

DECLARATION OF ROBERTO DANIEL CHILAVERT OLMEDO

I, Roberto Daniel Chilavert Olmedo, 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 Paraguay in May 2023 because of the violence I experienced in my home country and I needed safety. I have lived with my family in Queens since I arrived over two years ago.
3. On July 10, 2025, I went to an immigration court hearing at 26 Federal Plaza in Manhattan. The immigration judge gave me another court date to continue with my case but then as I left I was surrounded and detained by Immigration and Customs Enforcement (“ICE”) officers in masks. There were about four or five of them.
4. From July 10 until July 16, I was held in a holding cell at 26 Federal Plaza.
5. The conditions at 26 Federal Plaza were awful. We were all kept in a very small room. The number of people in the room ranged from 45-66 people every day. I remember that if there was more than 50 people, it was uncomfortable and I could not sleep. I remember sleeping upright for three days because there was no room. There was no air conditioning and since there were so many people in the room, it was hot. The officers gave us aluminum blankets that we placed on the floor to sleep on. It felt so stuffy and it was hard to breathe.
6. I got a throat infection but I never saw a doctor or nurse. I remember someone fainted and the officers took them out of the room and placed them into a smaller room to give them space to breathe. That person never saw a doctor or a medic. Once he was “better” they brought him back into the big room. I felt so powerless and at the will of the officers. The lights were kept on and I lost track of the days.
7. During my six days, I had four 1-3-minute calls with my sister. We had to form a line where an officer would give us a phone and stand next to us as we spoke. Sometimes depending on how long the line was, I was only able to speak with my sister at 1am. If she didn’t answer before it got to voicemail then I was not allowed to dial again.
8. We had no access to a shower for six days. They gave us a damp towel to clean ourselves but it did not help with the heatwave and we were all sweating all the time. We didn’t get toothbrushes or toothpaste and I couldn’t clean my teeth during the entire time I was there. We did not have much privacy in the bathroom. Someone hung up one of those aluminum blankets as a shield to add privacy. Sometimes people slept in there but the floor was muddy because people tried to wash their feet in the toilet and left water splashed everywhere.

9. I was also hungry because we were not given inadequate food. It was mush and it was twice a day. It was beans and chicken and chocolate. Although, I am not sure you could even call it chicken. It tasted so fake. It was given to us in a small plate. We saw the officers put some sort of liquid in the plate, microwave it and then hand it to us. We had to eat it or we starved. I also felt bad for the diabetics because the food was very sweet and they could not eat most of the food because it was unhealthy and not a part of their diet.
10. I asked to speak with an attorney but was told that was not allowed until my hearing.
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. I was also not told that I could use my one- or two-minute call to call a lawyer—from what I understood, I could only call family. 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. I grew exhausted and it felt hard to hold on to any hope that we would leave.
12. After six days, I was transferred to another detention facility in Louisiana. We were in transit for an entire day and I remained handcuffed and chained at my feet the entire time. It was painful and my wrists became bruised. We were not given food or water the whole day. I felt that we were treated like animals.
13. I am at Joe Corley now and I have access to legal calls. I had one legal call and I am meeting with an attorney in person very soon to help me fight my case.
14. My time at 26 Federal Plaza affected me very negatively emotionally. It hurts to think about my days there and that more people are going to keep getting jailed there just for going to court.

Executed on the 11th of August 2025

A handwritten signature in black ink, appearing to read 'DEISY FLORES', with a stylized, looping flourish at the end.

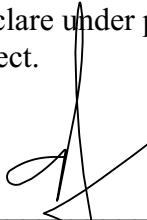
DEISY FLORES

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, Deisy Flores, certify that I am fluent in both English and Spanish. On August 11, 2025, I personally spoke with Roberto Daniel Chilavert Olmedo and read the foregoing declaration to him, translated into Spanish faithfully and accurately, over the phone. Roberto Daniel Chilavert Olmedo affirmed that he understood my translation and that the information in the above declaration is true and accurate.

Due to Roberto Daniel Chilavert Olmedo'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, Roberto Daniel Chilavert Olmedo 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.

A handwritten signature in black ink, appearing to be 'Deisy Flores', written over a horizontal line.

Deisy Flores
104-19 Roosevelt Avenue
Corona, NY 11368
718-565-8500 ext. 1064