

# **EXHIBIT 4**

UNITED STATES DISTRICT COURT  
DISTRICT OF VERMONT

**RÜMEYSA ÖZTÜRK,**  
*Petitioner,*

v.

No. 2:25-cv-00374

**DONALD J. TRUMP,** et al.,  
*Respondents.*

**DECLARATION OF HEATHER YOUNTZ, ESQ.**  
**SUBMITTED IN SUPPORT OF PETITIONER'S MOTION FOR RELEASE UNDER**  
**MAPP v. RENO, OR IN THE ALTERNATIVE, FOR RETURN TO VERMONT AND**  
**PETITIONER'S SUPPLEMENTAL MEMORANDUM OF LAW ON JURISDICTIONAL**  
**ISSUES**

I, Heather Yountz, declare the following under pain and penalty of perjury:

1. I am an attorney licensed to practice in the Commonwealth of Massachusetts.
2. Overall, I have been practicing immigration law for 17 years. I make this declaration based on my personal knowledge and personal observations accumulated over that time period.
3. Since 2021, I have been employed as a Senior Immigration Staff Attorney at the Massachusetts Law Reform Institute. Immediately prior to that, I was an immigration and criminal defense attorney at the firm Demissie & Church for about six years.
4. I have been honored to receive awards based on my work representing detained immigrants and related matters. I was named one of Boston Magazine's Top Lawyers of 2022, 2023 and 2024, and 2018 Top Women of Law by Massachusetts Lawyers Weekly. I have chaired the AILA New England Litigation committee, and given seminars, talks, and served on panels for the American Medical Association, Massachusetts Women's Bar Association, New England

Muslim Bar Association, Boston University Law School, Northeastern University School of Law, Suffolk Law School, Boston College Law School, and many other organizations and groups.

5. Since much of my work has been in deportation defense and the intersection of criminal law and immigration law, I have often spent approximately one day a week in detention facilities operated by U.S. Immigration and Customs Enforcement (“ICE”), including by ICE’s Enforcement and Removal Operations (“ERO”) department. ICE ERO is generally responsible for civil immigration enforcement within the United States, including the identification, arrest, detention, and removal of noncitizens who ICE alleges are subject to removal or unlawfully present in the United States.

6. I have been to ICE Boston Field Office, which is located in Burlington, Massachusetts. The Boston Field Office has administrative and operational authority over ICE arrest, removal, and detention operations in all of New England, including Massachusetts, Connecticut, Maine, New Hampshire, Rhode Island, and Vermont. The scope of this authority is confirmed by ICE’s website entry for the Boston Field Office: <https://www.ice.gov/field-office/boston-field-office>

7. ICE has a another division, called Homeland Security Investigations (“HSI”). HSI conducts federal criminal investigations. In my experience, HSI also gives notice of visa revocations in some cases. HSI’s mission is confirmed on its website: <https://www.ice.gov/about-ice/hsi>

8. I have been to four ICE detention facilities in New England, including the Plymouth County Correctional Facility and the Wyatt Detention Facility, and I have represented clients held at other ICE detention facilities throughout the northeastern United States. I am generally familiar with the use these facilities in the immigration detention and removal process.

9. There are multiple ICE detention facilities in New England and elsewhere in the Northeastern United States that hold women detainees. These include the Stafford County Corrections facility in New Hampshire, Cumberland County Jail in Maine, Chittenden Regional Correctional Facility in Vermont, and the ICE's Buffalo Facility in Batavia, New York. Additionally, for short-term and overnight detention of women detainees, ICE has holding cells in Wyatt Detention Facility and its local offices, including at ICE ERO's Boston Field Office in Burlington, Massachusetts.

10. In my experience, immigrants who are arrested on civil immigration charges in eastern Massachusetts are booked and processed at ICE ERO's Boston Field Office in Burlington, Massachusetts. In my 17 years of practicing immigration law, I cannot recall seeing an immigrant arrested on civil immigration charges in eastern Massachusetts who has not been processed at Burlington before being sent to a detention facility. I have also seen some immigrants arrested in eastern Massachusetts taken to Boston for booking and processing, but my recollection is they were people arrested by either by HSI or by U.S. Customs and Border Protection.

11. In my 17 years of working with hundreds of immigrants in Massachusetts, I have never seen or heard of an immigrant arrested by ICE or HSI taken to Methuen, Massachusetts or to St. Albans, Vermont. I have also never seen an immigrant moved to Methuen, then moved to Lebanon, New Hampshire, and then moved to ICE's local office in St. Albans, Vermont. This is a highly unusual event, especially taking place within a matter of a few hours. According to Google Maps, the drive from Boston to St. Albans, Vermont, is over 240 miles. According to Google Maps, St. Albans, Vermont, is less than 15 miles from the Canadian border.

12. The typical path for immigrants arrested on civil immigration charges in eastern Massachusetts is that they are booked and processed at the Boston Field Office in Burlington.

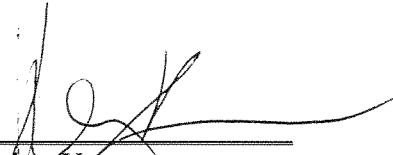
Typically, the booking process takes over an hour and often much longer as the ICE officer typically has multiple questions to ask the immigrant, the immigrant is fingerprinted, the immigrant is served with the NTA, the immigrant's belongings are taken and documented, the immigrant's passport and other immigration paperwork is documented and stored, and other procedures are performed. In most cases, ICE is not required by law to detain noncitizens arrested within the United States on civil immigration charges, and ICE sometimes releases people directly from Burlington. Where ICE chooses to pursue detention, the person is generally held at Burlington and transferred many hours later or the next day to a detention facility such as Plymouth, Wyatt, or Strafford. The detainee may stay at those locations long term, or may be transferred a few days later to a facility elsewhere in the United States. In all of those situations, I observed that the detainees were held in Massachusetts for at least 12 hours (and generally more like 24-48 hours).

13. I have reviewed the Declaration of David Wesling. The procedures described therein for Ms. Ozturk are not consistent with anything I have ever observed in my 17 years of immigration practice. I have never seen or even heard of an immigrant booked in 14 minutes. I have never seen a client transferred twice in the same day. The fastest transfer I recall seeing was 24 hours after initial placement. I do not recall ever seeing a client arrested in Massachusetts be detained in St. Albans, Vermont. I have never seen an F-1 revocation where the noncitizen was arrested and detained on the street, by masked men, with no prior notice that the visa had been revoked. To the best of my memory, in each of the F-1 revocations I have seen, the noncitizens' alleged actions leading to the visa revocation would (if true) have been clearly in violation of the terms of the visa (*e.g.*, the immigrant was no longer attending the listed school, the immigrant had

overstayed the visa). I have never before seen an F-1 visa revoked, and the student arrested without prior notice of the revocation, based on an op-ed published in a school newspaper.

\* \* \*

Executed on April 10, 2025, in Boston, MA.

  
/s/ \_\_\_\_\_  
Heather Yountz