

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

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

Asian Americans Advancing Justice | AAJC

1620 L St. NW, Washington, D.C. 20036

Plaintiffs,

v.

KRISTI NOEM, Secretary of Homeland

Security, in her official capacity;

2707 Martin Luther King, Jr. Ave., S.E.

Washington, D.C. 20528

TODD LYONS, Acting Director, U.S.

Immigration and Customs Enforcement, in his

official capacity;

500 12th St., S.W. Washington, D.C. 20536

Civil Action No.
1:25-cv-03135

Declaration of
Jonathan G. Pratt

PAMELA BONDI, Attorney General, in her

official capacity;

950 Pennsylvania Ave., N.W. Washington,
D.C.

20530

and

MARCO RUBIO, Secretary of State, in his

official capacity;

2201 C St., N.W. Washington, D.C. 20451

Defendants.

DECLARATION OF JONATHAN G. PRATT

I, Jonathan G. Pratt, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury as follows:

1. I am the Senior Bureau Official for the Bureau of African Affairs. In that capacity, I am a member of the Senior Foreign Service responsible for, among other things, coordination of the conduct of our diplomatic activities in the countries of Africa. I have served

in this role since July 16, 2025, and previously served as the Principal Deputy Assistant Secretary for the Bureau of African Affairs, among other positions.

2. I am aware that the court has ordered the Government to “file a declaration by today, September 13, 2025, at 9:00PM EST, setting forth the government’s efforts, in light of Ghana’s transfer of at least one Plaintiff to his home country, to keep Plaintiffs from being removed to their countries of origin or other countries where they fear persecution or torture.” Minute Order (Sept. 13, 2025).

3. On the date of this filing, the time in Ghana is four (4) hours ahead of the time in Washington, D.C.

4. I am generally familiar with the fact that the U.S. Embassy in Ghana has corresponded with the Government of Ghana regarding the removals of 14 individuals of West African nationalities to Ghana.

5. Prior to these removals, the U.S. government received diplomatic assurances from the Government of Ghana, communicated to the U.S. government by diplomatic note. As of the time of this filing, I am not aware that the Department of State, including through the U.S. Embassy in Ghana, has made any additional efforts to keep Plaintiffs from being removed from Ghana to their country of origin or other countries where they fear persecution or torture.

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

Executed this 13th day of September, 2025.

/s/ Jonathan G. Pratt
Jonathan G. Pratt
Senior Bureau Official
Bureau of African Affairs