

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

<p>ROBERT F. KENNEDY HUMAN RIGHTS; SOUTHERN BORDER COMMUNITIES COALITION; URBAN JUSTICE CENTER,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>U.S. DEPARTMENT OF HOMELAND SECURITY; KRISTI NOEM, in her official capacity as Secretary of Homeland Security,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Action No. 25-1270-ACR</p>
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PLAINTIFFS' STATUS REPORT

In advance of the hearing scheduled for June 12, 2025, Plaintiffs submit the following status report and attached declarations detailing the ongoing harms to Plaintiffs, SBCC's members, and the public, caused by the continued failure of CRCL, CISOM and OIDO to perform their statutory functions. Plaintiffs also draw the Court's attention to another recent public representation made by an agent of Defendants that one of these offices no longer exists.

Specifically, this report is accompanied by a second declaration from Lilian Serrano, the director of Plaintiff Southern Border Communities Coalition, discussing recent excessive uses of force by DHS personnel in response to protests of immigration enforcement activities in southern California. Although SBCC intends to file a CRCL complaint about these incidents, Ms. Serrano is concerned that CRCL will not be able to respond promptly to that complaint based on its current staffing levels and the backlog of tasks currently facing existing staff in light of the office's effective closure since March 21. Also attached to this report is a second declaration from Tracey

Horan on behalf of an SBCC member, Kino Border Initiative, recounting several complaints that KBI has recently filed with CRCL and OIDO, and the lack of any substantive response from CRCL to any of KBI's pending complaints since mid-February.

Underscoring the extent to which the public-interest factor favors issuing preliminary injunctive relief here, Plaintiffs also offer declarations from three non-plaintiffs describing ongoing serious situations on which CRCL's or OIDO's intervention could have a significant impact if those offices were currently fulfilling their statutory functions. A declaration from Mayra Jones describes the serious medical neglect of a Guatemalan man detained at Otay Mesa Detention Center in San Diego who is suffering from untreated colon cancer and has reached out to both OIDO and CRCL, as well as to ICE directly, for help but whose efforts have been thwarted by the suspension of operations at those two offices. The declaration of Javier Hidalgo and attached CRCL complaint describes the detention of children at the Dilley Detention Center in Texas for extended periods of time, a type of detention that has been described as inherently harmful by long-time CRCL medical expert Dr. Scott Allen (whose contract as a subject matter expert was canceled in April of 2025 after ten years). The oversight functions of CRCL, as well as the way those oversight functions would be applied to current situations that have unfolded since March of this year, are described in the declaration of a recently separated CRCL employee proceeding under the pseudonym Taylor Doe.

Finally, this report is also accompanied by a third declaration from Anthony Enriquez of Plaintiff RFK Human Rights, which attaches as an exhibit a document filed in federal court in the Southern District of New York by the Assistant U.S. Attorney representing DHS in a Freedom of Information Act (FOIA) action in which Plaintiff RFK Human Rights sought information from

CRCL. The attorney in that case represented to the court, as recently as June 3, and despite Defendants' representations in this case, that "CRCL no longer exists."

Dated: June 11, 2025

Respectfully submitted,

/s/ Karla Gilbride

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