

DECLARATION OF ALEJANDRO VERA ANGEL

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

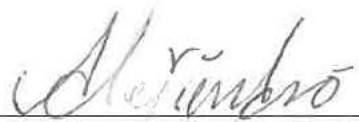
1. I make this declaration based on my own personal knowledge.
2. I am 47 years old and am originally from Mexico. I have lived in the United States for more than 20 years. I came to the United States in 2004, and have lived in New York since then.
3. I currently live in Staten Island with my partner, the mother of my son, and our son.
4. I work in construction and use the earnings from my job to support my family.
5. The day of February 11, 2026, began like any other. I was driving home from work around 5:00 p.m. when my life was changed forever. About 15 minutes after leaving work, I approached an intersection when another car cut in front of me, flashed its lights, and blocked me from driving forward. Two other cars quickly pulled up behind me to block me from backing up. All of the cars were unmarked and looked like regular cars you would see driving on the street. The cars definitely didn't look like police vehicles, and they didn't use any sirens.
6. Two men quickly got out of the vehicles and approached my car. One of the men came up to my door, grabbed the door handle, and forcibly opened the door. The other man did the same to my passenger-side door. I had not even been able to put the car in "park" position or bring it to a complete stop before the men ripped open my car doors. I pleaded with the men to let me stop my car but by that time they had already opened my car doors.

7. Other unmarked cars soon arrived as well and there ended up being about eight-to-ten men who surrounded my car. I was terrified. The man who had opened my driver's side door shouted at me to get out of the car.
8. The men didn't identify themselves to me, and never said if they were police or not. They shouted at me in English and grabbed me out of my car.
9. After I was out of my car, one of the men asked for my driver's license which I gave to him. The man asked me if I "was illegal," which I did not answer. That didn't matter to the men, who I learned were ICE agents, as they arrested me anyway.
10. The ICE agents never asked for my name or anything else, and they never explained to me why I was being arrested.
11. The men did not show me a warrant or any paper explaining why they had stopped me or were arresting me. One of the men held his phone up to my face and took a picture of me. I was still wearing my work clothes from my construction job. I don't think the agents were looking for a criminal, because if they had been, they would have seen that I have not committed any crimes when they took my license from me.
12. After the agents had placed me in handcuffs, they again asked about my status. I said that I was from Mexico and have been living in the United States for more than 20 years. I told them that I was working in construction and used to work in restaurants.
13. The agents then took me to 26 Federal Plaza in Manhattan, where I spent the night. While there, all of my property was taken from me, including my cell phone, my bank card, and my ID. It wasn't until after I was released from detention because of a habeas petition that my lawyer was able to retrieve my property for me. I worry about other people who

have been arrested by ICE who are never released or who don't have lawyers, as I think they might never get their property back after they are arrested.

14. Being arrested by ICE was a terrifying experience. I haven't committed any crimes, was driving the speed limit, and was just trying to return home after a day of hard work. I don't think ICE knew who I was when they stopped me, and think that they might have followed me from work or stopped me because of the way I look. I think ICE targets Latinos and people who look like me, even if they have no reason to believe we are undocumented.
15. I believe ICE's actions when they pulled their cars in front of mine and surrounded me were unsafe and dangerous to me and other drivers. It was terrifying to be stopped by men in plainclothes who came out of unmarked vehicles, and to have my car doors ripped open by them before I could even bring my car to a complete stop.

DATE: March 26, 2026

A handwritten signature in cursive script, appearing to read "Alejandro", written over a horizontal line.

Alejandro Vera Angel