

DECLARATION OF ZOEY JONES

I, Zoey Jones, 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 represent Oscar¹ in immigration matters. Oscar is a young man who was granted Special Immigrant Juvenile Status in the United States.
4. Oscar was taken into custody and detained by Immigration and Customs Enforcement (“ICE”) at 26 Federal Plaza, New York, NY, on October 9, 2025. I know this because Oscar called me that morning from 26 Federal Plaza from his personal cell phone and told me he was being arrested, that he did not know where he was being taken, and that he could only speak very briefly. I could tell from the very loud background noise that the call was not confidential. That day I filed a petition for habeas corpus in the SDNY requesting, among other things, that Oscar’s removal be stayed and he be released from custody.
5. When I checked the Online Detainee Locator System the morning of October 10 at 10:44 am it showed Oscar’s “current detention facility” as “Call ICE For Details.” It then stated that “Family members and legal representatives may be able to obtain additional information about this individual’s case by contacting this ERO office: NEW YORK, NY, DOCKET CONTROL OFFICE, Phone Number: (212) 436-9315.” I called this number at 10:46 am that day and left a message but did not receive a call back.
6. I called (212) 436-9315 again at 11:41 am on October 10 and an officer answered. I did not get the officer’s name. In response to my inquiries, he told me I had reached the ICE office at 26 Federal Plaza but that it was not possible for me to schedule a legal call with my client. He informed me I had to wait for my client to call me but would not confirm that my client had access to any phone calls. He stated there was no way for me to request a call with my client or request that my client call me. He refused to confirm whether my client was still (or ever) located at 26 Federal Plaza.
7. I did not receive a call from Oscar that day or at any time after, even though Oscar had told me he wrote my phone number on his arm before going to 26 Federal Plaza.
8. On Monday, October 13, shortly after I filed a motion for emergency relief on the habeas petition, counsel for the government informed me that Oscar had been removed from the United States that morning.

¹ “Oscar” is a pseudonym.

Executed on 25 of November, 2025, at Brooklyn, New York.

A handwritten signature in black ink, appearing to read 'Zoey Jones', written over a horizontal line.

Zoey Jones