

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

<p>ROBERT F. KENNEDY HUMAN RIGHTS; SOUTHERN BORDER COMMUNITIES COALITION; URBAN JUSTICE CENTER,</p> <p>Plaintiffs,</p> <p>v.</p> <p>U.S. DEPARTMENT OF HOMELAND SECURITY; KRISTI NOEM, in her official capacity as Secretary of Homeland Security,</p> <p>Defendants.</p>	<p>Civil Action No. 25-1270-ACR</p>
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**DECLARATION OF SARAH GILLMAN**

I, Sarah Gillman, declare as follows:

1. I am over the age of 18 and competent to testify to the matters described below. This declaration is based on my personal knowledge and information that has been shared with me through conversations with my colleagues.

2. I am the Director of Strategic U.S. Litigation at Robert F. Kennedy Human Rights (RFK). I have served in this position since September of 2022. I joined RFK to continue the work I carried out as a co-founder of the Rapid Defense Network, a non-profit legal organization I started in 2019 to defend the rights of non-citizens from detention and deportation.

3. As part of my work at RFK, I am part of our team's legal rights initiative that involves traveling to immigration detention centers around the country to provide information to detained people on how to vindicate their legal rights to protection from abusive treatment, including through federal litigation and by filing complaints with the Department of Homeland

Security (DHS) oversight offices, the Office for Civil Rights and Civil Liberties (CRCL) and the Office of the Immigration Detention Ombudsman (OIDO).

4. I recently was part of a legal rights initiative team that traveled to the Central Louisiana ICE Processing Center (CLIPC) in Jena, Louisiana, from June 9 to June 11, 2025.

5. At CLIPC, I heard from people who attended the legal rights presentation that information related to CRCL and OIDO and how to file complaints with the oversight bodies had been removed from the dormitory units where detained people are housed. Formerly, that information had been posted so that detained people would know how to make complaints with the oversight bodies directly, without the assistance of a lawyer.

6. On June 18, 2025, I spoke by telephone with a client of RFK who is currently detained at the Buffalo Federal Detention Facility (BFDF), an immigration detention center in Batavia, New York.

7. My client detained at BFDF told me that all information related to CRCL and OIDO and how to file complaints with the oversight bodies had been removed from his unit and that the OIDO representative that formerly would meet with people is no longer available. My client's description of the removal of information related to how to file complaints with oversight bodies was identical to what I was told by people during the legal rights presentation in CLIPC. I did not personally inspect either the units at CLIPC or the unit where our client is detained at BFDF and therefore the statements made herein are based upon the representations made to me by people detained at CLIPC and at BFDF.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 18, 2025

/s/ Sarah Gillman