

DECLARATION OF AMY LEIPZIGER

I, Amy Leipziger, 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 the project director of the Free to Be Youth Project of the Urban Justice Center. In addition to my other responsibilities, I supervise all legal work within my project.
3. I am an attorney in good standing in the state of New York. I am admitted in the 2nd Department of New York, as well as the SDNY, EDNY, and Second Circuit. I oversee many types of litigation in my current role including the immigration practice.
4. I represent Elder Vasequez Salgado (preferred name Sheila Bracamontes) in her immigration proceedings.
5. Ms. Bracamontes was taken into custody and detained by Immigration and Customs Enforcement (“ICE”) at 26 Federal Plaza, New York, NY, on August 7, 2025. She was detained during an ICE check-in, and was accompanied to the check in by a case worker at the Ali Forney Center. Apart from a brief period when 26 Federal Plaza was evacuated, she has remained at 26 Federal Plaza from the time she was taken into custody until August 18, when she was hospitalized.
6. After Ms. Bracamontes was detained, I tried to contact her as quickly as possible. She called me when she was first detained, and I spoke to her briefly to assure her that I was continuing to work on her immigration case. Ms. Bracamontes has several legal remedies available to her, including seeking release on bond. I also worried that Ms. Bracamontes was being held in dangerous, inhumane conditions, and I wanted to try to provide her with as much relief from those conditions as I could, and to do so as quickly as possible. Ms. Bracamontes is a transgender woman, and despite multiple efforts to provide her with gender affirming medical care, she has thus far been denied her medication. We were also concerned that she would be held in detainment with men and that doing so would compromise her safety. It is our understanding that Ms. Bracamontes was separated for a time from the male detainees; however, she has had frequent interactions with the male detainees, and has experienced persistent harassment, including homophobic slurs like “maricon” and at least one incident wherein a male detainee exposed himself to her.
7. Generally, when I need to locate and contact a client detained by ICE, I can enter that client’s information into the ICE online detainee locator system (<https://locator.ice.gov/odls/#/search>), which lists the facility where that client is detained.

Clicking on the detention center in the locator leads to information about how to set up a call with the client.

8. The online detainee locator system did not give this information for Ms. Bracamontes. Instead, it simply listed her location as "CALL FIELD OFFICE." When I clicked on the location, it provided the address "170 William Street" and the phone number (212) 436-9413. I last checked the online detainee locator on August 18 and it indicated the same display. She has not been at 170 William Street. She was briefly moved to Varick Street last week when they evacuated Fed Plaza. We know this because we have the declaration from the ICE supervisor in our case, and because she told me during one of our two minutes phone calls. She is currently being hospitalized after alleged suicidal ideations.
9. Ms. Bracamontes has been able to make brief phone calls to me, usually about two minutes in length, for the past week. I have reason to believe these phone calls are recorded, and that we are not provided with privacy in these conversations. I can hear her talking to other people around her, and have heard voices of those nearby. One of the calls was facilitated by an ICE guard who arranged for the phone call and was standing next to her. The last time we had such a call was on Friday, April 15.
10. I have not had the opportunity to speak to my client confidentially since she was detained. I have not been able to discuss case strategy in any detail, or share specifics about her case, or provide her with copies of any legal documents for review.
11. Ms. Bracamontes has stated that she is sleeping on the ground and has not received a toothbrush. My team brought her a toothbrush and change of clothes but neither were provided to her. She has also said the food is inadequate.

Executed on 20th of August 2025

A handwritten signature in black ink, appearing to read "Amy Leipziger", with a stylized flourish extending from the end.

Amy Leipziger, Esq.