

**DECLARATION OF ALEJANDRO JOSE PULIDO CASTELLANO**

I, Alejandro Jose Pulido Castellano, 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 Alejandro Jose Pulido Castellano. I am 26 years old and from Venezuela. I came to the United States on August 26, 2024 to seek asylum, via a CBP One appointment. At this appointment, the Border Patrol official told me that I looked like a gang member because of my tattoos.
3. In September 2024, I received a third-country removal order to be removed to Mexico.
4. I have spent my entire time in the United States federal custody. Since August 26, 2024, I have been transferred all around the country. First, I spent about three months detained at Otay Mesa Detention Center in San Diego, California. Then, I was moved to South Texas ICE Processing Center in Pearsall, Texas, where I spent about three weeks. Next, I was moved to Florence Detention Center, where I spent about two days. I was moved back to Otay Mesa Detention Center for about one month. Then, I was transferred again, to Winn Louisiana, where I spent about two months. In early February 2025, I was transferred to El Paso Processing Center in El Paso, Texas, where I am currently detained.
5. 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.
6. During one of the periods that I was detained in Otay Mesa Detention Center, I was questioned by three ICE officials from an anti-gang division. They took my phone and went through my WhatsApp, Facebook, and photos. I have a lot of friends on Facebook and would accept friend requests from anyone. These ICE officials told me that my Facebook friends were proof that I was a gang member. But I have never been involved with any gang, and I have no criminal record.
7. I am afraid of being transferred to Guantánamo. I believe that I am at risk of being transferred because I have a third-country removal order and am from Venezuela. I also believe that I am going to be transferred to Guantánamo because I have tattoos and have been erroneously accused of being a gang member.
8. 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.

10. I suffer from chronic migraines, and I fear that I would not receive adequate medical care if transferred to or detained at Guantánamo.
11. 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 20th of February, 2025 in El Paso, Texas.

Alejandro

Alejandro Jose Pulido Castellano

**CERTIFICATE OF TRANSLATION**

I, Julia Randolph, certify that I am fluent in both English and Spanish. On February 20, 2025, I personally spoke with Alejandro Jose Pulido Castellano and read the foregoing declaration to him, translated into Spanish faithfully and accurately. Mr. Pulido Castellano 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 be "Julia Randolph", is written over a horizontal line.