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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

AL OTRO LADO, INC., *et al.*,  
Plaintiffs,  
v.  
ALEJANDRO N. MAYORKAS, *et al.*,  
Defendants.

Case No.: 3:23-cv-01367-AGS-BLM

Hon. Andrew G. Schopler

**EXHIBIT 10 TO THE  
DECLARATION OF STEPHEN M.  
MEDLOCK IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
PROVISIONAL CLASS  
CERTIFICATION**

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**DECLARATION OF JOANNA WILLIAMS**

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3 I, Joanna Williams, hereby declare under penalty of perjury pursuant to 28  
4 U.S.C. § 1746:

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1. I am the Executive Director of the Kino Border Initiative (KBI). KBI is a binational, inclusive Roman Catholic organization, inspired by the spirituality of the Jesuits and Missionaries of the Eucharist, locally rooted in Ambos Nogales on the Mexico-U.S. border and with a regional approach organization throughout Central America and North America. KBI’s mission is to promote humane, just and workable migration through: direct humanitarian assistance and holistic accompaniment of migrants; education and encounter between migrants and others that transforms people and communities towards solidarity with migrants; and policy advocacy in Mexico and the U.S.
  2. KBI offers food, clothing, medical attention, and other humanitarian services in our aid center in Nogales, Mexico. KBI also offers shelter to women and children and to certain men at high risk of violence in the city of Nogales, Mexico.
  3. As Executive Director, I oversee our organization’s programming and strategy, lead our staff, engage with our Board on key governance issues, and ensure that we have adequate resources to carry out our mission.
  4. I have a Bachelor’s degree in International Culture and Politics with a focus on migration from Georgetown University’s School of Foreign Service and a Master’s degree in Public Policy from Arizona State University. I have worked in migrant accompaniment and justice for over 12 years, including over 8 years at KBI. Prior to becoming Executive Director, I served for 6 years as the Director of Education and Advocacy.

- 1 5. In addition to our humanitarian services, KBI documents abuses that  
2 migrants report to staff members, and advocates for humane, just, and  
3 workable migration policy in the United States and Mexico.
- 4 6. In May 2023, KBI joined with The Florence Immigrant & Refugee Rights  
5 Project and Human Rights First to conduct monitoring at the DeConcini  
6 Port of Entry in Nogales, Arizona after the end of Title 42. On June 9,  
7 2023, we published our report,<sup>1</sup> explaining our findings.
- 8 7. Since May 17, KBI staff have had a daily presence at the DeConcini Port  
9 of Entry to offer basic humanitarian assistance, including food, to  
10 individuals and families waiting in Nogales, Mexico. We have continued  
11 our monitoring effort through that presence.
- 12 8. A few days after Title 42 ended on May 12, 2023, KBI staff observed that  
13 over a hundred individuals and families waiting in Nogales, Mexico, who  
14 had been unable to seek asylum in the United States due to Title 42, began  
15 to create an orderly line outside of the DeConcini Port of Entry in Nogales  
16 to present themselves at the port. KBI spoke with many individuals and  
17 families waiting, and most of these individuals had been attempting to  
18 obtain a CBP One appointment for months without success. Among those  
19 waiting in line were infants, young children, adolescents, pregnant and  
20 lactating women, individuals with serious medical conditions, Indigenous  
21 language speakers, and elderly individuals.
- 22 9. At the DeConcini Port of Entry, only a limited number of people are  
23 typically allowed into the roofed pathway leading up to the “limit line,”  
24 the official entry point to U.S. soil, where CBP officers stand behind closed  
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28 <sup>1</sup> Available at [https://humanrightsfirst.org/wp-content/uploads/2023/06/A-Line-That-Barely-Budges\\_Nogales-Arizona-1.pdf](https://humanrightsfirst.org/wp-content/uploads/2023/06/A-Line-That-Barely-Budges_Nogales-Arizona-1.pdf).

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doors. The majority of the asylum seekers waiting remain outside the turnstile that demarcates the entrance to the port.

10.KBI staff has observed that CBP has failed to allow all but a small number of those waiting in line without appointments to present at the port of entry each day. CBP has not disclosed how many individuals are processed without appointments at the DeConcini Port of Entry.

11.Nogales has two additional pedestrian ports of entry. On July 7<sup>th</sup>, an asylum seeker from China reported to KBI staff that he attempted to approach the Mariposa Port of Entry and CBP officials at the limit line informed him that only U.S. citizens, residents, and visa holders were allowed to access the Mariposa Port of Entry.

12.Through interviews with people waiting in line and through monitoring the line ourselves, KBI learned that on most days in July only one family from the line has been processed at the DeConcini POE each day. On July 31<sup>st</sup>, KBI staff monitoring the situation at the Nogales Port of Entry spoke to people waiting to be processed without a CBP One appointment. People inside the turnstile at the POE, next in line to be processed, reported they had been waiting and sleeping there for 22 nights and still had not been processed. Also in July, a young Mexican woman with her infant son approached CBP at the Nogales Port of Entry to ask what she could do to seek asylum and the officer said they could not do anything.

*Mexican Municipal Authorities Create an Asylum Waitlist*

13.At the DeConcini Port of Entry, a municipal authority in Nogales, Mexico called *Bienestar Social* has created a waitlist system for people waiting in Nogales to seek asylum in the United States.

14.The Mexican municipal authority initiated the list on or about May 25<sup>th</sup> and on May 27<sup>th</sup> began issuing a QR code that assigns a number on a

1 waitlist to each individual and family unit registered in line. On June 5th,  
2 KBI staff observed the municipal authority issue QR codes to new  
3 individuals and families and instructed them to leave the port of entry as  
4 they were last on the list and would not be called any time soon. The same  
5 day, KBI staff spoke with a single mother and her child who were waiting  
6 near the limit line outside the Nogales port of entry and were next in line.  
7 The woman told KBI staff that, two days prior, she had received a phone  
8 call from the municipal authority informing her that it was her turn to be  
9 processed and instructing her to return to the port. Because of that, she and  
10 her child had spent the last two nights sleeping outdoors at the port waiting  
11 to be processed.

12 15. Municipal authorities in Nogales, Mexico originally informed KBI in late  
13 May 2023 that they intended to close the waitlist after registering those  
14 individuals who were in line at the time and to disperse the line as soon as  
15 possible. However, by Thursday, June 1, 2023, the municipal authority had  
16 moved on to its third waitlist, with 100 people on each list.

17 16. According to reports from migrants, starting on or about June 28<sup>th</sup>, the  
18 representative of *Bienestar Social* claimed in conversations with migrants  
19 at the DeConcini Port of Entry that she would no longer add newly arriving  
20 individuals or families to the list. When KBI staff contacted her directly,  
21 including on July 3<sup>rd</sup> and July 6<sup>th</sup> as well as other dates, she claimed that  
22 she was continuing to add individuals to the list. However, since early July,  
23 KBI has consistently received reports from asylum seekers that they have  
24 attempted to add their name to the list but the list manager has refused to  
25 add them. On July 31<sup>st</sup> municipal authorities informed KBI that the list  
26 would be closed to new arrivals for two weeks.

27 17. While the waitlist system has permitted some asylum seekers to  
28 temporarily leave the line, its broader implications are troubling. List-

1 keeping at ports of entry in any form raises concerns about illegal metering,  
2 and Mexicans in particular – who are not even subject to the most recent  
3 asylum ban – are exposed to additional risk of harm because they are  
4 trapped in their country of persecution and forced to share personal  
5 information with government authorities who manage the list.

6 18. At present, there is no transparency or a mechanism for complaints,  
7 monitoring, or oversight of the list. Before the implementation of Title 42  
8 in March 2020, the Mexican municipal government controlled a similar  
9 waitlist, which generated multiple allegations of corruption with no  
10 accountability or oversight mechanisms to address concerns. In late July  
11 of 2023, KBI began to hear rumors of individuals buying spots in line and  
12 on July 31<sup>st</sup> a migrant directly informed a KBI staff member that he had  
13 purchased his spot. KBI is concerned that cartels may be involved in  
14 selling these places in line.

15 19. Employees of *Bienestar Social* have dissuaded and misinformed asylum  
16 seekers waiting at the Nogales Port of Entry. KBI staff spoke with a  
17 Mexican asylum seeker who first arrived in Nogales in February 2023. He  
18 approached the port of entry on May 24, 2023 and was added to the waitlist  
19 and issued the number 88. On May 27<sup>th</sup> at around noon, the Nogales  
20 municipal authority arrived and began issuing QR codes. The municipal  
21 agency inappropriately asked whether the man had been deported to  
22 Mexico previously. He answered in the affirmative but was not provided  
23 an opportunity to explain that he had been expelled under Title 42, which  
24 does not carry the same immigration consequences as an order of removal  
25 under U.S. law. *Bienestar Social* told him that he had to leave the line  
26 because he no longer qualified for asylum in the United States and that  
27 U.S. authorities would not allow him to enter and would detain him. The  
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1 man tried to protest and explain that this wasn't a decision for the Mexican  
2 municipal agency to make but rather for the U.S. government; however,  
3 the municipal agency asked him to leave the line and to give his place to  
4 someone who "actually needed it." He was not allowed to speak and was  
5 not issued a QR code like others in line. The man was only able to access  
6 the port on June 4th because fellow asylum seekers in line immediately  
7 before and after him honored his place, despite the municipal authority's  
8 efforts to prevent him from seeking asylum.

9 20. On June 27<sup>th</sup>, the *Bienestar Social* staff managing the list shared with KBI  
10 staff that she was considering sending a man to the front of the line because  
11 his asylum case was "strong." KBI staff encouraged *Bienestar Social* to  
12 respect the order of the waitlist. This highlights the potential concern that  
13 people waiting at the Nogales port of entry—due to CBP's failure to  
14 process asylum seekers without CBP One appointments, most of whom are  
15 Mexican nationals—would not only have to give their personal  
16 information to a Mexican authority, but also disclose information about  
17 their asylum case to try to get priority in the line. This leaves them at risk  
18 of harm should the information reach cartels or other persecutors.

19 21. On June 12, *Bienestar Social* shared with our staff that two Russian  
20 nationals had arrived that morning and that *Bienestar Social* decided to put  
21 them at the top of the waitlist, bypassing the other approximately 300  
22 individuals on the waitlist. CBP processed them immediately, granting  
23 them admission the same day they arrived at the line, while other  
24 individuals reported waiting over two weeks to be processed. This raises  
25 concerns about *Bienestar Social*'s administration of the list, since there is  
26 no oversight process or accountability.

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*Issues with CBP One*

22. People waiting to seek asylum in Nogales, Mexico face numerous barriers to seeking asylum, including the lack of sufficient CBP One appointments; financial, technological and other equal access deficiencies; and language access deficiencies.

23. While the number of appointments available across the entire border has recently increased to 1450 per day, a negligible portion of these appointments have been available to people waiting in Nogales. Currently, the Nogales port of entry only processes 70 persons a day with CBP One appointments. This means that less than 5% of all available appointments are allotted to the Nogales Port of Entry, one of eight total ports across the border where people can present via CBP One. DHS and CBP officials have stated that appointments are allocated based upon each port's capacity constraints, but it is inconceivable why the only port of entry with CBP One appointments for a span of nearly over 600 miles (from the California border to El Paso, Texas) could be so poorly resourced to process less than 100 asylum seekers per day.

24. In order to even attempt to secure a CBP One appointment, people seeking asylum must have daily access to a smartphone with certain capabilities, electricity, internet, and/or phone reception with data. The use of this appointment system – and the new asylum ban's provisions barring most people from seeking asylum if they do not have an appointment – prevents many vulnerable people who lack financial resources or access to technology from seeking asylum. Some families do not have phones or have had their phones stolen in Mexico. Other families seeking asylum

1 have had to make the choice between going hungry and buying data for  
2 their phones.

3 25. Requiring a CBP One appointment for processing at a POE  
4 disproportionately impacts vulnerable populations, such as Indigenous  
5 people seeking asylum protection who face Indigenous language exclusion  
6 in use of the CBP One application, which is only available in English,  
7 Spanish, and Haitian Creole.

8 26. KBI consistently receives new arrivals at our shelter who are Indigenous  
9 community members and Indigenous language speakers from southern  
10 Mexico and Guatemala who struggle to use the CBP One application. For  
11 example, two single mothers who are part of the Triqui indigenous group  
12 and are primarily Triqui language speakers had to flee from their home  
13 community. It was difficult for both of them to use the app due to language  
14 barriers, though one mother did end up obtaining an appointment. Out of  
15 desperation, the other mother and her baby child attempted to access the  
16 port without an appointment by joining the physical line at the port of entry  
17 in mid-May and were only processed after nearly two weeks of waiting  
18 outside day and night.

19 27. KBI staff has accompanied Chinese and Russian individuals who have  
20 only been able to access the app through the support of the KBI staff and  
21 KBI's use of translation services.

22 28. One KBI staff member has been attempting to assist an older Mexican man  
23 travelling alone in obtaining his appointment. When the man arrived in  
24 Nogales, Mexico he did not have a smartphone. The phone he was finally  
25 able to obtain has a camera with bad resolution and hasn't been able to take  
26 a photo for CBP One app. He has been coming regularly to KBI, where  
27 KBI staff lend him a different phone, but as of July 13<sup>th</sup>, 5 weeks after he  
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1 initially arrived in Nogales, Mexico he has yet to obtain an appointment in  
2 part because of poor vision and a lack of technological proficiency.

3 29. Since its inception in January 2023, the CBP One application has been  
4 plagued with glitches and technical errors. New errors constantly emerge  
5 on the app and KBI staff have to try to troubleshoot together with the  
6 asylum seekers. For example, KBI staff have seen the app freeze with the  
7 message “unexplained error. Something went wrong. If this error continues  
8 close CBP One and try again.” In the past it was possible to resolve the  
9 error by closing the app and starting again, but KBI staff have seen 8  
10 instances in early July, including as recently as July 13<sup>th</sup>, in which the error  
11 message continues to freeze the app even after asylum seekers have exited  
12 and restarted the application multiple times.

13 30. In mid-May 2023, KBI staff witnessed a Venezuelan woman who was  
14 notified of a CBP One appointment and had 23 hours to accept the  
15 appointment on the app. She nearly missed the deadline because the app’s  
16 facial recognition software did not recognize her darker pigmentation. KBI  
17 staff observed her repeated attempts over hours and growing anguish as  
18 she moved to different spots within our fully-lit, bright shelter. We even  
19 placed strong lighting over her face. She ultimately succeeded in capturing  
20 her image after multiple attempts. However, had she not been able to  
21 secure such shelter in the first place, the woman likely would have missed  
22 her CBP One appointment for failure to confirm the appointment slot in  
23 time. Had she been displaced nearly anywhere else, in a dimly lit shelter,  
24 on the street, or waiting in line at or near a port of entry, the app’s facial  
25 capture software would have likely failed this woman, as it continues to do  
26 for countless others.

27 *Asylum Seekers Face Grave Danger While Waiting in Nogales, Mexico*  
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31.Many people waiting outside the Nogales port have spent months struggling and failing to secure CBP One appointments. As they wait in Nogales, Mexico, asylum seekers are at risk of kidnapping, disappearance, rape, trafficking, and extortion. Many asylum seekers in Mexico suffer horrific violence at the hands of Mexican government agents and cartels, with many targeted precisely because they are migrants or seeking asylum in the United States.

32.In June, over 80 percent of new arrivals to KBI’s Migrant Aid Center reported leaving their homes due to violence or persecution. Asylum seekers fleeing persecution in Cuba, Haiti, Nicaragua, and Venezuela have informed KBI staff that they were unable to avail themselves of the Cuba, Haiti, Nicaragua, and Venezuela (CHNV) parole “pathways” specific to their countries of origin that would except them from the asylum ban’s application. The CHNV parole program requires long wait times of many months, each family member to have a valid passport from their country of origin, a U.S. sponsor who must initiate the application and have legal status within the United States, and other prerequisites that create barriers and often force those fleeing persecution to continue waiting in danger. Some of these new arrivals also shared that they had only learned of the parole process once in Mexico and were now disqualified due to their manner of entry into Panama and/or Mexico.

33.Most of those waiting in line at the DeConcini Port of Entry are Mexican asylum seekers. Many of the Mexican asylum seekers reported that they had been waiting in Nogales, Mexico for over a month. These Mexican individuals and families are not subject to the asylum ban for entering without a CBP One appointment, yet CBP has left them to wait for over a month, trapped inside their own country of feared persecution and at

1 continued risk of harm. People fleeing persecution in Mexico, a country  
2 that directly borders the United States, cannot wait.

3 34. For Mexican individuals and families, the threat of persecution by those  
4 they are fleeing – such as violent cartels and other organized crime groups  
5 that exercise control over territory and often work in collusion with  
6 Mexican authorities – is still palpable as they are forced to continue to wait  
7 in northern Mexico in the hopes of finally having access to safety.

8 35. Many Mexican asylum seekers have shared with KBI staff that they feel  
9 unsafe because the Mexican National Guard and police force have taken  
10 photos and videos of them waiting in line without their consent. In general,  
11 it is less than a one or two days’ journey from southern Mexican states to  
12 Nogales, Mexico, so an average wait time of a month or more leaves these  
13 Mexican families in great danger if their perpetrators can locate them  
14 quickly at or near U.S. ports of entry.

15 36. The week of July 9<sup>th</sup>, asylum seekers reported to KBI staff that while they  
16 were waiting to be processed at the port of entry, people in civilian clothes  
17 approached asylum seekers in the line saying that they had contacts in  
18 Washington, DC and could get people access to the asylum process. KBI  
19 later heard from other asylum seekers that those who went with those  
20 individuals were smuggled into the U.S. and abandoned in the desert. All  
21 asylum seekers waiting in Nogales, Mexico are at risk of harm, particularly  
22 those in immediate need of access to protection due to particular  
23 vulnerabilities or security risks. In mid-May 2023, multiple people  
24 reported to KBI staff that a group of men had recently arrived at the port  
25 of entry and beaten up a teenager who was waiting at the port of entry to  
26 seek asylum. A woman with the group recorded the assault on the teenager.  
27 The attackers threatened the migrants who had witnessed the attack,  
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warning that they needed to stay quiet about the attack or something even worse would happen to them.

37. In mid-May 2023, KBI staff learned of two young men who were waiting to seek asylum outside the Nogales port of entry and left the line to shower. On their way back, they were apprehended by an organized crime group and were searched, questioned, threatened, and robbed of their belongings. We were informed that the young men reported the incident to the Nogales municipal police, but the local police did not do anything.

38. Asylum seekers waiting in Nogales, Mexico also face serious public health issues. Soon after Title 42 ended, asylum seekers waiting outside the Nogales port reported to KBI staff that they did not have access to a public bathroom because it needed repairs. Local Mexican municipal authorities fixed the bathrooms temporarily but did not maintain them and the majority of the days KBI staff has witnessed that the bathrooms are out of service. These inhumane conditions led some families to decrease their water intake and resulted in dehydration and the spread of preventable, communicable illnesses such as gastrointestinal and respiratory illnesses that required evacuation of several children in need of urgent medical care.

I declare under penalty of perjury under the laws of the United States of America that the preceding declaration is true and correct.

Executed on this 3rd day of August, 2023 at Nogales, Arizona.

  
/s/ \_\_\_\_\_

Joanna Williams

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