

EXHIBIT Q

DECLARATION OF M.A.A.

I, M.A.A., hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge, and if called to testify, I could and would do so competently and truthfully to these matters.
2. My name is M.A.A.. I currently live in Tachira, Venezuela. I am the mother of G.A.A..
3. I am submitting this declaration because my son's name is on the public list of people who were deported to El Salvador under the Alien Enemies Act. My son had an open asylum case in the United States and no deportation order. I also believe my son G.A.A. was accused of being associated with the Tren de Aragua gang, with which he has no affiliation whatsoever.
4. G.A.A. and his partner entered the United States in December of 2023 through a CBPOne appointment at the border. G.A.A. came to the U.S. to seek asylum. We are from the state of Tachira, VZ where the area is run by a paramilitary group. Due to the violence in our town at the hands of this group, my son fled. He came to the United States to seek a better, safer life for his family, and never expected to be met with such injustice.
5. In December 2024, G.A.A. submitted his application for asylum and was scheduled to appear for a master calendar hearing on October 1, 2025. While he was in the United States waiting for his asylum claims to be heard, he and his wife settled in Louisville, Texas and in June 2024, they gave birth to a baby boy.
6. On February 4, 2025, G.A.A. was in the driveway of his own home, working on fixing his car when he felt someone touch his foot and ask him to please stand up and answer some questions. It was an ICE officer who had arrived at the apartment with a picture of an individual they were looking for, an individual G.A.A. knew nothing about. The ICE officers informed G.A.A. and his wife that they were going to enter the apartment and search for this man. After they investigated the apartment and found no sign of the man they were searching for, they asked G.A.A. to take off his jacket so that they could inspect him. When they saw the tattoos on his arms, they informed G.A.A. and his wife that they were going to apprehend him and inspect him further. They provided G.A.A. and his family no further explanation.
7. Once ICE officers had G.A.A. detained at a detention center, his wife tried calling to figure out what was going on. She was informed that the investigation was ongoing, and "just routine" and that once it ended, he would be released.
8. At the detention center, G.A.A. was told that because of his tattoos he was being investigated as a possible gang member. G.A.A. has five tattoos, and none of them have any relation to gang activity. In Venezuela, tattoos are very common, and people do not get them in association with a gang. On his neck he has a crown with the name

‘Santiago’, that he got in honor of his eldest son, Santiago. On his right shoulder he has a star and on his left shoulder he has an infinity sign, and on his bicep he has a skull with flowers, all of which he got because he liked them when he was younger. On his forearm, he has tattooed the words “Real Life” which is a reference to a music album.

9. G.A.A. has never had any connection with Tren de Aragua or any other gang. He has no criminal record, he has never been in prison, and his tattoos have nothing to do with any gang affiliation. He is a hard worker, a big support for his family and he would not have any time or desire to be affiliated with a gang.
10. On Friday, March 14, G.A.A. was put on a plane and told that he was being deported to Venezuela. The plane was not able to take off, and he along with the other passengers were returned to the detention center. March 14 was the last time G.A.A. was able to communicate with his family.
11. On Saturday, March 15 G.A.A. was put on a plane and sent to El Salvador. I am so worried about my son’s well-being, and I am so worried for his wife and baby who are still in the United States without his support.
1. Everything in this declaration is true and correct to the best of my knowledge and recollection. This declaration was read back to me in Spanish, a language in which I am fluent.

Executed on the 28th day of March, 2025.




M.A.A.

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, Talia Roma, certify that I am fluent in both English and Spanish. On March 28, 2025, I personally spoke with M.A.A. and read the foregoing information to her over the phone. M.A.A. affirmed that the information in the above declaration is true and accurate.

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



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