

EXHIBIT I

**DECLARATION OF STEPHANIE QUINTERO,
ATTORNEY FOR J.G.G.**

I, Stephanie Quintero, declare under penalty of perjury and under the laws of the United States, as follows:

1. My name is Stephanie Quintero, and I am licensed to practice law in California and Oregon. I have been licensed to practice law in California since March 15, 2024, and I have been licensed to practice law in Oregon since May 22, 2020. I am the attorney of record for J.G.G. before the Executive Office of Immigration Review.
2. I scheduled a video call to speak to my client (J.G.G.) on Sunday March 16, 2025, at 2:30pm. The El Valle Detention facility in Raymondville, Texas told me that they could not accommodate a video call within 24 hours, so I had a telephonic call with my client at 2:20pm, which lasted for twenty-seven (27) minutes. In that call my client (J.G.G.) relayed what happened to him and other detainees on Saturday March 15, 2025.
3. The guards took him as well as several other detainees out of their dorms at about 7am and told them that they would be taken to Port Isabel, Texas. They put my client and the rest of the detainees in a cramped room in El Valle Detention Center for hours. The guards then took J.G.G. and the other detainees that were in the room and loaded them onto buses. They were chained from top to bottom-wrists, waist, ankles, chains, which came up through their backs, so they could barely move. J.G.G. and the other detainees believed they were being taken to Port Isabel, Texas. However, they were taken instead to an airport.
4. Later that day, J.G.G. and the other detainees were put on three planes. Shortly thereafter, J.G.G. as well as several other Venezuelan detainees were taken off the plane before it departed. Everyone else that was put on a plane stayed on the plane. As J.G.G. and the other detainees were taken off the plane, an ICE Agent named Daniel Cantun verbally taunted them, he told them: "you all do not know how lucky you are, and you all hit the lottery because you are not getting deported today."
5. J.G.G. and the other detainees were put on a bus which contained several other detainees. Once they were back on the bus, which was hot, one of the detainees almost passed out from heat exhaustion and dehydration and started bleeding profusely from his nose. The detainees notified the guards, but they did not provide that person with medical attention. Instead, the guards just told him to clean up his nose. Some detainees on the bus told J.G.G. that some of the detainees who were placed on the plane for deportation had recently been picked up from their houses or jobs and quickly processed from deportation.

6. J.G.G. and the other detainees were then taken back to the El Valle Detention Facility. They were not given food or water until about late in the evening, a few hours after they arrived back at El Valle Detention Center.

I swear under penalty of perjury that I am accurately relaying what my client told me on Sunday March 16, 2025.

Stephanie Quintero
Stephanie Quintero

03/19/2025
Date