

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

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

Petitioner,

v.

DONALD J. TRUMP, *et al.*,

Respondents.

Declaration Of Attorney General

Pamela J. Bondi

No. 1:25-cv-766 (JEB)

DECLARATION OF ATTORNEY GENERAL PAMELA J. BONDI

I, Pamela J. Bondi, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury as follows:

1. I am the United States Attorney General and the head of the United States Department of Justice, an Executive Department of the United States. *See* 28 U.S.C. §§ 501, 503. As Attorney General, I advise the heads of other executive departments on questions of law. *See* 28 U.S.C. § 512.

2. The purpose of this Declaration is to protect the national security and foreign affairs interests of the United States by joining, in my official capacity, the formal assertions of the state secrets privilege over information requested by this Court in its Minute Order of March 18, 2025, made by the Secretary of State and the Secretary of Homeland Security.

3. The statements made herein are based on my personal knowledge, on information provided to me in my official capacity, including declarations made by the Secretary of State and the Secretary of Homeland Security, on reasonable inquiry, and on information obtained from Department of Justice employees.

4. Following the public issuance of the Presidential Proclamation, *Invocation of the Alien Enemies Act Regarding the Invasion of The United States by Tren De Aragua*, on March 15, 2025, the Department of Homeland Security successfully removed by aircraft a number of aliens subject to that Proclamation. Those removals were facilitated by Department of State negotiations with foreign countries.

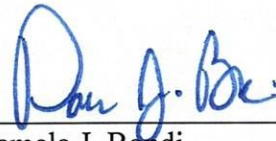
5. In a March 18, 2025 Minute Order, this Court requested the following information regarding those removals: (1) what time the planes took off and from where; (2) what time the planes left U.S. airspace; (3) what time the planes landed, where they landed, and whether they made more than one stop; (4) what time aliens subject to the Proclamation were transferred out of U.S. custody; and (5) how many aliens were aboard the flights based on the Proclamation.

6. The Secretary of State and the Secretary of Homeland Security have each submitted a declaration asserting a formal claim of the state secrets privilege regarding disclosure of the information sought in the March 18, 2025 Minute Order. Those declarations reflect the studied and well-supported conclusion of each Secretary that disclosure of the information, even *ex parte* and *in camera*, would cause significant harm to the foreign relations and national security interests of the United States.

7. After considering all relevant information, including the declarations of the Secretary of State and the Secretary of Homeland Security, and following an independent legal review by Department of Justice personnel, I am satisfied that the assertions of the state secrets privilege by the Secretary of State and the Secretary of Homeland Security regarding information requested in the Court's March 18, 2025 Minute Order are adequately supported and warranted, and I join their assertion of the privilege.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed this 24th day of March 2025.



Pamela J. Bondi
Attorney General