Exhibit D

Redacted

DECLARATION OF B[redacted] I[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 to the best of my knowledge, memory, and belief:

1. My name is B[redacted] I[redacted] and my date of birth is [redacted]. I am 21 years old. I am from Uzbekistan and I speak Uzbek, Tajik, and Russian. I only speak a little English.
2. When I first came to this country, I was in a shelter in California. When I turned 18 in [redacted], I was released.
3. After that, I lived in Croydon, Pennsylvania with my older brother.
4. I attended a check-in with ICE on October 24, 2023, in Philadelphia. I did not have a lawyer. My brother came with me and helped translate but ICE did not provide an official translator or provide copies of any of the documents in Uzbek or another language I understand. There were no issues during the appointment.
5. As far as I remember, ICE did not tell me I needed to come back to check-in again on a certain date. If I had known I was supposed to check in again in 2024, I would have gone to the check-in. I also never received any mail or phone call from ICE telling me I had another check-in appointment scheduled.
6. In August 2024, my brother helped me submit an asylum application.
7. In 2024, my brother and I moved to Philadelphia, Pennsylvania. My brother helped me submit my new address to the government online in November 2024. We thought that was all we needed to do to make sure the government had my new address. My brother also kept checking with our old landlord to make sure no important mail came to our old address. I thought I was complying with the rules.
8. In the spring of 2025, my brother and I moved to another apartment in Philadelphia, and we submitted another change of address to the government using the same website.
9. On August 14, 2026, I was driving my brother's car when suddenly three cars with lights and sirens came behind me and stopped me. It was ICE. I had never been stopped by ICE before, and I didn't know why they stopped me.
10. The lawyer, Ms. Martin, told me that the ICE records say that ICE had been following me for weeks before they stopped my car. I did not know that ICE had been following me until the lawyer Ms. Martin told me.
11. As soon as they told me to get out of the car, I called my friend to help interpret since I don't speak a lot of English. One of the ICE agents came over and he said ICE was arresting me because I had escaped from them a few days before and asked me for my ID, which I showed him. A second ICE agent came over and said something like, "no, he is not the guy we are looking for, that guy had a beard." The agents then told me they were looking for the guy with the beard who had been driving my car and escaped from them. They asked me questions about who he was and where he lived. I explained to them that he was my friend who had been staying with us for a few days, I had let him

borrow my car, and I was not the one who had tried to escape. The friend who borrowed my car is around 30 years old and has a beard. I have never had a beard.

12. My friend was still on the phone interpreting and told me that the agents were talking to each other and trying to decide whether to detain me or let me go, and one of the officers said, let's bring him to the FDC [Federal Detention Center] and decide there. I asked the agents why I was being detained and they said once we got to the FDC they would decide what to do and tell me.

13. The agents arrested me and brought me to the ICE office for a few hours, and then the FDC. I stayed at the FDC for two days and then ICE transferred me to Moshannon Valley Processing Center where I have been detained for the past two months.

14. Ms. Martin also told me that ICE claims that I tried to flee from ICE agents in my car on July 31, 2026. That is not true. I never fled from ICE and I never even knew that ICE had been following me until they turned on their lights and pulled me over on August 14th. As I told the ICE agents who arrested me, on July 31st I had loaned my car to a friend who had stayed at our home the night before. I don't know why ICE would write in their records that I was the one who fled from them since they said during my arrest that they knew I wasn't the man with the beard that escaped from them.

15. After I was detained, my brother immediately hired a lawyer to represent me. The lawyer requested bond, but the immigration judge denied it at the end of August. After that, the attorney told my brother that there was no chance that I would be released so I could either take voluntary departure or fight my case and stay in detention for one to three more years. My brother called me and explained what the lawyer had said. The lawyer never called me directly to explain to me what was going on and what my options were.

16. Being detained has been very hard and has made me depressed. The food at Moshannon Valley is terrible, they put about 80 of us in one room, and I haven't been able to get any medical care for my tooth pain. I have also watched other detainees who have been stuck here for months going crazy and it is scary. I couldn't imagine staying here for years.

17. I requested a second bond hearing, but the judge denied bond again at the end of September. After that, my brother tried to talk to the lawyer about my case but the lawyer stopped answering his calls. My brother talked to the lawyer's assistant instead, who said they would help me get out of detention quicker by preparing voluntary departure paperwork.

18. Around September 23, 2026, I got a notice that I had an asylum interview with USCIS scheduled for October 6, 2026. My brother sent my lawyer the notice that same day, but the lawyer didn't respond.

19. I had my first master calendar hearing on October 5, 2026. My lawyer didn't meet with me or my brother before the hearing, and he never discussed my asylum interview scheduled for the next day with me or my brother. My lawyer did not show up to my hearing but sent another lawyer from his office instead. When the judge asked if I wanted to take voluntary departure, the lawyer asked for five minutes to discuss it with me. During that five minutes, the lawyer didn't tell me anything new and said again that my options were to accept voluntary departure or fight my case in detention.

20. I told the judge I wanted to accept voluntary departure because I was afraid of having to stay in detention for years. I only accepted because I was afraid of being detained for a long time. I had seen what being in detention for many months had done to other people at my detention center and that made me stressed and scared. But I would not have accepted voluntary departure that day if knew there was a chance I would be released soon.

21. Before I was arrested, I lived with my brother and our roommate. I worked for my brother's car rental business and sometimes worked shifts as a delivery driver. I was involved the Uzbek community in Philadelphia and my local mosque. I attended weekly gatherings at the mosque, and my brother and I regularly volunteered there and attended events. I had also recently signed up for English classes in September, but I was not able to attend because ICE arrested me. I don't have a criminal record and I was trying to do everything right in my immigration case so I don't understand why ICE detained me.

Executed on the 16th day of October, 2026.

[redacted] (Detained)

Orally reviewed and consented to signature via telephone from Moshannon Valley Processing Center on October 16, 2026.

Certificate of Translation

I, Umidjon Ikromjonov, swear under penalty of perjury that I speak English and Uzbek and that the foregoing statement has been faithfully translated to the best of my ability.

Dated: October 16th, 2026

_____

Umidjon Ikromjonov