IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

TEXAS TRIBUNE, MANO AMIGA, CALDWELL/HAYS EXAMINER,

Plaintiffs,

v.

CALDWELL COUNTY, TEXAS,

TREY HICKS, in his official capacity as Caldwell County Court at Law Judge and Caldwell County Magistrate,

MATT KIELY, SHANNA CONLEY, ANITA DELEON, and YVETTE MIRELES, in their official capacities as Caldwell County Justices of the Peace and Caldwell County Magistrates, and

MIKE LANE, in his official capacity as the Sheriff of Caldwell County,

Defendants.

Civil Action No. 1:23-cv-910-RP

DECLARATION OF MANO AMIGA IN SUPPORT OF PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION

I, Eric Martinez, hereby declare and state as follows:

1. I am Executive and Policy Director of Mano Amiga. I am over the age of eighteen and am competent to make the statements herein. I have personal knowledge of the facts stated in this declaration, and, if called and sworn as a witness, could and would competently testify to them.

2. Mano Amiga is an advocacy organization founded in 2017 that works with communities impacted by the intersection of the criminal legal system and immigration policy. It

focuses on criminal legal system reform issues in Caldwell and Hays Counties, including reducing pretrial detention, ensuring access to counsel, and minimizing the impact of the criminal legal system on noncitizens. In addition, Mano Amiga has operated a bail fund in Caldwell County since 2020.

3. The Caldwell County magistrates' refusal to allow Mano Amiga access to magistration proceedings impedes many aspects of the organization's work, including bailing people out of jail expeditiously, gathering information to advocate for arrestees and victims of crime, supporting community members from populations that are overrepresented in the criminal legal system, and educating the public on the importance of local courts.

4. Being banned from attending magistration in Caldwell County prevents us from bailing people out expeditiously because there are significant delays between when a bond is set and when that information becomes available to our organization and the wider public. Since we are unable to learn bail amounts in real-time by attending magistration, our organization has to wait for bail to be set, bail information to be processed, processed bail information to be entered into the online system, and the system to populate bail information publicly. In our experience, these processes often take significant amounts of time.

5. Due to the policy prohibiting us from observing magistration, we have been unable to expand our support for detained community members through initiatives like court-watching during bail setting, offering court accompaniment, and collecting and organizing data on bail practices for broader public awareness.

6. I declare under penalty of perjury that the foregoing is true and correct. Executed on this 20th day of September, 2023.

Eric Martinez

Eric Martinez