

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

ANGELICA REBECA GONZALEZ-GARCIA, et al.,

Plaintiffs,

v.

JEFFERSON BEAUREGARD SESSIONS III, et al.,

Defendants.

Civil Action No. \_\_\_\_\_

**AFFIDAVIT OF SUSAN B. CHURCH**

1. I, Susan B. Church, am an attorney licensed to practice law in Massachusetts and am counsel to Plaintiffs Angelica Rebeca Gonzalez-Garcia and her eight-year old daughter, S.K.
2. Since being retained on June 24, 2018<sup>1</sup>, I have been working to attempt to effectuate the release of S.K. to Ms. Gonzalez-Garcia. I have learned that S.K. has been deemed by the government to be an “unaccompanied minor” and that the government has impeded S.K.’s release to her mother.
3. The Office of Refugee Resettlement (ORR) and its shelter agent have thus far refused to release S.K. unless Ms. Gonzalez-Garcia “applies” to “sponsor” her own daughter.
4. In attempting to comply with that requirement, on June 22, 2018, Ms. Gonzalez-Garcia filed a 36-page “reunification package” seeking return of her daughter.
5. Since June 24, 2018, I have spoken to the shelter multiple times.

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<sup>1</sup> I am pro bono counsel to Ms. Gonzalez-Garcia and her daughter.

6. At first, officials at the shelter would not even tell me the location at which S.K. was detained. We were able to obtain this information when Ms. Gonzalez-Garcia called the facility without an attorney.
7. On June 24, 2018, I was advised that “protocol” required that Ms. Gonzalez-Garcia to submit to fingerprints for herself and all residents of the home where she was staying.
8. When Ms. Gonzalez-Garcia offered to mail her fingerprints through a private fingerprinting service, that offer was rejected by the shelter.
9. I was also told that the “first available” date for her to provide these fingerprints was in Worcester, Massachusetts on July 31, 2018.
10. After repeated calls and emails, Ms. Gonzalez-Garcia was offered the opportunity to have a fingerprint appointment on a “new” date of July 16, 2018 in Newark, New Jersey—requiring everyone in the household to make the six- to seven-hour journey.
11. Since beginning to practice immigration law in 1998, I have dealt with possibly hundreds or thousands of cases of asylum seekers at the border, being detained and eventually released from CBP custody. I have never seen a parent separated from a child for any significant period of time. In my opinion, requiring all members of a household to subject to fingerprinting would prevent large numbers of mothers from timely reuniting with family members.

Signed under pains and penalties of perjury, this 27<sup>th</sup> day of June, 2018.

/s/ Susan B. Church

SUSAN B. CHURCH