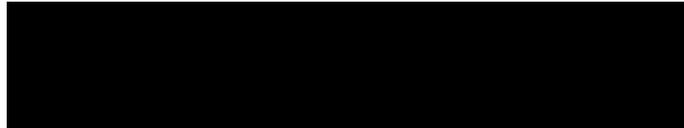


Exhibit A



**IN THE UNITED STATES COURT OF FEDERAL CLAIMS
BID PROTEST**

Redacted Version

CSI AVIATION, INC.

Plaintiff,

v.

No. 25-1338C (MHS)

UNITED STATES,

Defendant,

v.

SALUS WORLDWIDE SOLUTIONS
CORPORATION,

Defendant-Intervenor.

DECLARATION OF TAUNDRIA CAPPEL

I, Taundria Cappel, am the Chief Financial Officer of Salus Worldwide Solutions Corporation (“Salus”). This Declaration is provided in reference to a Court of Federal Claims pre-award protest filed by CSI Aviation. These facts are accurate to the best of my knowledge and belief.

1. I am over the age of twenty-one and have personal knowledge of all the representations contained herein.

2. I am the co-founder of Salus Worldwide Solutions, Corp, which I established with two colleagues in 2023. I currently serve as the company’s Chief Financial Officer. I previously served as a Program Analyst at the U.S. Department of State. I hold a Bachelor of Applied Science (B.A.Sc.) in Biological Sciences from the University of Pittsburgh, and a Master of Business Administration (MBA) from the University of Maryland.

3. Salus is currently performing Comprehensive Support to Removal Operations (“CSRO”) Support Services for the U.S. Department of Homeland Security (“DHS” or the “Agency”) under Indefinite-Delivery, Indefinite-Quantity Contract No. 70RDA225D00000005 (the “Contract”), including Task Order No. 1 (“CSRO TO1”). I have first-hand knowledge of Salus’ work under both the IDIQ Contract and CSRO TO1. I also have personal knowledge of Salus’ financials, structure, and personnel.

4. CSRO TO1 mobilizes the baseline operational infrastructure required by the DHS Under Secretary for Management (MGMT) to scale the Assisted Voluntary Return Program.

Under CSRO TO1, Salus provides fixed infrastructure that includes large-scale outreach capacity, worldwide stipend processing, and commercial ticketing. These capabilities enable the operation to scale and meet MGMT's goals for the Assisted Voluntary Return (AVR), Voluntary Departure (VD), and Incentivized Voluntary Departure (IVD) programs. Salus also provides the following to meet CSRO TO1 requirements:

- A tailored Project Management team to support operational and strategic decision making within DHS/MGMT, including subject matter expertise in the use and management of foreign assistance funding, deconfliction of efforts and reporting between DHS and State in execution of the Interagency Agreement, coordinating all program activity, integration of AVR options into the existing ICE Enforcement and Removal Operations (ERO) workstreams, analysis and presentation of operational data to support strategic decision making, and coordination of strategic messaging and demographic-specific branding efforts.
- Development, deployment, and maintenance of a Progressive Web App that allows for improved data acquisition, facilitates post-enrollment outreach, allows for user-revision of personal and family enrollment details, and serves as an ongoing communications channel between the registrant and the Government through the travel experience.
- Deployment of 38 two-person Enrollment Management teams to designated Detention Locations to facilitate the enrollment of individuals in the AVR program, helping to alleviate domestic detention congestion.
- Coordination of foreign assistance funded transportation options to support the AVR program, including commercial ticketing, block booking of commercial tickets, or special aviation services to address international relocation of AVR participants to their country of citizenship and safe third country staging area.
- Identification, coordination, and certain intensive case management administration support services for pre-screened, low risk, VD- and IVD- eligible travelers. Support services for this workflow include but are not limited to VD- and IVD-case identification and potential alien traveler list formation, I-210/I-210A document generation, coordination of alternate travel document generation and acquisition, and assuming DHS/ICE-granted supervision for transportation to the airport and airport escort departure services.
- Provision of forward movement ground logistics support services to rapidly establish and increase throughput for AVR eligible individuals requiring DHS/ICE-authorized, contractor-provided movement options as well as airport escort services and witnessed departure support.

5. Approximately 200 contractor personnel, across 20 states, currently support Salus' performance under CSRO TO1. These personnel include enrollment managers, case coordinators, communication specialists, travel coordination specialists, and foreign assistance

program specialists. Many of the individuals supporting CSRO TO1 require Top Secret (TS) / SCI, TS, or Secret security clearances.

6. As of December 1, 2025, Salus' performance of the CSRO TO1 involved: (1) receipt of 672 Lists of Authorized Travelers (LATs) from DHS; (2) outreach or other support to 58,653 unique travelers; (3) direct support involving 34,738 AVR departures; (4) 17,530 contacts with potential beneficiaries; (5) initiation of 34,738 stipends; and (6) completion of 17,406 stipend collections. Contract performance has involved 9 chartered aircraft flights, supporting 917 voluntary departures. Further, Salus has provided support services to detained individuals who chose to voluntarily start the deportation process and leave ICE Detention facilities.

7. Through CSRO, DHS has established a mechanism for expedited travel document issuance with [REDACTED] facilitating the voluntary departure of passengers who would otherwise be kept in detention centers. DHS is currently in the process of implementing program support for voluntary departures to other countries. Importantly, CSRO has also enabled DHS to provide rapid foreign assistance support to key regional partners, including [REDACTED]. For example, thanks to the CSRO effort DHS has procured and facilitated the donation of vehicles to [REDACTED], which are used to safely transport noncitizens returning south from the U.S. and Mexico toward South America.

8. The need for CSRO support by Salus is increasing due to rising demand for participation in the AVR, VD, and IVD programs. At the same time, Salus continues to achieve operational efficiencies as performance continues, including (a) reductions in contact time, reflecting faster case management and stronger outreach workflows; (b) reductions in intake to departure times; and (c) reductions in contact failures due to expanded outreach staffing, multilingual outreach, and better reconciliation of data.

9. Salus' operational efficiencies and achievements have provided strategic successes for DHS, including (a) reducing pressure on detention and removal systems by providing a voluntary pathway home for thousands of individuals; (b) lowering costs per resolved case relative to traditional ICE removal operations, given the use of commercial ticketing options, and streamlined case management; and (c) supporting U.S. foreign policy objectives.

10. There will be significant harm to DHS and the Administration's priorities if the Court stops further performance of the Contract and CSRO TO1. Doing so would remove the central pillar to the U.S. Government's use of domestic removal and foreign assistance authorities to effectuate its national security priorities, at a time when capacity expansion is essential. No other mechanism exists to absorb these functions, and severe operational, diplomatic, humanitarian, financial, and national security consequences will result. These consequences include:

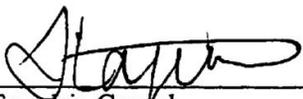
- The current pipeline of over a 100,000 participants who have attempted to leave the United States through the AVR program will have no operational pathway to depart.

- 38 ICE detention facilities will lose the only on-site personnel dedicated to identifying and assisting with processing voluntary departure candidates, resulting in decreased voluntary departure throughput, increased detention populations, slowed removal pipelines, and increased DHS costs. By removing a dignified alternative to involuntary removal, ICE will lose a key capability that reduces tensions and improves morale at detention centers.
- Ongoing diplomatic efforts, including in-progress discussions with [REDACTED] and [REDACTED] may stall or collapse. Further, established agreements and pilot programs may suffer negative repercussions, as the U.S. Government's commitment to its efforts may be questioned by its foreign partners.
- The credibility of the AVR, VD, and IVD programs as a meaningful lawful pathway will be undermined and may result in accusations that the U.S. Government is not providing a viable alternative to forced removal for individuals willing to voluntary depart.
- The U.S. Government's border security initiative at-large will be disrupted as the voluntary return options play a vital role in reducing pressure on the overall system.

11. There will also be significant harm to Salus if the Court stops DHS from completing the Contract and CSRO TO1. Salus will need to cease performance unless a bridge contract is awarded. If performance ceases, Salus will either have to terminate 200 personnel or self-finance their employment until DHS resolves the protested issues. Salus currently does not have any other active contracts to which these employees can be transferred. Retention of essential personnel, many who possess the invaluable expertise required to create and implement the CSRO program, will be nearly impossible.

12. The CSRO Contract is Salus' only federal prime contract. Loss of this contract and associated revenue will cause catastrophic financial harm to our non-public, privately financed company. In addition to the loss of revenue, cessation of performance will result in significant workforce impacts, the loss of contract-specific infrastructure investments, and the loss of economies of scale. These factors will diminish Salus' operational capabilities, damage our reputation, and create broader consequences that could hinder future growth.

Dated: December 9, 2025



Taundria Cappel
Chief Financial Officer
Salus Worldwide Solutions Corporation