

EXHIBIT 7

UNITED STATES DISTRICT COURT
DISTRICT OF VERMONT

RÜMEYSA ÖZTÜRK,
Petitioner,

v.

No. 2:25-cv-00374

DONALD J. TRUMP, et al.,
Respondents.

**Declaration of Brett Stokes, 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, Brett Stokes, declare the following under pain and penalty of perjury:

1. I am an attorney licensed to practice in Vermont and New Mexico.
2. I have been practicing immigration law in the area of removal defense for about 9 years. I previously worked in Colorado but have been practicing in Vermont since July 2022. I am presently the Director of the Center for Justice Reform Clinic at Vermont Law & Graduate School.
3. I am providing this declaration based on my experience as a removal defense practitioner in Vermont since 2022. My declaration is also informed by conversations with immigration practitioners in Vermont and other Northern New England states.
4. I am aware of two primary facilities that Immigration and Customs Enforcement uses to detain noncitizens overnight in Vermont, the Chittenden Regional Correctional Facility and the Northwest State Correctional Facility. Both of these facilities are run by the Vermont Department of Corrections. In my experience, ICE typically uses these facilities to detain noncitizens who are first taken into custody in Vermont or near the Vermont border. ICE detainees typically stay at these facilities for a few days before being transferred to another facility, such as the Plymouth County Correctional Facility in Massachusetts. Chittenden is used to house female ICE detainees, whereas the Northwest State Correctional Facility is used to house male ICE detainees. I have heard but cannot confirm that ICE may also use other Vermont Department of Corrections facilities sometimes.
5. ICE also has a suboffice in St. Albans, Vermont. In my experience, noncitizens who are taken into custody in Vermont are detained at that Field Office location only for the duration of their initial processing. In my experience, after being initially processed in the St. Albans Field Office, noncitizens who were not

released from custody on supervision are then promptly taken to another detention facility, such as one of the Vermont Department of Corrections facilities or the facility in Plymouth, Massachusetts. I have never heard of a detainee arrested in Massachusetts, or any other location not in or very near Vermont, being processed or held at the St. Albans Field Office. And I have never heard of a case in which a detainee has been held overnight at the St. Albans Field Office.

6. The Vermont Department of Corrections facilities are all connected to an online portal where, in my experience, within an hour or so of booking, their location is publicly available at the doc.vermont.gov website. The St. Albans Field Office is the only ICE detention location I am aware of in Vermont where an ICE detainee could be held without their location becoming publicly available via that portal.
7. On three occasions that I can recall, clients that I was already working with have been detained by ICE in Vermont and processed at the St. Albans Field Office. Two of these clients had their phones with them and were permitted to use their phones to call family members while held for processing at the St. Albans Field Office. On those occasions, I was able to learn in real time not only that the client was detained for processing at the St. Albans Field Office, but also the facility to which the client would be taken next. The third client checked into the ICE at the St. Albans Field Office without a phone, was detained, and as far as I am aware did not call anyone from the St. Albans Field Office.
8. I have reviewed the declaration of Acting Deputy Field Office Director David T. Wesling in this case. I have never encountered or heard of a detainee transferred into and out of Vermont in a manner resembling the transfer of Ms. Öztürk. The distance from which Ms. Öztürk was brought to Vermont, the fact that she was processed and held overnight at the Field Office St. Albans rather than being taken to Chittenden, and the speed with which she was transferred into and out of Vermont all make this case highly unusual, in my experience.

Executed on April 10, 2025, in Burlington, VT.



Brett Stokes