

Exhibit A

Redacted

DECLARATION OF Y [REDACTED] Z [REDACTED] P [REDACTED]

I, [REDACTED], make the following declaration based on my personal knowledge and declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. My name is Y [REDACTED] Z [REDACTED] P [REDACTED] and my date of birth is [REDACTED]. I am 20 years old.
2. When I first came to this country, I was in ORR custody. When I turned 18, I was released.
3. After that, I lived in Willis, Texas. I got a free lawyer when I was in ORR custody and got Special Immigrant Juvenile Status because I never knew my father. I had deferred action too, and I had a work permit.
4. In November 2025, I was driving in my car at the speed limit, 45 miles per hour. I accidentally hit a car that was turning left. From what I could see, I scratched the other car a little, my car had a little bigger scratch. The person in the other car didn't look impacted.
5. There was a woman driving the car that I hit, I saw her through her car window. I stopped my car immediately because I knew that was what you were supposed to do after an accident. But the woman driving the car just drove away, she didn't stop at all. I waited a few minutes but she didn't come back, so I just left too, and drove towards my house. The accident happened about a mile away from where I lived.
6. Arriving near my house, I saw a police car that turned its lights on, so I again stopped immediately. The police officer asked me if I had just been in an accident, I said yes, and when they asked me, I got out of the car with my hands up.
7. The officer told me a woman called the police and said someone had hit her car, so they were going to arrest me. I said okay, and they took me to the police station.
8. Never in my life had I ever been in a jail before. I never had any problem with the police ever in my life, in my country or here in America.
9. I was in the county jail for 10 days. The attorney they gave me said I had to plead guilty or I would spend a long time there. The criminal judge just gave me time served, but then they took me to ICE.
10. Before all this happened, I worked packing food at a store from Monday to Friday, from six in the morning to six in the evening. I rented a room from a woman I met at church.
11. On Saturdays and Sundays, I went to my church, which is called Casa de David. I did a lot of things as part of the congregation. I sang in church, and evangelized in the community, talking to people about God. I always like going to church since I was young because my whole family believed in God and cared about our church community. In Willis, I just liked being in the church and wanted to spend as much time as I could there.
12. I have been in ICE custody since December 2025. All seven of those months I have been at Joe Corley. The truth is it's really bad here. I can't talk to my family because it's so expensive. I am trying to have patience, have faith, but it's horrible. There is so much racism from the guards, the food is often not edible, it's impossible to sleep.

13. It's been hard because before this, I had never been in jail. When I first came to this country and was in ORR custody, it was so different. They let us play, never put shackles on us, and they let us speak to our family. I miss my mother and my brother. I'm thinking of signing for my removal, but I have fought hard to be here and I am appealing my case. It's not easy, it's a torment to be in detention so long, but I am trying to keep fighting for myself.

Paralegal Certification of Telephonic Affidavit

I, Ilse Ramirez, do hereby solemnly swear that I transcribed the foregoing statements, as stated by the declarant to me, to best of my knowledge and abilities. I did so because staff at Joe Corley Processing Center informed me, when I called them on June 16, 2026, that they would not transmit any legal mail from a detainee via electronic means. I further affirm that I am fluent in the English and Spanish language. On June 16, 2026, I reviewed the foregoing declaration with the declarant and translated it faithfully and accurately over a video teleconference call. After I completed translating and reviewing the declaration with him, the declarant verified that the contents of the foregoing declarations are true and accurate.

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



Ilse Ramirez

Dated: June 16th, 2026