

DECLARATION

I, Christopher D. McGregor, make the following statements under oath and subject to the penalty of perjury pursuant to the provision of 28 U.S.C. § 1746 and I declare the following to be based on my personal knowledge, information acquired by me in the course of performing my official duties, information contained in the records of U.S. Immigration and Customs Enforcement (“ICE”), and information supplied to me by current ICE employees:

1. I am currently employed as the Officer in Charge (OIC) with U.S. Department of Homeland Security (DHS), ICE, Enforcement and Removal Operations (ERO). I am assigned to the Eloy Detention Center (EDC), located in Eloy, Arizona. At the EDC, I manage ERO personnel and provide oversight of ICE operations in the facility. I have been employed by DHS since 2008. I served as the Assistant Officer in Charge at the EDC from June 2020 to May 16, 2021, when I began serving as the Acting Officer in Charge. I officially began my duties as the OIC on October 9, 2021.
2. As an OIC, I am responsible for the supervision and oversight of ERO operations, including detention and removal of noncitizens, at the EDC and the La Palma Correctional Center (LPCC). As part of my duties described above, I am familiar with the ENFORCE Alien Removal Module (EARM) which provides information on the housing location, classification level, encounters, and administrative charges of ICE detainees.
3. All of the subsequent information provided on Plaintiffs comes from a review of their records in EARM.
4. A review of EARM shows that Plaintiffs Wilbur P.G., Erendira C.M., Joshua G.G., and Karl G.G. were all held at ICE detention facilities on varying dates in 2018. At no point were Plaintiffs Wilfredo P.E. and Yasmin M.C. housed in ICE facilities.
5. Plaintiff Wilbur P.G. was transferred from U.S. Customs and Border Protection (“CBP”) custody into ICE custody at the Florence Staging Facility (“FSF”) in Florence, Arizona on June 02, 2018.
6. Plaintiff Wilbur P.G. remained at the FSF until June 6, 2018, when he was transferred to the EDC, where he remained until his release on July 20, 2018.
7. Plaintiff Erendira C.M. was transferred from CBP custody into ICE custody at the FSF on May 22, 2018, before being transferred to the Santa Cruz County Jail in Nogales, Arizona on the same day.
8. Plaintiff Erendira C.M. was released back to the FSF on May 23, 2018, and transferred to Irwin County Detention Center in Ocilla, Georgia the following day.
9. On July 20, 2018, Plaintiff Erendira C.M. was transferred to the Port Isabel Detention Center in Los Fresnos, Texas where she remained until her release on July 25, 2018.
10. Plaintiff Joshua G.G. was transferred from CBP custody into ICE custody at the FSF on May 29, 2018.
11. On June 2, 2018, Plaintiff Joshua G.G. was transferred to the Pine Prairie Processing Center in Pine Prairie, Louisiana, where he remained until he was transferred to the Alexandria Staging Facility in Alexandria, Louisiana on July 17, 2018.
12. The following day on July 18, 2018, Plaintiff Joshua G.G. was transferred to the EDC.

13. Plaintiff Joshua G.G. was processed through Phoenix District Office on July 24, 2018, before being transported to the Karnes County Residential Facility in Karnes City, Texas where he arrived on July 26, 2018.
14. Plaintiff Joshua G.G. was reunited with his minor child Karl G.G. at the Karnes County Residential Facility on July 26, 2018, and they remained there until their release on August 14, 2018.

This declaration comprises two pages, including this one. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on this 4<sup>th</sup> day of January 2022.

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Christopher D. McGregor