

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISCTRICT OF MISSISSIPPI

CARMONA SANCHEZ)	
)	
)	
PETITIONERS)	
)	
v.)	
)	Case No. 26-cv-46-DCB-BWR
VERGARA, ET AL)	
)	
RESPONDENTS)	

DECLARATION OF WILLIAM M. SAUNDERS

I, William M. Saunders, declare under penalty of perjury the following:

1. I am employed as an Assistant Field Office Director (AFOD) with the United States Department of Homeland Security (DHS), United States Immigration and Customs Enforcement (ICE), Enforcement and Removal Operations (ERO) in the New Orleans Field Office with a duty station in Oakdale, Louisiana. I have held this position since July 2025.
2. I have prepared this declaration at the request of the U.S. Department of Justice, the United States Attorney’s Office, Southern District of Mississippi, in connection with a petition for a writ of habeas corpus and motion for temporary restraining order filed by Sabrina Aylen Carmona Sanchez (Petitioner), who has been assigned the alien registration number A [REDACTED]. This declaration is based upon knowledge and information obtained from various records and systems maintained by DHS in the regular course of business. I provide this declaration based on the best of my knowledge, information, belief, and reasonable inquiry for the above captioned case.
3. I have reviewed the file and ICE computer databases for Petitioner, and unless otherwise stated herein, this declaration is based on that review.
4. Petitioner is a native and citizen of Ecuador, born on [REDACTED].
5. On or about January 5, 2026, Petitioner came into ICE custody following Petitioner’s arrest by Nassau County, New York Police Department for N.Y. Penal Law [REDACTED]. During this encounter with ICE, Petitioner represented themselves as a female.

RESPONDENT'S EXHIBIT A

6. On January 6, 2026, while Petitioner was in transit to Louisiana, ICE medical personnel learned that Petitioner is [REDACTED]. Based upon this assessment, ICE placed Petitioner in a male facility per ICE policy regarding housing of males in male facilities.
7. Once Petitioner arrived in the New Orleans area of responsibility, Petitioner was placed in the Adams County Correctional Center on January 6, 2026.
8. Upon arrival at Adams County Correctional Center, Petitioner was placed in protective custody until such time that an assessment of Petitioner's detention housing arrangements could be conducted. On January 7, 2026, an assessment was conducted per ICE policy, at which time it was determined that Petitioner could be placed in general population. During this assessment, Petitioner did not express any concerns about being housed with male individuals.
9. Aliens in ICE custody are advised to inform any employee at their facility of safety concerns so that they can be removed from general population for their protection. To date, there is no indication that Petitioner has raised any such concerns.

I hereby declare under penalty of perjury that the above statements are true and correct to the best of my knowledge and belief.

March 6, 2026
Executed of this Date

WILLIAM M SAUNDERS Digitally signed by
WILLIAM M SAUNDERS
Date: 2026.03.06
14:12:35 -06'00'

William M. Saunders
Assistant Field Office Director
DHS/ICE/ERO
Oakdale, LA