

EXHIBIT 15

DECLARATION OF VALENTIN TOTO POLITO

I, Valentin Toto Polito, make the following declaration based on my personal knowledge:

1. My name is Valentin Toto Polito. I am competent to make this declaration.
2. On Sunday, September 28, 2025, I was arrested by ICE, handcuffed, and brought to the Broadview ICE facility around 2:30 or 3:00 p.m. with about five other people.
3. When I got to the security area at Broadview, the officers took off the handcuffs and took all my belongings, including my phone, belt, money, wallet, identification, and shoelaces. They put me in a small room with about 10 other people.
4. The officers took other people out to process them. I was one of the last ones processed.
5. Around 6:00 p.m., about 3.5 hours after I arrived, an officer took me out of the room to an open area for processing. The officer asked me questions about myself in Spanish and filled out paperwork.
6. I asked the officer for a phone call. The officer told me I could only use the landline phone on his desk. I asked if I could check my cell phone to get my family's phone numbers, but he refused. The officer put me back in the cell.
7. About 30 to 40 minutes later, the officer pulled me out of the cell again. The officer had 3 to 4 pieces of paper. The paperwork was in English. I did not understand most of it because I do not understand much English. I remember one page said something about a court date in Texas on October 16.
8. The officer tried to make me sign a document, which was written in English. He said if I wanted to leave voluntarily, I should sign the document.
9. I refused to sign. I told him that I needed somebody to translate the document into Spanish because I cannot read English. The officer did not translate the document into

Spanish or explain its contents. I told the officer that I did not know my rights, and I did not know what I was being asked to sign. He told me that it did not matter if he did not sign the document because the outcome would be the same. I did not sign the document.

10. There was a Spanish speaking officer nearby. I asked him what the consequences would be if I signed the document. He said not to worry. He told me that I did not need an attorney now, that I could talk to an attorney later when I got to Texas. He told me that it did not matter if I signed the document or not, the result would be the same. I still refused to sign. I was never able to speak to a lawyer.
11. The officer gave me the document with a court date and a document with phone numbers for lawyers and then put me back in the cell.
12. I repeatedly asked the officers if I could make a phone call. The officers kept telling me to wait ten minutes, but they never let me make a call. I never got to make a phone call. I was never able to call any of the phone numbers for legal support.
13. I did not have access to my phone the entire time I was at Broadview. I got my phone back before crossing the border. By then, it had run out of battery.
14. I was detained in a small and dirty room at Broadview. There was one toilet out in the open in the corner of the room. There was nothing separating the toilet from the rest of the room, so everyone could see people using the toilet. There was no privacy. There was a large window so people outside the room could see into our room.
15. I was not given soap, toothpaste, a toothbrush, or anything to wash myself. I did not have access to a shower.

16. I could not sleep at Broadview. There were no beds or mattresses, only about 8 hard and uncomfortable plastic chairs. At least three or four other people in my room also did not sleep at all.
17. The temperature in the room fluctuated between extremely hot and extremely cold. It was very uncomfortable. I was only wearing shorts and a T-shirt. They did not give me a blanket or any clothes to keep warm.
18. We were not given enough food or water. I was given one small Subway sandwich with ham and lettuce and a bottle of water around 6:00 p.m. on Sunday.
19. I did not receive any other food or water while I was at Broadview. When we asked officers for water, the officers ignored us. I did not eat or drink until around 2:00 p.m. the next day when I was on the airplane.
20. The next morning, the officers put me into another cell. The room was full, with about 30 other men.
21. I asked about 5 other men detained with me if they signed any documents. Most of them said they did not sign anything.
22. Around 9:00 a.m., they took us outside and put handcuffs and shackles on us. I was taken out of Broadview and put on an airplane with about 45 other men. Almost everyone who was at Broadview was on the airplane. They did not tell us where we were going. People kept asking where we were going. They eventually told us we were going to Indianapolis.
23. The plane stopped in Indianapolis, but I did not get off. I got off the airplane in Texas. The officers at Broadview told me I would have the chance to talk to an attorney or the Mexican consulate in Texas. But this did not happen. We were moved from the airplane

onto a bus and taken to the border crossing. Once we arrived at the border crossing, officers told us to go through. I walked about fifteen feet and crossed the border.

24. On the Mexican side of the border, Mexican police were waiting for us and informed us of our next steps.

25. Later, my coworkers told me that they were trying to find me using the ICE online detainee locator (<https://locator.ice.gov/odls/#/search>), but I did not appear in the system at all on Sunday. They told me that my information briefly appeared for a few minutes early on Monday, but when they looked again 5-10 minutes later, it had disappeared.

This declaration was read to me in Spanish, a language that I know and understand. I declare under penalty of perjury under the laws of the United States of America pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed on October 17, 2025, in Mexico City, Mexico.

Esta declaración me fue leída en español, un idioma que conozco y comprendo. Declaro bajo pena de perjurio, conforme a las leyes de los Estados Unidos, en 28 U.S.C. § 1746, que lo anterior es verdadero y correcto.

Ejecutado el 17 de Octubre, 2025, en la Ciudad de México, México.

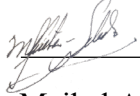


Valentin Toto Polito (Oct 20, 2025 12:55:47 MDT)
Valentin Toto Polito

CERTIFICATE OF TRANSLATION

I, Maikel Arista-Salado, certify that I am fluent in both the English and Spanish languages and that I am competent to translate between them. I have read the attached declaration to Valentin Toto Polito in Spanish, and he confirmed that he understood and agreed to its contents before signing.

Date: October 17, 2025.

A handwritten signature in black ink, appearing to read 'Maikel Arista-Salado', is written over a horizontal line.

Maikel Arista-Salado, Paralegal










2025.10.12 Valentin Toto Polito Draft Decl Copy

Final Audit Report

2025-10-21

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