

Kary Diaz MARTINEZ

Petitioner,

v.

PATRICIA HYDE, Field Office Director,
MICHAEL KROL, HSI New England Special
Agent in Charge, and TODD LYONS, Acting
Director U.S. Immigrations and Customs
Enforcement, and KRISTI NOEM, U.S. Secretary
of Homeland Security,

Respondents.

Case No. 1:25-cv-11613

I, Annelise M. Jatoba de Araujo do hereby swear and affirm:

2. I am a member in good standing of the Massachusetts bar and immigration counsel for an individual who I shall refer to as Jane Doe 3 to protect her privacy.

4. Pursuant to existing ICE policy at the time of the T Visa filing, ICE granted our request to pause her departure plan, pending the USCIS's adjudication of her T Visa application.

Jane Doe 3 has complied with all necessary check-ins and home visits since she has been under ISAP's supervision.

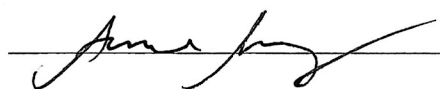
5. Jane Doe 3 received sudden notice from the Intensive Supervision Appearance Program (ISAP) that she was to present herself at ISAP's office, located at 11 Ray Avenue in Burlington, MA. She appeared at ISAP on June 3, 2025, but was turned away. She returned on June 4, 2025 complying with their request and was subsequently detained.

6. She was held overnight at the ICE field office, located at 1000 District Avenue, Burlington, MA on June 4, 2025 and upon information and belief, she remains there currently.

7. She was permitted to call her family and request necessary medication. Initially, her family members went to the ICE office to deliver her medication, but the ICE officers refused to accept it, stating only an attorney could deliver the medication. My associate emailed ICE to confirm this policy but received no response. A friend of the family was later able to deliver the medication, but did not see or speak with Jane Doe 3. Jane Doe 3's family has not had any contact with her since this morning.

8. Portions of this affidavit conveying factual information I learned from communications with my client; no attorney-client protected legal advice is being disclosed.

Signed under the pains and penalties of perjury, this 5th day of June, 2025,


Annelise M.J. de Araujo, Esq.