

EXHIBIT 11

DECLARATION OF JUAN M. GASPAR-NOCHEBUENA

I, Juan M. Gaspar-Nochebuena, make the following declaration based on my personal knowledge:

1. I was detained at Broadview for approximately six days, from Monday, September 8, 2025, until Saturday, September 13, 2025.
2. When I arrived at Broadview, the officer who processed me asked me to sign a document. I was unsure what the document was, and I refused to sign the document.
3. When I first arrived at Broadview, I was allowed to use a landline phone to make one short phone call. However, the call was not confidential; a Broadview staff member was within one to two meters from me while I made the call.
4. During my time at Broadview, I never observed anyone able to speak with their lawyer. When people asked the officers to speak with lawyers, officers told people to wait but never actually allowed people to speak with their lawyers. I did not see any lawyers arrive to speak with their clients. I did not see anyone able to speak with a lawyer confidentially.
5. There was no place at Broadview where detainees could make a confidential telephone call. All of the telephones that detainees could use were located in areas where officers and other detainees could listen.
6. The only opportunity I had to make a free telephone call was in the office area when I first arrived at Broadview, as described above.
7. There was a telephone for paid phone calls located in the holding room where I was held. All phone calls on that telephone were recorded and monitored, according to a written notice located near the phone and a recorded notice when one would try to make a phone call.

8. In order to make phone calls from the phone in the holding room, the person that you were calling had to answer the telephone and then agree to deposit funds to pay for the collect phone call. It was not possible to leave a voicemail message using that telephone.

9. While I was at Broadview, I was held in a room with about 80 other people. The room was roughly square and not very big. I believe the width of the room was approximately the length of six people lying down, end-to-end. The room was very crowded.

10. The only furniture in the room was plastic chairs. There were no beds or mattresses. I joined two plastic chairs together to sleep on. People who arrived after all of the plastic chairs were occupied were forced to attempt to sleep on the floor.

11. I saw three other rooms where detainees were held at Broadview. Those rooms were also crowded.

12. At night, the officers turned up the Air Conditioning, and the room was very cold. We were not given any pillows or blankets. After three days, we were finally given a thin foil blanket. By Thursday, September 11, I developed congestion due to the cold temperatures.

13. I saw that other people in the holding room were sick because of the cold temperatures. One person fainted and had to be taken away to the hospital. There were no doctors or medical staff at Broadview.

14. On approximately Friday, September 12, after the person fainted and was taken to hospital—and after many people had been complaining about the cold temperatures—I and some other detainees received a sweater to wear over the clothes that we had been detained in.

15. During the first three days of my detention at Broadview, the only food I received was a Subway sandwich three times a day. After the third day, there were more people in the holding rooms and people were banging on the walls to try to get more food. The Broadview staff became annoyed, and they started giving us less food.

16. On Thursday and Friday, I received only two Subway sandwiches per day, once around 2:00 pm and again around 8:00 pm. This was not enough food, and I remained hungry. At one point, I asked an officer for food because I was hungry, but the officer dismissed me, and I did not receive any more food.

17. I believe, based on the behavior of the officials, that they gave us less food as retaliation and punishment.

18. The only water I received was one bottle of water each time that I was given a sandwich. Otherwise, I did not have access to proper drinking water. When I asked officers for more water, they refused.

19. Women could see into the men's holding room and men could see into the women's holding room.

20. The room I was held in had only two toilets. There was no privacy in the toilet area. Women could see into the men's holding room when men were using the toilet.

21. I asked the officers for soap many times, but I was only given a small amount of soap one time. It was only enough to use about one time.

22. Eventually, I was given toothpaste, but the toothpaste had expired in 2021 and tasted terribly. We were forced to use the expired toothpaste because they refused to give us anything else.

23. I asked an officer for Tylenol because I was in pain due to a toothache. The officer told me that they did not have any Tylenol. They did not provide me with any medications or medical attention for my toothache.

24. Some of the officers at Broadview treated me and other detainees very badly and with disrespect.

25. I recall that an officer who appeared to be in charge would belittle me and other detainees when we asked for things like food, blankets, hygienic items or medicine. I recall that at one point he said something to the effect that he did not ask us to come to the United States, so why were we asking for things.

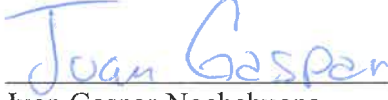
26. I also noticed that the officials at Broadview would delay and refuse to give us supplies, like the foil blankets, even though I could see that they had plenty on hand right there in the facility. I felt that they did this in order to cause us despair.

27. Some of the people I was detained with at Broadview were held for even longer than I was. I recall, for example, two people from Honduras who were held at Broadview for 7-8 days.

28. This declaration was read to me in full in Spanish, a language that I know and understand.

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

Executed on October 2nd, 2025, at the North Lake Processing Center, Baldwin, Michigan.



Juan Gaspar-Nochebuena

CERTIFICATE OF TRANSLATION

I, Hugo Arenas, certify that I am a competent translator of Spanish to English and that I read the attached declaration to Juan Gaspar-Nochebuena in Spanish, and that he understood and agreed to its contents before signing.

Date: October, 2nd, 2025.

Hugo Arenas

Hugo Arenas (Oct 2, 2025 12:15:08 MDT)
Hugo Arenas, SPA Interpreter







Cert of Translation (J. Gaspar-Nochebuena)

Final Audit Report

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