

SECOND SUPPLEMENTAL DECLARATION OF SERGIO BARCO MERCADO

I, Sergio Barco Mercado, 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 supplementing my earlier two declarations. I have authorized my attorney, Andres Santamaria, to sign on my behalf as I am still in detention at Orange County Jail.
3. My attorneys have explained to me that a temporary restraining order issued in this case on August 11, 2025 which imposed important new requirements on how people should be treated at 26 Federal Plaza. That was great to hear.
4. I also know that there is now ongoing litigation over whether that order will be extended or changed. My attorneys have also explained that unfortunately the government does not seem to be doing some of things it was ordered to, like offering private legal calls to people at 26 Federal Plaza.
5. I hope that the order put in place by the Court continues indefinitely. I would also like to make sure that it is enforced and that the Court's orders continue to address the needs of people in detention.
6. What happened to me at 26 Federal Plaza was very traumatizing and I remain committed to doing what I can to stop others from having the same experience. The guards at 26 federal ICE act like they are taking care of animals, not humans. They do not care about the safety or health of the people detained there

/s/ Sergio Barco Mercado

Sergio Barco Mercado

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, Andres Santamaria Cortes, certify that I am fluent in both English and Spanish. On August 22, 2025 I personally spoke with Sergio Barco Mercado and read the foregoing declaration to him, translated into Spanish faithfully and accurately, over the phone. Sergio Barco Mercado affirmed that he understood my translation and that the information in the above declaration is true and accurate.

Due to Sergio Barco Mercado'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, Sergio Barco Mercado also gave me verbal consent to sign on his/her 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 cursive script, appearing to read "Andres S.C.", written in black ink.

Andres Santamaria Cortes
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