

DECLARATION OF MARIA PACHECO VASQUEZ

I, MARIA PACHECO VASQUEZ, pursuant to 28 U.S.C. § 1746, declare as follows:

1. My name is Maria Pacheco Vasquez, and I am 32 years old. I am a naturalized United States citizen.
2. I am married to Filemon Pacheco Rosario. He is 34 years old. We have lived in Albion, New York since 2011, and Filemon has lived in the United States since 2009. I work as a Spanish interpreter for a health clinic, and my husband works in the construction industry. We have three children, ages thirteen, ten, and nine. All of our children are United States citizens. Our family is Latino.
3. On January 8, 2026, after our children returned home from school, my husband and I drove with them to Batavia, New York to go shopping. After we finished shopping, we stopped at a gas station in Elba, New York to buy gas before heading home to have dinner, help our children with their homework, and put them to bed.
4. We drove a car that is registered under my name. My husband was driving. I was in the passenger seat, and our three children were in the back seat.
5. At the gas station, no one exited the car other than my husband to pump gas. Soon after he reentered the car and we drove off to head home, cars suddenly emerged behind us with flashing lights.
6. My husband pulled over, and three unmarked cars stopped behind us. Multiple agents stepped out of the vehicle. Three men came to the driver's side and three came to the passenger's side. The agents were dressed in plainclothes and were wearing bulletproof vests.

7. My husband and I rolled our windows down. One of the agents on the driver's side of the vehicle asked my husband for his identification. He handed them his New York State driver's license, which is active and valid. My husband asked if he had violated a traffic law and that is why he was stopped, and the agent said no. The agent never ran my husband's driver's license and remained beside his window during the entire interaction. The agent told my husband they were looking for him and that his driver's license photo matched a list of people that they had. I was confused because this sounded very vague the agents did not say what this list was and they did not provide any indication that they knew my husband's name before he handed them his license.
8. One of the agents then asked my husband if he had legal status. He told them that he had work authorization. The officers said that work authorization does not mean that he had legal status. They asked what country he is from and he said Mexico.
9. I began asking the officers whether they had a warrant. I told them there was no reason for them to arrest my husband without a warrant. At first, they ignored my questions, so I repeated my ask that they display a warrant. One officer eventually dismissed me by saying, "we're not talking to you!" No one ever produced a warrant.
10. The agents then told my husband to exit the car and he complied. Our children and I watched as the officers then immediately placed my husband in handcuffs and put him into their car. He did not resist arrest. My children were terrified and started to cry. I was also scared—I got out of the car and tried to speak to the agents. I did not want them to hurt my husband or my children. My children and I then watched the agents drive away with my husband

11. None of the agents explained why they pulled us over or why they arrested my husband.

They did not ask him any questions about his family, his job, or anything else related to his ties to our community.

12. As the agents arrested my husband, I felt stunned and scared. Prior to the arrest, my husband had been going to immigration court, has valid work authorization, and has a valid New York State license. I don't understand why he was arrested, and it's heartbreaking that it happened in front of our three young children.

13. Around an hour and a half after the agents arrested my husband, he called me. He said he was not exactly sure where he was because the windows of the car they drove him in were so heavily tinted. But he had asked one of the agents where he was, and they told him that he was in an office in Batavia.

14. My husband was detained at an immigration detention center Batavia for a month and a half. His detention devastated my family. Our children did not want to eat or go to school. They missed their father and constantly asked about his wellbeing and when he would be coming home. My husband has always played an active role in our children's lives—he takes them to soccer practice, does our daughters' hair every day before school, and we eat dinner as a family every night—and we all felt his absence acutely.

15. My husband was released from the Batavia immigration detention center on February 24, 2026 after a federal court ordered that he receive a bond hearing. Although the immigration judge did not order him to wear an ankle monitor, ICE put one on him upon his release.

16. My husband described to me that immigration detention was extremely cold. He spent many days in a small, crowded gym with other men who all had to share one bathroom

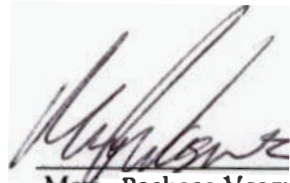
with no door. He told me that for weeks, he did not have a bed and was not permitted to regularly shower.

17. Since returning home, my husband does not like speaking about his detention because of the pain of the experience. He frequently experiences anxiety attacks and often has bad sweats and intense heart palpitations. He never had these symptoms prior to his detention.
18. We are afraid that he may be again stopped and detained. My husband still goes to work, drives our daughters to soccer practice, and goes grocery shopping. I am nervous for his safety every time he leaves the house. We have an acquaintance from Niagara County, New York who was held in immigration detention, released, then re-detained less than two weeks later. I do not want my husband to similarly be arrested and sent back to immigration detention.

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

Albion, New York

Executed on March 31, 2026.



Maria Pacheco Vasquez