

# EXHIBIT O

**Declaration of A.V.S.O.**

I, A.V.S.O., do hereby declare the following under penalty of perjury:

1. I am 44 years old and live in Estado Nueva Esparta, Capital La Asuncion, Venezuela. I am the mother of Luis Carlos Jose Marcano Silva. My son, Luis, is 26 years old. We are both nationals of Venezuela.
2. I believe that the United States removed my son to El Salvador on or about March 15, 2025, under the false pretense that he was a member of Tren de Aragua ("TdA").
3. Luis entered the United States on November 20, 2023, with his partner and their two daughters. He and his family presented themselves to immigration officials upon entering the United States and were released on their own recognizance. He applied for Asylum, Withholding, and CAT within one year of entering the country, on or about August 19, 2024, with his youngest daughter, as a derivative on his application.
4. My son experienced political persecution in Venezuela. He experienced threats of death and physical violence by political opponents.
5. Since arriving in the United States, Luis has complied with all his immigration requirements. He attended his in-person check-ins as required and was scheduled to attend another on February 27, 2025, along with his family, as he had previous ones. However, in January 2025, he received a letter addressed only to him that indicated his check-in had been moved up to February 5, 2025, and that he should appear with identification. He consulted an immigration practitioner about this but was reassured that nothing would happen, as he has a pending asylum application. Yet, Luis was falsely and unfoundedly accused of being a member of TdA during that check-in and detained.
6. On February 6, Luis was transferred from the Tampa Field Office to FDC Miami. He was scheduled for an immigration hearing on February 25, 2025, that never occurred. The hearing was continued to March 31, 2025. On March 8, 2025, Luis was transferred from FDC Miami to the El Valle Detention Facility in Raymondville, Texas.
7. On March 14, 2025, Luis called his partner to inform her that he had been told that he would be deported to Venezuela that same day. He later communicated that he and others had been loaded onto a plane but that the plane had never actually taken off due to weather concerns, or so they were told.
8. Around 7:00 a.m. on March 15, 2025, he called his partner again to tell her that he and the others detained with him had been woken up and told they would be deported to Venezuela that day. He called his partner again that day around 10:00 a.m. and reassured her that as soon as he could access a telephone upon arriving in Venezuela, he would call her, since to his knowledge he was being deported to Venezuela. We only learned that he was removed to El Salvador days later because we saw the list published by news outlets.

9. My son is not and has never been affiliated with any gang. I raised him and I know him well. He is a family man who spends his time with his family or at work. Outside of that, he has only ever dedicated time to sports. He has played baseball and softball since he was a child and has also participated in adult leagues. He does not have any criminal records in any country. I believe he has been wrongfully accused of being a gang member simply because he is Venezuelan and has tattoos. His tattoos have nothing to do with any gang. He has a tattoo on his chest that says, "one life," which he had done with his ex-girlfriend. Her matching tattoo says, "one love." He also has a tattoo of the face of Jesus Christ near his ribs, because he is a devout Christian. The rest of his tattoos are of his loved ones. For instance, he has an infinity symbol next to the name of his youngest daughter; a doll with the name of his grandfather; and the name of his eldest daughter.
10. Neither I nor any of his family members have been contacted by the U.S. government to inform us of Luis' whereabouts. We cannot even confirm his location on the ICE Detainee Locator because he no longer appears there. I fear that my son is experiencing mistreatment at CECOT because I have seen videos and reports about CECOT, and it is not a place my son belongs. I have struggled to eat and sleep properly since my son was taken. No mother should have to live through this.

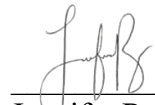
Sworn on this 27th day of March 2025

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A.V.S.O. [REDACTED]

**CERTIFICATE OF TRANSLATION**

I, Jennifer Reyes, certify that I am fluent in both English and Spanish. On March 27, 2025, I personally spoke with A.V.S.O. and read the foregoing declaration to her, translated into Spanish faithfully and accurately, over the phone. A.V.S.O. affirmed that she understood my translation and that the information in the above declaration is true and accurate.

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



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