

DECLARATION OF ANGELA CAROLINA SEQUERA

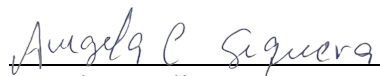
I, Angela Carolina Sequera, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

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 Angela Carolina Sequera. I have lived in the United States since 2022, when I came from Venezuela to seek asylum. I received Temporary Protected Status in September of 2024.
3. I am the mother of Yoiker David Sequera. Yoiker is 25 years old and left Venezuela to seek asylum in the United States. I am submitting this declaration because I am so scared that my son might have been transferred to the military base on Guantánamo Bay. I do not know how to contact him or find out how he is doing.
4. Yoiker waited in Mexico for about a month trying to get a CBP One Appointment. In September 2024, he entered the United States and sought asylum because he is afraid of what would happen if he were deported to Venezuela.
5. Yoiker saw the immigration judge three times starting in December 2024. At the third hearing, on January 6, 2025, he received an order of deportation. We tried to get my son an immigration attorney to help with his case, but we have very little money and ended up being scammed. I know that my son would want an attorney to help him with his situation.
6. Yoiker was detained the entire time since entering the United States in September 2024. He was last detained at the El Paso Processing Center. I spoke to my son almost every day, whenever I could. On Fridays we would do a video call and on all other days of the week we would do regular phone calls.
7. I last heard from my son on Saturday, February 8, 2025, when we had one of our regular phone calls. My son called me as he normally does, and he did not say anything about expecting a transfer.
8. On Sunday, February 9, I received a call from another person who was detained with my son and he told me that my son had been told he was being transferred to Guantánamo. I immediately panicked and tried desperately to get in contact with the detention center to get more information. The detention center provides a phone number for families who are seeking information about a detainee. I called the number about 10 times since February 9, but my calls were never answered, and I was unable to get in contact with anyone.
9. I heard the U.S. government say that they are sending members of the Tren de Aragua gang to Guantánamo. But my son is not a gang member. He's never been involved in any gang. I think he was targeted because of his tattoos but they are not gang-related. Yoiker

is a good and respectful boy. He has always supported his family. Even when we were in Venezuela, he helped me out with emotional and financial support. He has a good relationship with his little sister as well. Our family is small so we are all very close.

10. On February 11, I checked the U.S. government's website with Yoiker's information. Before it had said he was at the El Paso Proceeding Center, but it now says that he is in Florida. I called the phone number listed on the website but nobody picks up. The phone just keeps ringing until it eventually hangs up. If I had the money, I would travel to Florida to try to find him. But I do not even know if he is in Florida or where he might be. I have no information about his whereabouts or how to contact him. I heard that other people transferred to Guantánamo are also being listed in Florida, but I have not heard anything from the U.S. government at all.
11. I am so worried about Yoiker. He is still so young and did not have a fair chance in his case because he did not have a lawyer. It is unfair what is happening to him. I feel like he's been kidnapped. It breaks my heart not knowing whether he is ok and not being able to talk to him.
12. I desperately want my son to have access to an attorney so that they can help him with his situation and to try to get him out of detention. 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 son's best interest to have this legal representation.
13. 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 11 day of February, 2025 at Beaumont, California.



Angela Carolina Sequera

CERTIFICATE OF TRANSLATION

I, Talia Roma, certify that I am fluent in both English and Spanish. On February 11, 2025, I personally spoke with Angela Carolina Sequera and read the foregoing declaration to her, translated into Spanish faithfully and accurately, over the phone. Ms. Sequera 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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