

DECLARATION OF LAUREN REIFF

I, Lauren Reiff, hereby declare under penalty of perjury that the following is true and correct to the best of my personal knowledge.

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 a licensed attorney in the state of New York and am over the age of 18. I am also admitted in the Southern District of New York, Eastern District of New York, and U.S. Court of Appeals for the Second Circuit. I specialize in the practice of immigration law.
3. I am the Associate Director of the Immigrant Protection Unit at the New York Legal Assistance Group.
4. I was retained to represent J.L.V.¹
5. Immigration and Customs Enforcement (“ICE”) took J.L.V. into custody and detained at 26 Federal Plaza, New York, NY, on June 2, 2025. I know this because the ICE Online Detainee Locator System, <https://locator.ice.gov/odls/#!/search>, showed J.L.V. as under the jurisdiction of 26 Federal Plaza, and J.L.V. confirmed his presence at 26 Federal Plaza to me by telephone on a non-confidential line.
6. After J.L.V. was detained, I tried to contact him. He had legal remedies available to him, including the right to a Credible Fear Interview. These remedies were time-sensitive and required me to speak to my client urgently.
7. I also worried because I had been made aware by members of J.L.V.’s community that he had medical conditions requiring treatment, and I wanted to ensure he was receiving adequate treatment for those conditions. I worried that J.L.V. was being held in conditions that would be dangerous and unsafe for his wellbeing, 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. Generally, when I need to locate and contact a client detained by ICE, I obtain that information through the ICE Online Detainee Locator System. I can typically enter client’s A number or biographical information into the ICE Online Detainee Locator System and the Locator will display the facility where that client is detained. Clicking on the detention center in the Locator leads the Locator to display information about how to set up a call with the client.
8. On June 2, 2025, I entered J.V.L.’s information into the ICE Online Detainee Locator System. But the Locator did not display location information for J.L.V. Instead, it simply listed his location as “CALL FIELD OFFICE.” When I clicked on the location, it provided the address “26 Federal Plaza” and the phone number (212) 436-9315.

¹ I have referred to my clients by their initials throughout to protect their privacy.

9. I checked the ICE Online Detainee Locator System again on June 3, 4, and 5, 2025. Each time, it indicated the same display.
10. On June 2, 2025, upon learning that J.L.V. had been detained, I emailed the ICE Enforcement and Removal Operations (“ERO”) Office and its directors at 26 Federal Plaza to request a call with my client. I sent an email to Joseph T. Pujol, joseph.t.pujol@ice.dhs.gov, NYCERO Attorney Inquiries, nyceroattorneyinquiries@ice.dhs.gov, William D. Morrow, william.d.morrow@ice.dhs.gov, and Mayra A Pardo-Figueroa, Mayra.A.Pardo-Figueroa@ice.dhs.gov.
11. Mr. Pujol responded that my client was “in transit” and that I would not be able to contact my client until he was no longer “in transit.”
12. On June 3, 2025, J.V.L. remained at 26 Federal Plaza. I emailed the same parties again to request a call with my client. Mr. Pujol again denied my request.
13. On June 4, 2025, my client’s friend was able to provide him with my phone number. At approximately 8:44 PM, he was able to call me in a public room with officers and other detainees present for approximately 10 minutes, after which an officer ended the call. I was not able to speak to my client confidentially at this time.
14. On June 5, 2025, J.L.V.’s friend told me that the officers at 26 Federal Plaza informed him he may not call his attorney again.
15. On June 6, 2025, the ICE Online Detainee Locator System listed his location as at Joe Corley Detention Facility in Texas. Since this transfer, my client called me and we spoke by telephone. He expressed that he was medically unwell and that he was exhausted from his time at 26 Federal Plaza because of insufficient food and sleep. He has since signed papers abandoning his claim for asylum, not fully understanding what he had signed because it had not been translated to him. I believe has been deported because he feared for his health if he remained in detention.

Executed on 8th of August, 2025, in New York, NY.



Lauren Reiff