

# EXHIBIT A

Declaration of S.Z.F.R.

1. I am a woman from Venezuela and I am in detention at Webb County Detention Center in Laredo Texas. My initials are S.Z.F.R.
2. On March 9 at 7 a.m. I was in my dorm in El Paso and was told to get my things together and I was being transferred to another facility. There was one other woman and 14 men who were also transferred with me.
3. I was supposed to have a merits hearing for my asylum claims on March 10<sup>th</sup>.
4. They took me to the airport in El Paso and I was put on a plane. Already on the plane were many Venezuelan men and three other Venezuelan women. We flew to Laredo.
5. When we got to Laredo we met up with another group of Venezuelan men.
6. There were at least 10 Venezuelan women on the plane. We arrived March 9 in Laredo and were taken to Webb County Detention Center.
7. Thursday of last week, March 13<sup>th</sup>, we were told to gather our belongings and we were driven toward the airport for about an hour. We were told we were being deported to Venezuela. We never made it to the airport. We were sent back to Webb and told it was because of a plane malfunction.
8. On Friday again we were told to gather our belongings and put on the bus at Webb and sat on the bus for about 15 minutes and then were taken back to Webb.
9. Saturday morning we were again told to gather our belongings and get on the bus. We went to the airport and 8 women were put on the plane with me.
10. When we got on the plane there were already over 50 men on the plane. I could see other migrants walking to the plane but we took off before any additional people boarded.
11. Within a couple of minutes of take off I heard two US government officials talking and they said "there is an order saying we can't take off but we already have."
12. I asked where we were going and we were told that we were going to Venezuela.
13. Several other people on the plane told me they were in immigration proceedings and awaiting court hearings in immigration court.
14. We were not allowed to open our window shades.
15. We landed somewhere for refueling. We were there for many hours. We were arm and leg shackled the whole time.
16. We took off again and landed fairly quickly. I was then told we were in El Salvador.
17. While on the plane the government officials were asking the men to sign a document and they didn't want to. The government officials were pushing them to sign the documents and threatening them. I heard them discussing the documents and they were about the men admitting they were members of TdA.
18. After we landed but were still on the plane a woman opened the shade. An officer rushed to shut the shade and pushed her down by her shoulders to try and stop her from looking out. The person that pushed her down had HOU-02 on his sleeve.
19. I saw out the window for a minute and I saw men in military uniforms and another plane. I saw men being led off the plane. Since I've been back in the U.S. I have seen news coverage and the plane I saw looks like the one I've seen on TV with migrants from the U.S. being delivered to El Salvador.

20. All the men got off the plane. The remaining women asked what happens to us? I was told that the President of El Salvador would not accept women. I was also told that we were going back to detention in the U.S.
21. We left in the middle of the night and landed in the early morning in Laredo. The 8 women who were on the plane were all returned back to the U.S.

/s/ S.Z.F.R.  
S.Z.F.R.