

# EXHIBIT H

**KARYN ANN SHEALY ATTORNEY AFFIRMATION:**  
**ATTORNEY OF RECORD FOR J.L.G.O.**

I, Karyn Ann Shealy, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct to the best of my knowledge and belief:

1. I am a staff attorney of the New York Immigrant Family Unity Project at The Legal Aid Society, located at 49 Thomas Street, Fifth Floor, New York, New York 10013. I am admitted to the New York State Bar, license number 6161160, and the Massachusetts State Bar, license number 703929. I represent J.L.G.O.
2. On March 14, 2025, I sent an email request to El Valley Detention Facility (“EVDF”) for an urgent attorney call with J.L.G.O. on March 15, 2025. My request was not granted. On March 15, 2025, I sent another email request to EVDF for an urgent attorney call with J.L.G.O. on March 16, 2025. The request was granted and confirmed by EVDF. However, on March 16, 2025, I did not receive the confirmed attorney call. I called and emailed EVDF but did not receive a response. On March 16, 2025, I emailed another request to EVDF for an urgent attorney call with J.L.G.O. on March 17, 2025. The request was granted, and the following reflects statements made by J.L.G.O. during attorney calls on March 17 and 18, 2025.
3. Around the beginning of March 2025, while J.L.G.O. was detained by ICE at the Orange County Correctional Facility in Goshen, New York, the risk designation on his identification badge was changed from low to medium high. J.L.G.O. asked an officer why his designation had been changed, and he was told that ICE must have seen something in his file.
4. The officer asked J.L.G.O. if he had been part of a gang. J.L.G.O. vehemently denied any affiliation with a gang, past or present. J.L.G.O. was confused about why he was being questioned about gang affiliation and asked to speak with an ICE officer. J.L.G.O. was told that he had to wait until the ICE officer was available in three days. J.L.G.O. has consistently stated to this affirmant that he has never had any connection or affiliation with any gangs.
5. Two days later, on March 8, 2025, at approximately 3 AM, J.L.G.O. was awoken, taken out of his cell and transferred along with other Venezuelans to EVDF. J.L.G.O. did not know his destination until he arrived.
6. On March 12, 2025, an officer at EDVF asked J.L.G.O. to sign a paper in English, which he cannot speak or read fluently. J.L.G.O. asked what the paper said and was told that the paper was to acknowledge his prior transfer from Orange County Correctional Facility to EVDF. J.L.G.O. asked for someone to translate the paper, but the officer said that he was wasting his time and instructed J.L.G.O. to leave. J.L.G.O. refused to sign the paper.
7. On March 14, 2025, at approximately 3 AM, J.L.G.O. was awoken, taken out of his

cell, and transported to a large building. J.L.G.O. was kept with more than 100 other detainees from Venezuela. At approximately 12:30 PM, an ICE officer announced that a flight had been cancelled because the plane did not pass inspection. The ICE officer also told J.L.G.O. that everyone would be deported the next night. J.L.G.O. heard from other detainees that they were to be deported to El Salvador or Guantanamo Bay and was terrified.

8. On March 15, 2025, around 7:30 AM, officers took J.L.G.O. into a big room with other Venezuelan detainees. Officers told everyone to change into their civilian clothing and receive their personal items. J.L.G.O. was shackled on his wrists, waist, and ankles and loaded onto a bus. J.L.G.O. was terrified and believed he was to be taken to another detention facility. However, J.L.G.O. was driven approximately 40 minutes to an airport.
9. At the airport, a helicopter and media crews took pictures and recorded video of J.L.G.O. and other Venezuelan detainees. J.L.G.O. saw officials in uniforms with the lettering of DEA, FBI, and ICE. J.L.G.O. and the other detainees were taken out of the buses and loaded in groups of 10 onto the airplanes.
10. On the plane, J.L.G.O. and the other detainees asked the officers where they were being taken. The officers would only say that they didn't know and then laughed. J.L.G.O. described a scene of panic and fear as he and the other detainees desperately begged for information. The officers refused to speak to the detainees and would only speak amongst themselves in English and laugh.
11. After J.L.G.O. was on the plane for what seemed like 30 minutes to one hour, an officer got on the plane and called out five names, including J.L.G.O. The officer told J.L.G.O. to get off the plane. After J.L.G.O. got off the plane, one of the five men asked the officer what was going to happen to them. The officer said that the group had "just won the lottery" and laughed.
12. The officers then loaded J.L.G.O. and the other four men onto the bus still shackled. The group was transferred to another bus where 8-12 other detainees were seated in shackles. J.L.G.O. was held shackled on the bus for what seemed like two to three hours. J.L.G.O. and the other individuals asked and begged officers for food and water. The officers did not provide any water or food but instead drank water themselves in front of them and laughed.
13. One of the other men who had been pulled off the plane was seated in direct sunlight on the bus. The man's nose began to bleed, and the officers yelled at the man to close his nose. However, the man was shackled and could not reach his nose. The officers continued to yell at the man to close his nose and to stop the drama.
14. J.L.G.O. and the others on the bus returned to EVDF at approximately 8 PM and did not receive any food until around 9 PM.
15. J.L.G.O. was overcome with emotion many times, including crying uncontrollably and expressing fear of being deported at any moment, while recounting the events of the weekend during our attorney calls on March 17 and 18, 2025. J.L.G.O. reports that he

is experiencing extreme fear, sadness, and anxiety as a result of the events of the weekend. He has a poor appetite and struggles to sleep. He sleeps at most two to three hours per night and when he manages to sleep, he experiences nightmares and flashbacks of the events of the weekend.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

March 19, 2025  
New York, NY

  
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Karyn Ann Shealy, Esq.