

EXHIBIT J

DECLARATION OF ALLEGRA LOVE

I, Allegra Love, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:


1. I make this declaration based on my personal knowledge except where I have indicated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.
2. I am an attorney licensed to practice law in New Mexico. I am admitted to the New Mexico State Bar. My business address is 1213 Mercantile Rd, Santa Fe, NM 87507.
3. I have been practicing law since 2011. My practice focuses on immigration law with a particular focus on asylum and the detention of asylum seekers.
4. The following is based on my experience representing or attempting to represent asylum seekers who are placed in the expedited removal program called PACR and HARP.
5. Based on my experience, CBP does not have adequate systems in place to locate potential individuals in their custody in order to provide timely representation.
6. On November 26th, I emailed Jaime Castillo, Lisa Donaldson, Samuel Cleaves, and Sadie Herbert, all of whom work for Customs and Border Protection about 8 potential Mexican clients, who had recently crossed the Paso Del Norte Bridge in El Paso, Texas, seeking political asylum and who I believed could potentially be placed in HARP. My email had a G-28 attached for all 8 of my potential clients. The email requested:
 - A. Access for myself and my legal assistant to meet with the individuals in person
 - B. Access the individuals by telephone
 - C. Time to conduct full intakes
 - D. Ability to represent my client in Credible Fear Interviews
 - E. All documents related to their custody and immigration matters
 - F. My email also contained my cellphone number for communication. I specifically mentioned that it could be used over the Thanksgiving holiday if necessary.
7. I received an email on 11/27/2019 from Sergio Soto asking for their Alien Numbers so he could better search for where they were detained. I immediately responded explaining that I couldn't possibly know their A#'s as I had not had contact with them in custody

and in fact one reason for my email was to establish communication for the purpose of knowing their A#'s. I also reiterated that they were Mexican nationals.

8. Ms. Donaldson, who identified herself as CBP counsel, then emailed me also requesting Alien Numbers. I immediately responded explaining that I couldn't possibly know their A#'s as I had not had contact with them in custody and in fact one reason for my email was to establish communication for the purpose of knowing their A#'s. I also reiterated that they were Mexican nationals.
9. Ms. Donaldson then called me at home at 11/27/2019 and told me that she could not locate the individuals in question without more information such as date of birth. I said I didn't have the date of birth. She specifically told me they were not in the HARP program.
10. Sergio Soto then emailed me again on 11/27/2019 requesting dates of birth. He said that he had located 3 of the individuals in the South Texas family Residential Facility in Dilley, TX and 1 individual was detained in Eloy in Arizona. He could not locate four of the individuals and said without the dates of birth it would be impossible.
11. It is worth mentioning that name and country of origin is enough to locate someone in the public ICE Online Detainee Locator.
12. I have not received any correspondence since from DHS about the whereabouts of those individuals.
13. Based on my understanding of how the PACR and HARP programs work, it is functionally impossible to meaningfully prepare someone for their Credible Fear Interview while they are in those programs. Based on my personal experience, most asylum seekers are suffering from severe trauma, stemming from the trauma they experienced in their home country and the journey they undertook to arrive in the United States. Establishing rapport and trust with an asylum seeker is essential to adequately prepare them for a CFI. For these reasons, it is far more preferable to prepare a client for their CFI in person. It is not possible to meaningfully prepare someone for a CFI while they are still traumatized, have been sleeping on the floors of a hielera cell (Spanish for "ice boxes" that is generally used to describe CBP detention facilities), in a rushed phone call with a guard standing nearby.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and recollection.

Executed on December 16, 2019 at 1213 Mercantile Rd, Santa Fe, NM, United States.



Signature

Allegra S. Love

Printed Name