

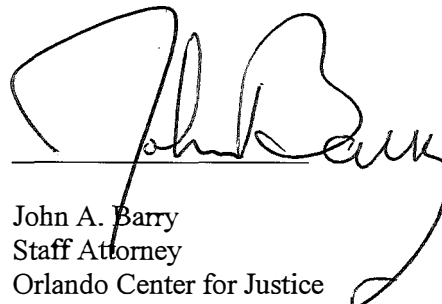
### DECLARATION OF JOHN BARRY

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

1. I am a practicing attorney licensed to practice before the State of Florida. My business address is 1300 North Semoran Blvd, Suite 120, Orlando, Florida 32807. I have been employed as a Staff Attorney at Orlando Center for Justice since September 3, 2020. I am over the age of 18 and am competent to testify regarding the matters described below.
2. I have been working in immigration law since 2000. Since 2020 I have been working primarily with immigrant children on their state court cases (e.g., dependency, temporary custody), on their removal cases in immigration court, and on their cases before United States Citizenship and Immigration Services (USCIS). I have represented several dozen immigrant children and I currently have more than 100 child immigrant clients in and out of ORR Shelters. For more than 5 years I have provided Know Your Rights presentations and Intakes for hundreds of immigrant children detained at two ORR-affiliated shelters in Central Florida. I have near daily contact with the children and staff at both shelters
3. This morning, at 10:35AM I received a call from Lead Case Manager [REDACTED] at the [REDACTED]. Arleny was very concerned and explained to me that the FOJC (Department of Homeland Security Field Office Juvenile Coordinator) for her Shelter contacted Arleny this morning to say that: (a) the Trump Administration is ordering FOJCs to detain all children who turn 18 years old in the Shelter, (b) the FOJC needs a list of children turning 18 so that the FOJC may offer Voluntary Departure to these children instead of adult detention, and (c) the FOJC knows that these actions are in violation of a standing court order protecting children turning 18 in the shelters.
4. In addition, [REDACTED] explained that she had requested this information in writing from the FOJC, but that the FOJC was unable to provide the information in writing. The FOJC stated that it was not possible to provide this information in writing since the offer of Voluntary Departure was not in accordance with Trump Administration directives and that committing this in writing to get the FOJC in trouble.
5. I asked [REDACTED] to send me an email summarizing her conversation with the FOJC. A copy of the email is attached to this declaration below.
6. I advised [REDACTED] that I was going to alert the leadership of our organization and prepare legal protections for the children at the shelter in response to the FOJC's information.

I declare under penalty of perjury that the above information is true and correct to the best of my knowledge.

Executed this 3rd day of October 2025 at Orlando, Florida.



John A. Barry  
Staff Attorney  
Orlando Center for Justice

## FW: ICE Detaining Age Outs - US RIDD

External

Inbox x



[Redacted]

10:44 AM (5 hours ago)



to me, Melissa, Giselle, Melanie, Jessica, Claudia, Janice ▾

Hi John,

As per our conversation, this morning FOJC informed the program that the current administration has ordered them to detain all age outs moving forward. FOJC asked if program can provide the names of the age outs coming up so that he can give them VD as an option instead. I asked if he could send this information in writing and FOJC stated that they cannot as giving the minors the option of VD would essentially be going against the administration. FOJC also added that the current administration ordering FOJC's to detain age outs is going against the court order in place protecting minors who age out in ORR. We currently have one minor aging out on the 20<sup>th</sup> of this month and 4 minors aging out in November.

Thank you,

