

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

D.A., T.L., I.O., D.S., and K.S.;

*Plaintiffs,*

v.

KRISTI NOEM, Secretary of Homeland Security, in her official capacity; TODD LYONS, Acting Director, U.S. Immigration and Customs Enforcement, in his official capacity; PAMELA BONDI, Attorney General, in her official capacity; and MARCO RUBIO, Secretary of State, in his official capacity

*Defendants.*

Civil Action No. 1:25-cv-03135

**DECLARATION OF PLAINTIFF D.A.**

I am over 18 years of age, am currently detained in Dema Camp, Ghana and am competent to testify. I hereby swear and affirm that the following is based on my own personal knowledge and is true and correct, and that my testimony, under oath and penalty of perjury, is as follows:

1. I am using a pseudonym, D.A., for safety reasons. I am currently detained in Ghana in Dema Camp after being deported from the United States to Ghana on September 5, 2025.
2. I have read this declaration and confirmed that everything written here is true and correct to the best of my knowledge. Because I am currently detained in Ghana, I would be unable to go to court to testify.
3. I was granted withholding of removal by an immigration judge in the Otero Immigration Court on April 30, 2025 on account of the likelihood that I would be persecuted or killed

if removed to Nigeria. My wife is a U.S. citizen. She filed an I-130 petition on my behalf for me to receive a family visa. That petition was approved four months ago.

4. I am currently detained in Dema Camp in Ghana, where myself and other people who were also deported from the United States are being imprisoned. We are constantly surrounded by military guards.
5. I am originally from Nigeria. In Nigeria, I was a member of one of Nigeria's main political parties, the P.D.P. In 2018, I started being violently targeted by members of the ruling political party, the A.P.C. In November 2018, members of the A.P.C. beat me and other party leaders with plank woods, iron rods, and machetes. The attacks escalated from then and happened several times until I left Nigeria.
6. I fled Nigeria in 2019 after being tortured by the military and police officers for the Nigerian Department of State Services. They tortured me and kept me locked in a dog cage for three days until they let me go and told me they would kill me if they ever saw me again. After this incident I had to leave Nigeria to save my life.
7. Nothing in Nigeria has gotten better since I left. The situation in the country has become worse. The political party that targeted me is still in power.
8. On September 5, 2025, I was taken along with several other people in the middle of the night from my cell from the detention center in Alexandria, Louisiana. I did not know where we were going. I asked the officers where we were going, and they only told us that we were being transferred. They shackled us at the waist, hands, and feet. I asked yet again where we were going and said I was afraid for my life, and needed to speak with my lawyers.

9. The officer finally told me that we were going to Ghana. I told him that I am afraid of going to Ghana and that I cannot go to Ghana.
10. He told us “whether you like it or not, your ass is getting on that plane.” He then straitjacketed me extremely tightly, tying me from my shoulders to my feet.
11. I was put onto a military plane with the other people who were taken from their cells. I remained straitjacketed for several hours until I pleaded with the officers to remove it so that I could use the restroom. I begged the officers over and over again to take off the straitjacket so that I could use the restroom, otherwise I would urinate on myself. They finally removed the restraints on my legs after pleading with them for a long time, but left the restraints on my upper body.
12. Because the straitjacket was so tight on my legs, I now have difficulty walking. My legs are extremely swollen to the point that I can only limp to move around.
13. While on the plane, the leader of the ICE officer who put me into a straitjacket said that he was ordered to make sure we all get to Ghana.
14. I told the officers repeatedly that I was afraid for my life. He told me that he didn’t care, and that when we got to Ghana we would then go to our respective countries of origin.
15. I asked this ICE officer and the other officers on the plane for their names, but they refused to tell us. They only told us that they are following orders to deport us to Ghana, and from Ghana to send us to our countries of origin.
16. We eventually arrived in Ghana and were taken to Dema Camp, where I have been detained since then.
17. I fear for my life if I were to go back to Nigeria. If I go back to Nigeria, I will be tortured and possibly killed.

18. I have been terrified of returning to Nigeria since government officers a few days ago told us we would be sent back to our home countries imminently.
19. On September 12, 2025, around 8:00PM GMT, a Ghanaian military commander came to Dema Camp and informed me and the other people detained here that government officials from our countries would be coming to the camp to see us tomorrow morning. The commander told us that they gave our governments our names and information. We were told we will be removed the next day, on September 13, 2025.
20. Conditions are horrible at Dema Camp. Since the morning of September 12, there has been no reliable power, Internet, or running water. Ghana is not safe for any of us. But I am even more afraid of returning to Nigeria. I have been wearing the same clothes that I left the United States in over a week ago. We are constantly surrounded by military guards.
21. On September 13, 2025, around 2:30PM GMT, officials from the Nigerian Consulate came to Dema Camp to collect more of our information. We told both the Nigerian and Ghanaian officials that we cannot go back to Nigeria due to our fear of persecution and torture. I told them that I was granted protection from an immigration judge and could not be deported to Nigeria. I told the Ghanaian and Nigerian officials that we are not protected in Ghana, either.
22. Both the Nigerian officials and Ghanaian officials told us that they do not care, and that we will be sent back to Nigeria anyway. Officials told us that no matter what, we would be removed from Dema Camp by Monday.

23. We are all afraid for our lives. We are not safe here, and now they are planning to hand us over to our country's government for further persecution and torture. We don't know what our futures hold.

24. We urgently need help. We do not want to meet with government officials of our countries or to be returned to those countries.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on September 13, 2025.

/s/

Signature

A handwritten signature in black ink, consisting of several overlapping, stylized loops and lines, written over a horizontal line.

September 13, 2025

Date