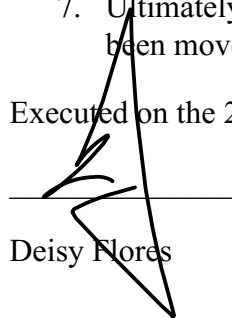


DECLARATION OF DEISY FLORES

I, Deisy Flores, 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 an attorney in good standing in the state of New York.
3. I specialize in representing noncitizens in removal proceedings who are at risk of or have already been detained. By definition, these individuals face urgent legal issues—including the possibility of out-of-state transfers to other detention centers or, in some cases, imminent removal. As such, I usually need to prioritize getting in touch with them as soon as possible to ascertain their legal needs and options.
4. Early in the day on October 21, 2025, I received a referral for a woman who had been detained by Immigration & Customs Enforcement (ICE) the day before, October 20, 2025, outside their home in Queens, New York. Her family said she was being held at 26 Federal Plaza and was particularly concerned about whether she would have access to her medication.
5. Shortly after receiving the referral, I called the telephone number that ICE recently indicated was the newly designated number that attorneys should use to schedule legal calls with individuals detained at 26 Federal Plaza: (212) 436-9400. This call took place around 10:45am on October 21, 2025. The individual who answered, however, told me it was not the right number and that these types of calls get routed to them “a lot.” The person then told me to send an email to newyork.outreach@ice.dhs.gov to schedule legal calls. My understanding on October 21, 2025, however, was that ICE had recently designated a different email address for such scheduling, namely NYCIntakeInquiries@ice.dhs.gov. I was left very confused.
6. I then sent an email to the address provided by ICE recently (i.e. NYCIntakeInquiries@ice.dhs.gov). I received an email in response, which said that “Unfortunately, your client is located in a different facility, she departed this location approximately 10:45 AM 10/21/2025.”
7. Ultimately, I was not able to speak with my client until much later when she had already been moved to a different detention center.

Executed on the 29th of October 2025, at Queens, NY.



Deisy Flores