1. Submit to Appropriate Federal Agency:

Office of the General Counsel U.S. Department of Homeland Security Washington, DC 20528

U.S. Customs and Border Protection Office of the Chief Counsel 1300 Pennsylvania Ave., N.W. Washington, DC 20229

Office of the Principal Legal Advisor Immigration and Customs Enforcement U.S. Department of Homeland Security 500 12th Street, SW Washington, DC 20024 U.S. Customs and Border Protection McAllen Border Patrol Station 3000 West Military Highway McAllen, TX 78503

2. Claimant's Personal Representatives:

Joseph Anderson, Esq. Americans for Immigrant Justice 3000 Biscayne Blvd., Suite 400 Miami, Florida 33137 305-573-1106 ext. 1080 janderson@aijustice.org Losmin Jimenez, Esq.
Americans for Immigrant Justice 3000 Biscayne Blvd., Suite 400 Miami, Florida 33137 305-573-1106 ext. 1380 ljimenez@aijustice.org

6. Date and Day of Accident:

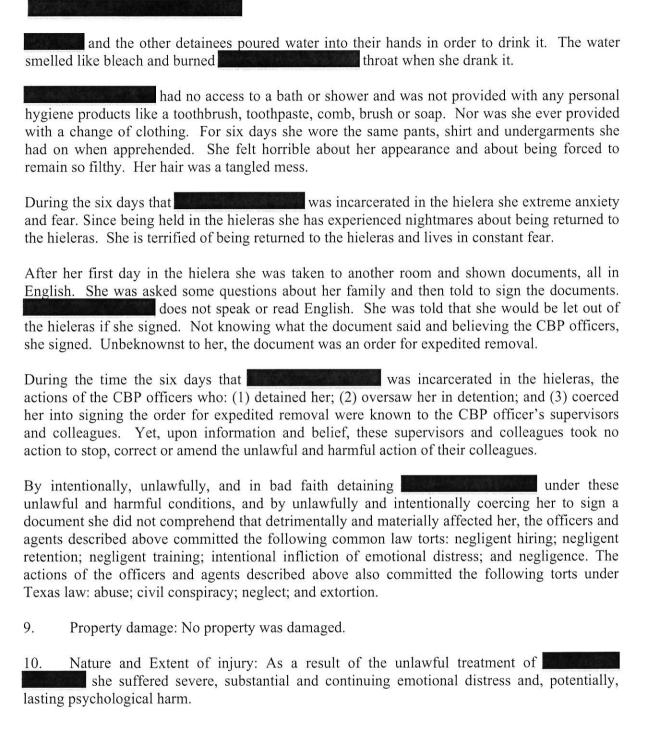
On and about 2013.

8. Basis of Claim:

On or about 2013, 2013, was taken into custody by United States Customs and Border Protection (CBP), in McAllen, Texas. is a twenty-eight year-old woman. Taken into custody at the same time were her sisters five-year old child and brother,

She was told by the CBP officers that she and her family members were being taken to the "hielera," translated in English to mean the "freezer," "icebox" or "refrigerator." She was then transported, upon information and belief, to the CBP McAllen Station, in the CBP Rio Grande Valley Sector. There, the extra clothing that she had was confiscated. In addition her hair accessory and her shoelaces were taken from her. She was then placed in what the CBP officer

had meant by "hielera": a small, freezing cold cell where many detainees were crowded together. She later heard other CBP officers also refer to the cell as the "hielera" and realized this was their nickname for it.
was in the first hielera to which she taken for a period of three days. Her sister was also in the first hielera for three days. Her sister and her child were removed from the first hielera after one day. and her sister were transported to a second hielera where they spent an additional day and night. They were then transported to another hielera where they spent another day before they were transported to the Hidalgo County Jail where she was incarcerated for several days before being transported to the Broward Transitional Center in Florida.
The conditions in the three hieleras were almost identical. The hielera had no beds, no chairs and a single toilet and sink sitting in plain view. A large window in the door of the cell allowed CBP officers to see into the entirety of the cell, including the toilet and anyone using it. The temperature in the hielera was so cold that the lips split, her face hurt and peeled. Because of the cold, she and her sisters and her sister's child would huddle together on the floor for warmth. The cold temperature made it very difficult to sleep. There was no mattress or blankets, and the other women had to try and sleep on the concrete floor. The cramped quarters also made it impossible for all of the women to lie down all at one time on the floor. There were three or four large air conditioner vents in the middle of the ceiling from which could feel a steady flow of cold air.
was extremely embarrassed to use the toilet which sat exposed in the open in the corner of the cells. She was humiliated to have to expose herself to the other detainees while urinating and defecating. She would go without using the bathroom as long as she possible could to avoid the shame of having to take down her pants and go to the bathroom in the room full of other people. She now has a urinary tract infection which she believes is a result of having forced herself not to urinate for such long periods of time.
Through the window in the door of the hielera she could see across into an area where CBP agents where speaking with two children, a boy and a girl who had mud up to their knees, who looked to be younger than ten years of age. The little girl was crying and the boy was speaking to the CBP agents. Another detainee in the hielera with had a child who was three years old.
While in the hieleras, was fed once or twice a day. Due to transfers from one hielera to another hielera, she also missed meals. She was not fed on those occasions when she missed the meal. Each meal consisted of a single sandwich made of an unidentifiable, processed meat product and white bread. This meager food left her hungry every day and caused her to suffer headaches. The only water available to was provided in a single thermos shared by all the detainees. There were no cups to drink the water.



11. Witnesses:















12. (d) Total: \$500,000.00

15-19. does not carry any insurance responsive to these requests.