

DECLARATION OF MANUEL LUCERO LOJANO

I, Manuel Lucero Lojano, 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 Ecuador in December 2022 for safety. I just graduated from high school in June. Before I was detained, I was working in a kitchen and trying to save money to go to community college. My dream is to join the United States Army, once I get my Special Immigrant Juvenile Status. I have never been arrested.
3. On Tuesday, August 12, my mother and my younger sister and I were all detained by ICE when we went to a check-in appointment at 26 Federal Plaza. I was separated from them; they were taken to Texas but I stayed there at 26 Federal Plaza until Thursday night, August 14.
4. During my time at 26 Federal Plaza, I got food only one or two times a day and it was cold. Everyone in the room was in the same clothes they arrived in, including me. I asked to also get new clothes but the guards said no. There was a man who had ripped his pants and he was very cold. He waited a whole day before the guards brought him new pants.
5. We had to sleep on the floor and it was very cold. I did not get an aluminum blanket until my second day, so the first night especially I was freezing and worried I would get sick. During my time there, I never got anything to wash or bathe—we did not even have sufficient toilet paper. I did not get anything to brush my teeth, even a wipe.
6. When I arrived, I think that a large group had just left and there were only about 20 people in the room with me. But later it held as many as 30 or 40 people. It was not a big space and I know there were other rooms with more people, including women.
7. I only saw the room I was in be cleaned once in the two and a half days I was there.
8. I was able to call my family twice, once on Tuesday and once on Wednesday. The calls were very short—maybe 3 or 5 minutes—and a guard was always listening. They would ask for the person's name and phone number when we called. On Thursday, I asked for another call and the guards said no.
9. During my time at 26 Federal Plaza, no one mentioned anything about legal calls. The day that I was detained, I asked if I could call a lawyer and the officer I asked said no, that I was not allowed to call a lawyer because I already had a deportation order. I was not aware that we could make legal calls; I understood we could only call family.
10. I saw some people request medical assistance who waited a day to be attended to.

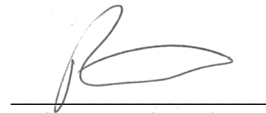
DATED: August 18, 2025

Manuel Lucero
Manuel Lucero Lojano

CERTIFICATE OF TRANSLATION

I, Paige Austin, certify that I am fluent in both English and Spanish. On August 18, I personally spoke with Manuel Lucero Lojano and read the foregoing declaration to him, translated into Spanish faithfully and accurately, over the phone. Mr. Lucero Lojano affirmed that he understood my translation and that the information in the above declaration is true and accurate.

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



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