

EXHIBIT 5

UNITED STATES DISTRICT COURT
DISTRICT OF VERMONT

RÜMEYSA ÖZTÜRK,
Petitioner,

v.

No. 2:25-cv-00374

DONALD J. TRUMP, et al.,
Respondents.

Declaration of Margaret Moran, 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, Margaret Moran, do hereby swear and affirm as follows:

1. I am an immigration attorney at New Hampshire Legal Assistance (NHLA) responsible for NHLA's Immigrant Justice Project. I have been practicing immigration law for 13 years and represent NHLA clients in immigration court proceedings in the Boston and Chelmsford Immigration Courts and in appeals or petitions for review therefrom.
2. NHLA is a non-profit law firm that provides free civil legal services to people with low income, including noncitizens. NHLA works on civil cases impacting low-income clients' basic needs.
3. In April 2021, NHLA began providing full representation to people in immigration proceedings, focusing on those apprehended by Immigration and Customs Enforcement (ICE) and detained at the Strafford County House of Corrections in Dover, New Hampshire (Strafford Jail). I have been representing noncitizens in ICE custody at the Strafford Jail since April 2021. Before joining NHLA in April 2021, I worked at Greater Boston Legal Services, where I also represented noncitizens in ICE detention in New England.
4. The Strafford Jail holds men and women in ICE detention. The noncitizens in ICE detention I have met at the Strafford Jail are in a variety of immigration-related postures and have been apprehended by ICE for different reasons. People in ICE detention at the Strafford Jail have included people who have entered or attempted to enter the U.S. on student or visitor visas, pursuant to a visa waiver program, as refugees, without inspection, or on parole, or who are lawful permanent residents or applicants for asylum, withholding of removal or Convention Against Torture protection, etc. The ICE detainee population at the Strafford Jail has included people who have been charged with or convicted of

non-immigration crimes as well as people who have no history with the criminal legal system in the U.S. or elsewhere.

5. During the past four years, I have continuously represented and provided legal consultations for women and men in ICE detention at the Strafford Jail. I have observed that almost all the women and men I have met in ICE detention at the Strafford Jail have been apprehended in Massachusetts and processed for detention at the ICE Enforcement and Removal Operations (ICE ERO) Boston Field Office in Burlington, MA before being transported to the Strafford Jail. Most recently, for example, of the 30 men and women I met with in March 2025 at the Strafford Jail, 29 were residing in Massachusetts before ICE apprehension and were apprehended by ICE in Massachusetts, and one came from Rhode Island.
6. Based on my experience, people apprehended by the Boston ICE ERO Field Office and its sub-offices are processed for detention by ICE at an ICE office, usually the Burlington, MA Field Office, and then transported to a detention facility. When people are brought to the Strafford Jail, for example, ICE has already prepared custody papers and sometimes has already confiscated their personal property and placed it in storage at the ICE office. If anyone is transported to the Strafford Jail who is in possession of their personal property, the Strafford Jail confiscates the property and puts it in storage at the Strafford Jail. People are then processed through the booking process at the jail, including a medical screening and an interview to determine any safety or other issues that might influence where they will be housed at the facility, and held in the Booking Area of the Strafford Jail until taken by jail personnel to the unit where they are to be housed. People are often held in an interim location at the Strafford Jail due to medical protocols or while the facility personnel are relocating people within the facility to accommodate new arrivals. Part of the booking process includes a determination about the appropriate unit to which someone will be taken. These are the typical steps I have observed while at the Strafford Jail and heard of from ICE detainees I have met with.
7. In my years of immigration practice, I have never seen a person arrested in Massachusetts moved to Methuen, Massachusetts, to Lebanon, NH, to St. Albans, VT, all within a span of hours. I have never heard at all of any ICE facility in Methuen, Massachusetts, or of ICE detainees being taken there. Similarly, I am not familiar with any ICE facility in Lebanon, NH, and have never heard of ICE detainees being taken to such a facility. Nor am I aware of detainees from Massachusetts or New Hampshire ever being transported to the ICE Field Office in St. Albans, Vermont.
8. In my work at NHLA, I routinely participate in meetings and collaborate with immigration attorneys in New England who work with other non-profit legal services providers, law school clinics, and private firms providing pro bono or low-cost removal defense. In those meetings, I discuss with other practitioners

the enforcement, detention, and removal operations of ICE and Customs and Border Protection in the region.

9. Based on my conversations and collaboration with other attorneys in New England, I am aware of at least two other facilities in New England that hold or have recently held women in ICE detention. One of these facilities is the Cumberland County Jail in Portland, Maine, and the other is the Chittenden Regional Correctional Facility in Burlington, Vermont.

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

4/10/2025
Date

Margaret Moran
Margaret Moran, Esq.