

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

D.A., T.L., I.O., D.S., and K.S.;

Plaintiffs,

v.

KRISTI NOEM, Secretary of Homeland Security, in her official capacity; TODD LYONS, Acting Director, U.S. Immigration and Customs Enforcement, in his official capacity; PAMELA BONDI, Attorney General, in her official capacity; and MARCO RUBIO, Secretary of State, in his official capacity

Defendants.

Civil Action No. 1:25-cv-03135

DECLARATION OF WIFE OF D.A.

I am over 18 years of age and competent to testify. I hereby swear and affirm that the following is based on my own personal knowledge and is true and correct, and that my testimony, under oath and penalty of perjury, is as follows:

1. I am the wife of one of the Plaintiffs in this lawsuit, D.A. I am afraid to disclose my name because of the threat my husband faces from Nigeria, and that disclosing my name will identify my husband.
2. My last communication with D.A. was around 9:55 AM EDT, today, September 15, 2025. At that time, D.A. and other detainees, including three other Plaintiffs in this lawsuit, T.L., I.O., and D.S., remained at Dema Camp in Ghana. It is my understanding that they remain under threat of immediate removal to their countries of origin, where they face persecution, torture, and death.

3. I have been in communication with my husband via a cellular telephone that he is sharing with the other detainees at Dema Camp.

4. I pay for service for the cellular telephone, which is very expensive—\$3.00 per minute. Since Friday, I have already spent \$100, as all of the detainees share it.

5. D.A. has been able to use the cellular telephone to communicate with me, even though reception is not good and I am not always able to reach him. Sometimes we have been able to communicate using the telephone via the Internet, rather than regular service, which he has been able to access occasionally, at unpredictable times. The Internet communication has been more stable than the regular cellular connection.

6. On the morning of September 15, 2025, D.A. informed me that camp officials would no longer permit him or the other detainees access to the Internet. D.A. informed me that he believes that the officials' decision was motivated by this lawsuit, and the intent was to limit the detainees' ability to communicate with their family members, their attorneys, and anyone else. D.A. has conveyed to me a shift in the guards' demeanor over the past 24 hours. The guards used to occasionally help D.A. and the other detainees, such as by periodically providing Internet access, but now are cold and refuse to help.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: September 15, 2025

/s/ Jane Doe .