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DECLARATION OF JODI GOODWIN

I, Jodi Goodwin, make the following declaration based upon my personal knowledge and, if called to testify, I would as follows:

1. I have been an immigration attorney in the Rio Grande Valley of Texas for the past 24 years. For the past 23 years, I have run my own immigration law practice, located in Harlingen, Texas.
2. The majority of my clients come from Central America or Mexico, and many come fleeing violence in their home country.
3. I often represent clients as they prepare for their CFIs.
4. Based on my experience, it is extremely important that individuals are able to speak with an attorney before their CFI. The stakes of a CFI are very high. A negative CFI finding that is confirmed by an immigration judge sends individuals back to the countries from which they fled, and where they face risks of violence and death.
5. As an attorney, I am able to explain what will happen during the interview, which makes it less overwhelming for my client and enables my client to understand the process and mentally prepare. I can also work with my client to make sure they are recounting all of the important details that might matter during the interview and to help to tell their story chronologically and to make sure everything is understandable. Because many of my clients are fleeing traumatic experiences and still undergoing trauma, it can be difficult for them immediately recount the most horrible moments of their lives without preparing with their attorneys. Based on this, it is important to be able to meet more than once with a person prior to their CFI.
6. It is also extremely important that CFI preparation take places in person. Telephonic access is simply no substitute for in person preparation *especially* for CFIs. In person, I am better able to connect with my clients, which is especially important given their trauma. Building rapport, trust, and confidence in me and the truth and value of the information I provide to them about the CFI process is paramount. I also can both bring documents to show the client, such as what asylum officers fill out when they do a credible fear evaluation, and look at documents my clients have brought such as death certificates or police reports. In person meetings are more private, more confidential and can not be substituted by a phone call.
7. Because preparing for a CFI can involve going through a large amount of information concerning a person's history, including traumatic events, it can be necessary to have multiple meetings to prepare for a CFI. The meetings are also often lengthy, I often spend two plus

hours on each visit with an individual and generally have at least two to three meeting prior to the CFI. It is important that the meetings occur in a setting where the individual feels comfortable and where they can concentrate.

8. In my general experience as an immigration attorney, I have also on numerous occasions attempted to access a client in CBP custody. Generally, I have tried to access clients who were detained by CBP in or around the Rio Grande Valley, including at Fort Brown BP Station, all three Ports of Entry in Brownsville, Brownsville BP Station, Harlingen BP Station, Weslaco BP Station, McAllen BP Station, and Central Processing Center in McAllen.
9. I have never been allowed to physically access a client who was in CBP custody. It is my understanding that CBP categorically denies attorneys physical access to their facilities.
10. I also believe it is nearly impossible to speak telephonically with an individual detained in CBP custody. In my 24 years of practicing law, I estimate that I have tried to arrange a call with someone in CBP custody at least 100 or more times. I have been able to speak telephonically with a client of mine only once. The one time I was able to speak with my client was at the Sarita Border Patrol Checkpoint. The client was on his way to attend a medical appointment at a children's speciality hospital with his United States citizen child. I was allowed to speak with the client, but not in private. On every other occasion that I have tried to arrange a telephone call with a client who is in CBP custody, I have been denied by CBP.
11. It is also my understanding that CBP keeps individuals in inhumane conditions. When I talk to clients who have just been released by CBP, they tell me horrible stories about how they were held incommunicado, cold, hungry, sleep deprived and treated poorly by CBP agents..

I hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed this 12 th day of December, 2019, in Houston, Harris County, TX



JODI GOODWIN