

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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

Petitioner,

v.

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

Respondents.

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

DECLARATION OF JOSEPH N. MAZZARA

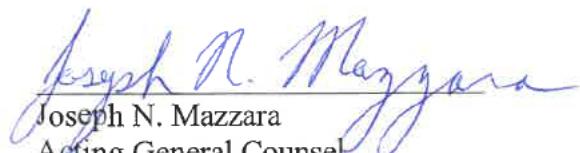
I, Joseph N. Mazzara, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury as follows:

1. I have served as Acting General Counsel of the Department of Homeland Security (DHS) since January 2025. On March 15, 2025, I analyzed what the Court said at the TRO hearing and in its subsequent written order. After my review, I then gave Secretary Noem legal advice—prior to her decision—about the legality of continuing with the transfer of custody to El Salvador of certain terrorist aliens detained under the Alien Enemies Act. DHS had removed these terrorists from the United States before this Court issued any order (or oral statement) regarding their removal.

2. That same evening, I also gave Secretary Noem—prior to her decision—legal advice on the same topic that I received from senior Department of Justice leaders.

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

Executed this 5th day of December 2025.


Joseph N. Mazzara
Acting General Counsel
Department of Homeland Security