

DECLARATION OF IBRAHIMA BARRY

I, Ibrahima Barry, 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 originally from Mali. I fled Mali in late 2023 because of grave threats to my life stemming from my participation in the local community council, where I was elected as the young representative. Both my brother and father were murdered because of ethnic and political conflict. I arrived in the United States on January 1, 2024. After arriving in the United States, I lived in the Bronx.
3. On July 3, 2025, I went to an immigration court hearing at 26 Federal Plaza in Manhattan. I waited all morning to see the judge only to be told that there was no French interpreter and that I would not see the judge that day. I was given a hearing notice by the judge's clerk telling me to return on October 30, 2025. As I left, I was surrounded and detained by Immigration and Customs Enforcement ("ICE") officers in masks. It was a terrifying experience. No one explained anything to me about why I was being arrested.
4. I was taken to a holding cell in 26 Federal Plaza immediately after my arrest, where I was held for one night. I was then transferred to a criminal detention facility in Nassau County, where I was held for 3 days. I was then transferred back to 26 Federal Plaza on July 7th, where I was held in a holding cell for four days. I was transferred to New Jersey on July 11, 2025.
5. The conditions at 26 Federal Plaza were awful. I was in a small room with approximately 50 other men. We all had to sleep on the floor, often while sitting upright, because there were too many people and no beds.
6. We shared one toilet, which was very difficult to use with that many people. We were not allowed to bathe, to change our clothes, or to brush our teeth.
7. There was no window in the room and the door was always closed. The room was terribly hot and it smelled terrible given the conditions.
8. Some people had trouble breathing and were removed from the room temporarily. The room was very small and I saw a number of people have what looked like asthma attacks. They gasped for air and could not breathe. They were taken out of the room in handcuffs and brought back a little while later. When they recovered, they were brought back.
9. We were provided with inadequate food. We sometimes received food only once a day; at most, we received food only twice a day. The food seemed to be military style, meaning it was pre-packaged. It was not enough food and I often felt hungry.

10. We were allowed to make one 5-minute phone call every few days. In-person visits were prohibited.
11. The whole time that I was at 26 Federal Plaza, I was never told that I had a right to speak to a lawyer. Since I was arrested, no government officers have spoken to me and give me the opportunity to speak to anyone. I was 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. I never saw any indication that I could call legal non-profits or a legal referral line to try to find a lawyer.
12. I learned later that an attorney at a nonprofit called CoCounsel NYC, Rebecca Press, had requested a legal call with me but I did not speak with her until after I was transferred to Delaney Hall in New Jersey.
13. My time at 26 Federal Plaza affected me very negatively emotionally. I feel I was treated like an animal.

Executed on 1st of August 2025

/s/ Ibrahima Barry

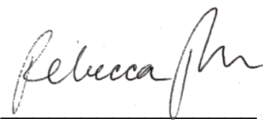
Ibrahima Barry

ATTESTATION

I, Rebecca Press, certify that Ibrahima Barry speaks both English and French. On August 1, 2025, I personally spoke with him and read the foregoing declaration to him over via Zoom. Ibrahima Barry affirmed that he understood the information contained in the declaration and that the above declaration is true and accurate.

Due to Ibrahima Barry's detention, it was not possible to obtain a written signature on the declaration. In addition to confirming the information on the above declaration is true, Ibrahima Barry 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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