

DECLARATION OF JACKSON MANUEL VILLA WILHELM

I, Jackson Manuel Villa Wilhelm, 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 Jackson Manuel Villa Wilhelm. I am 27 years old and from Venezuela. I first entered the United States in July 2023, after which I was deported to Mexico. I tried entering again around October 2023, but was sent back to Mexico. I last entered the United States around December 2023 because I was desperate to be safe and with my family in the United States. I was in federal custody for the whole time I was in the United States.
3. I am currently detained at the El Paso Processing Center in Texas. My partner, Elena Urbina, and four year old daughter live nearby in El Paso.
4. I heard from other people in detention that the U.S. government has started transferring Venezuelans with final orders to the military base at Guantánamo Bay, Cuba. I also heard the U.S. government is targeting people they think are criminals or gang members, even if they have no proof.
5. I am afraid of being transferred to Guantánamo. I believe that I am at risk of being transferred because I have a final order of deportation and am from Venezuela. I also think I will soon be transferred to Guantánamo because I have a tattoo, and I hear that ICE thinks people with tattoos are gang members. My tattoo is of a rosary, and does not have anything to do with a gang.
6. I do not want to be transferred to or detained at Guantánamo. I am afraid of what will happen to me when I get there. I heard that there is no ability to contact lawyers or family from Guantánamo. I want access to an attorney to help me get out of detention and figure out what options I have in my immigration case.
7. 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 19th of February, 2025 in El Paso, Texas.

A handwritten signature in blue ink, appearing to read "Jackson".

Jackson Manuel Villa Wilhelm

CERTIFICATE OF TRANSLATION

I, Zoe Bowman, certify that I am fluent in both English and Spanish. On February 19, 2025, I personally spoke with Jackson Manuel Villa Wilhelm and read the foregoing declaration to him, translated into Spanish faithfully and accurately. Mr. Villa Wilhelm affirmed that he 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.

A handwritten signature in black ink, appearing to read "Zoe Bowman", is positioned above a horizontal line.

Zoe Bowman
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