

EXHIBIT E

KARYN ANN SHEALY SUPPLEMENTAL 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, and I began representing J.L.G.O. on February 24, 2025.

2. I submit this declaration as a supplement to my prior declaration submitted to the Court on March 15, 2025, and on March 19, 2025. My client J.L.G.O. has relayed to me what happened to him on March 15, 2025 and in the days before and after.

3. J.L.G.O. explained that on March 15, 2025, around 7:30 AM, officers took him into a big room with other Venezuelan detainees. He was not told what was happening or where he was being taken.

4. J.L.G.O. and other detainees repeatedly asked officers what was happening and where they were being taken. J.L.G.O. said he and other detainees begged for information from officers while at El Valle Detention Facility (“El Valle”) while on the bus to the airplane, while on the airplane before it took off, while on the bus after being removed from the airplane, and then again when returned to El Valle.

5. Despite repeated requests for information about what was happening and where he was going, at no time on March 15, 2025, or during the days leading to the attempted removals did any officer show or provide J.L.G.O. with any paperwork explaining the basis for his removal or provide any information on where he was being taken. Officers provided no indication that they were attempting to remove him or any of the other detainees to El Salvador. Officers never provided any notice whatsoever that he was subject to the Alien Enemies Act.

6. Likewise, I have never been informed or notified by ICE, DHS, or officials at any of the facilities that detained J.L.G.O. about the basis for the attempted deportation. I have never been informed or notified by ICE, DHS, or officials at any of the facilities that held J.L.G.O., about any allegations that J.L.G.O. has any affiliation with a gang, past or present. He has no tattoos, a fact that I mention only because it appears from news reports that tattoos were a basis for gang allegations against the men removed that day. DHS has never provided any information that J.L.G.O. was subject to the Alien Enemies Act.

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



Karyn Ann Shealy, Esq.

Executed this 27th day of March, 2025