

EXHIBIT B

DECLARATION OF MONIQUE R. SHERMAN

I, Monique R. Sherman, 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 Detention Program Managing Attorney at the Rocky Mountain Immigrant Advocacy Network (“RMIAN”), a nonprofit legal services provider that provides access to information and legal counsel for people at the Denver Contract Detention Facility (“Denver facility”), where Immigration and Customs Enforcement (“ICE”) detains people.
2. In 2025, RMIAN staff have met with more than 100 detained Venezuelans, most of whom were apprehended in the community. Most of the individuals with whom RMIAN conducted in-depth interviews were either accused of being part of Tren de Aragua (“TdA”) at the time of their apprehension or were arrested during raids in December 2024, or January and February 2025 and ICE officials subsequently alleged that they are members of TdA. Based on information and belief, at least 11 people currently at the Centro de Confinamiento del Terrorismo (“CECOT”) prison in El Salvador were originally detained in Colorado. Several people who are currently in ICE custody in the Denver facility were apprehended in the same law enforcement actions as some of the men who are now in CECOT and are facing allegations of TdA membership.
3. Named petitioner D.B.U. had immigration proceedings before the Aurora Immigration Court on Thursday, April 17, 2025. Another RMIAN attorney observed that hearing. At that hearing, the immigration judge indicated that ICE had filed a Form I-213 for D.B.U., which is a document prepared by the Department of Homeland Security when they arrest someone. In open court, the immigration judge indicated that ICE suggests that D.B.U. has a gang affiliation. I have reviewed the Form I-213 form for D.B.U. It was filed in Immigration Court on April 16, 2025, and it states that D.B.U. was arrested as part of an operation related to TdA. In public statements, ICE has accused everyone apprehended as part of the operation in which D.B.U. was arrested as being associated with TdA.
4. About 85% of people in ICE custody at the Denver facility, which can hold up to 1,532 people, do not have an attorney. People without counsel are at grave risk of disappearing without anyone realizing that ICE moved them for many days, if not weeks. That is exactly what happened when people were initially taken to CECOT. RMIAN first realized people were transferred to El Salvador only after community members began reaching out to inform us that their loved ones who were previously in the Denver facility were appearing in media footage shot at CECOT.

Executed this 20th day of April 2025.

/s/ Monique R. Sherman

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