

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

JOSÉ ESCOBAR MOLINA, *et al.*, individually  
and on behalf of all others similarly situated,

*Plaintiffs,*

v.

U.S. DEPARTMENT OF HOMELAND  
SECURITY, *et al.*,

*Defendants.*

No. 25-cv-3417

**DECLARATION OF Y.R.M.**

I, Y.R.M., pursuant to 28 U.S.C. § 1746, declare as follows:

1. My name is Y.R.M. I am 21 years old, and I work in construction. I have lived in the United States for 4.5 years in Lanham, Maryland. I have five brothers in the United States.
2. On August 22, 2025, at 5:30 AM, I was a passenger in a company truck. As we were driving, two unmarked cars surrounded our truck on the road, and the driver pulled over. The truck was following all traffic regulations and going under the speed limit. There were three other unmarked cars that quickly arrived and about 15 agents that got out of the cars. I am not sure what agency they were from, but they were not Metropolitan D.C. Police. An agent took the driver's ID and came back to say that the driver had an arrest warrant in New York. The driver said that he had never been to New York, and I believe that the agent lied to get us to get out of the vehicle.
3. Once I got out of the car, they asked me for my ID, but I did not have one on me. They then put handcuffs on me. I did not make any attempt to resist arrest or run away. They

did not ask my immigration status. They put me in a car and drove away to a parking lot next to the Pentagon. They then transferred me to a van to go to Chantilly.

4. None of the agents at any point ever identified themselves, presented a warrant, explained why they arrested me, asked me any questions about my immigration status, indicated that they knew me/knew my name prior to arresting me. They did not ask me any questions about my ties to the community, how long I've been living/working in D.C., my family here, or anything else about my circumstances.
5. I spent about 5 days in Chantilly. When I arrived, they took my fingerprints. They fed me only one burrito per day, provided no hygiene products or toothbrushes, and told us repeatedly that we had "no right to anything." The burritos were hard to keep down, and we had to drink toilet water. Many people would pass out from dehydration or hunger. There were about 70 people in the room.
6. After leaving Chantilly, I was transferred to Richmond for 4 days before going to Louisiana by plane. I stayed on the plane and went to Ohio. We then flew back to Louisiana and flew to Detroit before driving the North Lake, where I am currently housed. During these flights we were handcuffed from the wrists to the waists to the ankles the entire time. They even kept us shackled while we used the bathroom.
7. Since I entered this country, this is the first and only time I was arrested by law enforcement for non-immigration purposes. I have not had any other interactions with law enforcement, I have never been convicted of any crime/offense, and I have not had any issues with meeting deadlines or appearing in court in relation to my immigration case.
8. Since my arrest, I have lost over 15 pounds because I cannot eat the food provided. I feel that I can pass out regularly because I do not have enough energy. We have the ability to

buy our own food, and I have started to feel better but only because I am buying my own food. Emotionally, it has been a traumatizing experience. I feel that I need to be tough to survive in the detention center. There are instances where the guards will hit detainees, and I have seen detainees hurt one another.

9. I am deeply concerned and scared by this incident. I believe I was stopped and arrested solely because of the color of my skin and my appearance, as it was clear that the arresting officer did not know who I was, did not present any warrant, and did not say why I was being arrested.
10. I am applying for a bond to be released. If I am released, I am afraid to go back into D.C., but I would do so in order to get work. I would need to go back into D.C. because I would need to get work to support myself. However, I am very scared that I will be arrested and detained again when I do so.
11. I am also afraid of retaliation towards me and my family may face if my identity were to become public as a result of my participation in this lawsuit. I am afraid that me and my family members will be retaliated against and harassed by members of the public on social media given recent reports about people harassing noncitizens online.
12. This declaration was read to me in full in Spanish on October 1, 2025, by Yahir Santillan-Guzman. I completely understand the content of this declaration.

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

Executed on October 1, 2025.

  
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Y.R.M.

I, Yahir Santillan-Guzman, a paralegal at Covington & Burling LLP, affirm Y.R.M. gave me permission to sign this declaration on his behalf because he is currently detained. At 2:00 pm on October 1, 2025, I read the above Declaration back to Y.R.M. word for word to confirm its accuracy and he stated that it was accurate.

Executed on October 1, 2025.



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Signature