mother, DEKA WARSAME,)	
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.)	
)	

DECLARATION OF DEKA WARSAME

Deka Warsame makes the following declaration under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. "My name is Deka Warsame. I have two daughters, Aisha Ibrahim (11 years old) and Bahja Ibrahim (9 years old), and one son, Mohammed (7 years old). We are from Somalia. We have been detained in Hutto since November 30, 2006. I speak only a little bit of English, my children speak more. I am writing this for my children because they are too young to explain everything and Mohammed can only write a little bit.

2. I left my country with my children because the clans were fighting each other all around where we lived, every day and night bombs were dropping on the houses and people were bleeding and their arms and legs came off, there were not enough people to help and most people died. I was so afraid, a bomb fell on our house and then I decided to leave. My brother was a doctor, he delivered my baby Aisha, he was killed on his way to his office. My uncle was killed and my cousin was killed.
3. Until recently it was so cold we shivered all the time and we wore all our clothes all the time and sometimes blankets also, like a shawl wrapped around us while we walked around. They gave us a blanket that smelled like pee, it had a big yellow stain on it and it smelled very bad. Sometimes the clothes smell like oil and are scratchy. They gave my daughter Bahja stained shirts and pants, and dirty underwear. I don't have enough clothes for Mohammed and the ones they give me are also stained. Aisha has gotten mostly clean clothes.
4. One time the toilet blew up in my daughters' cell, when they flushed it, it exploded upward and water hit the ceiling and came down the walls and it smelled. They let my daughters come into my room.
5. Of my three children my little son Mohammed needs me the most, he loves me so much. He won't even be separate from me to go to the bathroom. He cannot take care of himself or dress himself or bathe himself, he needs me. He sleeps with me every night. My girls are in a separate cell but after the count at night they come into my room and

share one bed and my son and I share the other bed, that way they are not so cold and they are not so scared. I do not want to let them out of my sight.

6. My daughter Bahja had a fight with another little girl at the end of January, the little girl got out of the line to get a drink and the guard said if you get out of line you can't come back and when the girl came back she pushed Bahja to get back in line and scratched her. An officer wrote them up for fighting and the case manager, Miss Parks, came to me and said Bahja has been fighting, if you cannot make your child behave I will separate your family, I will send your children to a different pod. Bahja had to sign a paper that said she would not do it again. I begged the case manager please for another chance to make my children behave, but it is hard because I am not with them at rec time and I cannot control them when they are not with me. They behave worse in here, they are angry and scared.
7. The case manager said the boss said I can have one chance but if the children don't behave first we will be separated into different pods and then if they still don't behave ICE will take them to another place. Mohammed was listening, I saw his face and he was so scared, his face looked wrong and he said to me "Mommy mommy, why would ICE do that, why would they do that" and he held on to me and he would not let go.
8. Mohammed told me he is tired, he cannot sleep because they leave the light in the cell on all night long. None of my children will eat the food that is served in the cafeteria, maybe they eat one meal or two there each week, it makes their stomachs hurt so they won't eat it. Mohammed has thrown up. The children eat the food from the commissary, only chips and chocolate cookies and honey bars and cupcakes and apple juice are for

sale there, they don't have any healthy food there only junk food but the children will not eat the other food. Aisha has gotten sick two times and Mohammed has gotten sick one time. Mohammed is always cold and he can't get warm.

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

EXECUTED on March 1, 2007.

Deka Warsane
Deka Warsane

Williamson County, Texas