

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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DETENTION WATCH NETWORK and  
CENTER FOR CONSTITUTIONAL RIGHTS

Plaintiffs,

v.

UNITED STATES IMMIGRATION AND  
CUSTOMS ENFORCEMENT and UNITED  
STATES DEPARTMENT OF HOMELAND  
SECURITY,

Defendants.  
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14 Civ. 583 (LGS)

DECLARATION OF  
NATALIE N. KUEHLER

I, Natalie N. Kuehler, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an Assistant United States Attorney in the Office of Preet Bharara, United States Attorney for the Southern District of New York, attorney for defendants United States Immigration and Customs Enforcement (“ICE”) and United States Department of Homeland Security (“DHS” and, together with ICE, the “Government”) in the above-captioned action. I make this declaration in support of the Government’s opposition to plaintiffs’ motion for a preliminary injunction.

2. Attached hereto as **Exhibit A** is the Declaration of Catrina Pavlik-Keenan, FOIA Officer of the Freedom of Information Act Office at United States Immigration and Customs Enforcement, dated March 5, 2014.

3. Attached hereto as **Exhibit B** is the Declaration of James V.M.L. Holzer, Senior Director of FOIA Operations for the Department of Homeland Security Privacy Office, dated March 4, 2014.

4. Attached hereto as **Exhibit C** is a true and correct copy of a Joint Statement for the Record, by Rafael Borrás, Under Secretary for Management, Management Directorate, and Thomas S. Winkowski, Deputy Commissioner, Performing the Duties of the Commissioner, U.S. Customs and Border Protection, and John Halinski, Deputy Administrator, Transportation Security Administration, and Daniel H. Ragsdale, Deputy Director, U.S. Immigration and Customs Enforcement, U.S. Department of Homeland Security, Before the United States House of Representatives Committee on Homeland Security, dated April 12, 2013.

5. Attached hereto as **Exhibit D** is a true and correct copy of the written testimony of DHS Management Directorate, U.S. Customs & Border Protection, U.S. Immigration & Customs Enforcement and the Transportation Security Administration for a House Committee on Homeland Security, Subcommittee on Oversight and Management Efficiency hearing titled “The Impact of Sequestration on Homeland Security: Scare Tactics or Possible Threat?” dated April 12, 2013.

6. Attached hereto as **Exhibit E** is a true and correct copy of a letter from Natalie N. Kuehler to Ghita Schwarz, Center for Constitutional Rights, dated February 18, 2014.

7. Attached hereto as **Exhibit F** is a true and correct copy of a letter from Ghita Schwarz, Center for Constitutional Rights, to Natalie N. Kuehler dated February 21, 2014.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 5th of March, 2014, in New York City, New York.

*/s/ Natalie N. Kuehler*  
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NATALIE N. KUEHLER  
Assistant United States Attorney