

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS

DECLARATION OF JOHN SARGENT, M.D.

John Sargent, M.D. makes the following declaration under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Dr. John Sargent. I am a Board Certified Child and Adolescent Psychiatrist and Pediatrician and have 30 years experience as a practicing and academic physician. I practice in Harris County, Texas and am Professor of Psychiatry and Pediatrics at Baylor College of Medicine in Houston. I have attached my curriculum vitae. I am over 18 years of age and have never been convicted of a felony or a crime involving moral turpitude. I am of sound mind and competent to make this Declaration and the facts presented are true and correct.

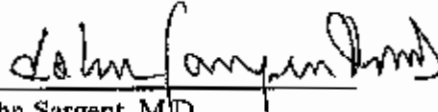
2. Throughout my career I have treated children and adolescents who have experienced a wide range of traumatic events: physical abuse, sexual abuse, war, refugee experiences, exposure to domestic violence, rape and sexual harassment, serious accidental injury, difficult immigration and natural disasters including Hurricane Katrina. I teach locally, nationally, and internationally all varieties of health and mental health professionals about the effects of trauma upon children, adolescents and their families. I also teach about sources of resilience for children who experience adversity and about methods of treating and supporting trauma exposed children and youth. At this point in my career I am a recognized national expert on trauma and children.

3. I am aware that immigrant children and adolescents, many of whom are asylum seekers fleeing war and trauma, are detained by U.S. Immigration and Customs

Enforcement in a former Texas state prison, the T. Don Hutto facility in Taylor, Texas. The experience of being detained in a prison-like environment, for even relatively short periods, is extremely stressful for children and families and may represent retraumatization and reenactment for these children. Without therapeutic support and appropriate programming the children may have difficulties in the facility. Throughout my clinical experience, in all research investigations and in the professional literature the key element identified to be necessary for the healing of children after trauma is the child's caring relationship with his mother and/or father. To help the children, the mother and/or the father needs to be available and able to provide support, care, affection and warmth for the children. All children are distressed by forced separation from either or both parents, especially if the duration of separation is uncertain. The children detained in the Hutto Prison are uniquely vulnerable to serious psychological ill effects of separation from their mothers or fathers. Separation of these children from their mothers or fathers is undeniably harmful, cruel and counter – therapeutic. It will harm the children and deprive them of the support and care they require to withstand the stresses of their detention experience. It is unconscionable, unethical and must not be allowed.

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

EXECUTED on March 5, 2007


John Sargent, M.D.