

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

EGLE BAUBONYTE, by and through her )  
next friend and mother, Rasa Bunikiene )

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 EGLE BAUBONYTE**

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

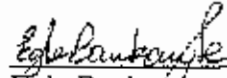
1. My name is Egle Baubonyte and I am fifteen years old. My mother is Rasa Bunikiene and my sister is Saule Bunikyte. Before ICE brought my family to Hutto I was a freshman at Prairie Ridge High School in Crystal Lake, IL. We have been at Hutto since December 15, 2006.
2. Being in this facility is not the best experience. One of the things I don't like about it is living by someone else's rules. I honestly can't stand how some of these rules are too harsh. They're not for little kids. Also being closed in our

room with the same people every day and having nothing to do drives me nuts. It also seems like every officer has their own rules. I think officers should be more considerate for little kids. Some of them could be less harsh.

3. Education here is very low level. I'm learning nothing. The teacher only gives out packets of work but does not explain anything. Sometimes it gets really boring and I just sit there staring at the wall. Recreation time is always the best. Too bad we only get an hour of it.
4. In my opinion, even if they're trying to make this place nicer and look like an actual residential center, it is still a prison to me. There's no pediatrician. Nurses don't care about is babies sick or not (sic). They treat us like we're nothing.
5. I can't wait to get home. I miss my stepdad (Paul), my friends and even school. I'm afraid that I will not be able to graduate my ninth grade. I'm missing too much school and I'm not getting the credit I should be that could be sent to my school.
6. I am scared of the guards. I also remembered that the guard can have any criminal record as long as there are no deaths.
7. I am terrified of being separated from my mother. I am becoming seriously depressed and, without my mother, I think I would go completely nuts. If we were separated, I think she would, also. I cannot imagine what it would be like to be without her. We have been through enough already; we need each other to stay sane.

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

EXECUTED on March 1, 2007.



\_\_\_\_\_  
Egle Baubonyte

Williamson County, Texas