

Declaration of Karina Torres Quito

I, Karina Torres Quito, swear that the following is true and accurate to the best of my knowledge:

1. I am the romantic partner of H. S. A., and we've been together for over two years. Before he was detained, we were living together in the Bronx along with my [REDACTED] daughter from a previous relationship.
2. I fled to the United States from Ecuador in 2022, about a year before H. came to the United States. I have a pending asylum application right now, and so does H. When he arrived, he was detained at the border for a few weeks. Upon release, he lived with family members in Denver, Colorado for a few months and then Washington state for less than a month. Eventually, he joined me in New York. We've also been living together with my sister, her partner, and my 7-year-old nephew.
3. For work, H. was working for a company, but he has bacteria in his femur and ongoing pain. He stopped working for the company and started doing Walmart deliveries out of his car. The pain was so excruciating that he couldn't walk. He would only walk on crutches when he needed to pick up medication, but otherwise he avoided walking at all costs. He had holes in his knee and femur where there was liquid coming out, and his knee was super swollen.
4. When he saw doctors for the pain, they scheduled a surgery for February 3, 2026. The surgery went well. I believe a temporary screw was placed in his femur, and he was given antibiotics. Another surgery was scheduled for about 1.5 months later, where he was supposed to receive a more permanent screw. I don't think it was officially scheduled, but he was given follow up appointments every other week to check up on the bacteria.
5. After his surgery, his pain was still bad but was still a bit better than before. He still couldn't walk or go to the bathroom on his own—and he won't be able to walk until after the final surgery that he needs. For his Walmart deliveries, when he could no longer walk, I started going with him in the car and walking the packages up to the house doorsteps for him. This was our only source of income as a family. H. also sent money back to his kids in Venezuela, his [REDACTED] and [REDACTED] who live with their maternal grandparents, who depend on his financial support.
6. On February 27, 2026, we were leaving a Walmart in Kearney, New Jersey when we heard a siren sound and saw an ambulance coming. We pulled our car over and someone came up to the window and requested our IDs. He asked if we had open immigration case, and we told him we did have asylum cases. I asked if he was arresting us, and he said no at first, but then they detained both of us. I told the Spanish-speaking officer that my daughter would have no one to pick her up from school, so they eventually let me go but took H. I asked if they could release him too, but they said his immigration case was in Seattle not New York, so they had to correct that at their office. They handcuffed him and put him in the back of their car.

7. I found out he was at a detention center in New Jersey, and I tried calling him but since he was detained, we have not been allowed to communicate. I tried calling Delaney Hall multiple times to speak with him, but I was told that only his lawyer can talk with him. I was also told he was at a hospital but not which one. I don't even know where he is right now or which hospital he's at.
8. I quickly found an attorney at UnLocal in New York to represent his case. She has also tried multiple times to speak with H., but the officers won't let either of us speak to him. He's written me two letters since being detained in the past three weeks, but he doesn't say where he is or much about how he's doing. In one of letters he said he has been handcuffed by one leg to the hospital bed like a dog, and they're not allowing him to shave or groom himself. At least I know he is alive.
9. H. is a generous and loving man. I miss him daily while he's been detained, and I'm worried about him. It's been really stressful since H. has been detained. We have no income and literally no money to pay for anything. But I'm most worried for H., because I know he's in pain and alone in a hospital somewhere right now.

This declaration was read to me in Spanish, a language which I speak fluently.

/s/ Karina Torres Quito
Karine Torres Quito

March 19, 2026
Date

Verification

I, Hannah Schaafsma, verify that I took this statement from Mr. Quito over the telephone with the assistance of a Spanish/English interpreter provided by Voiance, the interpretation service our agency contracts with. After taking the statement, it was read back to Ms. Quito in Spanish, and she confirmed it was true and accurate to the best of her knowledge.

/s/ Hannah Schaafsma
Hannah Schaafsma
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