

## DECLARATION OF EUCARIS CAROLINA GOMEZ LUGO

I, Eucaris Carolina Gomez Lugo, 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. My name is Eucaris Carolina Gomez Lugo. I am a 46-year-old national of Venezuela, living in Pueblo Nuevo in the state of Falcon in Venezuela. I am the older sister of Tilso Ramon Gomez Lugo. Tilso Ramon is 38 years old and left for the United States in early 2024.
3. I am submitting this declaration and bringing this lawsuit because I am deeply concerned for my brother, because no one in my family or I have heard from him since Saturday, February 1, 2025.
4. Tilso Ramon and I are extremely close. We are about ten years apart and my older sister and I helped raise him and take care of him since he was a baby, as my mother had another child shortly after Tilso Ramon was born. Tilso Ramon is very caring and supportive of the family and has always provided financial support to the family when has had the means. Tilso Ramon has always confided in me and sought my advice and help with respect to his personal life.
5. Tilso Ramon arrived in the United States around April 9, 2024. He crossed the border with a group and presented himself to immigration officers. He was detained in El Paso, Texas the entire time in the United States.
6. Tilso Ramon had a credible fear interview and received a positive result. He then had three hearings scheduled with the immigration judge. He tried to get an attorney to help him with his immigration case. But because he got sick with COVID-19 while in detention, he was isolated and missed one of his hearings, and was not able to get an attorney. When he showed up at his last hearing on November 25, 2024, he was alone and representing himself. He received an order of deportation from the immigration judge that day.
7. My brother wanted to appeal the immigration judge's decision and was in touch with our family to try to gather the necessary documents for his appeal, but we were unable to obtain all the documents, especially under such limited time. It was particularly difficult for Tilso Ramon to try to appeal without legal counsel at the time. My brother told us multiple times how much he desperately wanted an attorney to help him with his case and to get him out of detention.
8. My siblings and I in Venezuela spoke with Tilso Ramon regularly while he was in detention, about every two to three days. We always spoke by video. It was important for me and the rest of our family to see his face and check how he was doing in detention.

9. Our family last spoke with Tilso Ramon on February 1, 2025, when he said he believed he was scheduled for deportation. He asked for more comfortable clothes for his flight. So I tried to arrange through friends for someone to send him clothes at the detention center. He was last held at the El Paso Processing Center.
10. Tilso Ramon told us that he was going to be taken out of the system so he would not be able to call us until he arrived in Venezuela. So we waited, and waited. Monday and Tuesday passed, but we did not hear anything.
11. Then on Wednesday, February 5, 2025, my nephew was on Twitter and saw the photos that were posted of Venezuelans being put on a plane and transferred to the military base on Guantánamo Bay. My nephew showed them to us and I was shocked to see my brother on the screen. I recognized him immediately. We had just seen him four days ago on our video call and knew it was him. I recognized him by his beard and the shape of his head. All our family has similar shaped heads. I also recognized him by his hairline and shoulders and, in a video of him I saw online, by his walk.
12. It felt like the worst nightmare. The government said that they were transferring members of the Tren de Aragua gang from Venezuela. However, my brother is not and never was a gang member. I think he has been labelled as a gang member because of his tattoos, but they are not gang-related. I am so worried that he will be targeted because of this gang label.
13. My brother is a good man. He is caring, responsible, hardworking, and honest. He told our family that while he was in immigration detention, he worked long hours despite only being paid a dollar a day so that he could afford to make calls to our family and assure us that he was doing okay even if he may not have been. It is very like him to be concerned about us and not want us to worry, even when he is not doing well.
14. I would like my brother to have access to an attorney so that they can help him with his immigration case and to try to get him out of detention. Since I lost contact, I have not been able to sleep. I have been eating very little, and I feel weak because I am not eating properly but I cannot eat because I am consumed with worry for my brother. My brother and family members, including myself, are all devout Christians. I have been praying to God that Tilso Ramon will be okay, but it is very emotional for me and my family members not to know exactly where my brother is and if he is okay. I have been crying a lot but have tried to hold it together for my mother who is older and cannot bear the gravity of the situation.
15. I have no idea what is happening to Tilso Ramon. I want my brother to have an attorney to talk with about his situation. I understand that there are legal organizations in this case who would offer him services and I would like them to represent him if they are able to communicate with him. I believe that it would be in my brother's best interest to have this legal representation.

16. Everything in this declaration is true and correct to the best of my knowledge and recollection. This declaration was read back to me in Spanish, a language in which I am fluent.

Executed on the 9 day of February, 2025 at Pueblo Nuevo, Venezuela.



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Eucaris Carolina Gomez Luga

**CERTIFICATE OF TRANSLATION**

I, Talia Roma, certify that I am fluent in both English and Spanish. On February 9, 2025, I personally spoke with Eucaris Carolina Gomez Lugo and read the foregoing declaration to her, translated into Spanish faithfully and accurately, over the phone. Ms. Gomez Lugo affirmed that she 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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