

EXHIBIT D

GRACE CARNEY SUPPLEMENTAL ATTORNEY AFFIRMATION:

ATTORNEY OF RECORD FOR G.F.F.

I, Grace Carney, 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 a staff attorney Staff Attorney at The Legal Aid Society within the New York Immigrant Family Unity Project. I am the attorney of record for plaintiff G.F.F. in his removal proceedings.

2. I submit this declaration as a supplement to my prior declaration submitted to the Court on March 15, 2025, and on March 19, 2025. My client G.F.F. has relayed to me what happened to him on March 15, 2025 and in the days before and after.

3. At no time on March 14, March 15, or during the preceding days leading to the attempted removals did any officer show or provide G.F.F. with any paperwork explaining the basis for his removal. Likewise, no officer informed him that they were planning to remove him to El Salvador, nor did they provide any notice that he was designated an alien enemy under the Alien Enemies Act. On March 14th, when the government first attempted to remove him, he was told he would go to Mexico or Venezuela, depending on his criminal history, however he was at no point specifically told of his intended destination. G-F-F- was also kept in the dark on March 15th, when the government attempted to remove him a second time. He indicated that he was told only that he was being transferred to Port Isabel Detention Facility, and that even on the plane government officials never confirmed his ultimate destination.

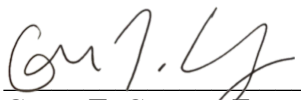
4. These details were once again confirmed by G-F-F- in a follow-up call on March 26, 2025.

5. In my capacity as G-F-F-'s attorney I also took steps to inquire as to his location and intended destination on Friday March 14th and Saturday March 15th. I reached out to both El Valle Detention Facility and ERO on multiple occasions, and was at no point provided with an answer, even upon providing a signed G-28 and copy of the Temporary Restraining Order barring my client's deportation. I was informed on several occasions that G-F-F- was no longer at El Valle Detention Facility, but that they were not allowed to share where he presently was, the purpose of his move, or his intended ultimate destination.

6. G-F-F- has repeatedly denied any connection to Tren del Aragua. It appears from news reports that tattoos have been used as a basis for gang affiliation. G-F-F- tattoos are completely unrelated and have no connection whatsoever to Tren del Aragua. G-F-F- has one tattoo on his right arm of his parents' first names surrounded by flourishes like stars. On his I-213, the tattoo is listed and described as the following: "TATTOO ARM, RIGHT, NONSPECIFIC - TATTOO OF FATHER AND MOTHER FIRST NAMES." The I-213 does not allege the tattoo as a basis for any gang allegation, nor has the tattoo been raised as an issue during the asylum proceedings. DHS has never indicated G-F-F-'s tattoos as a basis for gang affiliation.

I, Grace Carney, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

March 28, 2025
New York, NY


Grace T. Carney, Esq