

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

LIYANARA SANCHEZ, as next friend  
on behalf of FRENDEL REYES MOTA,  
*et al.*,

*Petitioners-Plaintiffs,*

J.G.G., *et al.*,

*Plaintiffs,*

v.

DONALD J. TRUMP, in his official  
capacity as President of the United States,  
*et al.*,

*Respondents-Defendants.*

Civil Action No. 1:25-cv-00766-JEB

DECLARATION OF SECRETARY NOEM

I, Kristi Noem, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury as follows:

1. As Secretary of Homeland Security, I made the decision to continue the transfer of custody of the Alien Enemies Act detainees who had been removed from the United States before this Court issued its temporary restraining order in the evening of March 15, 2025.

2. Before making that decision, I received privileged legal advice from the Acting General Counsel of the Department of Homeland Security, Joseph N. Mazzara, and through him from the senior leadership of the Department of Justice.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 4th day of December 2025.

  
Kristi Noem  
Secretary of Homeland Security