

DECLARATION OF JANFRANK BERRIOS LAGUNA

I, Janfrank Barrios Laguna, 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 Janfrank Barrios Laguna. I am 43 years old and from Venezuela. I came to the United States in May 2023 to seek asylum. I have been in immigration detention since July 15, 2024. I am currently detained at T. Don Hutto Detention Center in Taylor, Texas.
3. When I came to the U.S. in May 2023, I presented myself to CBP agents in El Paso. I had tried to make an appointment using the CBP One application, but it was very faulty so I was not able to make one. I was released and told to check in with ICE in June 6, 2023. I applied for asylum, along with my sister, but I ultimately withdrew my application and asked to voluntarily leave the country. The immigration judge granted my request, but I was unable to secure a flight. I received a deportation order on October 4, 2024.
4. I heard 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. On February 6, 2025, ICE officers went around asking Venezuelans in my unit to sign off on deportation to Mexico. I refused to sign, and ICE told me and the others who refused to sign that they would transfer us to Guantánamo if we did not agree to be deported to Mexico.
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.
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 26 of February, 2025 in Taylor, Texas.



Janfrank Barrios Laguna

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, Marisol Dominguez-Ruiz, certify that I am fluent in both English and Spanish. On February 20, 2025, I personally spoke with Janfrank Berrios Laguna and read the foregoing declaration to him, translated into Spanish faithfully and accurately, over the phone. Mr. Berrios Laguna 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 'Marisol Dominguez-Ruiz', is positioned above a horizontal line.

Marisol Dominguez-Ruiz
Justice Catalyst Fellow, National Prison Project
American Civil Liberties Union
915 15th St. NW, Washington, DC 20005
mdominguez-ruiz@aclu.org