

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS

SAULE BUNIKYTE, 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 RASA BUNIKIENE

Rasa Bunikiene makes the following declaration under penalty of perjury pursuant to 28 U.S.C.

§ 1746:

1. "I am mother of Saule ("Sunny") Bunikyte, 9 years old, and Egle ("Anna") Baubonyte, 15 years old. We have been detained in Hutto since December 15, 2006.
2. I make this declaration on behalf of my daughter Sunny because she is too young to be capable of making a declaration herself.
3. One of the worst parts of being in Hutto is seeing my kids deprived of normal life, school, normal daily activities (sic). Detaining my children is an absolute overexercise of power by ICE. School is absolutely inappropriate here, and do not meet their level

- of education. Now, when (if) they are back to normal life, I am not sure if they will be allowed to graduate from grade they are in now. Sunny has only been outside a handful of times since we arrived at Hutto. I am worried that she will become depressed, like me and Anna.
4. One morning Sunny woke up really early in the morning because she was sick and she could not sleep. There was an Iraqi family with three children named Danny, Diana and Andy in our pod. Sunny saw the Iraqi mom go into the Iraqi dad's room to put some cleaning stuff in there. One of the guards, a lady with long blonde hair who is middle aged, came and she told the Iraqi mom, you are not allowed to go in there and if you go in there again I will take away your children.
 5. Only 30 minutes is allowed for all the children in the pod to take a shower, from 8:30 pm -9:00 pm. Sometimes the nicer guards take the kids earlier so it is not so rushed. One night when there were 28 kids in the pod, there were only three showers working, two had only very cold water and we could not use them. Officer Washington said we could not have any extra time. The parents were upset. ICE Officer Ramos and CCA Officer Mokry came, and Officer Ramos said "Only 1 minute per child in the shower." Sunny freaked out, she was crying, she felt bad because no kid can take a shower in 1 minute. She hates this place and she does not understand.
 6. If Sunny were taken away from me, she would be seriously traumatized. She needs to be near her mother to prevent even more trauma and sadness. If Sunny were taken away, I would also go nuts. We both live in fear of this possibility.

EXECUTED on March 1, 2007.

Rasa Bunikiene

Rasa Bunikiene
Williamson County, Texas