

SUPPLEMENTAL DECLARATION OF [REDACTED]

I, [REDACTED], make the following statement under penalty of perjury:

1. My name is [REDACTED], and I submit this declaration on behalf of myself and my two children, [REDACTED] as part of our ongoing effort to receive an opportunity to seek asylum in the United States. My husband, [REDACTED], is currently seeking asylum in the United States.
2. We are plaintiffs in the case *RAICES v. Noem*, No. 1:25-cv-306-RDM. In that case we are referred to by the initials F.A., K.A., and Y.A., respectively.
3. We are from Turkey, and we came to the United States with the intention of seeking asylum. I and my family fear persecution, torture, and death at the hands of the Turkish government. My family left Turkey with the intention to apply for a CBP One appointment once we arrived in Mexico.
4. My husband came to the United States ahead of us, in October 2024, and he is currently in the United States and has an asylum application pending in immigration court. While he was in Mexico, he tried multiple times to get a CBP One appointment, but he was unable to. So, he crossed the border without an appointment.
5. Right before my husband fled to the United States, our family submitted applications for diversity lottery visas to immigrate to the United States. My husband filled out the application for us, and, to the best of my knowledge, he answered the questions completely and truthfully and submitted all the information required. We did not hear about that application before my husband had to flee Turkey and our application was still pending when I fled with our children. In early May 2025, we learned that we had not been granted visas through the lottery.
6. When my children and I fled, we intended to try and use CBP One. But by the time we got to Mexico, the CBP One app was no longer available. We thought that, because my husband was allowed to pursue asylum, we would also be able to if we entered like my husband did.
7. When we crossed the U.S. border on or about February 3, 2025, I did not know there was any new requirement to submit health information or other background information to U.S. officials in advance of seeking asylum. I also did not know of any system for submitting that kind of information.
8. I entered the United States with my children after spending as little time in Mexico as we could. We did not feel safe there and stayed inside as much as possible to avoid any danger.
9. Without knowing what else to do, and fearing for our lives, we decided to enter the United States and ask for protection, which we did on approximately February 3, 2025.

At the time we entered, we did not know that the Proclamation existed, and we did not know about any requirements that it imposed. I did not know I needed to provide medical records, though I did arrive to the United States with medical information for myself and my elder son. I was not allowed to give this information to anyone while detained in the United States. I do not have a criminal record anywhere, so I do not know what kind of evidence I could have provided on that issue, and regardless I did not have that information.

10. For about nine days, my children and I were detained by the Department of Homeland Security. While in detention, no one spoke to us in Turkish or gave us any information in Turkish, which is the only language we speak. I don't believe any U.S. officials mentioned any requirement to provide health or other background information to the U.S. government to seek asylum. I did try to provide documents about my husband's asylum case, but no one who I encountered in detention would accept them from me.
11. We were then put on a military airplane and sent to Panama with a bunch of other asylum seekers, where everyone spoke Spanish, which is another language we do not speak. While we were in Panama, we were held in a hotel in Panama City. We were not allowed to use the phone or communicate with the outside world while we were there. I did manage to make one call to some attorneys, which is how I was able to join this case, but that call was also not officially permitted. In fact the attorney I was speaking to had to speak to someone in the hotel in Spanish to convince them to let me keep talking in the one conversation I managed to have.
12. While this case has been pending, we were pressured to accept a flight back to Turkey. While we were at the hotel in Panama City, some government officials came to tell us that if we wanted to stay in Panama, we would have to go to a detention camp in the jungle. This terrified me. I did not know where that camp would be or what it would be like. By the way they talked about it, I was fearful that we would not survive if we got sent there. For that reason, I felt pressured to accept a return to Turkey for myself and my kids.
13. We are now in hiding in Turkey, and I am unable to find a job because of my affiliation with the Gülen religious and political group. Recently, I have grown more fearful that I could be arrested because we have heard of the government arresting people who have traveled abroad recently. So I live in fear every day. I pray that we can reunite with my husband soon.

DECLARATION SIGNATURE ON THE FOLLOWING PAGE.

Thank you for considering my statement.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge, memory, and belief.

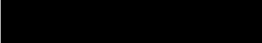
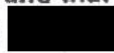
Executed on the 23 Day of May, 2025 in Turkey.



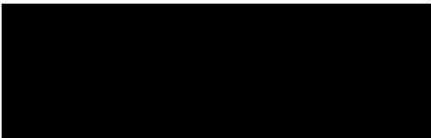
May 23, 2025

DATE

CERTIFICATE OF TRANSLATION

I,  swear under penalty of perjury that I speak English and Turkish and that I have translated this document to the best of my ability. I reviewed this document with  and have incorporated changes or corrections provided. I declare under penalty of perjury that the foregoing statement has been faithfully translated and executed to the best of my knowledge, memory, and belief.

Executed on the 22 Day of May, 2025 in Boulder, CO.



May 22, 2025

DATE