

BRETT A. SHUMATE
Assistant Attorney General
Civil Division
WILLIAM C. SILVIS
Assistant Director
MICHAEL A. CELONE
Senior Litigation Counsel
JESSICA R. LESNAU
JOSHUA C. MCCROSKEY
Trial Attorneys
United States Department of Justice
Office of Immigration Litigation
P.O. Box 878, Ben Franklin Station
Washington, DC 20044
202-305-1540
Joshua.C.McCroskey@usdoj.gov

Attorneys for Defendants

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

JENNY LISETTE FLORES, *et al.*,

Plaintiffs,

v.

TODD BLANCHE, Acting Attorney General of the United States, *et al.*,

Defendants.

No. 2:85-cv-4544-DMG-AGR

**DEFENDANTS' NOTICE OF FILING
CORRECTED EXHIBITS A AND B TO
MAY 4, 2026 ICE JUVENILE
COORDINATOR'S SUPPLEMENTAL
REPORT**

Honorable Dolly M. Gee
Chief United States District Judge

1 On April 3, 2026, the Court ordered the Juvenile Coordinator for U.S. Immigration
2 and Customs Enforcement (“ICE”) to file a supplemental report by May 4, 2026, that
3 includes certain census data:

4 A census of minors who were held in ICE facilities or ICE-contracted facilities
5 for over 20 days during the months of February 2026, March 2026, and if
6 possible, April 2026. The supplemental report shall provide a detailed
7 explanation as to the reason(s) for the prolonged detention of minors in excess
8 of 20 days either in a Family Residential Center and/or in a hotel. For minors
9 held for over 72 hours in hotel(s), the census shall include data of minors who
10 are held consecutively in multiple hotels, for over 72 hours.

11 Dkt. # 1755 at 2.

12 On May 4, 2026, to comply with the Court’s order, ICE filed Exhibit A: ICE Family
13 Residential Center 20-day Report February and March 2026 (“FRC 20-day Report”) [Dkt.
14 # 1768-2]; Exhibit B: ICE Hotel Stays Report February and March 2026 (“Hotel Report”)
15 [Dkt. # 1768-3]; and Exhibit C: ICE Accompanied Children Report February and March
16 2026 (“Accompanied Children Report”) [Dkt. # 1768-4]. On May 8, 2026, counsel for
17 Plaintiffs emailed Defendants’ counsel and alleged that some class members were omitted
18 from the FRC 20-day Report and the Hotel Report. After investigating Plaintiffs’
19 assertions, ICE determined that four class members were omitted from the FRC 20-day
20 Report and that one class member was omitted from the Hotel Report. ICE states that the
21 five class members were omitted from the report due to human error. The supplemental
22 reports require law enforcement officers to conduct additional manual review of ICE
23 systems of record. This process is labor-intensive and increases the risk of human error.

24 Therefore, ICE submits the attached corrected Exhibit A: ICE Family Residential
25 Center 20-day Report February and March 2026 and corrected Exhibit B: ICE Hotel Stays
26 Report February and March 2026.

27 In the interest of clarity, ICE also provides the following explanations of the three
28 data reports that it submitted with the ICE Juvenile Coordinator’s May 4, 2026 Report. In

1 the April 3, 2026 Order, the Court required ICE to file detailed information that differs
2 from the reporting that ICE provides to Plaintiffs' counsel on a monthly basis. To cover
3 the specific information required by the April 3, 2026 Order, ICE prepared three reports:
4 the FRC 20-day Report, the Hotel Report, and the Accompanied Children Report.

5 Together the FRC 20-day Report and the Accompanied Children Report provide
6 "[a] census of minors who were held in ICE facilities or ICE-contracted facilities for over
7 20 days" during the reporting months. Dkt. # 1755 at 2. Almost all children held for over
8 20 days in ICE custody were held at the family residential center. Those children are on
9 the FRC 20-day Report. The children on the FRC 20-day Report may also have spent time
10 in custody at a hotel or hotels before or after being in custody at the family residential
11 center. The few remaining children who spent over 20 days in ICE juvenile detention
12 facilities are reported on the Accompanied Children Report.

13 The FRC 20-day Report provides "a detailed explanation as to the reason(s) for the
14 prolonged detention of minors in excess of 20 days" in a Family Residential Center and/or
15 in a hotel combined. Dkt. # 1755 at 2. Specifically, the FRC 20-day Report provides
16 reasons for class members' length of stay in ICE custody. No children were held in ICE
17 custody for over 20 days in a hotel during the reporting months.

18 Last, the Hotel Report shows all class members who stayed for over 72 hours in a
19 hotel or hotels, including data of minors who were held consecutively in multiple hotels
20 for over 72 hours, and for whom their *entire stay* in ICE custody was in hotels.
21
22
23
24
25
26
27
28

1 Dated: May 22, 2026

Respectfully submitted,

2 BRETT A. SHUMATE
3 Assistant Attorney General

4 WILLIAM C. SILVIS
5 Assistant Director

6 MICHAEL A. CELONE
7 Senior Litigation Counsel

8 /s/ Joshua C. McCroskey
9 JOSHUA C. MCCROSKEY
10 JESSICA R. LESNAU
11 Trial Attorneys
12 United States Department of Justice
13 Office of Immigration Litigation
14 P.O. Box 878, Ben Franklin Station
15 Washington, DC 20044
16 202-305-1540
17 Joshua.C.McCroskey@usdoj.gov

18 *Attorneys for Defendants*
19
20
21
22
23
24
25
26
27
28