

# EXHIBIT F

**Supplemental Declaration of Molly Lauterback**

I, Molly Lauterback, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct to the best of my knowledge and belief:

1. I am a Senior Staff Attorney in the Immigration Practice at Brooklyn Defender Services. I represent W.G.H. in his removal proceedings.
2. I previously submitted a declaration in this case on March 15, 2025.
3. I spoke to W.G.H. on March 25, 2025 and he relayed further information about what happened on March 15, 2025, the day of his attempted removal, as well as on the days before.
4. W.G.H. told me that he was never told by any officials why they were attempting to remove him, nor was he ever given any notice of any kind that he had been designated under the Alien Enemies Act.
5. I was never told by DHS officials or any detention officials of the basis for attempting to remove W.G.H. I have never been provided any notice that he was designated under the Alien Enemies Act.
6. I understand from news reports that it appears tattoos were a basis for gang allegations against the men removed that day. W.G.H. has asserted his tattoos do not have any connection to Tren de Aragua. Additionally, ICE has not provided any documentation mentioning W.G.H.'s tattoos.

I, Molly Lauterback, swear under penalty of perjury that the forgoing declaration is true and correct to the best of my knowledge and recollection.



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Molly Lauterback

Executed this 28th day of March, 2025