

# EXHIBIT I

### DECLARATION OF ABIGAIL BECKMAN

I, Abigail Beckman, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge or knowledge I have from representing my client, G.T.B., and if called to testify I could and would do so competently and truthfully on these matters.
2. My name is Abigail Beckman. I am an Associate Attorney with Pachuta & Kammerman PLLC, an immigration law firm with offices located in Fairfax, Virginia and Denver, Colorado. I represent G.T.B. pro bono through a referral from the Rocky Mountain Immigrant Advocacy Network, a nonprofit legal service provider based in Colorado. G.T.B. is a young woman from Venezuela who fled her country in around 2018. She is against the oppressive tactics of the Venezuelan government and is a survivor of domestic violence.
3. G.T.B. has lived in the United States with her three children ages ten years and under since 2023. She has a close relationship with her children and has tattoos of their names on her body. G.T.B. and her children have strong ties in the United States. Her older children attend school, the family has supportive friends, and they live in a community that is much safer than the one they fled in Venezuela.
4. G.T.B. lived in an apartment complex in Aurora, Colorado, where local law enforcement and Immigration and Customs Enforcement conducted multiple law enforcement actions against individuals alleged to be members of Tren de Aragua.
5. G.T.B. was forced into an abusive relationship by one of the individuals who was apprehended during those enforcement actions. G.T.B.'s forced partner beat her and threatened to kill her. G.T.B. sought protection from him from local law enforcement in 2024. Based on her cooperation with the police, she is eligible to pursue a U-visa, a form of protection from deportation for people who are the survivors of crimes in the United States.
6. In late 2024, local law enforcement briefly arrested G.T.B. after she missed a traffic court appearance because one of her children was sick. Immigration and Customs Enforcement (ICE) were waiting for her upon her release from criminal custody. She was placed in removal proceedings and detained at the Aurora Contract Detention Facility.
7. In early March, G.T.B. was transferred out of the Aurora Contract Detention Facility, and I briefly lost contact with her.
8. When I spoke to her next on March 21, 2025, I learned that on March 15, 2025 officers put her on a plane with other women from Venezuela. Officers hurriedly ordered men

who were also in ICE custody onto the plane as well, and G.T.B. felt that they left in a rush. The officers did not tell G.T.B. why she was being moved again so suddenly.

9. On the plane, G.T.B. and other people in ICE custody repeatedly asked where they were going. Officers told them they were going to Venezuela. Officers asked G.T.B. to sign documents but she refused, explaining that she did not have an order of removal and that she did not understand the forms, which were in English.
10. When the plane G.T.B. was on landed, she realized that she was not in Venezuela. She and the other women on the flight saw officers treat the men in their custody roughly and shave their heads. The women were devastated and crying. One of the women was crying out for her husband, and an officer slapped her across the face.
11. G.T.B. and the other women were flown back to the United States.
12. As G.T.B. told officers on the plane, she does not have a final removal order. She is in removal proceedings pursuant to 8 U.S.C. § 1229(a) and at the signing of this declaration, the Immigration Court calendar still has a master calendar hearing scheduled in her proceedings before the Aurora Immigration Court in Colorado. She has the right to contest any allegations and charges related to her inadmissibility and seek relief from removal through her pending immigration case. There was and is no basis to remove G.T.B. under the Immigration and Nationality Act.
13. G.T.B. received no notice that the Alien Enemies Act was being invoked against her. She received no notice that the government believed her to be a member of any gang and was never asked by any government official if she was. Before G.T.B. was flown to El Salvador, ICE did not provide G.T.B. with any documents or information about allegations that would establish a legal basis for the invocation of the Alien Enemies Act. Accordingly, she did not have any opportunity to contest any allegations or charges.
14. To this day, G.T.B. has not received any explanation from ICE regarding why she was loaded onto a plane and flown to El Salvador.
15. G.T.B. and her family steadfastly assert that G.T.B. is not a gang member and is not affiliated with any criminal organization.
16. G.T.B.'s family members and friends are distraught and terrified for her safety. Without explanation, ICE transferred her away from her community in Colorado and she has been unable to see her children ever since.

Executed on the 28<sup>th</sup> of March, 2025 in Fairfax, Virginia.

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