

DECLARATION OF GEOVANI MARADIAGA OCHOA

I, Geovani Maradiaga Ochoa, 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 came to the United States from Honduras on July 9, 2005. When I entered the country, I was detained by immigration officers and let go after a couple days. They made me sign a couple of documents in English when I was released. At the time, I did not realize the documents they gave me included a notice to appear in court in Texas on September 29, 2005. Because I did not attend that hearing, I received an order of removal from an immigration judge.
3. Since then, I have lived in Bronx, New York for nearly twenty years. During this time, I created a community and a family here in the United States. In 2012, I met and began dating Ethel Gomez, a United States citizen. We married on July 8, 2016 and together we have started a beautiful family including our ten-year-old daughter and our six-year-old son. Ethel and our kids, along with our close family and friends have been my community here in the United States for most of my adult life.
4. I have been under an order of supervision since around May 18, 2020. The conditions of my release required that I check in with Intensive Supervision Appearance Program ("ISAP") frequently. I also had periodic check ins at 26 Federal Plaza. At first, I had an ankle monitor along with video or in-person check ins. More recently, I had been having in-person check-ins about once every other month, video check-ins about once a month, and additional requests for pictures from ISAP throughout the month. For nearly five years, I had reported without issues. On July 3, 2025, I received an unscheduled call-in requesting that I show up the to ISAP office on July 6, 2025 at 7:00 AM.
5. When I arrived on July 6, 2025, I was apprehended by Immigration and Customs Enforcement ("ICE") at my ISAP check-in at 4777 Park Ave, Bronx, NY. When I arrived at my check-in with my wife and children, I was led into the back office alone where about five ICE officers were waiting for me. They pushed me against the wall, tied my hands, and then took my personal belongings. I asked the officers if I could at least say goodbye to my wife and children but they told me no.
6. The first facility where I was detained was located at 26 Federal Plaza in New York City. I was held at 26 Federal Plaza for six days, from July 6, 2025 until July 11, 2025.
7. I have been represented by lawyers from The Bronx Defenders since March 2020. When I was held at 26 Federal Plaza, I wanted to call my lawyer. I knew that this was an important time in my case and I wanted to keep him updated. I was being held in very

difficult conditions, and I wanted his help getting out of 26 Federal Plaza as soon as possible. My lawyer was also aware that I have medical conditions including diabetes, high blood pressure, and hyperlipidemia.

8. When I arrived at 26 Federal Plaza an ICE officer who was walking by started asking me why I had such a serious face. I replied that I was distraught about being separated from my family. The officer was upset that I responded and told me that I had to obey whatever the officers told me. I think he was trying to mess with me and make it clear that I had to obey whatever ICE told me and not ask too many questions.
9. While I was being processed, I asked to be able to speak with my lawyer, but I was told no and that I had to wait. Later on, I was told by ICE officers that I would be given a single call. During my entire time at 26 Federal Plaza, I think I was only able to make two calls to speak with my wife, for around 3-5 minutes per call. The calls were made available to us late at night after 9 PM. When it was time for my call, an ICE officer took me out of the holding area and walked me over to the landlines in the office. I was allowed to call from those phones, but the officer would be there waiting for me to be done and they would hurry me if they thought that I was taking too long.
10. I was never told that I had a right to speak to a lawyer. I was not told that I could use the calls I was provided to talk with my lawyer. I was also not told that there was any way to request a confidential legal call, and I never saw any forms that could be used to do this.
11. During this time, I wanted to speak with my lawyer about my case. I wanted to discuss the legal remedies available to me so that I could stay here with my family. I wanted to talk to him about the conditions at 26 Federal Plaza and to also see if there was a way for me to get out of there. But I was never afforded that opportunity.
12. My time at 26 Federal Plaza was very difficult. It was incredibly crowded in the holding areas we were kept in. There were about 30-40 people in the area I was in, but some areas looked even more crowded. We had to sleep on the floor because there were no beds. My first night, I was placed in a holding area that was very hot when the air conditioning was not on, but then I was moved to another holding area where the air conditioning was on all day. It was freezing in there, yet all we were given to stay warm was aluminum blankets. . We were not given pillows, so I had to use my shoes as a makeshift pillow to try to sleep. However, it was very hard to actually get rest. The lights were on the entire time and it was hard to know what time of day it was. I tried putting a shirt or a piece of the aluminum blanket over my eyes to try to be able to rest.
13. There was also lots of noise. People were constantly coming in and out and the guards were constantly calling out people's names so it was hard to sleep with all the commotion. Some of the people who were detained with me were becoming unstable and

started screaming so it was also difficult to block that out. Some people had been there longer than me.

14. There was also a horrific stench in the room. The bathroom was in the same holding area so the smell was everywhere. There were only two toilets and two sinks in the area for all the people in the holding area with me so they got dirty very quick.
15. The food I received was awful. The food we got was like the packets that soldiers get where you put hot water on the sides to try to warm up the meal. We usually got about 2 meals a day along with a water bottle. The portion sizes were small so I was usually still hungry even after I ate. If we wanted more water, we were told that there wasn't anymore so we had to drink water from the sinks next to the toilets.
16. The medical attention was also lacking. For example, one person in the holding cell was having what looked to me like a seizure or epilepsy and it took nearly 30 minutes for that person to get any medical attention.
17. The guards were intimidating and abusive. If they called your name and you didn't respond right away, they would get upset and start yelling at you. I felt like they were treating us as if we were the worst of the worst. One guy who was in another cell was screaming at some point and he was beaten by various guards who put their foot on his neck and head and then grabbed his arms behind his back.
18. We were not being treated like humans. For six days, I was not allowed to brush my teeth or shower. I felt so dirty. I feel like I was being treated like a dog. The bathrooms are also in plain sight in the holding area so there was no privacy for you to do your business.
19. As a result of these conditions, I felt like my dignity was taken from me. I was not being treated like a human. It was as if they totally forgot that I too was a husband and a father. I was losing my head in there. I lost weight and I felt constantly sleep deprived. I couldn't go to the bathroom for four days and I felt dirty generally. It was a nightmare being there. I was desperate to get out of there as soon as possible. It was like being in hell. I do not wish that on my worst enemy.
20. On July 11, 2025, I was transferred from 26 Federal Plaza to Arizona. I was very briefly able to call my attorney from Arizona and let him know that I had been transferred there. The following day I was transferred to the Northwest Immigration Processing Center in Tacoma, Washington. In Tacoma, there were finally phones and tablets that I could use to make calls. I was able to call and speak with my lawyer for more time on Monday, July 14, 2025 after nearly a week of not having access to him. I was able to talk to him about what I had endured, and we were finally able to discuss my case.
21. I was held in Tacoma until about Thursday July 17, 2025 when I was transferred to Arizona and then put on a plane to Texas. On Saturday July 19, 2025, I was removed

from the United States. I leave behind my United States citizen wife and two young United States citizen children.

Executed on 24th of July, 2025

/s/ Geovani Maradiaga Ochoa
Geovani Maradiaga Ochoa

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, DAVID JIMENEZ, certify that I am fluent in both English and Spanish. On July 24, 2025, I personally spoke with GEOVANI MARADIAGA OCHOA and read the foregoing declaration to him, translated into Spanish faithfully and accurately, over the phone. GEOVANI MARADIAGA OCHOA affirmed that he understood my translation and that the information in the above declaration is true and accurate.

Due to GEOVANI MARADIAGA OCHOA's removal, it was not possible to obtain a written signature on the declaration. In addition to confirming the information on the above declaration is true, GEOVANI MARADIAGA OCHOA also gave me verbal consent to sign on his behalf.

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


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