

SUPPLEMENTAL DECLARATION OF JOHN BARRY

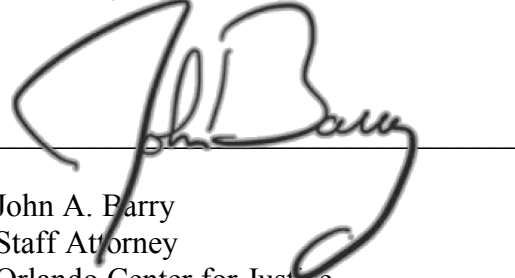
I, John A. Barry, make the following declaration based on my personal knowledge and declare under the penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

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 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, etc.), 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. On the evening of Friday, October 3, 2025, at 10:58PM, I received a call from a staff member of one of the ORR-affiliated shelters. The staff member was concerned because of the circumstances involving C.H.V., an unaccompanied minor at the shelter who was turning 18 on the following day, Saturday, October 4, 2025. The staff member told me that the ICE Field Office Juvenile Coordinator (FOJC) supervising the shelter confirmed that the FOJC was going to take C.H.V. into ICE custody. The staff member and other shelter staff were initially told by the FOJC at approximately 5:00PM that C.H.V. was going to be released to his mother the following morning. The staff member explained that the FOJC had changed her mind at approximately 9:00PM and alerted the shelter staff that the FOJC was going to pick the youth up the following morning.
4. The following morning, on Saturday, October 4, 2025, the ICE FOJC picked up C.H.V. between approximately 10:00AM and 11:30AM. The FOJC took the unaccompanied minor to the ICE ERO facility located at 9495 Delegates Drive, Orlando, Florida 32837. At 12:02PM I received the Temporary Restraining Order signed by Judge Contreras only minutes before at 11:49AM. I immediately drove to the ICE ERO facility and I waited outside the facility for the FOJC to deliver C.H.V. to me so that I could reunite the youth with his family. I am the attorney of record for C.H.V.. After a wait at the front door of the facility, at approximately 1:30PM, an ICE officer opened the door of the facility and released C.H.V. The ICE officer did not introduce himself and he was not the FOJC.
5. Upon receiving the unaccompanied minor, I did not receive any paperwork from the ICE officer. The unaccompanied minor showed me copies of his Order of Release on

Recognizance. To my knowledge, these are the only documents the FOJC provided to the unaccompanied minor.

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

Executed this 27th day of October 2025 at Kissimmee, Florida.



John A. Barry
Staff Attorney
Orlando Center for Justice