

Declaration of F.R.P.

1. My name is **F.R.P.** . I want to continue with my initials F.R.P.
2. I am 63 years old. I am a Latino.
3. I have lived in Buffalo, New York since 2025.
4. I have never had any contact with law enforcement. Prior to this incident, I had never been arrested. We entered the U.S. with a tourist visa and then we applied for asylum. We did not have any contact with ICE or CBP prior to this.
5. I have two children, a nineteen-year-old daughter and a twenty-eight-year-old daughter.
6. When I first got to Buffalo, I worked for a housekeeping company. I have a valid work permit. I was able to return to this job after I was released from detention.
7. On January 24, 2026, at around 6:00 p.m., I drove with my wife to buy ingredients for a soup because a storm was coming. We were at a local Walmart on Walden where we often shopped. We left the store and were chatting. We were not dressed in work clothing, just our normal jackets. I saw a red car with its headlights on. The red car was in a parking spot behind our car. The lights illuminated the back of our car.
8. My wife and I were speaking in Spanish.
9. I saw a man run out of the red car. He ran towards us. He had his hand on the gun at his waist, it made me feel like he was about to take it out and point it at us at any moment. He pulled out a badge. He shouted, "immigration immigration, let me see your papers" in English.
10. I could see that my wife was very scared. I presented my work permit, my Social Security card, and my driver license (it was a REAL ID from Florida) and my wife presented her work permit, her Social Security Card, and a non-driver's REAL ID. I did not run because

I knew that all of my documents were valid. As soon as we handed over our documents, and without looking at our documents, the officer told my wife and me that we were detained and not to make a scene.

11. Our car is registered to our eldest daughter and has valid Florida license plates. Our car is a blue Hyundai sedan with four doors. It is a very normal car. To my knowledge, the car has never received any tickets or been involved in any criminal activity. It was also properly parked in a handicap spot with our handicap sign clearly displayed. I have a medical condition that qualifies me for a handicap plaque. In the Walmart parking lot, there were a lot of people walking around. We were the only Latinos that I saw. I saw many white people pass by and the agent ignored them.
12. My wife and I stood with the agent in front of our car while the officer held our papers and spoke on a radio device in English. He told my wife and me that we were "illegal." I tried to tell him that we had valid employment authorization. I called my younger daughter, who speaks English fluently. The officer spoke with her. It is my understanding that our daughter asked the officer why he had detained us and if he had a warrant for our arrest. The officer told her that he did not need a warrant to arrest us, and that he was going to create a warrant once he took us to his office. I could hear her crying. The officer did not read us our rights.
13. Approximately three minutes after we were initially stopped, a second officer arrived in a green and white prison-style van. This officer spoke Spanish. He was wearing what looked to me like military green uniform. He also had a gun in his belt. Upon his arrival, the initial officer gave him our documents. The second officer told my wife and me to sit in his van. He asked us where we were from, when we came to the United States, and

how we got here. He did not ask about our family here, about what work we do, or about any connections we have to the community in Buffalo. We told the Spanish speaking officer that we were in the process of seeking asylum, and that we had work permits and Social Security cards. The Spanish speaking officer said that our documents weren't valid, and that they didn't give us any valid legal status. He told me that if we did not commit any crimes and we were legal, he would let us go. This agent told us that we had to go to the immigration office with him.

14. The agents never identified themselves or asked me any questions about my life in the U.S. before putting us into the van.

15. After approximately thirty minutes, we were taken to what seemed to be a jail in Buffalo. I was kept there for three days: Saturday, Sunday, and Monday. The officers at the jail said that we crossed the river illegally. I told them no and that I entered with a visa and that I had applied for asylum. They didn't believe me. They said that if we didn't commit any crimes they would let us go. When I tried to explain that we were legal, they pretended to not understand Spanish anymore.

16. After the questioning they put us into a cell. I told them that they had to put the two of us together because my wife has had nervous panic attacks and would faint so I needed to be around to protect and care for her. Thankfully they agreed, and kept us together there, in a cell by ourselves.

17. On Monday, I was sent to Batavia. My wife spent another few days there, and then was sent to a jail for women, and from there to Louisiana.

18. I was in Batavia for around 25 days. I have thyroid problems and I needed my medication daily or I could die. I told this to a guard, but he told me, "I don't care." I was told that if

I signed for voluntary departure then they would give me my medication. They threatened me with solitary confinement. For four days they did not give me my medication because I did not sign. They did not let me shower, brush my teeth, and they would not give me water. When I asked for water, they told me to drink from the toilet in my cell. Because I was not allowed to shower, I began to have bad body odor. When they served us oranges to eat, I would rub the orange peels on my underarms to try to combat the bad body odor. They also would not let me sleep. They would make noise outside my door at 1:00 a.m. On the fourth day, they allowed me to have one call. I called my cousin. After, I signed a document that was for me to get my pills. Then they gave me my medication the next day. I didn't see a doctor until days later.

19. I was released on a \$10,000 bond on February 18, 2026, with an ankle monitor and with ICE check-ins.

20. I returned to my home. I still have an ankle monitor. It prevents me from sleeping because it goes off and says that I need to charge it. I have had two in-person check-ins with ICE. My next check-in will be on June 24, 2026.

21. I still have heart and chest pains to this day from my time in detention. My health has worsened a lot. Because I do not have money for health insurance, I have not been able to get medical treatment.

22. Since returning home, I am extremely anxious that I will be targeted by immigration officials again. I am scared to leave the house. I try only to leave the house to go to and from my job, from Monday through Friday. My wife and I also take our youngest to and from her job, where her days and hours are varied. When my wife and I do have to go shopping, we now go to a different Walmart, not the Walmart where we were arrested. I

am too nervous to return to the Walmart where we were arrested, even though it is closer to our home.

23. We used to go to church regularly, but we stopped going to church after this arrest because we heard people are getting arrested in the church parking lot.

24. I do drive to see my mother, who is elderly. She lives about a 15-20 minute drive from our home. It makes me anxious to be out driving to see her, but I have to see her since she is elderly.

25. Since returning home, we have seen other people get arrested. For instance, we saw a Hispanic looking man with a construction vest getting arrested in a McDonald's parking lot.

26. I understand that in filing this lawsuit, I am seeking to be a class representative for other people who are or will be in a similar situation to me. If this case is certified as a class action, I am willing and able to represent the class and its interests, with the help of my lawyers.

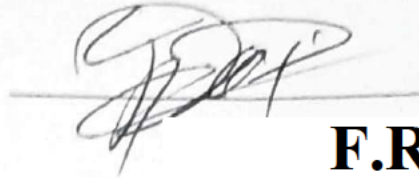
27. I would like to use the initials F.R.P. as my name throughout this lawsuit. I am working to seek immigration relief. I am afraid of retaliation towards me if my identity were to become public due to my participation in this lawsuit. I am afraid I will be retaliated against and harassed by members of the public on social media given recent reports about people harassing noncitizens online.

28. This declaration was read to me in full in Spanish, the language I understand best on April 3, 2026, by Hasan Shafiqullah. I completely understand the content of this declaration.

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

Buffalo, New York

Executed on 04/03/26
Date

A handwritten signature in black ink, appearing to be "J. P. P.", written over a horizontal line.

F.R.P.