

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

E.J.C.C., a minor, by and through his next
friend and attorney, Beth Baltimore,

Petitioner-Plaintiff,

Case No. 25-cv-08805 (CS)

v.

William JOYCE, in his official capacity as
Acting Field Office Director of New York,
Immigration and Customs Enforcement; Todd
LYONS, in his official capacity as Acting
Director U.S. Immigration and Customs
Enforcement; Kristi NOEM in her official
capacity as Secretary of Homeland Security;
Robert F. KENNEDY, JR. in his official
capacity as Secretary of Health and Human
Services; Angie SALAZAR, in her official
capacity as Acting Director of the Office of
Refugee Resettlement; Joseph B. EDLOW, in
his official capacity as Director of U.S.
Citizenship and Immigration Services; U.S.
Department of Homeland Security; U.S.
Immigration and Customs Enforcement; U.S.
Department of Health and Human Services;
U.S. Office of Refugee Resettlement; U.S.
Citizenship and Immigration Services.

Respondents-Defendants.

DECLARATION OF JUAN BAUTISTA YUPA CAMAS

I, Juan Bautista Yupa Camas, declare the following under 28 U.S.C. § 1746, and state that under penalty of perjury the following is true and correct to the best of my knowledge and belief:

1. The facts set forth in this declaration are based on my personal knowledge, and if called to testify as a witness, I would testify thereto. I am over eighteen years of age and am of sound mind to declare the facts stated herein.

2. My name is Juan Bautista Yupa Camas, and I am E.J.C.C.'s uncle and legal guardian.

3. I have known his mother, Maria Elvia Chafra Maza ("Elvia"), since I was a child, as well as E.J.C.C. for his entire life.

4. A few months ago, I began discussing the care of E.J.C.C. with Elvia. Elvia was afraid that she would be detained and/or deported by U.S. Immigration and Customs Enforcement ("ICE"), and she wanted to have a plan in place to ensure that E.J.C.C. could stay safely in New York even if she became unable to care for him.

5. I care deeply for E.J.C.C. and Elvia, so I offered to help. Elvia, E.J.C.C., and I decided that I would serve as E.J.C.C.'s Standby Guardian in case Elvia were unable to care for E.J.C.C. and prepared and executed all of the necessary documents in August 2025.

6. In late September 2025, Elvia made the very difficult decision to self-deport to Ecuador to try to protect E.J.C.C. and allow him to keep living in New York, where he would be able to have a safe and stable life and achieve his goals. I was so sad for E.J.C.C. and Elvia, but I was also grateful that E.J.C.C.'s life could remain stable in New York and that he could continue his education.

7. Upon Elvia's departure, the standby guardianship documents she prepared went into effect. As his standby guardian, I did my best to look out for E.J.C.C. after his mother left the country. I was available to him for emotional support and to help him adjust to life without his mother.

8. On October 23, 2025, E.J.C.C. was arrested and detained by ICE at an ICE check-in. Now, he is in a children's detention center in the Bronx, and he needs my support more than ever.

9. In addition to the standby guardianship documents, I completed an application to become E.J.C.C.'s sponsor through the Office of Refugee Resettlement because it is my understanding that the government's position is that E.J.C.C. can only be released from detention to me through the sponsorship process. I completed fingerprints for this application on November 8, 2025 and have done everything asked of me to complete the sponsorship application.

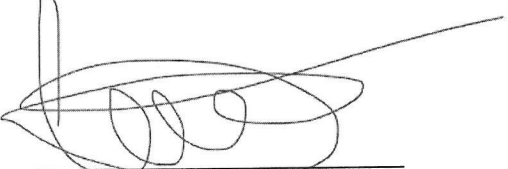
10. Additionally, a petition for guardianship of the person was filed by E.J.C.C.'s attorney in Bronx Family Court on November 4, 2025. The petition sought to have me appointed as guardian of the person of my nephew.

11. On November 10, 2025, I appeared in Bronx Family Court and was appointed guardian of E.J.C.C. The Family Court Judge found that it was in my nephew's best interest to have me appointed as his guardian.

12. I have done everything possible to support E.J.C.C.'s release from detention. As his legal guardian, upon his release, I am able to care for him, support him, and keep him safe in the United States.

13. This declaration was read to me in Spanish prior to my signing.

Executed on this 11th day of November 2025,
in Hamden, Connecticut



Juan Bautista Yupa Camas