

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ALABAMA
MOBILE DIVISION

LEONARDO GARCIA VENEGAS,
Plaintiff,

vs.

TOM HOMAN, ET. AL.,
Defendants.

1:25-cv-397-JB-C

DECLARATION OF
PARKER STILL

DECLARATION OF PARKER STILL

In accordance with Title 28, United States Code Section 1746, I, Parker Still, do declare and state as follows:

(1) I am currently a Supervisory Special Agent (SSA) assigned to the Federal Bureau of Investigation's (FBI's) Mobile, Alabama Field Office and have served in this capacity since 2020 in several roles. One of my job responsibilities was supervising FBI Special Agents assigned to the "Gulf of America Homeland Security Task Force" as described further below. I entered on duty with the FBI as a Special Agent in 2012. The matters stated herein are based on my personal knowledge, my background, training, and experience relating to FBI operations in the Mobile, Alabama Field Office, and my review and consideration of information available to me in my official capacity, including information furnished by FBI personnel in the course of their official duties. FBI Special Agents are required to comply with the U.S. Constitution, federal laws, and FBI policies and regulations.

(2) I submit this declaration in support of the U.S. government's motion to dismiss in *Leonardo Garcia Venegas v. Tom Homan, et al.*, Case No. 1:25-cv-00397-JB, in the United States District Court, Southern District of Alabama.

(3) I have reviewed Plaintiff's Complaint, filed on September 30, 2025, at ECF No.1, and familiarized myself with the allegations in that Complaint that relate to: paragraphs 187-88 (concerning the "Gulf of America Homeland Security Task Force"); paragraphs 63-114 (the alleged immigration enforcement operation on May 21, 2025 in Foley, Alabama); and paragraphs 116-152 (the alleged immigration enforcement operation on June 12, 2025 in Fairhope, Alabama).

(4) The Plaintiff's Complaint, paragraphs 187-88, references the "Gulf of America Homeland Security Task Force," which is an immigration enforcement task force that was established in 2025 by the United States Department of Homeland Security (DHS) concerning immigration enforcement operations within the Southern District of Alabama. This task force is correctly known as the "Homeland Security Task Force – Mobile." Hereafter, I will refer to the task force as the "HSTF-M." The DHS oversees and directs the HSTF-M. FBI Special Agents from FBI's Mobile, Alabama Field Office assigned to the HSTF-M are supervised by the FBI. FBI Special Agents participate in HSTF-M immigration enforcement operations, as further described below, within the Southern District of Alabama.

(5) Plaintiff's Complaint, paragraphs 155 through 157, alleges the existence of three DHS immigration policies: the Warrantless Entry Policy; the Preemptive Detention Policy; and the Continued Detention Policy. These three policies are discussed in other parts of the Complaint. The FBI has no role or function in creating or formulating DHS immigration policies. I am unaware of DHS policies as identified and articulated in Plaintiff's Complaint.

(6) On January 25, 2025, the Acting Attorney General authorized and conferred immigration enforcement authority upon all United States Department of Justice law enforcement officials, including the FBI. The Acting Attorney General took this action pursuant to a January 22, 2025 memorandum from the Acting Secretary of DHS, where the Acting Secretary authorized law enforcement officials, at the FBI and other federal law enforcement agencies, to perform the functions of an immigration officer granted to the DHS in Title 8, Chapter 12, of the United States Code and the regulations thereunder.

(7) FBI Special Agents play a support role in Title 8 enforcement operations, and generally have a peripheral role in planning the DHS Title 8 enforcement operations.

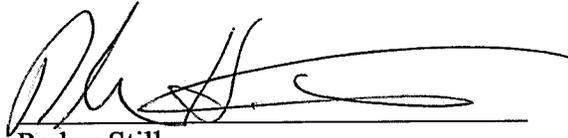
(8) Plaintiff's Complaint references two interactions on May 21, 2025 in Foley, Alabama and June 12, 2025 in Fairhope, Alabama. To the extent that DHS requested FBI assistance for Title 8 activities planned in Foley, Alabama or Fairhope, Alabama, only FBI Special Agents assigned to the Mobile, Alabama Field Office would have been assigned to assist in those locations. The FBI does not participate in every enforcement operation of the HSTF-M within the geographic boundaries of the Southern District of Alabama. Instead, upon request, the FBI provides support to the HSTF-M.

(9) I have access to the records contained in the FBI's Central Records System. I am also personally familiar with the FBI records maintenance and retrieval system. All records contained in the FBI's Central Records System are identifiable through the FBI's practice of indexing records to a particular subject matter or individual. Once indexed, a record pertaining to a particular subject matter or individual is retrievable through a search of the general indices to the FBI's Central Records System. In short, the Central Records System is the FBI's official system of records for all investigative, administrative and official business of the FBI. The

Central Records System enables the FBI to maintain information it has acquired during the course of fulfilling its mandated law enforcement responsibilities. The records maintained here consist of administrative, applicant, criminal, personnel and other files compiled for law enforcement purposes. Searching the FBI's Central Records System is the means by which the FBI can determine what retrievable information, if any, the FBI may have in its files on a particular subject matter or individual. A search of the FBI's Central Records System did not disclose any documentation relating to contact between the Plaintiff and FBI personnel on May 21, 2025 or June 12, 2025.

(10) After reviewing the FBI's Central Records System and speaking with FBI personnel assigned to immigration operations on or about June 12, 2025, I identified no information indicating any interaction between the Plaintiff and FBI personnel.

Dated: January ²¹21, 2026

A handwritten signature in black ink, appearing to read 'Parker Still', written over a horizontal line.

Parker Still
Supervisory Special Agent
Federal Bureau of Investigation
Mobile, Alabama