

MICHAEL J. HEYMAN
United States Attorney

NOAH ROETMAN
Assistant U.S. Attorney
Federal Building & U.S. Courthouse
222 West Seventh Avenue, #9, Room 253
Anchorage, Alaska 99513-7567
Phone: (907) 271-5071
Fax: (907) 271-2344
Email: Noah.Roetman@usdoj.gov

Attorneys for Respondents

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

S.A.E.A. (adult), individually and as parent and
next friend to her minor children, A.A.E.A.
(adult child of S.A.E.A), C.I.C.E. (minor child
of S.A.E.A), and M.M.E.A. (minor child of
S.A.E.A),

Petitioners,

vs.

Laura HERMOSILLO, Acting Field Office
Director of Enforcement and Removal
Operations, Seattle Field Office, Immigration
and Customs Enforcement; Kristi NOEM,
Secretary, U.S. Department of Homeland
Security; U.S. DEPARTMENT OF
HOMELAND SECURITY; Pamela BONDI,
U.S. Attorney General; EXECUTIVE OFFICE
FOR IMMIGRATION REVIEW.

Respondents.

Case No. 3:26-cv-00072-SLG

DECLARATION OF BRADLEY HAYES

I, Bradley Hayes, declare under penalty of perjury that the following is true:

1. I am a Supervisory Detention and Deportation Officer (“SDDO”) employed by the U.S. Department of Homeland Security (“DHS”), U.S. Immigration and Customs Enforcement (“ICE”), Enforcement and Removal Operations (“ERO”). I am currently assigned to the Anchorage, Alaska Sub-Office, under the ERO Seattle Field Office.
2. In my official capacity, I manage the detention and removal of noncitizens, including executing removal orders, coordinating with foreign governments, and maintaining case records in official DHS systems. I make this declaration based on my review of those systems and records, and on my familiarity with the case of S.A.E.A. (adult), individually and as parent and next friend to her minor children, A.A.E.A. (adult child of S.A.E.A.), C.I.C.E. (minor child of S.A.E.A.), and M.M.E.A. (minor child of S.A.E.A.), (“Petitioners”).
3. On February 18, 2026 at approximately 0002 hours Alaska Standard Time (“AKST”), S.A.E.A., C.I.C.E., and M.M.E.A. were placed into the custody of the ICE Juvenile & Family Management Transportation & Compliance Unit (“JFMTCU”) Contractor at the Anchorage International Airport in Anchorage, Alaska for transport to the San Ysidro Port of Entry in California for repatriation to Mexico.
4. According to the itinerary, S.A.E.A., C.I.C.E., and M.M.E.A. traveled on flight number DL0853 at 0545 hours from Anchorage International Airport and landed at Seattle-Tacoma International Airport at 1035 hours. The itinerary does not indicate whether these are in AKST or PST. The exact time their plane crossed out of the state of Alaska is not

possible to identify based on the records available to ICE at this time.

5. According to the itinerary, S.A.E.A., C.I.C.E., and M.M.E.A. traveled on flight number DL1552 at 1140 hours from Seattle-Tacoma International Airport and landed at San Diego Lindberg Field at 1429 hours. The itinerary does not indicate whether these are in AKST or PST.
6. On February 18, 2026 at approximately 1600 hours Pacific Standard Time (“PST”), S.A.E.A., C.I.C.E., and M.M.E.A were repatriated to Mexico at the San Ysidro Port of Entry in California. To the best of ICE’s knowledge, S.A.E.A., C.I.C.E., and M.M.E.A are in Mexico and not in the custody or control of the United States.
7. A.A.E.A. was not able to be transported with his family members due to being an adult child per the JFMTCU contract. A.A.E.A. remained in Alaska in the Anchorage jail at that time.
8. On February 20, 2026 at approximately 0400 hours AKST, A.A.E.A was booked out of the Anchorage jail for transport to the Northwest ICE Processing Center in Tacoma, Washington.
9. According to the itinerary, A.A.E.A. traveled on Alaska Airlines flight number 82 at 0600 hours from Anchorage International Airport and landed at Seattle-Tacoma International Airport at 1037 hours. The itinerary does not indicate whether these are in AKST or PST.
10. A.A.E.A is currently in ICE custody en route to the Northwest ICE Processing Center in Tacoma, Washington. It is unclear when or if he has crossed out of Alaska. Records do not indicate that he has been booked into the Northwest ICE Processing Center as of the

time of this declaration being prepared which is approximately 11 hours after being booked out of the Anchorage jail.

11. My declaration is based on what the currently-available records reflect. Due to the urgent nature of this declaration, the information above is the most detailed available to me at this time. I have requested more detailed information as to the exact travel itineraries of the Petitioners and can provide a supplemental response if directed by the Court. ICE records reflect that all Petitioners were still in the state of Alaska as of at least 0002 hours AKST on February 18, 2026.

Executed on February 20, 2026 By: Bradley Hayes BRADLEY A HAYES Digitally signed by BRADLEY A HAYES
Date: 2026.02.20 13:49:29 -09'00'

Declarations have the same legal force as affidavits. 28 U.S.C. § 1746.

CERTIFICATE OF SERVICE

I hereby certify that on February 20, 2026,
a true and correct copy of the foregoing
was served electronically on the following:

Lara Erin Nations (AKBN: 1506043)
Nations Law Group
2525 Blueberry Road, Suite 207
Phone: 907-770-0909
Email: lara@nationslawak.com
Attorney for Petitioners

S.A.E.A., et al. v. Hermosillo et al.
Case No. 3:26-cv-00072-SLG

Page 4 of 5

/s/ Noah Roetman
Office of the U.S. Attorney

S.A.E.A., et al. v. Hermosillo et al.
Case No. 3:26-cv-00072-SLG

Page 5 of 5