

Exhibit O

Declaration of Kara S. Narberes

I, Kara S. Narberes, declare under penalty of perjury under the law of the United States of America pursuant to 28 U.S.C. §1746 that the following is true and correct to the best of my knowledge and belief:

1. I am a paralegal at the American Civil Liberties Union of Colorado, counsel of record in this action for all Plaintiffs. I make this declaration in support of Plaintiffs' Status Report and Notice of Noncompliance. I have personal knowledge of the following facts, and, if called as a witness, I could testify competently thereto.

2. As a part of my job, I have been tasked with searching the U.S. Immigration and Customs Enforcement Online Detainee Locator System ("ICE Locator") for the subjects of the I-213 Forms produced to our office by Defendants pursuant to the Court's November 25, 2025 Order (ECF No. 49) and the Court's May 12, 2026 Order (ECF No. 112).

3. The ICE Locator search page can be accessed at this link (<https://locator.ice.gov/odls/#/search>) and requires you to know either the person's A-Number and Country of Birth, or the person's First and Last Name and Country of Birth, in order to initiate a search.

4. A search in the ICE Locator can yield three different results:

- a. Search results in "zero (0) matching records."
- b. Confirmation that the person is "In ICE Custody" but the "Current Detention Facility" field prompts you to "Call ICE For Details." The link embedded in "Call ICE for Details" takes you to a page that provides the corresponding "ERO Office Information."
- c. Confirmation the person is "In ICE Custody" and the "Current Detention Facility" field is filled in, identifying the detention center the person is being held in.

5. I understand that results that return in category (a) above, "zero (0) matching records" means that the person is no longer in ICE custody. Unless the person was released back in the community, it means that the person has been removed from the United States.

6. On August 26, 2026, I used the A-numbers and Country of Origin provided on the I-213 Forms to search for each person, for whom Defendants produced documents

since the Court's May 12, 2026 Order (ECF 112), in the ICE Locator. Only 10 people are still detained at the Aurora Detention Center.

- D.R.M. : REDACTED , Honduras
- S.N. : REDACTED , Venezuela
- G.F.F. : REDACTED , Mexico
- G.B.R. : REDACTED , Mexico
- D.B.D.J. : REDACTED , Mexico
- R.O.D.L.G. : REDACTED , Guatemala
- Y.J.C.A. : REDACTED , Venezuela
- J.D.S.A. : REDACTED , Honduras
- K.A.M.M. : REDACTED , Venezuela
- J.H.D.B. : REDACTED , Mexico

7. After the Court's May 12, 2026 Order (ECF 112), where Plaintiffs' Counsel had a good-faith basis that arrests were not targeted arrests (Category (c)), they requested "the Form I-213s and the associated administrative warrants and notices to appear" for those people. Additionally, pursuant to paragraph 12 of the Court's May 12, 2026 Order (ECF 112), Defendants should have produced the above listed documents for each warrantless arrest (Category (a)) and each arrest pursuant to a "field warrant" (Category (b)) on a monthly basis. There are a significant number of documents missing that should have been produced for each category.

8. On May 15, 2026, Plaintiffs' Counsel requested documents for the following individuals based on a good-faith basis that their arrests were not targeted arrests. To this day, Plaintiffs' Counsel has not received any documents for these people the majority of whom Defendants' Counsel identified as being arrested pursuant to "warrant[s] issued after [the] encounter began."

- REDACTED : REDACTED
- REDACTED : REDACTED
- REDACTED : REDACTED
- REDACTED : REDACTED
- REDACTED : REDACTED
- REDACTED : REDACTED
- REDACTED : REDACTED
- REDACTED : REDACTED
- REDACTED : REDACTED
- REDACTED : REDACTED

9. Furthermore, Plaintiffs' Counsel has requested documents for the following individuals based on a good-faith basis that their arrests were not targeted arrests, and Defendants have only produced a portion of the required documents.

- REDACTED : REDACTED (no I-200)
- REDACTED : REDACTED (no I-200)
- REDACTED : REDACTED (no I-200 or NTA)
- REDACTED : REDACTED (no I-200)
- REDACTED : REDACTED (no NTA)
- REDACTED : REDACTED (no I-200 or NTA)
- REDACTED : REDACTED (no I-200)
- REDACTED : REDACTED (no I-200 or NTA)

10. Lastly, Defendants have not produced full sets of documents for many individuals that they have identified as either Category (a) or Category (b) arrests. Plaintiffs' Counsel has not received full document sets for the following people:

- REDACTED : REDACTED (no I-200)
- REDACTED : REDACTED (no NTA)
- REDACTED : REDACTED (no NTA)
- REDACTED : REDACTED (no I-200)
- REDACTED : REDACTED (no documents)
- REDACTED : REDACTED (no I-200 or NTA)
- REDACTED : REDACTED (no I-200 or NTA)
- REDACTED : REDACTED (no I-200 or NTA)
- REDACTED : 2REDACTED (no I-200)
- REDACTED : REDACTED (no I-200)
- REDACTED : REDACTED (no I-200 or NTA)
- REDACTED : REDACTED (no NTA)

Dated: August 26, 2026

/s/ Kara S. Narberes

Kara S. Narberes