UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

T.M.B.A., by and through his next friend, Lauren Fouda,

Petitioner,

v.

Angie Salazar, et al.,

Respondents.

Case no. 1:26-cv-07604

DECLARATION OF ROBERT SANDERMAN, DIRECTOR OF LITIGATION AND ADVOCACY AT LEGAL SERVICES NYC | STATEN ISLAND, IN SUPPORT OF PETITION FOR WRIT OF HABEAS CORPUS

I, ROBERT SANDERMAN pursuant to 28 U.S.C. § 1746, declare as follows:

1. My name is Robert Sanderman, and I am a Director of Litigation and Advocacy at Legal Services NYC | Staten Island, a local affiliate of Legal Services NYC, located at 60 Bay Street, Suite 900, Staten Island, NY 10301. My phone number is (718) 233-6495, and my email address is rdsanderman@lsnyc.org.
2. I have worked as the Director of Litigation and Advocacy since June 2024. In this capacity, I provide litigation and advocacy support to various practice areas such as housing defense, foreclosure defense, family law, disability rights, and immigration rights.
3. Prior to joining Legal Services NYC | Staten Island, I worked for 10 years at Legal Services NYC | Queens, another local affiliate of Legal Services NYC. There, I was a housing-rights and community-economic-development attorney. I received my Juris Doctor from Northeastern University School Law in 2014; I also hold a Bachelor of Arts degree from The City College of New York.

4. I am one of the attorneys representing Petitioner T.M.B.A., age 16, who is currently detained in Office of Refugee Resettlement ("ORR") custody at Abbott House. I write this declaration to place certain facts before the Court.

5. My office has worked continuously with this child since August 2026. Since that date, I have had discussions with his advocates at The Door's Legal Services Center ("The Door"), I have met with T.M.B.A. to discuss the proceedings and relevant facts, I attended his September 1, 2026 master-calendar hearing in immigration court and will attend the forthcoming September 8, 2026 hearing, and I have reviewed his ORR records.

LEGAL SERVICES NYC

6. Legal Services NYC (LSNYC) is the largest civil legal services provider in the United States. LSNYC is a non-governmental organization that provides legal services to tens of thousands of low-income New Yorkers each year. With offices across the five boroughs of New York City, our mission is to fight poverty and seek racial, social, and economic justice through free legal services. We help clients meet their basic needs, including affordable housing, quality education, healthcare, economic security, and immigration rights.

7. As a legal service provider with a robust immigration practice, we represent adults and children who are seeking immigration status in the U.S., attending immigration proceedings, and seeking release from federal detention.

8. For children in removal proceedings, LSNYC has represented several children and partnered with other legal service providers such as The Door, who appeared as a Friend of the Court to provide the immigration court with updates on the status of the child's reunification with their sponsor.

ATTORNEY REVIEW OF T.M.B.A.'S ORR RECORDS

9. T.M.B.A. is a 16-year-old child who entered the United States on or about April 20, 2026, unaccompanied by a parent or legal guardian. Customs and Border Patrol apprehended and detained T.M.B.A. and designated him as an unaccompanied child. On April 22, 2026, DHS placed T.M.B.A. into ORR custody at the Abbott House shelter, an ORR care provider in Irvington, New York. T.M.B.A. remains at Abbott House today.

10. Through my work on T.M.B.A.'s case, I have spent hours reading and reviewing government records obtained from ORR by The Door and by my office. These records include medical-screening notes from U.S. Customs and Border Protection ("CBP"), immigration-court documents, ORR case-manager and clinical assessments and progress notes, and ORR medical records.

11. I reviewed a document in T.M.B.A.'s ORR file called a CBP Medical Summary Form, signed on April 20 and 21, 2026 by an Emergency Medical Technician identified as Maria Gaitan. These health-screening records indicate that T.M.B.A. reported to medical providers a history of depression, anxiety, suicidal ideation, and [redacted] The same records indicate that T.M.B.A. was "officially diagnosed with depression and has been seeing both [a] psychiatrist and [a] psychologist in his home country." These records also record that T.M.B.A. disclosed "constant intrusive self harm thoughts and auditory hallucinations of self harm" but state that [redacted]

24. I also reviewed a document in T.M.B.A.'s ORR file called a UC Assessment, signed on April 27, 2026 by Abbott House Case Manager Jazmine Palmasano and Clinician Jenne Valdovinos. This document contains a conclusion that "[b]ased on the most recent

screening, the child has been a victim of [redacted] under circumstances that indicate that the child's health or welfare has been significantly harmed or threatened."

25. I further reviewed a document in T.M.B.A.'s ORR file that consists of an electronic print-out of a request to the Administration on Children and Families Office of Trafficking in Persons submitted by Abbott House Case Manager Jazmine Palmasano on an unknown date. The request indicates that T.M.B.A. is a victim of [redacted] labor trafficking. The document also states that T.M.B.A. is [redacted] and experienced [redacted]

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed in New York, New York.

Executed this 4th day of September 2026,

/S/ ROBERT D. SANDERMAN
Robert D. Sanderman, Esq.
Director of Litigation and Advocacy
Legal Services NYC | Staten Island
60 Bay Street, Suite 900
Staten Island, New York, 10301
Tel.: (718) 233-6495
Email: rdsanderman@lsnyc.org