

DECLARATION OF ADELFO ELISEO BAUTISTA SANCHEZ

I, Adelfo Eliseo Bautista Sanchez, 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 most recently came to the United States from Mexico in around February or March 2010 to escape land-related disputes and violence in my hometown.
3. I have lived in the Poughkeepsie, New York, area for almost eleven years, since around 2014. I lived in New Jersey for about five years before that. I live with my partner, Alejandra, with whom I have been dating for almost two years. We plan to get married. I have been working in house painting and remodeling for approximately ten years. I go to church with Alejandra when I am not working.
4. On or around February 13, 2025, I was apprehended by Immigration and Customs Enforcement (“ICE”) at a check-in with my probation office in relation to a resolved matter in Poughkeepsie, New York.
5. The first facility where I was detained by ICE was located at Orange County Jail (“OCJ”), located at 110 Wells Farm Road, Goshen, New York. On or around June 20, 2025, I was transferred from there to 26 Federal Plaza in New York City. I was held at 26 Federal Plaza for approximately two days, from June 20 to June 21, 2025. I was then transferred to Alexandria at 96 George Thompson Road in Louisiana, where I was held for approximately ten days. On or around June 30, 2025, I was then transferred back to OCJ and then transferred, yet again, to 26 Federal Plaza on or around July 1, 2025. I was held at 26 Federal Plaza for around three days, from July 1 to July 3, 2025.
6. I was able to speak with my lawyer only once throughout this whole process, while I was at Alexandria. This was because I called my attorney myself—it wasn’t a legal call that the jail allowed or scheduled, despite my and my attorney’s requests.
7. 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 to keep him updated. I also was being held in very difficult conditions, and I wanted his help getting out of 26 Federal Plaza as soon as possible.
8. When they let me make phone calls, it was late in the evening, so I would call my partner, Alejandra, to make sure that the call was answered since it was outside of working hours.
9. While I was held at 26 Federal Plaza, I never observed anyone being able to speak with their lawyer, either in person or by phone. When I was there, I was only able to speak to my partner, Alejandra, two times, for around 5 minutes per call.

10. At 26 Federal Plaza, I was never told that I had a right to speak to my lawyer. I was told that I could request to speak with my family for five minutes, but I was not told that I could use this call to talk with my lawyer. 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.
11. I felt kidnapped, scared, and trapped. Unable to speak with my attorney, I felt like my rights were violated, and that there was no way for me to stop whatever ICE was doing or going to do to me. And not being able to speak with my loved ones made me feel isolated and deprived of my support system.
12. My time at 26 Federal Plaza—especially the second, longer period of time—was very difficult. I felt physically sick and unwell, with little food and water. They gave me chocolate, which was bad for my blood sugar, and they didn't give me my medication the first time I was at 26 Federal Plaza. We had no ability to shower or wash ourselves. We slept on the floor with many people in the same room. It was very warm in the room during the day, like being in an oven, and then the air conditioning was on and too strong during the night. It was like torture. When we asked for water or blankets, the guards would get angry and not give us anything that we asked for. My back hurt from sleeping on the ground and the cramped conditions. My feet hurt and changed into a yellowish color. My lungs hurt and I got very sick. Others there were sick as well. As a result of these conditions, I got very sick and had a fever and sore throat for several days.
13. The officers at 26 Federal Plaza only spoke in English, with me and with each other. There was one officer who spoke a little Spanish but was only there the first day I was at 26 Federal Plaza. When I asked for things like water, food, or blankets, the officers would get angry, not understand me, and not give me what I needed or asked for.
14. On or around July 3, 2025, I left 26 Federal Plaza for the Metropolitan Detention Center ("MDC") in Brooklyn, New York.
15. At MDC, about three weeks after I arrived, ICE officers took photographs of about ten handbooks to show that they had them, but I didn't receive one because there weren't enough. The handbook explained that I could communicate with my family and friends, and that I could communicate confidentially with my lawyer by phone, in person, or by mail. At this facility, I have spoken with attorney twice through legal calls that my attorney requested and scheduled. There are three phones in my unit that I can use to call my family, and there are no tablets that I can use for video calls with my family. I have been able to speak with my partner, Alejandra, for about 10-15 minutes on the days that I am able to make a call given the small number of available phones and the large number of people who get in line to make calls to their loved ones.

Executed on 12 of August, 2025

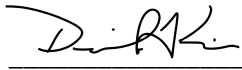
/s/ Adelfo Eliseo Bautista Sanchez
Adelfo Eliseo Bautista Sanchez

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, Daniel Kim, certify that I am fluent in both English and Spanish. On August 12, 2025, I personally spoke with Adelfo Eliseo Bautista Sanchez and read the foregoing declaration to him, translated into Spanish faithfully and accurately, over the phone. Adelfo Eliseo Bautista Sanchez affirmed that he understood my translation and that the information in the above declaration is true and accurate.

Due to Adelfo Eliseo Bautista Sanchez'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, Adelfo Eliseo Bautista Sanchez 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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