

### **DECLARATION OF RAFAEL ANGEL LOPEZ OCON**

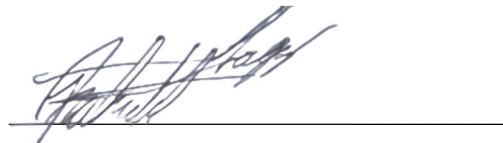
I, Rafael Angel Lopez Ocon, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

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 Rafael Angel Lopez Ocon. I am a named Plaintiff in this lawsuit challenging the government's use of the military base at Guantánamo Bay, Cuba, to detain noncitizens like myself.
3. I was detained at Guantánamo from around May 22, 2025, to June 5, 2025.
4. Guantánamo was much worse than any other detention center where I have been detained in the United States. It felt like an abandoned prison, designed for people who are very dangerous. We had to be inside all the time, and I felt very disoriented. The officers wouldn't tell us anything about what would happen to us or when we would be able to leave Guantánamo. The cell I was held in was very dirty, with dirt and hair everywhere. There was a stain on the floor that looked like blood. When I arrived, I was given a pillowcase that was dirty with blood, and when I asked to change it, the guard took the pillowcase away and never gave me a new pillowcase. They made us wear dirty clothes even after we showered. In fifteen days, I was only given change of clothes two times.
5. On Thursday, June 5, 2025, I was deported from Guantánamo to Nicaragua.
6. I was deported on a plane with 12 other Nicaraguans who were also detained at Guantánamo. When we boarded the plane, there were about 250 other people on the plane, both men and women. I was handcuffed and shackled by my ankles and waist.
7. I am scared in Nicaragua. I had been seeking asylum in the United States but the immigration judge had denied my application. As I previously explained, I was not able to file an appeal of my asylum denial before I was moved to Guantánamo. Because I did not receive information on how to contact an attorney at Guantánamo, I did not speak to one until the week before I was deported. I was working with a pro bono immigration attorney to help me file an appeal of my removal order. However, I was deported to Nicaragua the same day that my appeal was filed, even though it was still within 30 days of my removal order.
8. After the plane landed, I was taken into custody by Nicaraguan police and detained and questioned for several hours. I had to provide them with the address of where I was staying in Managua that night, and an officer accompanied me on the bus to the address and took a picture of me there.
9. I am scared police will come and search for me and detain me again. The police have been monitoring me since I arrived. I am also scared that I may be a target for violence because I was deported from the United States.

10. I am participating in this lawsuit because I do not believe the U.S. government should be detaining any immigrants like me at Guantánamo because it is a horrible place where immigrants are treated like criminals or terrorists and are isolated from the world.
11. I understand that as a class representative in this case, I would represent people who are currently in detention at Guantánamo, as well as people that will be detained at Guantánamo in the future.
12. I understand that, as a class representative, I represent the interests of all class members in this lawsuit and that it is my responsibility to represent the interests of each class as a whole and not just my own personal interests.
13. I understand that my duty to be a class representative continues until the Court decides this case is no longer a class action, or the case is over.
14. I understand and accept that any resolution of the lawsuit, for example by settlement and dismissal, is subject to Court approval and must be in the best interests of each class as a whole.
15. I understand that, by agreeing to become a class representative, I have a duty to take steps to help move the case forward, which I will do with my attorneys. I know that I must attend court if necessary; provide information to my attorneys that they feel is necessary for the case; give them documents I have if it is required; testify at a deposition or trial if necessary; and provide my attorneys with my contact information and current whereabouts because it may be necessary for them to contact me on short notice.
16. I understand that I am volunteering to represent many other detained persons with similar claims against the government's use of Guantánamo for detaining immigrants. I believe it is important that people in my situation not be sent to Guantánamo.
17. This declaration was read back to me in Spanish, a language in which I am fluent.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on the 6th of August of 2025 in Managua, Nicaragua.

A handwritten signature in dark ink, appearing to read 'Rafael Angel Lopez Ocon', is written over a horizontal line.

Rafael Angel Lopez Ocon

### ATTESTATION AND CERTIFICATE OF TRANSLATION

I, Megan Hauptman, certify that I am fluent in both English and Spanish. On August 6, 2025, I personally spoke with Rafael Angel Lopez Ocon and read the foregoing declaration to him, translated into Spanish faithfully and accurately, over the phone. Rafael Angel Lopez Ocon 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.



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