

DECLARATION OF MEI ZHOU

I, MEI ZHOU, 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 and if called to testify I could and would do so competently and truthfully to these matters.
2. I am an attorney at J & T, A Law Corporation.
3. I am an attorney in good standing in the state of California I am admitted in the Supreme Court of California and United States District Court (Central District of California and Northern District of California). I specialize in the practice of immigration law.
4. I represent Zhihui Xu *pro bono* in his immigration proceedings.
5. My understanding is the following: My client entered the country with a tourist visa in 2020 and timely filed for asylum. He is a Falun Gong practitioner who had been arrested and detained four times in China. Mr. Xu has deep ties to New York. His wife works at a local casino, his child attends a private school in New York, and his family owns a home.
6. My understanding is further that Mr. Xu lives in the woods in Upstate New York and is frequently visited by wild animals, so he decided to purchase a firearm to protect himself and his family. My understanding is that his attempt to purchase a firearm triggered a criminal background check and alerted ICE.
7. On July 1, 2025, I learned from Mr. Xu's wife that early in the morning on July 1, 2025, 10 armed officers had shown up to Mr. Xu's home and arrested him. He was taken into custody and detained by Immigration and Customs Enforcement ("ICE"), initially at the Newburgh Detention Center for half a day.
8. The online detainee locator first showed Mr. Xu as being detained at Newburgh and then showed "CALL FIELD OFFICE"; the same page did not update until Mr. Xu was finally transferred to Metropolitan Detention Center ("MDC") in Brooklyn, New York.
9. On the same day, July 1, 2025, having spent half a day at Newburgh Detention Center, my client was transferred to 26 Federal Plaza, New York, NY.
10. His family called Newburgh Detention Center on July 1, 2025, and was informed Mr. Xu was being transferred away. Newburgh, however, did not disclose where Mr. Xu was being transferred to.
11. On the night of July 2, my client told us he was in Manhattan New York, when he made a phone call from the facility; my client could not exactly explain where he was due to his insufficient English. Our suspicion was he was being detained at 26 Federal Plaza, New York.

12. After Mr. Xu was detained, I tried to contact him as quickly as possible. Mr. Xu had several legal remedies available to him, including seeking release on bond. I also worried that Mr. Xu was being held in dangerous, inhumane conditions, and I wanted to try to provide him with as much relief from those conditions as I could, and to do so as quickly as possible. Mr. Xu recently had a stroke and suffers from high blood pressure. His left limbs visibly shake and tremble from time to time. Mr. Xu reported that he was not given any medications for the first few days pending retrieval of his medical record. Mr. Xu reported the food in prison was too salty for a high blood pressure patient such as him, and the strong AC was so cold for him that he even felt the blood in his left limbs had stopped circulating. I was concerned that not having adequate medical care meant that Mr. Xu's health would deteriorate.
13. On July 7, 2025, my client had the first master calendar hearing scheduled at Varick Immigration Court; he kept reminding the guard at 26 Federal Plaza of his upcoming master calendar hearing. On July 7, 2025, however, the guard failed to produce him to court because he was yet to be transferred to MDC to be available for the Varick Immigration Court. As a result, he missed his first master calendar hearing.
14. Generally, when I need to locate and contact a client detained by ICE, I can enter that client's information into the ICE online detainee locator system (<https://locator.ice.gov/odls/#/search>), which lists the facility where that client is detained. Clicking on the detention center in the locator leads to information about how to set up a call with the client.
15. The online detainee locator system did not give this information for Mr. Xu. Instead, after Newburgh, the online detainee locator system simply listed his location as "CALL FIELD OFFICE." When I clicked on the location, it did not provide the address "26 Federal Plaza" and the phone number (212) 436-9315. I checked the online detainee locator on July 2, July 3, July 4, July 5, and July 7. Each time, it indicated the same display.
16. When I called (212) 436-9315, I could not get through.
17. On the noon of July 7, after missing the Varick Immigration Court master calendar hearing, Mr. Xu was transferred from 26 Federal Plaza to Metropolitan Detention Center ("MDC") in Brooklyn, New York. Since this transfer, I have spoken confidentially with my client by phone. I learned that MDC was a huge step up in terms of living conditions from 26 Federal Plaza; I also learned that from July 1, 2025, the date of his arrest, until July 8, 2025 when he was transferred to MDC Brooklyn, he had not been given any medications.

18. When Mr. Xu arrived at MDC, on July 9, 2025, he finally received his blood pressure medication. At that time, his blood pressure was dangerously high – 165/105, and his left and arm were trembling. His condition was very serious.
19. On July 14, Mr. Xu's bond was approved over the Department of Homeland Security's objection. On July 16, the obligor made the bond payment which arrived at the bank on July 17, 2025.
20. On July 21, Mr. Xu was finally released.

Executed on 30 of July 2025, at El Monte, California

/s/ 

Mei Zhou