

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

The Advocates for Human Rights and
L.H.M., through her next friend C.A.,

Court File No. 0:260-cv-00749 (NEB/DLM)

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY; KRISTI NOEM, in her
official capacity as Secretary of
Homeland Security; U.S.
IMMIGRATION AND CUSTOMS
ENFORCEMENT; TODD LYONS, in
his official capacity as Acting Director of
Immigration and Customs Enforcement;
MARCOS CHARLES, in his official
capacity as the Acting Executive Director
for Immigration and Customs
Enforcement's Enforcement and Removal
Operations; DAVID EASTERWOOD, in
his official capacity as Acting Field
Office Director for Immigration and
Customs Enforcement's Enforcement and
Removal Operations St. Paul Field
Office; U.S. FEDERAL PROTECTIVE
SERVICE; and FARON K. PARAMORE,
in his official capacity as Director of the
Federal Protective Service,

DECLARATION OF J.J.B.

Defendants.

DECLARATION OF J.J.B.

I, J.J.B., declare the following is true and accurate to the best of my knowledge and recollection.

1. My name is J.J.B. I am a 20-year-old man from Venezuela. I live in Minneapolis, Minnesota. I have refugee status.
2. I am filing this declaration under my initials, rather than my full name, due to fear of retaliation against me or my family for opposing the federal government. My full name is known to counsel for Plaintiffs.
3. I was at a friend's house on Tuesday, January 13, 2026, when my mom called me. She told me that ICE was at my house.
4. I drove home. When I parked in front of my house, I was surrounded by around 20 people, some of whom pulled me out of the car. Some wore vests saying "POLICE ICE" while others' vests said "POLICE" or "ERO." I surrendered peacefully and was arrested.
5. I told the officer I needed to tell my mom I was being detained, but he wouldn't let me. I wanted the agents to let me say goodbye and calm her down.
6. The officer put me in the car and took my phone away. He then drove me around Minneapolis for what felt like 30 minutes. I asked where he was taking me, and the officer said he was taking me to the detention center.
7. When I arrived at Whipple, there were many ICE officers. They made fun of me. They put handcuffs on me and tightened them uncomfortably on my wrists. They patted me down and took my shoes and my phone.
8. I stood there for about an hour, until the ICE officers took me to another room with recently detained people.
9. The officer there took my fingerprints and photos. He took my documents, including my I-94 and work permit. He took my handcuffs off. The ICE officer filled out papers for me without asking me any questions. I don't know what papers he was filling out. He did not tell me.
10. The officer told me I was only allowed to call my family and a lawyer, but I did not have a lawyer at the time. The officer told me they had attorneys available but they never gave me an attorney's contact information. If your family doesn't pick up the phone when you call, you can't call anymore, at any time. I called my mother. She answered and I told her I was ok to calm her down. She told me that she would try to find me an attorney.
11. I asked ICE questions about my case but no one told me anything or answered my questions. They just told me that they were going to look into my case in Texas.

12. ICE took me to a room that I estimate could not hold more than 20 people. Over the next two hours, the room filled up with about 100 people. The conditions in the room were inhumane. The room had a dirty toilet and there was no door for privacy. The excrement was overflowing. There was no toilet paper so I had to ask the officers for it, but sometimes they refused to give it to me and often they would just ignore my requests. ICE cuffed my feet, and I had to go to the bathroom with the handcuffs still on. My ankles hurt because the cuffs were meant for wrists and were too small for my feet. I asked them to loosen the cuffs a little but they refused. Nobody in my room was given any attorney contact information.

13. An ICE officer gave me a cold bread roll with ham and cheese, crackers, and water. There were no beds or blankets. There were no trashcans, so there was trash all over the ground. ICE didn't tell me what they were going to do to me. There was a person who had epilepsy who begged ICE for his medication. He knocked insistently on the door to ask for his medication but no one answered. Some people there were just wearing undershirts. ICE had gone to their doors and detained them when they opened the door. People had to sleep in handcuffs and standing up because there was not enough room.

14. I saw four to five other smaller detention rooms. Each one looked like it was holding about 40 to 50 people.

15. ICE beat people and denigrated them.

16. I only got to speak on the phone when I saw the ICE agents changing shifts. I got to use the phone a handful of times because I begged and told them I hadn't called anyone yet. The phone calls are never private. ICE only allows you to make phone calls in the open hallway between detention rooms. ICE agents walk around you while you are making calls, waiting for you to end the call so they can grab the phone back. On the second day, I called my mom and she gave me the numbers of two attorneys. After hanging up, I begged the ICE agent for a pen and paper so I could write down the numbers. He eventually gave me a pen and paper. After begging again, the agent let me call the attorney. I was only permitted to talk to my attorney for a few minutes.

17. Because I have refugee status, I did not believe that ICE could legally hold me. However, ICE officials refused to listen to me when I tried to explain that I had been granted refugee status, and without proper access to a lawyer I did not know how to formally exercise my rights. Even if I had known how to ask a court to order my release, there was no way to send mail or email, so I could not have sought my own release.

18. I talked with many of my fellow detainees, and because we were all crowded together, I overheard many other conversations. In my room of about 100 detainees, only me and two other men used the phone while I was there. The other two were given the phone after seeing that sometimes my begging to use the phone worked. I don't know if either of them spoke to an attorney, but I know that ICE did not give them one.

19. Planes arrived twice every day, once in the morning and once in the late afternoon, during the time I was there. The planes were taking people to Texas. The second day I was there, ICE kept me in the room with the people they were going to send to Texas. The planes arrived, but they didn't send me to Texas. ICE didn't give me any information.

20. On the third day, ICE chained my stomach and handcuffed my wrists. My feet had been cuffed the whole time I was there. ICE put me in a minivan with about ten other people, but just as we were about to leave, ICE told me to get out of the car because "the plane was full."

21. When I left the car, I was sent to another room. I was told that I would be going to Texas with a group of four to five refugees. I wanted to call a lawyer, but ICE wouldn't let me.

22. There are no windows and ICE wouldn't let me see the time. The room I was in had two big "mirrors" that allowed people outside the room to see in but didn't let us see out. It's like they're trying to drive you crazy. The stress was so much that I felt like I was hallucinating. It seemed like the ICE officers wanted to scare me. Most of them treated me and the other detainees like animals. Some people detained with me had been at Whipple for 20 days.

23. Other detainees in the room told me ICE wanted us to "get bored" until we agreed to sign self-deportation papers.

24. Around 7pm on Thursday, January 15, 2026, an ICE officer told me, "we're going to get you out of here, but I can't promise anything." Five minutes later, he let me call my mom to pick me up. I asked her to call my manager to pick me up since my manager is a U.S. citizen.

25. People who told me they were border agents from Texas removed the cuffs from my feet and told me they were called in to release me. The cuffs had been on my ankles for the whole time I was at Whipple. I still have marks on my ankles from them. They made me sign a paper that said "OUT" in English. When I asked what it was, they told me just to sign it. I asked if I could speak to a lawyer, but they wouldn't let me.

26. I signed the paper and I was allowed to go. They gave me back my phone and the documents I was forced to hand over when I was first detained.

27. I was never told why I was detained or why I was released. ICE never told me there was an attorney who came to Whipple to see me.

28. I am worried that ICE will detain me again and once again refuse to let me speak with a lawyer. ICE has already detained me once despite their records making clear that I'm a refugee who is legally allowed to be in the United States, so there's nothing stopping them from detaining me again. Because of this fear, I and other family members have hardly left the house since I was released.

Date: January 22, 2026

/s/ J.J.B.

CERTIFICATE OF TRANSLATION

I, Maria Fernanda Chanduvi am competent to translate from Spanish language into English and certify that the translation of Declaration of J.J.B. and Declaration of J.I.B.C. is true and accurate to the best of my abilities.

/s/Maria Fernanda Chanduvi

Signature of Translator

Maria Fernanda Chanduvi

Typed/Printed Name of Translator

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