

LEANNE HIGHTOWER ATTORNEY AFFIRMATION:
ATTORNEY OF RECORD FOR R.M.M.

I, Leanne Hightower, declare under penalty of perjury 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 the Director of Immigration at Barringer Law Firm in Greenwood Village, Colorado. I also volunteer with the Rocky Mountain Immigrant Advocacy Network (“RMIAN”), a nonprofit legal services provider that represents detained noncitizens before the Aurora Immigration Court in Colorado. I represent R.M.M. in his bond and removal proceedings. R.M.M. is currently detained at the Immigration and Customs Enforcement (“ICE”) Aurora Contract Detention Facility (“Aurora facility”), which is owned and operated by GEO Group, Inc.
2. R.M.M. is citizen of Venezuela who entered the United States at or near Eagle Pass, Texas in around 2023. He was born in 2000.
3. R.M.M. is married and has two children ages six and four years old. His wife and children live in Aurora, Colorado. R.M.M.’s wife is also seeking relief from removal before the Denver Immigration Court through an application for asylum. R.M.M. and his wife hoped to find safety and stability for their family in the United States.
4. R.M.M. is extremely afraid to return to Venezuela. He fled because the Tren De Aragua gang murdered his wife’s father and uncle, and he fears that Tren De Aragua will also murder him and his wife or children. R.M.M. protested against the Maduro regime and has been harmed by groups aligned with the regime.
5. On April 11, 2025, ICE filed a heavily redacted Form I-213 in R.M.M.’s bond case stating that “Subject has been identified as an Associate/Active of Tren de Aragua,” that R.M.M. was “believed to be an associate of TdA,” and that R.M.M. was a “known member of the Venezuelan gang Tren de Aragua.”
6. As sole basis for these allegations in the Form I-213, ICE describes their arrest of R.M.M. ICE reports that on March 1, 2025, ICE Enforcement and Removal Operations Denver Field Operations Unit was conducting surveillance at the address of an individual allegedly “named in a Tren de Aragua investigation.” That individual was not R.M.M.. During that surveillance, ICE reports that they observed a person of interest leave the address and “approach four Hispanic males that were standing outside their vehicles” and “determined to be Venezuelan nationals and amenable to removal.” One of these four men was R.M.M. R.M.M. denies any connection to the person of interest. R.M.M. had simply driven to the location with friends to meet a prospective buyer for his vehicle, at a public meeting spot chosen by the buyer. R.M.M. had no knowledge of the ongoing surveillance or any investigation and had no involvement in any criminal activity.
7. The Form I-213 also describes the search of a black Jeep that was not R.M.M.’s car, and a motel room; in the I-213, ICE identifies other people as the owners and occupants of

the vehicles and as the guest at the motel room. R.M.M. denies any connection to any of the locations searched; he had arrived to a parking lot simply to sell his car. No criminal charges were filed against R.M.M.

8. Since his arrest by ICE, R.M.M. has been detained at the Aurora facility. R.M.M. is currently in pending removal proceedings is pursuing asylum, withholding of removal, and protection under the Convention Against Torture based on his fear of persecution and torture if he is returned to Venezuela. He is scheduled for a hearing on May 1, 2025, in the Aurora Immigration Court.
9. R.M.M. and his wife vehemently deny any affiliation with Tren de Aragua and are seeking asylum in the United States, in part, because of past persecution at the hands of Tren de Aragua. R.M.M. has no criminal history or charges against him.
10. R.M.M. has several tattoos for personal reasons, including one of his birth year; another of a family-member's name, and a tattoo of religious significance.
11. Upon information and belief, undersigned counsel believes there were people similarly situated to R.M.M. who were transported from the Aurora facility and removed to El Salvador and incarcerated in El Salvador. As a result, and because of the factors outlined above, I believe R.M.M. is at grave risk that ICE will invoke the Alien Enemies Act against my client.
12. Upon information and belief, undersigned counsel believes that if R.M.M. is placed in custody in the United States or elsewhere with members of Tren de Aragua, based on his family's past persecution by Tren de Aragua, that his safety is in grave danger.

I, Leanne Hightower, swear under penalty of perjury that the forgoing declaration is true and correct to the best of my knowledge and recollection.

/s/ Leanne Hightower

Leanne Hightower, Esq.

Executed this 12th day of April, 2025