

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

JULIO RAMIREZ,)	
)	
Petitioner,)	C.A. No. _____
)	
v.)	
)	
STEVEN W. TOMPKINS,)	
Suffolk County Sheriff,)	
YOLANDA SMITH,)	
Superintendent of the South Bay House)	
of Correction,)	
TODD LYONS,)	
Immigration and Customs Enforcement,)	
Enforcement and Removal Operations,)	
Acting Field Office Director,)	
)	
Respondents.)	
)	
)	

DECLARATION OF JENNIFER VELARDE

I, Jennifer Velarde, declare as follows:

1. I am an attorney licensed to practice in Massachusetts. I have been a member of the Massachusetts bar since 2013. One focus of my practice is the representation of people in various types of immigration proceedings.

2. I currently represent Mr. Julio Ramirez in his removal proceedings, which are pending in the Immigration Court in Boston, Massachusetts. Mr. Ramirez was previously represented in these proceedings, including for his bond hearing, by Attorney Julio Henriquez.

3. My statements herein are based on my review of files relating to Mr. Ramirez’s removal proceedings, and my work as his counsel in those proceedings.

4. According to records prepared by the U.S. Department of Homeland Security (DHS), Mr. Ramirez was arrested by Immigration and Customs Enforcement (ICE) personnel on October 15, 2018, at the Cambridge District Court. A true and accurate copy of the portion of those records describing Mr. Ramirez’s arrest is appended hereto as Exhibit A.¹

¹ All appended documents are redacted as necessary to comply with the Local Rules of the U.S. District Court for the District of Massachusetts.

5. DHS issued a Notice to Appear to Mr. Ramirez on October 15, 2018. A true and accurate copy of this document is appended hereto as Exhibit B.
6. The Immigration Court conducted a bond redetermination hearing for Mr. Ramirez on October 29, 2018. At that hearing, Mr. Ramirez submitted letters of support from Congressman Michael Capuano, Congresswoman-elect Ayanna Pressley, City Council President Andrea Campbell, Community Economic Development Center Executive Director Corinn Williams, Massachusetts Jobs with Justice Co-Executive Director Lily Huang, Building Justice Executive Director Natalicia Tracy, Law Professor Rachel Rosenbloom, and Attorney Thomas Smith. True and accurate copies of these letters are appended hereto as Exhibit C.
7. On November 26, 2018, I obtained an audio recording of Mr. Ramirez's bond hearing, which I have subsequently reviewed. The Immigration Judge required that Mr. Ramirez bear the burden to prove that he was neither dangerous or a flight risk. Based on my belief, DHS's sole argument for detention was that Mr. Ramirez could not prove he is not dangerous because of his pending OUI charge. The Immigration Judge denied bond in an order dated October 29, 2018. A true and accurate copy of that order is appended hereto as Exhibit D. I have noticed a timely appeal of that denial on Mr. Ramirez's behalf.
8. Mr. Ramirez's master calendar hearing in the Immigration Court occurred on November 14, 2018. His hearing for submission of any pleadings was held on November 26, 2018. Another master calendar hearing and hearing for the submission of applications is scheduled for December 3, 2018. Mr. Ramirez intends to apply for Asylum, Withholding of Removal, protection under the Convention Against Torture, and Cancellation of Removal.

Signed under penalties of perjury this 27th day of November 2018.



Jennifer Velarde