

EXHIBIT 6

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

RUMEYSA OZTURK

Plaintiffs,

v.

PATRICIA HYDE, *et al.*,

Defendants.

Case No. 2:25-cv-00374

**SUPPLEMENTAL DECLARATION OF
JILL MARTIN DIAZ OF VERMONT
ASYLUM ASSISTANCE PROJECT, (VAAP)
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**

Pursuant to 28 U.S.C. § 1746, I, Jill Martin Diaz, Esq., Executive Director of Vermont Asylum Assistance Project and Part-Time Lecturer at the University of Vermont, declare under penalty of perjury the following:

1. I am Jill Martin Diaz, my pronouns are they/them, and I am an experienced immigration defense attorney licensed to practice in New York (2017), Vermont (2018), and the District of Vermont (2022) and living and working in Burlington, Vermont.
2. I have worked as an immigration defense attorney for about nine years since 2014, my second year of law school, and spent my other two years of legal practice in housing and benefits defense at Vermont Legal Aid. Today, I serve as Executive Director of the Vermont Asylum Assistance Project (VAAP; www.vaapvt.org), Vermont's only nonprofit law firm dedicated to direct immigration legal service delivery and technical assistance.
3. At VAAP, I lead a team of two lawyers, dozens of *pro bono* volunteers, and numerous students focused on providing humanitarian immigration legal services to noncitizens in Vermont, including individuals seeking detained and non-detained removal defense. I also teach immigration service provision as a part-time lecturer in social work at the University of Vermont; direct legal services for Connecting Cultures–New England Survivors of Torture and Trauma (NESTT); serve as an appointed member to the Vermont Judiciary's Access to Justice Coalition and the Vermont Treasurer's Federal Transition Task Force; and co-chair the Vermont Bar Association's Immigration Law Section as well as the Vermont Queer Legal Professionals affinity network.
4. My previous experience includes co-founding and directing the Center for Justice Reform Immigration Clinic; lecturing in doctrinal immigration law at Vermont Law and Graduate School; practicing as a Vermont Poverty Law Fellow at Vermont Legal Aid; practicing as an Immigrant Justice Corps Fellow at Sanctuary for Families New York; and practicing as a student attorney at Brooklyn Defender Services, Immigrant Defense Project, and Atlas:

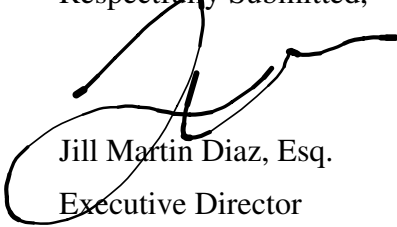
Developing Immigrant Youth. I received my Juris Doctor degree, *cum laude* in 2016 from Brooklyn Law School and my Bachelor of Arts degree, *summa cum laude* in 2008 from the George Washington University.

5. Over my eleven years in the legal profession, my supervisees and I have defended detained and nondetained Vermont and New York respondents in removal proceedings and custody matters in New York, New Jersey, Massachusetts, and Texas Immigration Courts.
6. The St. Albans Office serves as a subordinate office to the ICE Boston Field Office and is where ICE conducts Enforcement and Removal Operations (ERO) including supervision. The St. Albans Office is a small government office in a corporate park and not a detention facility. It lacks normal detention facility amenities like attorney-client meeting space, visitation space, or a telephone system with which detainees can communicate accessibly with loved ones or counsel.
7. Last year, ICE Boston Field Office and St. Albans Office leadership called a meeting with Vermont immigration legal services providers in Burlington, Vermont to introduce us to new management who would be permanently staffing the office. There, I had the chance to personally meet with Boston and St. Albans ICE leadership, solicit their practice preferences and prosecutorial discretion priorities, and exchange contact information to facilitate more efficient resolution of represented parties' immigration custody and removal proceedings. I understood from this engagement and have heard confirmed by numerous supervisees that the St. Albans Office is a small, simple administrative office not suitable for long-term custody and detention.
8. In my experience, noncitizens arrested by ICE in Vermont are processed at the St. Albans ICE Office and may be detained there for a short period of time—generally, hours—before being moved to another detention center in the region. I have only ever seen or heard of ICE detaining immigrants at the St. Albans Immigration and Customs Enforcement (ICE) Office upon their initial arrest in Vermont. I have never previously seen or heard of people from other states being transferred into the St. Albans Office for detention.
9. In my seven years of practicing in Vermont and serving as a local expert on immigration matters, I have seen many cases of noncitizens who are arrested by ICE in Vermont transferred to other states, such as Strafford in New Hampshire or Plymouth in Massachusetts. But I have not seen people detained in other states being transferred by ICE into Vermont, with one exception. That exception involved a recent case of an individual detained on the New York side of Lake Champlain, across from Burlington, Vermont. She was detained at the Chittenden Regional women's facility in Burlington temporarily before being transferred to Louisiana.
10. Last month was the first time I encountered a Vermont resident who had been initially detained in Vermont and then relocated to long-term custody outside of the northeast. That individual was initially moved to the Plymouth facility in Massachusetts and then to a facility in Texas. ICE told us the unusual transfer resulted from an administrative error that flagged that client's case for expeditious removal, even though the client's asylum application on Form I-589 was pending before the Chelmsford Immigration Court.

11. It is extraordinary for a Vermont detainee to be transferred from custody in the northeast to custody outside of the northeast. It is similarly extraordinary for a person to be transferred into a Vermont facility from ICE custody out of state.
12. It is even more extraordinary for a person to be transferred into the St. Albans ICE office, which is not a detention facility. It lacks normal detention facility amenities like attorney-client meeting space, visitation space, or a telephone system with which detainees can communicate accessibly with loved ones or counsel.
13. In my experience, the ICE Detainee Locator does not typically specify a Vermont detainee's location, no matter whether they are at the St. Albans office or at a Vermont Department of Corrections facility such as Chittenden pursuant to a Vermont-U.S. Marshals Service Intergovernmental Service Agreement (IGSA). Instead of a precise facility, the Detainee Locator typically suggests contacting ERO at the St. Albans Office.
14. The example of the asylum seeker who ICE relocated from Vermont to Plymouth, MA to Laredo, TX at Paragraph 10 is my only known example of a detainee whose custody at the St. Albans office was reflected on the Detainee Locator.

WHEREFORE, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed at Washington, D.C. on this 2nd day of April 2025.

Respectfully Submitted,



Jill Martin Diaz, Esq.
Executive Director