

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

MOVIMIENTO DEMOCRACIA, INC.;  
LIO, LIBAN CONCEPCION;  
LEYVA, ALEXEIS;  
PEREZ PEREZ, MICHAEL;  
PEREZ VAREA, YORDANKI;  
VERGARA LOPEZ, ALEXANDER;  
ALMAGUER, JEGNIER CESPEDES

*Plaintiff(s)*

EMERGENCY  
COMPLAINT FOR  
DECLARTORY,  
INJUNCTIVE AND  
OTHER RELIEF

JEH CHARLES JOHNSON, Secretary  
for the Department of Homeland  
Security; JOHN KERRY, Secretary of  
State; LORETTA E. LYNCH, Attorney  
General of the U.S. Department of  
Justice; LINDA SWACINA, Director of  
U.S. Citizenship and Immigration  
Services, and the District Director of the  
U.S. Citizenship and Immigration  
Services; local Office in Miami, Florida

*Defendant(s)*

\_\_\_\_\_ /

I. PRELIMINARY STATEMENT

1. This action is brought on behalf of U.S. citizens, a U.S. non-profit corporation, legal U.S. residents and aliens seeking judicial definition of the terms lighthouse rocks and U.S. territory in the context of the American Shoal lighthouse; and injunctive relief to bring certain Plaintiffs to the United States that are currently on a U.S. Coast Guard cutter on U.S. territorial waters. The specific request is as follows:

- (a) Judicial definition of the term "U.S. territory" in connection with Department of Homeland Security-Immigration (DHS-1) application of "at or within the borders of the United States" for repatriation purposes; including whether presence on a U.S. lighthouse and/or permanent structure of the United States equals presence within or at the borders of the United States;
- (b) Injunctive and mandamus relief ordering the Executive Branch ("White House") through the Department of Homeland Security ("DHS") and the Secretary of State ("DOS") to bring the interdicted Plaintiffs to U.S. land territory for proper processing by DHS on U.S. soil. The Plaintiffs are entitled to processing on U.S. land as they have arrived on U.S. territory for purpose of the "wet foot/dry foot" policy.
2. The Immigration and Nationality Act of 1952, codified as 8 U.S.C. Section 101 et seq. (1982):
- "...delegates responsibility for regulating the entry of aliens jointly to the Attorney General, the Secretary of State, and United States consular officials abroad."
- Abourzek v. Reagen, 785 F.2d 1043, 251 U.S. App. D.C. 355 (1985).
3. The history of the Immigration and Nationality Act of 1952, (U.S.C. 1101 et seq) contains references to restrictive provisions in other related acts, noting the favorable treatment extended to United States Citizens, and citizens of Canada, Cuba and Mexico upon their arrival to U.S. ports, (H.R. Rep. 82-1365, 1952 U.S.C.C.A.N. 1653, at 1664), as in the 1903 refusal to extend the "head tax."
4. Upon information and belief, on May 20<sup>th</sup>, 2016, approximately twenty-one (21) Cuban refugees entered U.S. territorial waters on a boat and landed on the American Shoal Lighthouse. This lighthouse is located east of the Saddlebunch Keys, just offshore from

Sugarloaf Key, close to Looe Key, in Florida, which is U.S. territory. See composite Exhibit "A", photographs of the location where 21 of the Plaintiffs were found. They were subsequently interdicted by the U.S. Coast Guard, along with two (2) others, that were swimming when found. The two refugees had also been on the American Shoal Lighthouse prior to jumping into the water.

5. By virtue of their entry and arrival on U.S. territory, the American Shoal Lighthouse, the twenty-one (21) refugees have become entitled to certain rights. These rights are established by the Refugee Act of 1980, 8 U.S.C. Section 1521 and the Immigration and Nationality Act, 8 U.S.C. Section 1253.
6. Under the "wet foot/dry foot" policy, and in accordance with the U.S. Coast Guard ("U.S.C.G") website, if a person "touches U.S. soil, bridges, piers or rocks, they are subject to U.S. Immigration processes for removal." This would entitle each plaintiff due process in the United States. Plaintiffs not only touched U.S. territory but landed on the lighthouse for a significant period of time. See exhibit "B," copy of Associated Press (A.P.) report and newspaper article referencing the U.S.C.G. website and its comments on the "wet-foot/dry-foot" policy and its relationship to "soil, bridges, piers or rocks." Undersigned counsel are not aware of any policy changes or other written changes U.S.C.G. has made to the website regarding this matter.
7. DHS conducts final adjudication of refugee cases under section 101 (A) (42) of the Immigration and Nationality Act.
8. The Immigration and Nationality Act defines a refugee as:  
  
"...any person who is unable or unwilling to avail himself or herself of the protection of that country because of persecution or a well-founded fear of persecution on account of race, religion, nationality, membership in a particular social group, or political opinion."  
  
Section 101 (A) (42) of the Immigration and Nationality Act.

9. Executive Order 12324 provides that:

"...no person who is a (political) refugee will be returned without his (or her) consent;" and the mandate that the Attorney General take all necessary steps to "...ensure the strict observation of our international obligations concerning those who genuinely flee persecution in their homeland."

10. Plaintiffs, Liban Concepcion Lio, Alexeis Leyva, Michael Perez Perez, Yordanki Perez Varea, Alexander Vergara Lopez, Jegnier Cespedes Almaguer, and others similarly situated but unknown at this time, are protected by the Cuban Refugee Adjustment Act, 8 U.S.C. Section 1255 and the Cuban Democracy Act 22 U.S.C. sections 6001-6010.

11. All Cuban, Haitian and other "boat people" who arrive on land in the territorial United States and request political asylum, are interviewed by DHS asylum officers and given the benefit of presenting a request for political asylum. Often these persons are represented by counsel and or agencies on their behalf. The twenty-one (21) Plaintiffs have arrived legally on U.S. territory and have been transferred to a U.S.C.G. cutter and legally should be brought unto U.S. land for further processing.

12. Once brought unto U.S. land, if DHS determines that there is a "credible fear" of returning them to their country, then in a great majority of cases, asylum seekers in this district are released from custody, prior to their complete asylum hearings.

13. Current federal caselaw has established that refugees interdicted on the high seas, that have not arrived on U.S. territory, including bridges, rocks and other structures, are not entitled to the rights and protections that arise under the Refugee Act of 1980, and the Immigration and Nationality Act. No Federal Court has analyzed and ruled on the issue of refugees who are stopped after entering U.S. territorial waters and landing on a U.S. lighthouse that is currently under U.S. jurisdiction.

14. However, if the Cuban refugees arrive on U.S. land territory and/or its structures, such as bridges, etc., the courts have generally been in agreement that the refugees should be brought unto land for proper processing. See Movimiento Democracia, Inc. v. Chertoff, (S.D.S.F., Case No. 06 Civ. 20044)
15. For the above reasons, Plaintiffs seek the entry of an Order requiring the United States Government to allow the twenty-one (21) Plaintiffs that landed on the American Shoal Lighthouse, to continue unto U.S. land for further immigration processing.

## II. JURISDICTION AND VENUE

16. This Court has jurisdiction under its general federal question jurisdiction, 28 U.S.C. Section 1331, and specific jurisdiction over claims arising under the Immigration and Nationality Act 8 U.S.C. 1329. This Court is the proper venue for the writ of mandamus pursuant to 28 U.S.C. Section 1361. Jurisdiction is also conferred pursuant to Rules 57 and 65 of the Federal Rules of Civil Procedure, which permit declaratory and injunctive actions.
17. The Southern District of Florida is the proper venue for this action pursuant to 28 U.S.C. 1391 (e), as it is here where the Defendants' policies have been implemented.

## III. STANDING

18. Plaintiffs have standing to commence this action under the Administrative Procedures Act (A.P.A.), which confers standing to any party who is "...adversely affected or aggrieved by agency action within the meaning of a relevant statute." 5 U.S.C. section 702 (1988).
19. The Defendants' policy also prolongs the separation of family members. Plaintiffs have a particular interest in preserving their family units. (See Abourzek v. Reagan, 785 F. 2d 1043, 251 U.S. App. D.C. 355 (1985); Clark v. Securities (Indus) Ass'n, 479 U.S. 388, 395-

96, 107 S. Ct. 750, 754, 93 L.Ed. i757 (1987). H.R. Rep No. 1365. 82d Cong., 2d Sess. (1952) reprinted in 1952 U.S.C. C.A.N. 1653, 1680.

#### IV. PARTIES

20. Plaintiff Movimiento Democracia, is a non-profit corporation. At least two of the interdicted Plaintiffs' family members, Carlos Leyva and Jose Alberto Concepcion are both Lawful Permanent Residents of the United States and are individuals who reside in Miami-Dade, Florida. Liban Concepcion Lio, Alexeis Leyva, Michael Perez Perez, Yordanki Perez Varea, Alexander Vergara Lopez, Jegnier Cespedes Almaguer, and others similarly situated but unknown at this time, were taken off US territory by the U.S.C.G. on or about May 20<sup>th</sup>, 2016, and are currently on a U.S. Coast Guard cutter.
21. Defendant Jeh C. Johnson is the Director of the Department of Homeland Security and in that capacity is the Chief Executive of the Department of Homeland Security. He is therefore directly responsible for the direction, conduct and action of the officers and employees of the Department of Homeland Security concerning the acts challenged herein. He is sued in his official capacity.
22. Defendant Jim Kerry, is the Secretary of State and in that capacity is the Chief Executive of the State Department. He is therefore directly responsible for the direction, conduct and action of the officers and employees of the State Department concerning the acts challenged herein. He is sued in his official capacity.
23. Defendant Loretta E. Lynch is the Attorney General of the United States and in that capacity has final authority over the decisions, practices and procedures challenged herein. As Attorney General, Ms. Lynch has final authority over the Department of Justice. She

has apparently delegated her authority to officials of the Department of Homeland Security. She is sued in her official capacity.

24. Defendant Linda Swanica is the District Director of the U.S. Citizenship and Immigration Services' local office in Miami, Florida. She is therefore directly responsible for the direction, conduct and action of the officers and employees of USCIS concerning the acts challenged herein. She is sued in her official capacity.

#### V. FACTS

25. On or about, May 20<sup>th</sup>, 2016, Plaintiffs Liban Concepcion Lio, Alexeis Leyva, Michael Perez Perez, Yordanki Perez Varea, Alexander Vergara Lopez, Jegnier Cespedes Almaguer, and others similarly situated but unknown at this time, departed from Cuba and headed to the United States on board a small home-made vessel.
26. After traveling for days on the high seas they arrived in the United States as their vessel broke down, and twenty-one (21) of the individuals aboard climbed onto the lighthouse. Enclosed please find Composite Exhibit "C", affidavits from Lawful Permanent Residents, Carlos Leyva and Jose Alberto Concepcion, who have family members on board the U.S. Coast Guard cutter. Also, enclosed as Exhibit "D" are the names of four (4) individuals that are known to be on the U.S. Coast Guard cutter.
27. Enclosed as Exhibit "E", are the names of the individuals we believe to be on the U.S. Coast Guard cutter, with corresponding affidavits from their family members who permanently reside in the U.S.
28. Enclosed as Exhibit "F", are the names of individuals we also believe to be on the U.S. Coast Guard cutter, but who do not have corresponding affidavits from family members.

29. On or about May 20<sup>th</sup>, 2016, Plaintiffs Liban Concepcion Lio, Alexeis Leyva, Michael Perez Perez, Yordanki Perez Varea, Alexander Vergara Lopez, Jegnier Cespedes Almaguer, and others similarly situated were taken off the American Shoal Lighthouse by the U.S.C.G.

COUNT I CLASS ACTION

Plaintiffs reallege and incorporate Paragraphs 1 through 29 inclusive and file this COUNT I as a Class Action for Declaratory and Injunctive Relief and allege:

30. Although Congress has delegated to the President extremely broad discretion to act in regards to the interdiction program, there are certain procedural guidelines which must be followed once refugees arrive on U.S. territory. This is especially true in light of prior congressional acts which confer specific rights to Cuban Nationals. (The Cuban Refugee Adjustment Act and the Cuban Democracy Act).
31. Plaintiffs bring this action as a class action pursuant to Rule 23 (a) and (b) (1) (2) on behalf of themselves and all others similarly situated. The class consists of the following ascertainable members, the names of whom can be ascertained from records in the possession of the Defendants:

All 21 individuals who were on board the lighthouse that arrived on U.S. territory on May 20<sup>th</sup>, 2016, and were subsequently taken onto a U.S.C.G. cutter. Apparently, all 21 refugees were at one point together on the lighthouse. Two of them jumped into the water once they saw U.S.C.G. approaching.



32. Defendants have acted, and will continue to act on grounds generally applicable to each member of both classes, making appropriate final declaratory, injunctive and mandamus relief to both classes as a whole.
33. Plaintiffs in the class are entitled to relief for having arrived on U.S. territory.
34. Plaintiffs Liban Concepcion Lio, Alexeis Leyva, Michael Perez Perez, Yordanki Perez Varea, Alexander Vergara Lopez, Jegnier Cespedes Almaguer, and all others similarly situated, are adequate representatives of the class because, like members of their respective class, they seek a meaningful opportunity to apply for political asylum and lawful permanent residency.
35. There exists a community of interest between Plaintiffs and members of their class in that there are questions of law and fact which are common to all. The Plaintiffs seek a determination of whether or not the practices and procedures used by the Defendants upon interdiction are consistent with the INA, the Cuban Adjustment Act, DHS guidelines and any and all applicable United States Laws.
36. Individual suits by each member of the class would be impractical because:
  - (A) There exist common and identical issues of law and fact for all members of the class, whether the policy and procedures of the Defendants with respect to Plaintiffs violate separation of powers, due process and any and all applicable laws of the United States;
  - (B) The number of individual suits would impose an undue burden on the courts as there appear to be a voluminous amount of members;
  - (C) Many members of the class are unaware of their rights and/or are intimidated due to their status.

37. A class action is superior to other available methods for the fair and efficient adjudication of this controversy.
38. Upon information and belief no independent litigation has been brought by any member of the respective class against Defendants as to the issues raised in this Complaint.
39. Plaintiffs' counsel are experienced in class action litigation and can adequately represent the interest of class members as well as the named Plaintiffs.
40. As a result of the Defendants' illegal and improper procedures and policies, Plaintiffs and the members of the class will continue to be deprived of their opportunity to apply for political asylum, to be joined with close family members, and to avail of all other benefits that accrue from such status.
41. There exists no adequate remedy at law if the Plaintiffs are not brought unto U.S. land. Plaintiffs are not allowed to properly apply for political asylum, lawful permanent residency or any other form of relief in the United States if not brought unto U.S. land. The denial of the opportunity to apply for relief on US soil, far outweighs any possible change of policy to Defendants, and it is in the public interest for the proper and fair administration of the law.

WHEREFORE Plaintiffs seek Certification of the Class.

#### COUNT II DECLARATORY ACTION

42. Plaintiffs reallege and incorporate Paragraphs 1 through 41 inclusive and file this COUNT II for Declaratory Relief and allege:
43. There exists confusion in the administrative definition of the term "borders" of the United States in connection with DHS interdiction and application of "at or within the borders of

the United States" for repatriation purposes, and corresponding constitutional rights and protections.

44. There is no uniformity in construing whether presence on a U.S. lighthouse or a portion of a lighthouse equals presence within, or at the borders, of the United States.
45. There is disparity in the administration of justice and the determination of rights depending on whether or not an individual is "at, or within the borders of the United States" which affects the integrity and reunification of families.

WHEREFORE Plaintiffs seek judicial definition of the term "territory" of the United States in connection with DHS application of "at or within the border of the United States" for repatriation purposes, including whether presence on a U.S lighthouse and/or structure of the United States equals presence within or at the borders of the United States; thus enabling the invocation of the respective right conferred to individuals residing within United States territory.

### COUNT III DECLARATORY ACTION

46. Plaintiffs reallege and incorporate Paragraphs 1 through 45 inclusive and file this COUNT for Declaratory Relief and allege:
47. The actions of the governmental agencies deprive Plaintiffs and of their family of certain rights and cause injury by prolonging family separation. These Plaintiffs and Plaintiff MOVIMIENTO DEMOCRACIA are citizens, legal institutions and residents and have the right to invoke review of the respective governmental agency conduct. The Plaintiffs are being denied their constitutional due process and equal protection rights.

WHEREFORE Plaintiffs pray this Court Order DHS to bring the 21 individuals unto U.S. land for DHS processing.

Respectfully submitted,

/s/ William J. Sanchez, Esq.

---

**WILLIAM J. SANCHEZ, ESQ.**

Florida Bar No.: 749060  
12600 SW 120th Street, Suite #102  
Miami, FL 33186  
william@wsanchezlaw.com  
Tel: (305) 232-8889  
Fax: (305) 232-8819

/s/ Virlenys H. Palma, Esq.

---

**VIRLENYS H. PALMA, ESQ.**

Florida Bar No.: 15347  
303 N Krome Ave,  
Homestead, FL 33030  
vhpalma@gmail.com  
Tel: (786) 601-2293  
Fax: (786) 513-5700

/s/ Luis Fernandez, Esq.

---

**LUIS FERNANDEZ, ESQ.**

Florida Bar No.: 271578  
2250 SW 3<sup>rd</sup> Avenue, Suite 303  
Miami, FL 33129  
lfernandez@aol.com  
Tel: (305) 854-5955  
Fax: (305) 854-5324

/s/ Wilfredo O. Allen, Esq.

---

**WILFREDO O. ALLEN, ESQ.**

Florida Bar No.: 5557900  
2250 SW 3rd Avenue, Suite #303  
Miami, FL 33129  
legalallen@aol.com  
Tel: (305) 854-5955

Fax: (305) 854-5324

/s/ Kendall Coffee, Esq.

---

**KENDALL COFFEE, ESQ.**

Florida Bar No.: 259861  
2665 S. Bayshore Drive  
kcoffee@coffeyburlington.com  
Miami FL, 33132  
Tel: (305) 857-9797  
Fax: (305) 859-9919

/s/ Joseph Geller, Esq.

---

**JOSEPH GELLER, ESQ.**

Florida Bar No.: 292771  
2411 Hollywood Blvd.  
Hollywood, FL 33020  
joseph.geller@gmlaw.com  
Tel: (954) 920-2300  
Fax: (954) 920-6885

/s/ Benedict P. Kuehne, Esq.

---

**BENEDICT P. KUEHNE, ESQ.**

Florida Bar No.: 233293  
100 SW 2<sup>nd</sup> Avenue  
Miami, FL 33020  
ben.kuehne@kuehnelaw.com  
Tel: (305) 524-1114  
Fax: (305) 789-5987

/s/ Santiago Alpizar, Esq.

---

**SANTIAGO ALPIZAR, ESQ.**

Florida Bar No.:  
1699 Coral Way,  
Coral Gables, FL 33145  
alpizarlaw@gmail.com  
Tel: (305) 856-2494  
Fax: (305) 854-9788

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY, that a true and correct copy of the foregoing Pleading was hand delivered to the U.S. Attorney's Office in Miami, Florida this \_\_ day of May, 2016

/s/ William J. Sanchez, Esq.

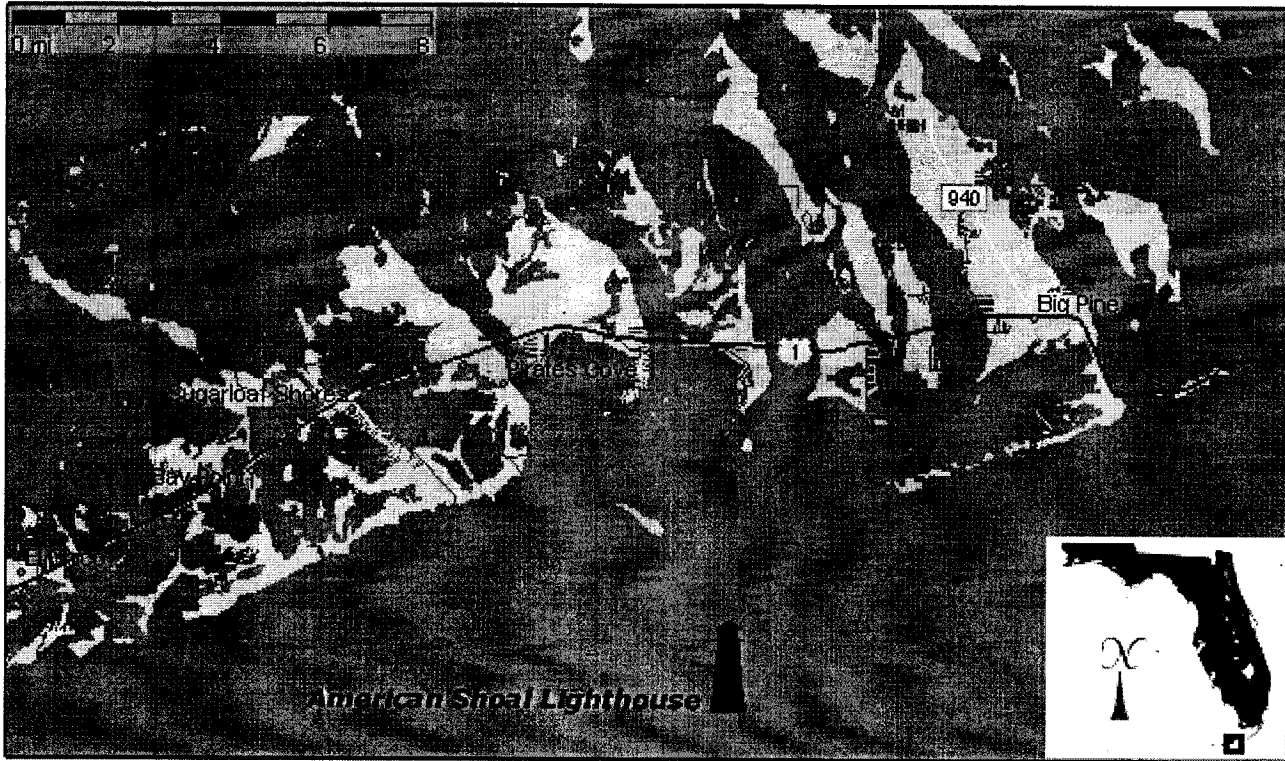
---

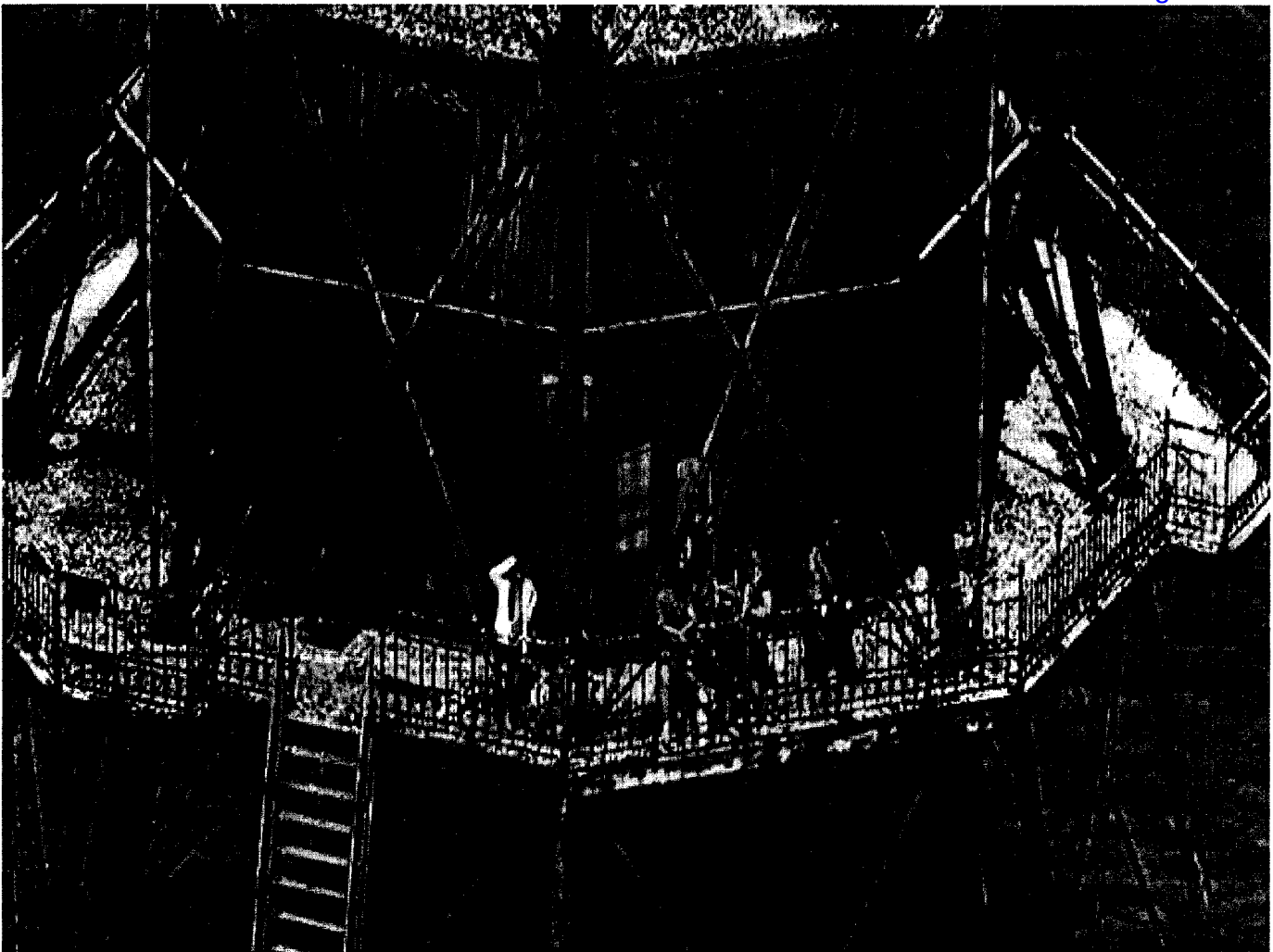
WILLIAM J. SANCHEZ, ESQ.

# Exhibit A









# Exhibit B

## Activists blast U.S. decision to return Cubans

### 'Wet-foot, dry-foot' policy under fire after Cubans found on defunct bridge

Below:

Alan Diaz / AP

Mariela Conesa of Miami cries after hearing that the 15 Cubans who fled their homeland and landed on an abandoned bridge piling in the Florida Keys were returned to their homeland Monday. Conesa is holding a photo of her husband Marino Hernandez and son Osniel, 13, who were among the repatriated Cubans.

**AP** Associated Press

updated 1/10/2006 10:25:29 AM ET

- Font:

**MIAMI** — Cuban-American community activists and politicians lambasted the U.S. government's decision to repatriate 15 Cubans picked up from the base of an abandoned bridge in the Florida Keys.

An attorney for the families of the migrants said he planned to file a suit Tuesday asking a federal judge to allow the group to return.

The migrants were sent back to Cuba on Monday after U.S. officials concluded that the section of the partially collapsed bridge where they landed did not count as dry land under the government's policy because it was no longer connected to any of the Keys.

Under the U.S. government's "wet-foot, dry-foot" policy, Cubans who reach dry land in the United States are usually allowed to remain in this country, while those caught at sea are sent back.

"Through a legal review, the migrants were determined to be feet-wet and processed in accordance with standard procedure," Coast Guard spokesman, Petty Officer Dana Warr, said in a statement.

#### 'An uncertain future'

U.S. Sen. Mel Martinez, R-Fla., called the government's decision an example of "the complete and utter failure" of the wet-foot, dry-foot policy.

"Because they reached an old bridge and not a new bridge there's a judgment they didn't reach American soil? The semantics used to return these men and women — who have risked so much to reach freedom and are now returned to an uncertain future — are an embarrassment," Martinez said in a statement.

U.S. Rep. Ileana Ros-Lehtinen, R-Miami, called the decision absurd. "If any crime would have been committed on that bridge, the perpetrators would have been arrested and charged with violating U.S. laws," she said in a statement.

### **Kids among the group**

The group — including a 2-year-old and a 13-year-old — left Matanzas Province in Cuba late on the night of Jan. 2 aboard a small, homemade boat. The migrants were rescued Wednesday morning by the Coast Guard from the base of the bridge just south of Marathon Key.

Mercedes Hernandez Guerrero said initially she was elated to receive a call from her niece Elizabeth Hernandez, telling her that she and her husband and their 2-year-old son John Michael had reached the bridge.

"I said stay there. The currents are strong. I thought I was giving them good advice," Hernandez recalled.

But her joy at her niece's arrival turned to concern as the days passed and she heard nothing more from the group.

### **Speedy return to Cuba**

William Sanchez, an attorney for relatives of the Cubans migrants who planned to file a motion asking for the group's return, said he was on his way to file an emergency injunction to halt their return when he learned they were already back in Cuba.

He noted that the Coast Guard's own Web site states that if immigrants "touch U.S. soil, bridges, piers or rocks," their feet are considered dry.

But Coast Guard Lt. Commander Chris O'Neil said the structure the migrants landed on didn't fall into any of those categories.

"The 'bridge' is kind of a misnomer," said O'Neil, spokesman for the department's Southeast region. He said officials in Washington determined the Cubans should be considered "feet wet," because they were not able to walk to land from where they landed.

*© 2013 The Associated Press. All rights reserved. This material may not be published, broadcast, rewritten or redistributed.*

# Exhibit C

AFFIDAVIT IN SUPPORT OF PLAINTIFF'S PETITION FOR DECLARATORY AND INJUNCTIVE  
RELIEF


BEFORE ME, the undersigned authority, personally appeared CARLOS LEYVA who being first duly sworn, deposes and says as follows:

1. That his true and correct name is CARLOS LEYVA, a lawful permanent resident of the United States who resides 13220 SW 58 Ter, Apt # 8, Miami, Florida 33183.
2. That he is the uncle of Alexeis Leyva (d/ob/b: 8/8/77),
3. That he learned on Friday 5/20/16 that his cousin had arrived to the United States by boat.
4. That he also discovered through the news that his cousin was one of the Cubans that was physically on the American Shoal Lighthouse located east of the Saddlebunch Keys just offshore from Sugarloaf Key.

That the affiant understands that this Affidavit may be disclosed to the United States Courts and other agencies and that any false statements contained herein could be punished by fine, imprisonment or both.

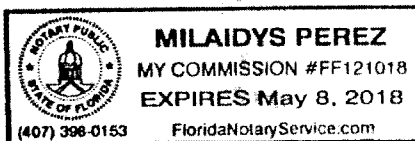
That the undersigned under penalties of perjury, declares that he has examined this affidavit and to the best of his knowledge and belief is true, correct and complete, and the undersigned further declare that they have the authority to sign this document.


FUTHER AFFIANT SAYETH NAUGHT

  
\_\_\_\_\_  
CARLOS LEYVA

STATE OF FLORIDA       )  
                                      )  
COUNTY OF MIAMI DADE )

Sworn to, subscribed and acknowledge before me this 21<sup>st</sup> day of May 2016, by Carlos Leyva. I used his Florida Driver's License number: L-100-100-62-056-0 for identification.



  
\_\_\_\_\_  
Notary Public, State of Florida

My commission expires:



AFFIDAVIT IN SUPPORT OF PLAINTIFF'S PETITION FOR DECLARATORY AND INJUNCTIVE  
RELIEF

BEFORE ME, the undersigned authority, personally appeared CARLOS LEYVA who being first duly sworn, deposes and says as follows:

1. That his true and correct name is CARLOS LEYVA, a lawful permanent resident of the United States who resides 13220 SW 58 Ter, Apt # 8, Miami, Florida 33183.
2. That he is the uncle of Alexeis Leyva (d/ob/b: 8/8/77),
3. That he learned on Friday 5/20/16 that his cousin had arrived to the United States by boat.
4. That he also discovered through the news that his cousin was one of the Cubans that was physically on the American Shoal Lighthouse located east of the Saddlebunch Keys just offshore from Sugarloaf Key.

That the affiant understands that this Affidavit may be disclosed to the United States Courts and other agencies and that any false statements contained herein could be punished by fine, imprisonment or both.

That the undersigned under penalties of perjury, declares that he has examined this affidavit and to the best of his knowledge and belief is true, correct and complete, and the undersigned further declare that they have the authority to sign this document.


FUTHER AFFIANT SAYETH NAUGHT

  
\_\_\_\_\_  
CARLOS LEYVA

STATE OF FLORIDA           )  
  )  
COUNTY OF MIAMI DADE )

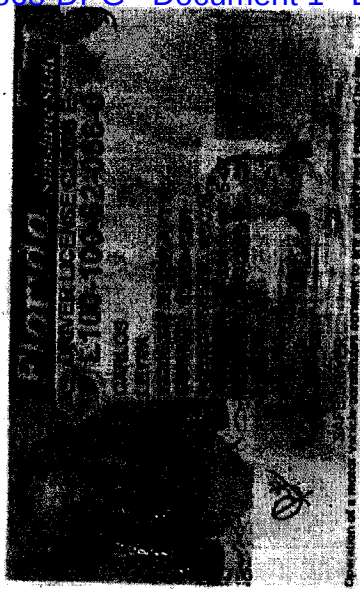
Sworn to, subscribed and acknowledge before me this 21<sup>st</sup> day of May 2016, by Carlos Leyva. I used his Florida Driver's License number: L-100-100-62-056-0 for identification.



  
\_\_\_\_\_  
Notary Public, State of Florida

My commission expires:





AFFIDAVIT IN SUPPORT OF PLAINTIFF'S PETITION FOR DECLARATORY AND INJUNCTIVE  
RELIEF

BEFORE ME, the undersigned authority, personally appeared JOSE ALBERTO CONCEPCION who being first duly sworn, deposes and says as follows:

1. That his true and correct name is JOSE ALBERTO CONCEPCION, a lawful permanent resident of the United States who resides at 8970 SW 20 ST, Miami, Florida 33165.
2. That he is the cousin of LIBAN CONCEPCION LIO (d/o/b: 12/9/92).
3. That he learned on Friday 5/20/16 that his cousin had arrived to the United States by boat.
4. That he also discovered through the news that his cousin was among the Cubans that were physically on the American Shoal Light located east of the Saddlebunch Keys just offshore from Sugarloaf Key.

That the affiant understands that this Affidavit may be disclosed to the United States Courts and other agencies and that any false statements contained herein could be punished by fine, imprisonment or both.

That the undersigned under penalties of perjury, declares that he has examined this affidavit and to the best of his knowledge and belief is true, correct and complete, and the undersigned further declare that they have the authority to sign this document.


FUTHER AFFIANT SAYETH NAUGHT

  
\_\_\_\_\_  
JOSE ALBERTO CONCEPCION

STATE OF FLORIDA           )  
  )  
COUNTY OF MIAMI DADE )

Sworn to, subscribed and acknowledge before me this 21<sup>st</sup> day of May 2016, by JOSE ALBERTO CONCEPCION. I used his Florida Driver's License number: C-521-421-64-165-0 for identification.



  
\_\_\_\_\_  
Notary Public, State of Florida

My commission expires:

AFFIDAVIT IN SUPPORT OF PLAINTIFF'S PETITION FOR DECLARATORY AND INJUNCTIVE  
RELIEF

BEFORE ME, the undersigned authority, personally appeared JOSE ALBERTO CONCEPCION who being first duly sworn, deposes and says as follows:

1. That his true and correct name is JOSE ALBERTO CONCEPCION, a lawful permanent resident of the United States who resides at 8970 SW 20 ST, Miami, Florida 33165.
2. That he is the cousin of LIBAN CONCEPCION LIO (d/o/b: 12/9/92).
3. That he learned on Friday 5/20/16 that his cousin had arrived to the United States by boat.
4. That he also discovered through the news that his cousin was among the Cubans that were physically on the American Shoal Light located east of the Saddlebunch Keys just offshore from Sugarloaf Key.

That the affiant understands that this Affidavit may be disclosed to the United States Courts and other agencies and that any false statements contained herein could be punished by fine, imprisonment or both.

That the undersigned under penalties of perjury, declares that he has examined this affidavit and to the best of his knowledge and belief is true, correct and complete, and the undersigned further declare that they have the authority to sign this document.

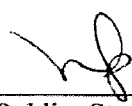
FUTHER AFFIANT SAYETH NAUGHT

  
\_\_\_\_\_  
JOSE ALBERTO CONCEPCION

STATE OF FLORIDA            )  
  )  
COUNTY OF MIAMI DADE )

Sworn to, subscribed and acknowledge before me this 21<sup>st</sup> day of May 2016, by JOSE ALBERTO CONCEPCION. I used his Florida Driver's License number: C-521-421-64-165-0 for identification.



  
\_\_\_\_\_  
Notary Public, State of Florida

My commission expires:



# Exhibit D

1. Michael Perez Perez D.O.B.: 01/27/1982
2. Yordanki Perez Varea D.O.B.: 12/11/1984
3. Alexander Vegara Lopez D.O.B. 04/08/1990
4. Jegnier Cespedes Almaguer D.O.B.: 07/22/1990

# Exhibit E

- |   |                    |
|---|--------------------|
| 1. Soltan Gamboa Ruis                     | D.O.B.: 02/23/1979 |
| 2. Felipe Gamboa Ruiz                     | D.O.B.: 08/25/1990 |
| 3. Oscar Luis Lopez                       | D.O.B.: 01/13/1966 |
| 4. Frencis Alejo Paula                    | D.O.B.: 12/14/1975 |
| 5. Yudeisy Rodriguez Diaz                 | D.O.B.: 12/01/1985 |
| 6. Yaima Hernandez Canto                  | D.O.B. 09/02/1986  |
| 7. Walter Marrero Velazquez               | D.O.B.: 02/05/1988 |
| 8. Idalys Fumero Martinez                 | D.O.B.: 03/29/1967 |
| 9. Maria De La Concepcion Milian Carrillo | D.O.B.: 08/15/1986 |
| 10. Andy Oliva Carrillo                   | D.O.B.: 10/18/1991 |



**1**

AFFIDAVIT IN SUPPORT OF PLAINTIFF'S PETITION FOR DECLARATORY AND INJUNCTIVE  
RELIEF

BEFORE ME, the undersigned authority, personally appeared JUAN GAMBOA  
HERNANDEZ who being first duly sworn, deposes and says as follows:

1. That his true and correct name is JUAN GAMBOA HERNANDEZ, a lawful permanent resident of the United States who resides at 703 Banyan Canal Dr., West Palm Beach, Florida 33415.
2. That he is the uncle of SOLTAN GAMBOA RUIS (d/o/b: 2/23/79) and FELIPE  
GAMBOA RUIZ (d/o/b: 8/25/90).
3. That he learned on Friday 5/20/16 that his uncle had arrived to the United States by boat.
4. That he also discovered through the news that his nephews were among the Cubans that were physically on the American Shoal Light located east of the Saddlebunch Keys just offshore from Sugarloaf Key.

That the affiant understands that this Affidavit may be disclosed to the United States Courts and other agencies and that any false statements contained herein could be punished by fine, imprisonment or both.

That the undersigned under penalties of perjury, declares that he has examined this affidavit and to the best of his knowledge and belief is true, correct and complete, and the undersigned further declare that they have the authority to sign this document.


FUTHER AFFIANT SAYETH NAUGHT

  
JUAN GAMBOA HERNANDEZ

STATE OF FLORIDA       )  
                                      )  
COUNTY OF MIAMI DADE )

Sworn to, subscribed and acknowledge before me this 21<sup>st</sup> day of May 2016, by JUAN  
GAMBOA HERNANDEZ. I used his Florida Driver's License number: G-516-420-60-049-0 for identification.



  
\_\_\_\_\_  
Notary Public, State of Florida

My commission expires:



AFFIDAVIT IN SUPPORT OF PLAINTIFF'S PETITION FOR DECLARATORY AND INJUNCTIVE  
RELIEF

BEFORE ME, the undersigned authority, personally appeared FELIPE A. GAMBOA HERNANDEZ who being first duly sworn, deposes and says as follows:

1. That his true and correct name is FELIPE A. GAMBOA HERNANDEZ, a lawful permanent resident of the United States who resides at 2353 Tallahassee Dr., West Palm Beach, Florida 33409.
2. That he is the father of SOLTAN GAMBOA RUIS (d/o/b: 2/23/79) and FELIPE GAMBOA RUIZ (d/o/b: 8/25/90).

3. That he learned on Friday 5/20/16 that his sons had arrived to the United States by boat.

4. That he also discovered through the news that his sons were among the Cubans that were physically on the American Shoal Lighthouse located east of the Saddlebunch Keys just offshore from Sugarloaf Key.

That the affiant understands that this Affidavit may be disclosed to the United States Courts and other agencies and that any false statements contained herein could be punished by fine, imprisonment or both.

That the undersigned under penalties of perjury, declares that he has examined this affidavit and to the best of his knowledge and belief is true, correct and complete, and the undersigned further declare that they have the authority to sign this document.

FUTHER AFFIANT SAYETH NAUGHT

  
\_\_\_\_\_  
FELIPE A. GAMBOA HERNANDEZ

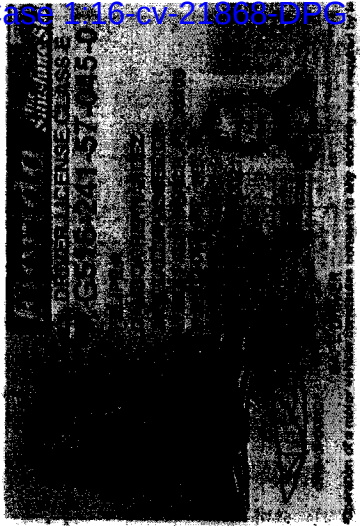
STATE OF FLORIDA           )  
  )  
COUNTY OF MIAMI DADE )

Sworn to, subscribed and acknowledge before me this 21<sup>st</sup> day of May 2016, by FELIPE A. GAMBOA HERNANDEZ. I used his Florida Driver's License number: G-516-241-57-045-0 for identification.



  
\_\_\_\_\_  
Notary Public, State of Florida

My commission expires:



**2**

AFFIDAVIT IN SUPPORT OF PLAINTIFF'S PETITION FOR DECLARATORY AND INJUNCTIVE  
RELIEF

BEFORE ME, the undersigned authority, personally appeared JUAN GAMBOA  
HERNANDEZ who being first duly sworn, deposes and says as follows:

1. That his true and correct name is JUAN GAMBOA HERNANDEZ, a lawful permanent resident of the United States who resides at 703 Banyan Canal Dr., West Palm Beach, Florida 33415.
2. That he is the uncle of SOLTAN GAMBOA RUIS (d/o/b: 2/23/79) and FELIPE  
GAMBOA RUIZ (d/o/b: 8/25/90).
3. That he learned on Friday 5/20/16 that his uncle had arrived to the United States by boat.
4. That he also discovered through the news that his nephews were among the Cubans that were physically on the American Shoal Light located east of the Saddlebunch Keys just offshore from Sugarloaf Key.

That the affiant understands that this Affidavit may be disclosed to the United States Courts and other agencies and that any false statements contained herein could be punished by fine, imprisonment or both.

That the undersigned under penalties of perjury, declares that he has examined this affidavit and to the best of his knowledge and belief is true, correct and complete, and the undersigned further declare that they have the authority to sign this document.

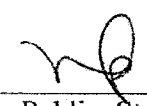
FUTHER AFFIANT SAYETH NAUGHT

  
JUAN GAMBOA HERNANDEZ

STATE OF FLORIDA           )  
  )  
COUNTY OF MIAMI DADE )

Sworn to, subscribed and acknowledge before me this 21<sup>st</sup> day of May 2016, by JUAN  
GAMBOA HERNANDEZ. I used his Florida Driver's License number: G-516-420-60-049-0 for identification.



  
Notary Public, State of Florida

My commission expires:





AFFIDAVIT IN SUPPORT OF PLAINTIFF'S PETITION FOR DECLARATORY AND INJUNCTIVE  
RELIEF

BEFORE ME, the undersigned authority, personally appeared FELIPE A. GAMBOA HERNANDEZ who being first duly sworn, deposes and says as follows:

1. That his true and correct name is FELIPE A. GAMBOA HERNANDEZ, a lawful permanent resident of the United States who resides at 2353 Tallahassee Dr., West Palm Beach, Florida 33409.
2. That he is the father of SOLTAN GAMBOA RUIS (d/o/b: 2/23/79) and FELIPE GAMBOA RUIZ (d/o/b: 8/25/90).

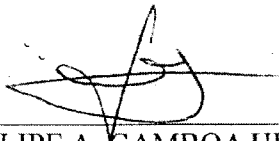
3. That he learned on Friday 5/20/16 that his sons had arrived to the United States by boat.

4. That he also discovered through the news that his sons were among the Cubans that were physically on the American Shoal Lighthouse located east of the Saddlebunch Keys just offshore from Sugarloaf Key.

That the affiant understands that this Affidavit may be disclosed to the United States Courts and other agencies and that any false statements contained herein could be punished by fine, imprisonment or both.

That the undersigned under penalties of perjury, declares that he has examined this affidavit and to the best of his knowledge and belief is true, correct and complete, and the undersigned further declare that they have the authority to sign this document.

FUTHER AFFIANT SAYETH NAUGHT

  
\_\_\_\_\_  
FELIPE A. GAMBOA HERNANDEZ

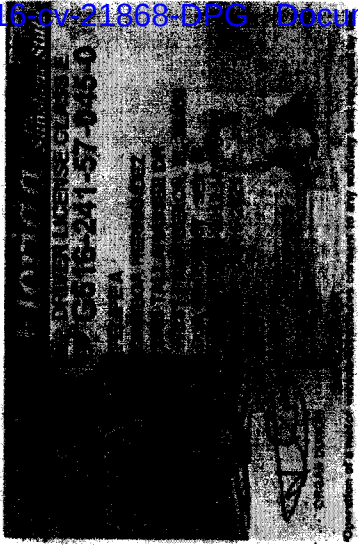
STATE OF FLORIDA            )  
  )  
COUNTY OF MIAMI DADE    )

Sworn to, subscribed and acknowledge before me this 21<sup>st</sup> day of May 2016, by FELIPE A. GAMBOA HERNANDEZ. I used his Florida Driver's License number: G-516-241-57-045-0 for identification.



  
\_\_\_\_\_  
Notary Public, State of Florida

My commission expires:



3

AFFIDAVIT IN SUPPORT OF PLAINTIFF'S PETITION FOR DECLARATORY AND INJUNCTIVE  
RELIEF

BEFORE ME, the undersigned authority, personally appeared MAUREN TUR LOPEZ who being first duly sworn, deposes and says as follows:

1. That her true and correct name is MAUREN TUR LOPEZ, a lawful permanent resident of the United States who resides at 24834 SW 128 PL, Homestead, Florida 33032.

2. That she is the niece of OSCAR LUIS LOPEZ (DOB: 01/13/1966).

3. That she learned on Friday 5/20/16 that her uncle had arrived to the United States by boat.

4. That she also discovered through the news that her uncle was among the Cubans that were physically on the American Shoal Light located east of the Saddlebunch Keys just offshore from Sugarloaf Key.

That the affiant understands that this Affidavit may be disclosed to the United States Courts and other agencies and that any false statements contained herein could be punished by fine, imprisonment or both.

That the undersigned under penalties of perjury, declares that she has examined this affidavit and to the best of her knowledge and belief is true, correct and complete, and the undersigned further declare that they have the authority to sign this document.

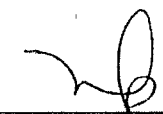
FUTHER AFFIANT SAYETH NAUGHT

  
\_\_\_\_\_  
MAUREN TUR LOPEZ

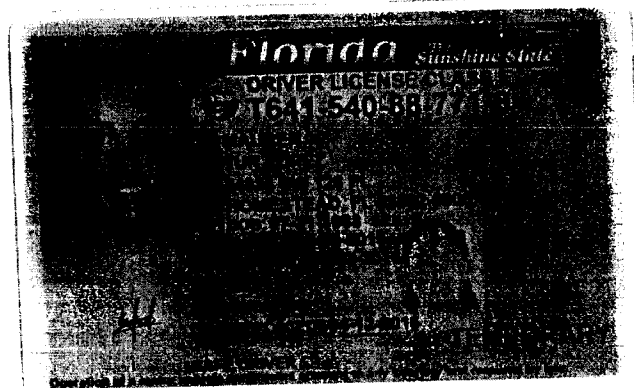
STATE OF FLORIDA       )  
                                      )  
COUNTY OF MIAMI DADE )

Sworn to, subscribed and acknowledge before me this 23<sup>rd</sup> day of May 2016, by MAUREN TUR LOPEZ. I used his Florida Driver's License number: T641-540-88-771-0 for identification.



  
\_\_\_\_\_  
Notary Public, State of Florida

My commission expires:



**4**

AFFIDAVIT IN SUPPORT OF PLAINTIFF'S PETITION FOR DECLARATORY AND INJUNCTIVE  
RELIEF

BEFORE ME, the undersigned authority, personally appeared HILDANYS RODRIGUEZ who being first duly sworn, deposes and says as follows:

1. That his true and correct name is HILDANYS RODRIGUEZ, a lawful permanent resident of the United States who resides at 11507 SW 64 STREET APT G. MIAMI FLORIDA 33173
2. That he is the COUSIN of FRENCIS ALEJO PAULA (d/o/b: 12/14/1975).
3. That he learned on Friday 5/20/16 that his sons had arrived to the United States by boat.
4. That he also discovered through the news that his cousin among the Cubans that were physically on the American Shoal Lighthouse located east of the Saddlebunch Keys just offshore from Sugarloaf Key.

That the affiant understands that this Affidavit may be disclosed to the United States Courts and other agencies and that any false statements contained herein could be punished by fine, imprisonment or both.

That the undersigned under penalties of perjury, declares that he has examined this affidavit and to the best of his knowledge and belief is true, correct and complete, and the undersigned further declare that they have the authority to sign this document.


FUTHER AFFIANT SAYETH NAUGHT HILDANYS RODRIGUEZ

STATE OF FLORIDA )

)

COUNTY OF MIAMI DADE )

Sworn to, subscribed and acknowledge before me this 22<sup>nd</sup> day of May 2016, by Hildanys Rodriguez  
I used his Florida Driver's License number: R362320775420.

  
Notary Public, State of Florida

My commission expires: April 27-2020



## INFORMATIONAL SHEET

SUBJECT: \_\_\_\_\_

NAME: Francis Alejo paula

DATE OF BIRTH: 12-14-75

ADDRESS IN CUBA: C-269#15216/152y160 Rio Verde  
Bojero.

POLITICAL PRISONER: YES/NO: NO

IF SO, EXPLAIN  
SITUATION: \_\_\_\_\_

DEPARTURE: 5/14/2016

VESSEL TYPE: Balsa

DISTRICT OF DETENTION: \_\_\_\_\_

FAMILY MEMBER MAKING CLAIM: Hildany Rodriguez

NAME: Hildany Rodriguez

ADDRESS: 11507sw 64st Apt #6 Miami, FL 33173

TELEPHONE: (305) 799-5569

E MAIL: hildany-rodriguez@yahoo.com

RELATIONSHIP: primo

LEGAL US STATUS Ciudadano

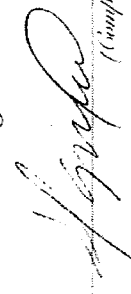

I hereby give permission to the legal team of the Democracy Movement to act on our behalf before any United States agency, department or entity. The Democracy Movement does not assure any outcome.

Signature: [Signature]

Witness [Signature]

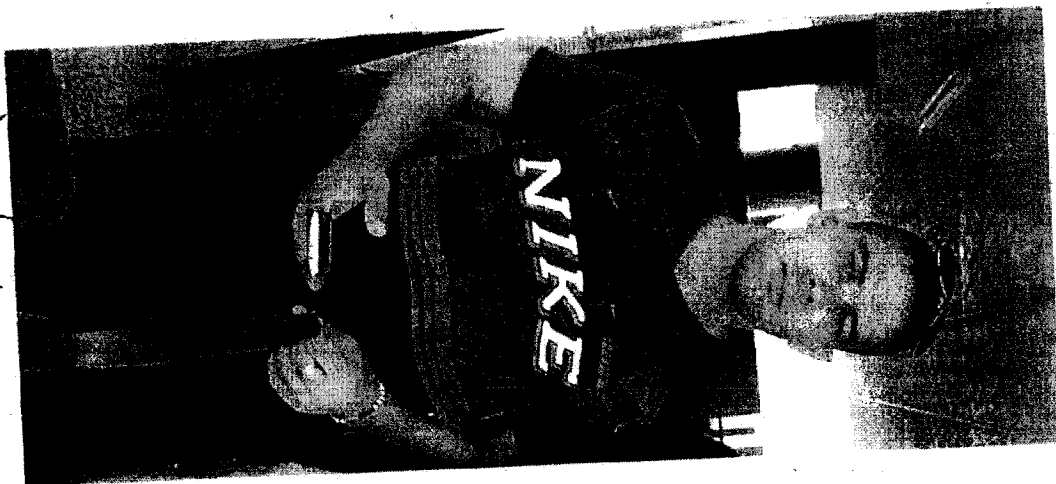
Date 05/22/2016



UNITED STATES OF AMERICA		No. 28971139	
DEPARTMENT OF HOMELAND SECURITY		CITIZENSHIP AND IMMIGRATION	
Personal description of holder as of date of naturalization: Date of birth: <b>FEBRUARY 02, 1977</b> Sex: <b>FEMALE</b> Height: <b>5</b> feet <b>6</b> inches Marital status: <b>DIVORCED</b> Country of former nationality: <b>CUBA</b>		CCS Registration No. <b>A077502556</b> I certify that the description given is true, and that the photograph affixed hereto is a likeness of me.  (Complete and true signature of holder) Be it known that, pursuant to an application filed with the Secretary of Homeland Security at: <b>MIAMI, FLORIDA</b> The Secretary having found that: <b>HILDANY RODRIGUEZ</b> then residing in the United States, intends to reside in the United States when so required by the Naturalization Laws of the United States, and had in all other respects complied with the applicable provisions of such naturalization laws and was entitled to be admitted to citizenship, such person having taken the oath of allegiance in a ceremony conducted by the <b>U.S. CITIZENSHIP AND IMMIGRATION SERVICES</b> at: <b>MIAMI BEACH, FLORIDA</b> on: <b>OCTOBER 03, 2005</b> that such person is admitted as a citizen of the United States of America.  Hildany Rodriguez Director, U.S. Citizenship and Immigration Services IT IS PUNISHABLE BY U.S. LAW TO COPY, PRINT OR PHOTOGRAPH THIS CERTIFICATE, WITHOUT LAWFUL AUTHORITY.	







WALTER MARRERO VELAZQUEZ

AFFIDAVIT IN SUPPORT OF PLAINTIFF'S PETITION FOR DECLARATORY AND INJUNCTIVE  
RELIEF

BEFORE ME, the undersigned authority, personally appeared BERTA ALEJO MIRANDA who being first duly sworn, deposes and says as follows:

1. That his true and correct name is BERTA ALEJO MIRANDA, a lawful permanent resident of the United States who resides at 11507 SW 64 STREET APT G. MIAMI FLORIDA 33173
2. That he is the COUSIN of FRENCIS ALEJO PAULA (d/o/b: 12/14/1975).
3. That he learned on Friday 5/20/16 that his sons had arrived to the United States by boat.
4. That he also discovered through the news that his nephew among the Cubans that were physically on the American Shoal Lighthouse located east of the Saddlebunch Keys just offshore from Sugarloaf Key.

That the affiant understands that this Affidavit may be disclosed to the United States Courts and other agencies and that any false statements contained herein could be punished by fine, imprisonment or both.


That the undersigned under penalties of perjury, declares that he has examined this affidavit and to the best of his knowledge and belief is true, correct and complete, and the undersigned further declare that they have the authority to sign this document.

FUTHER AFFIANT SAYETH NAUGHT BERTA ALEJO MIRANDA

STATE OF FLORIDA )

COUNTY OF MIAMI DADÉ )

Sworn to, subscribed and acknowledge before me this 22<sup>nd</sup> day of May 2016, by Berta Alejo Miranda  
I used his Florida Driver's License number: R362320775420.

  
Notary Public, State of Florida

My commission expires: April 27 2020





## UNITED STATES OF AMERICA



No. 35862629

ORDER OF NATURALIZATION

RENEWAL APPLICATION

Personal description of holder  
as of date of naturalization:

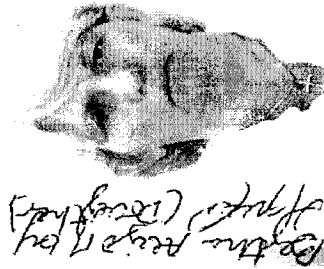
Date of birth: JULY 04, 1954

Sex: FEMALE

Height: 5 feet 5 inches

Marital status: WIDOWED

Country of former nationality:  
CUBA



U.S. Registration No. A047062523

I certify that the description given is true, and that the photograph affixed  
hereto is a likeness of me. *B.A.*

(Complete and true signature of holder)

Be it known that, pursuant to an application filed with the Secretary of  
Homeland Security,

at: MIAMI, FLORIDA

The Secretary having found that:

BERTHA ALEJO MIRANDA

residing at: MIAMI, FLORIDA

having complied in all respects with all of the applicable provisions of the  
naturalization laws of the United States, being entitled to be admitted as  
a citizen of the United States, and having taken the oath of allegiance at a  
ceremony conducted by

U.S. CITIZENSHIP AND IMMIGRATION SERVICES

at: MIAMI, FLORIDA

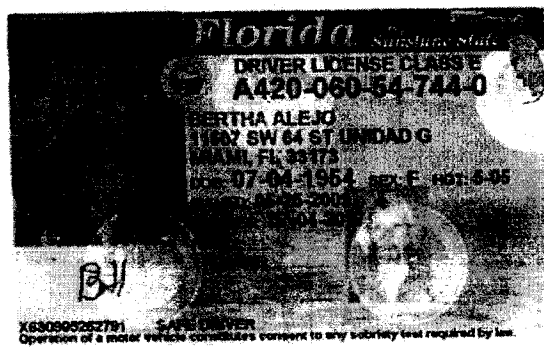
on: APRIL 09, 2013

such person is admitted as a citizen of the United States of America.

*Alfonso N. Mejias*, Director

U. S. Citizenship and Immigration Services

DEPARTMENT OF HOMELAND SECURITY



## INFORMATIONAL SHEET

SUBJECT: \_\_\_\_\_

NAME: Frencis Alejo Paula

DATE OF BIRTH: 12-14-1975

ADDRESS IN CUBA: C-269#15216 y 152160 Rio Verde Boyero

POLITICAL PRISONER: YES ☒ NO ☐

IF SO, EXPLAIN  
SITUATION: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

DEPARTURE: 5/14/2016

VESSEL TYPE: Balsa

DISTRICT OF DETENTION: \_\_\_\_\_

FAMILY MEMBER MAKING CLAIM: Bertha Alejo

NAME: Bertha Alejo

ADDRESS: 11507 Sw 64st Apt-G.H. Am, FL 33173

TELEPHONE: ( ) N/A

E MAIL: N/A

RELATIONSHIP: Sobrina

LEGAL US STATUS: Ciudadano

I hereby give permission to the legal team of the Democracy Movement to act on our behalf before any United States agency, department or entity. The Democracy Movement does not assure any outcome.

Signature: Bertha Witness: [Signature] Date: 5/22/2016





WALTER MARRERO VELAZQUEZ

**5**

AFFIDAVIT IN SUPPORT OF PLAINTIFF'S PETITION FOR DECLARATORY AND INJUNCTIVE  
RELIEF

BEFORE ME, the undersigned authority, personally appeared MELCHOR A. RODRIGUEZ  
who being first duly sworn, deposes and says as follows:

1. That his true and correct name is MELCHOR A. RODRIGUEZ, a lawful permanent resident of  
the United States who resides at 1251 SW 74 CT MIAMI FLORIDA 33144
2. That he is the uncle of YUDEISY RODRIGUEZ DIAZ (d/o/b: 12/01/1985).
3. That he learned on Friday 5/20/16 that his niece had arrived to the United States by boat.
4. That he also discovered through the news that his niece was among the Cubans that were  
physically on the American Shoal Lighthouse located East of the Saddle Bunch Keys just offshore from  
Sugarloaf Key.

That the affiant understands that this Affidavit may be disclosed to the United States Courts and  
other agencies and that any false statements contained herein could be punished by fine, imprisonment  
or both.


That the undersigned, under penalties of perjury, declare that he has examined this affidavit and  
to the best of his knowledge and belief is true, correct and complete, and the undersigned further  
declare that they have the authority to sign this document.

FUTHER AFFIANT SAYETH NAUGHT

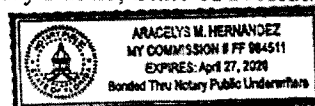
STATE OF FLORIDA           )  
  )  
COUNTY OF MIAMI DADE )

  
\_\_\_\_\_  
MELCHOR A. RODRIGUEZ

Sworn to, subscribed and acknowledge before me this 21<sup>st</sup> day of May 2016, by  
Melchor A. Rodriguez I used his Florida Driver's License number: R-362-541-62-083-0 for identification.

  
\_\_\_\_\_  
Notary Public, State of Florida

My commission expires: April 27 2020



## INFORMATIONAL SHEET

SUBJECT: \_\_\_\_\_

NAME: yudeysi Rodriguez Diaz

DATE OF BIRTH: 12/1/1985

ADDRESS IN CUBA: calle 160 # 271 y 268 Rio Verde Bolledo  
Habana

POLITICAL PRISONER: YES (NO)

IF SO, EXPLAIN  
SITUATION: D/N/A

DEPARTURE: Not sure last know to Habana

VESSEL TYPE: NOT KNOWN

DISTRICT OF DETENTION: \_\_\_\_\_

FAMILY MEMBER MAKING CLAIM: \_\_\_\_\_

NAME: Melchor Rodriguez Avila

ADDRESS: 1251 SW 74 CT

TELEPHONE: (386) 241 6192

E MAIL: None

RELATIONSHIP: Uncle

LEGAL US STATUS

I hereby give permission to the legal team of the Democracy Movement to act on our behalf before any United States agency, department or entity. The Democracy Movement does not assure any outcome.

Signature: [Signature] Witness: [Signature] Date: 5/22/14



6

AFFIDAVIT IN SUPPORT OF PLAINTIFF'S PETITION FOR DECLARATORY AND INJUNCTIVE  
RELIEF

BEFORE ME, the undersigned authority, personally appeared VLADIMIR PEREZ ROMERO  
who being first duly sworn, deposes and says as follows:

1. That his/her true and correct name is, VLADIMIR PEREZ ROMERO, a lawful RESIDENT of  
the United States who resides at 3856 GOOSE COURT, ORLANDO FL 32822
2. That he/she is the HUSBAND of YAIMA HERNANDEZ CANTO (d/o/b: ) 09/02/1986.
3. That he/she learned on 5/14/16 that his/her WIFE had arrived to the United States by  
boat.
4. That he/she also discovered through the news that his/her WIFE was among the Cubans  
that were physically on the American Shoal Lighthouse located East of the Saddlebunch Keys just  
offshore from Sugarloaf Key.

That the affiant understands that this Affidavit may be disclosed to the United States Courts and  
other agencies and that any false statements contained herein could be punished by fine, imprisonment  
or both.

That the undersigned under penalties of perjury, declares that he/she has examined this affidavit  
and to the best of his/her knowledge and belief is true, correct and complete, and the undersigned  
further declares that they have the authority to sign this document.

FUTHER AFFIANT SAYETH NAUGHT

Vladimir Perez Romero  
VLADIMIR PEREZ ROMERO

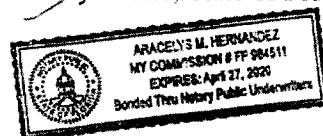
STATE OF FLORIDA )

COUNTY OF MIAMI DADE )

Sworn to, subscribed and acknowledge before me this 22<sup>nd</sup> day of May 2016, by  
Vladimir Perez Romero I used his Florida Driver's License number: P 626-860-76-140-0

Aracelys M. Hernandez  
Notary Public, State of Florida

My commission expires: April 27 2020



## INFORMATIONAL SHEET

SUBJECT: \_\_\_\_\_

NAME: ~~Vladimir Perez~~ Yaima <sup>Hernandez</sup> Canto

DATE OF BIRTH: ~~4-20-76~~ ?

ADDRESS IN CUBA: AVE: 250/0 22 y 28 # 2211 - caibarien

POLITICAL PRISONER: YES/NO: NO

IF SO, EXPLAIN  
SITUATION: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

DEPARTURE: 05-14-16 - caibarien

VESSEL TYPE: Balsa

DISTRICT OF DETENTION: \_\_\_\_\_

FAMILY MEMBER MAKING CLAIM: Vladimir Perez

NAME: Vladimir Perez

ADDRESS: 3856 Goose Ct, Ool, FL, 32822

TELEPHONE: (407) 760-9525

E MAIL: Vladimír Perez 594 @ yahoo.com

RELATIONSHIP: ESPOSA

LEGAL US STATUS Residente

I hereby give permission to the legal team of the Democracy Movement to act on our behalf before any United States agency, department or entity. The Democracy Movement does not assure any outcome.

Signature: Vladimir Witness \_\_\_\_\_ Date 5-22-16





**7**

AFFIDAVIT IN SUPPORT OF PLAINTIFF'S PETITION FOR DECLARATORY AND INJUNCTIVE  
RELIEF

BEFORE ME, the undersigned authority, personally appeared ANA MARIA IGLESIAS MARRERO who being first duly sworn, deposes and says as follows:

1. That his/her true and correct name is, ANA MARIA IGLESIAS MARRERO, a lawful PERMANENT RESIDENT of the United States who resides at 665 NE 83 TERRACE, APT. 401, MIAMI, FLORIDA 33138
2. That he/she is the COUSIN of WALTER MARRERO VELAZQUEZ (d/o/b: 02/05/1988).
3. That he/she learned on 5/20/16 that his/her COUSIN had arrived to the United States by boat.
4. That he/she also discovered through the news that his/her COUSIN was among the Cubans that were physically on the American Shoal Lighthouse located East of the Saddlebunch Keys just offshore from Sugarloaf Key.

That the affiant understands that this Affidavit may be disclosed to the United States Courts and other agencies and that any false statements contained herein could be punished by fine, imprisonment or both.

That the undersigned under penalties of perjury, declares that he/she has examined this affidavit and to the best of his/her knowledge and belief is true, correct and complete, and the undersigned further declares that they have the authority to sign this document.

FUTHER AFFIANT SAYETH NAUGHT

STATE OF FLORIDA )

COUNTY OF MIAMI DADE )

ANA MARIA IGLESIAS MARRERO

Sworn to, subscribed and acknowledge before me this 22<sup>nd</sup> day of May 2016, by  
Ana maria Iglesias Marrero I used his/her Florida Driver's License number: T242-013-86-531-0

Notary Public, State of Florida

My commission expires: April 27 2020





## INFORMATIONAL SHEET

SUBJECT: \_\_\_\_\_

NAME: Walter Marrero Velazquez

DATE OF BIRTH: 02-05-1988

ADDRESS IN CUBA: Calle 53 #4 Entre 46 y Juanito Mora

POLITICAL PRISONER: YES/NO: NO

IF SO, EXPLAIN  
SITUATION: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

DEPARTURE: 05/14/2016 Caibarien

VESSEL TYPE: Home made Raft

DISTRICT OF DETENTION: \_\_\_\_\_

FAMILY MEMBER MAKING CLAIM: Ana Maria

NAME: Ana Maria Iglesias Marrero

ADDRESS: 665 NE 83 TERR Apt 401 Miami FL 33138

TELEPHONE: (305) 680 9810

E MAIL: AnaIglesias31@yahoo.com

RELATIONSHIP: Cousin

LEGAL US STATUS Residente

I hereby give permission to the legal team of the Democracy Movement to act on our behalf before any United States agency, department or entity. The Democracy Movement does not assure any outcome.

Signature: [Signature] Witness: [Signature] Date: 5/22/16

AFFIDAVIT IN SUPPORT OF PLAINTIFF'S PETITION FOR DECLARATORY AND INJUNCTIVE  
RELIEF

BEFORE ME, the undersigned authority, personally appeared who being first duly sworn,  
deposes and says as follows:

1. That his/her true and correct name is, WALTER MARRERO HERNANDEZ, a lawful  
PERMANENT RESIDENT of the United States who resides at 2970 NW 31 STREET, MIAMI,  
FL 33142
2. That he/she is the FATHER of WALTER MARRERO VELAZQUEZ (d/o/b: 02/05/1988).
3. That he/she learned on Friday 5/20/16 that his/her SON had arrived to the United States  
by boat.
4. That he/she also discovered through the news that his/her SON was among the Cubans  
that were physically on the American Shoal Lighthouse located East of the Saddlebunch Keys just  
offshore from Sugarloaf Key.

That the affiant understands that this Affidavit may be disclosed to the United States Courts and  
other agencies and that any false statements contained herein could be punished by fine, imprisonment  
or both.

That the undersigned under penalties of perjury, declares that he/she has examined this affidavit  
and to the best of his/her knowledge and belief is true, correct and complete, and the undersigned  
further declares that they have the authority to sign this document.


FUTHER AFFIANT SAYETH NAUGHT

  
\_\_\_\_\_  
WALTER MARRERO HERNANDEZ

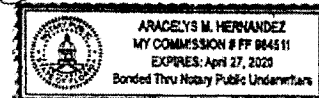
STATE OF FLORIDA )

COUNTY OF MIAMI DADE )

Sworn to, subscribed and acknowledge before me this 22<sup>nd</sup> day of May 2016, by  
Walter Marrero Hernandez used his Florida Driver's License number: H6666-900-66-444-0

  
\_\_\_\_\_  
Notary Public, State of Florida

My commission expires: April 27 2020



## INFORMATIONAL SHEET

SUBJECT: \_\_\_\_\_

NAME: Walter MARRERO Velazquez

DATE OF BIRTH: 02-05-1988

ADDRESS IN CUBA: CALLE 53 #4 Entre 46 y Juanito Moya

POLITICAL PRISONER: YES/NO: NO

IF SO, EXPLAIN  
SITUATION: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

DEPARTURE: 05/14/2016 Caibarien

VESSEL TYPE: Balsa

DISTRICT OF DETENTION: \_\_\_\_\_

FAMILY MEMBER MAKING CLAIM: \_\_\_\_\_

NAME: Walter MARRERO Hernandez

ADDRESS: 2970 NW 31st Miami FL 33142

TELEPHONE: (786) 499 9668

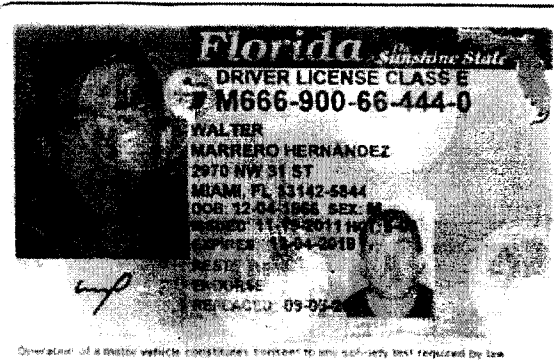
E MAIL: nuriscardero@gmail.com

RELATIONSHIP: Padre

LEGAL US STATUS

I hereby give permission to the legal team of the Democracy Movement to act on our behalf before any United States agency, department or entity. The Democracy Movement does not assure any outcome.

Signature: [Signature] Witness: [Signature] Date: 5/22/16





8

AFFIDAVIT IN SUPPORT OF PLAINTIFF'S PETITION FOR DECLARATORY AND INJUNCTIVE  
RELIEF

BEFORE ME, the undersigned authority, personally appeared ALEXANDER FUMERO MARTINEZ who being first duly sworn, deposes and says as follows:

1. That his/her true and correct name is, ALEXANDER FUMERO MARTINEZ, a lawful resident of the United States who resides at 5331 5<sup>th</sup> AVENUE, APT. 8C, KEY WEST FLORIDA 33040
2. That he/she is the BROTHER of ODALYS FUMERO MARTINEZ (d/o/b: 03/29/1967):
3. That he/she learned on Friday 5/14/16 that his/her SISTER had arrived to the United States by boat.
4. That he/she also discovered through the news that his/her SISTER was among the Cubans that were physically on the American Shoal Lighthouse located East of the Saddlebunch Keys just offshore from Sugarloaf Key.

That the affiant understands that this Affidavit may be disclosed to the United States Courts and other agencies and that any false statements contained herein could be punished by fine, imprisonment or both.

That the undersigned under penalties of perjury, declares that he/she has examined this affidavit and to the best of his/her knowledge and belief is true, correct and complete, and the undersigned further declares that they have the authority to sign this document.

FUTHER AFFIANT SAYETH NAUGHT

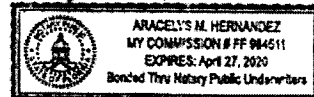
Alex  
ALEXANDER FUMERO MARTINEZ

STATE OF FLORIDA           )  
  )  
COUNTY OF MIAMI DADE )

Sworn to, subscribed and acknowledge before me this 22<sup>nd</sup> day of May 2016, by  
Alexander Fumero I used his Florida Driver's License number: F-565-000-69-166-0  
Martinez

My commission expires: April 27 2020

Aracely M. Hernandez  
Notary Public, State of Florida



## INFORMATIONAL SHEET

SUBJECT: \_\_\_\_\_

NAME: Dadalys Fomero Martinez

DATE OF BIRTH: ?

ADDRESS IN CUBA: Calle 26 # 2306 E/T 23 925  
Caibarien Vt

POLITICAL PRISONER: YES/NO: No

IF SO, EXPLAIN  
SITUATION: \_\_\_\_\_

DEPARTURE: 05/14/2016 - Caibarien

VESSEL TYPE: Balsa

DISTRICT OF DETENTION: \_\_\_\_\_

FAMILY MEMBER MAKING CLAIM: Alexander Fomero Martinez

NAME: Alexander Fomero Martinez

ADDRESS: 5331 5th Ave Apt 8c Key West Fl.  
33040

TELEPHONE: (305) 922 0180

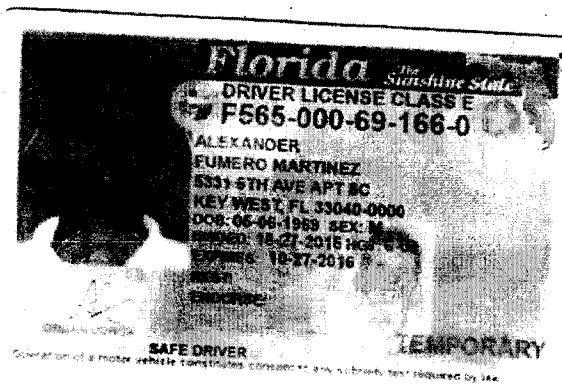
E MAIL: Alexander Fomero Mrtz @ idcvd.com

RELATIONSHIP: HER MAMA

LEGAL US STATUS PAROIT

I hereby give permission to the legal team of the Democracy Movement to act on our behalf before any United States agency, department or entity. The Democracy Movement does not assure any outcome.

Signature: [Signature] Witness: [Signature] Date: 05/22/2016



9

AFFIDAVIT IN SUPPORT OF PLAINTIFF'S PETITION FOR DECLARATORY AND INJUNCTIVE  
RELIEF

BEFORE ME, the undersigned authority, personally appeared REINALDO MAGARI MILIAN ALVAREZ who being first duly sworn, deposes and says as follows:

1. That his/her true and correct name is, REINALDO MAGARI MILIAN ALVAREZ, a lawful CITIZEN of the United States who resides at 3151 NW 133 STREET, OPA LOCKA, 33054
2. That he/she is the FATHER of MARIA DE LA CONCEPCION MILIAN CARRILLO (d/o/b: 08/15/1986) AND the UNCLE of ANDY OLIVA CARRILLO, (D/O/B: 10/18/1991).
3. That he/she learned on Friday 5/20/16 that his/her SON AND NEPHEW had arrived to the United States by boat.
4. That he/she also discovered through the news that his/her SON AND NEPHEW were among the Cubans that were physically on the American Shoal Lighthouse located East of the Saddlebunch Keys just offshore from Sugarloaf Key.

That the affiant understands that this Affidavit may be disclosed to the United States Courts and other agencies and that any false statements contained herein could be punished by fine, imprisonment or both.

That the undersigned under penalties of perjury, declares that he/she has examined this affidavit and to the best of his/her knowledge and belief is true, correct and complete, and the undersigned further declares that they have the authority to sign this document.

FUTHER AFFIANT SAYETH NAUGHT

REINALDO MAGARI MILIAN ALVAREZ

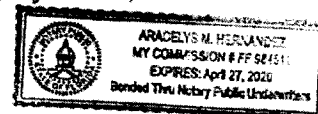
STATE OF FLORIDA )

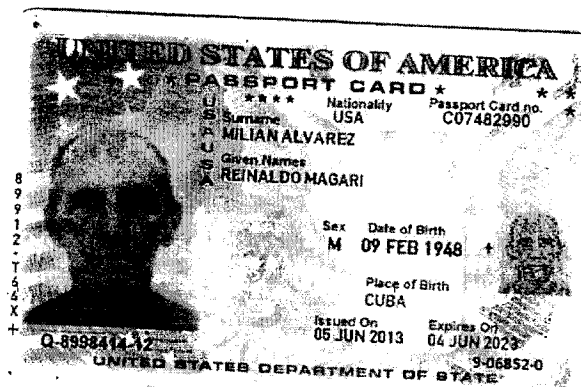
COUNTY OF MIAMI DADE )

Sworn to, subscribed and acknowledge before me this 22<sup>nd</sup> day of May 2016, by  
Reinaldo magari I used his Florida Driver's License number: N 454-733-45-049-0  
Milian Alvarez

Aracelys M. Hernandez  
Notary Public, State of Florida

My commission expires: April 27 2020





FOR 2

## INFORMATIONAL SHEET

SUBJECT: \_\_\_\_\_

NAME: ANDY OLIVA CAYILLO MARIA DE LA CONCEPCION MILIAN CAYILLO

DATE OF BIRTH: 10/18/1991 8/15/1986

ADDRESS IN CUBA: 1409 Ave 35 # 14 y 16 Calle 18 # 3120A 9/31 y 33  
CAIBARIEN VC, Cuba

POLITICAL PRISONER: YES/NO: \_\_\_\_\_

IF SO, EXPLAIN  
SITUATION: \_\_\_\_\_

DEPARTURE: 5/14/16

VESSEL TYPE: embarcacion rustica

DISTRICT OF DETENTION: DNA

FAMILY MEMBER MAKING CLAIM: Reinaldo Magari Milián Alvarez

NAME: Father Reinaldo Magari Milián Alvarez

ADDRESS: 3151 NW 133RD ST OPALOCKA, FL 33064

TELEPHONE: (986) 712-3682

E MAIL: \_\_\_\_\_

RELATIONSHIP: Father

LEGAL US STATUS

I hereby give permission to the legal team of the Democracy Movement to act on our behalf before any United States agency, department or entity. The Democracy Movement does not assure any outcome.

Signature: [Signature] Witness: [Signature] Date: 5/22/16



AFFIDAVIT IN SUPPORT OF PLAINTIFF'S PETITION FOR DECLARATORY AND INJUNCTIVE  
RELIEF

BEFORE ME, the undersigned authority, personally appeared OSCAR CARRILLO, who being first duly sworn, deposes and says as follows:

1. That his/her true and correct name is, OSCAR CARRILLO, a lawful PERMANENT RESIDENT of the United States who resides at 485 EAST THRASHER DRIVE, BRONSON, FLORIDA 32621.

2. That he/she is the UNCLE of MARIA DE LA CONCEPCION MILIAN CARRILLO (d/o/b: 08/15/1986) AND THE UNCLE OF ANDY OLIVA CARRILLO, (D/O/B: 10/18/1991).

3. That he/she learned on Friday 5/20/16 that his/her NIECE AND NEPHEW had arrived to the United States by boat.

4. That he/she also discovered through the news that his/her NIECE AND NEPHEW were among the Cubans that were physically on the American Shoal Lighthouse located East of the Saddlebunch Keys just offshore from Sugarloaf Key.

That the affiant understands that this Affidavit may be disclosed to the United States Courts and other agencies and that any false statements contained herein could be punished by fine, imprisonment or both.

That the undersigned under penalties of perjury, declares that he/she has examined this affidavit and to the best of his/her knowledge and belief is true, correct and complete, and the undersigned further declares that they have the authority to sign this document.

FUTHER AFFIANT SAYETH NAUGHT

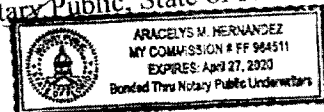
OSCAR CARRILLO

STATE OF FLORIDA )

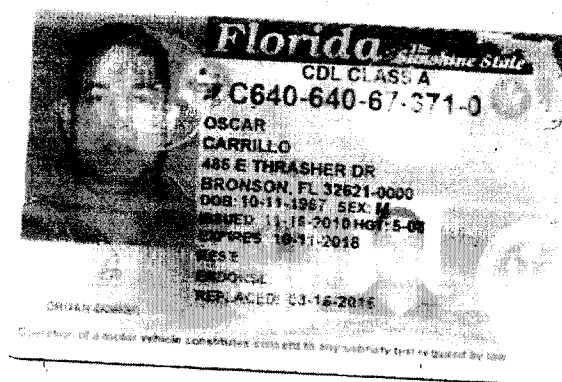
COUNTY OF MIAMI DADE )

Sworn to, subscribed and acknowledge before me this 22<sup>nd</sup> day of May 2016, by  
Oscar Carrillo I used his Florida Driver's License number: 0640-640-67-371-0

Aracelys M. Hernandez  
Notary Public, State of Florida



My commission expires: April 27 2020



For 2

## INFORMATIONAL SHEET

SUBJECT: \_\_\_\_\_

NAME: Andy Oliva Carrillo- MARIA DE LA CONCEPCION Nilon Carr

DATE OF BIRTH: 10-18-1991 08-15-1986.

ADDRESS IN CUBA: 1407 Ave 35 of 14 y 16 = Calle 18 #3120A E/31 y 33  
rehabilitacion VE cuba Rehabilitacion VE cuba

POLITICAL PRISONER: YES/NO: \_\_\_\_\_

IF SO, EXPLAIN  
SITUATION: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

DEPARTURE: 05/11/2016

VESSEL TYPE: Construction Rusted

DISTRICT OF DETENTION: DNA

FAMILY MEMBER MAKING CLAIM: Uncle

NAME: OSCAR Carrillo

ADDRESS: 2325 W. 60 Street Apt #205E Hialeah, FL 33016

TELEPHONE: (786) 580-8188

E MAIL: OCinvest@Live.com

RELATIONSHIP: Uncle

LEGAL US STATUS Resident

I hereby give permission to the legal team of the Democracy Movement to act on our behalf before any United States agency, department or entity. The Democracy Movement does not assure any outcome.

Signature: [Signature] Witness: [Signature] Date: 05/22/2016

AFFIDAVIT IN SUPPORT OF PLAINTIFF'S PETITION FOR DECLARATORY AND INJUNCTIVE  
RELIEF

BEFORE ME, the undersigned authority, personally appeared DOLORES NOA who being first duly sworn, deposes and says as follows:

1. That his/her true and correct name is, DOLORES NOA, a lawful CITIZEN of the United States who resides at 485 EAST THRASHER DRIVE, BRONSON, FLORIDA 32621.
2. That he/she is the GRANDMOTHER of MARIA DE LA CONCEPCION MILIAN CARRILLO (d/o/b: 08/15/1986) AND THE GRANDMOTHER OF ANDY OLIVA CARRILLO, (D/O/B: 10/18/1991).
3. That he/she learned on Friday 5/20/16 that his/her GRANDDAUGHTER AND GRANDSON had arrived to the United States by boat.
4. That he/she also discovered through the news that his/her GRANDDAUGHTER AND GRANDSON were among the Cubans that were physically on the American Shoal Lighthouse located East of the Saddlebunch Keys just offshore from Sugarloaf Key.

That the affiant understands that this Affidavit may be disclosed to the United States Courts and other agencies and that any false statements contained herein could be punished by fine, imprisonment or both.

That the undersigned under penalties of perjury, declares that he/she has examined this affidavit and to the best of his/her knowledge and belief is true, correct and complete, and the undersigned further declares that they have the authority to sign this document.

FUTHER AFFIANT SAYETH NAUGHT

Dolores Noa  
DOLORES NOA

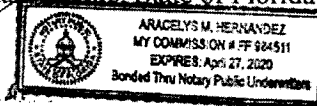
STATE OF FLORIDA )

COUNTY OF MIAMI DADE )

Sworn to, subscribed and acknowledge before me this 22<sup>nd</sup> day of May 2016, by  
Dolores Noa I used his Florida Driver's License number: N000-160-47-608-0

My commission expires: April 27 2020

Notary Public, State of Florida





For 2

## INFORMATIONAL SHEET

SUBJECT: \_\_\_\_\_

NAME: Andy Oliva Larrillo - Mario de la Concepcion Niliun Gari

DATE OF BIRTH: 10-18-1991 08-15-1986

ADDRESS IN CUBA: 1409 Ave 35 - 0/14 y 16 - Calle 18 #3120A E/31 y 33  
Caibarien V.E, Cuba. Caibarien V.E Cuba.

POLITICAL PRISONER: YES/NO: \_\_\_\_\_

IF SO, EXPLAIN  
SITUATION: \_\_\_\_\_

DEPARTURE: 05/14/2016

VESSEL TYPE: construction Portel.

DISTRICT OF DETENTION: DIA.

FAMILY MEMBER MAKING CLAIM: Dolores NOA GRANDMA.

NAME: Dolores NOA

ADDRESS: 485 E THRASHER DR, BRONSON, FL 32621

TELEPHONE: (352) 949-2960.

E MAIL: \_\_\_\_\_

RELATIONSHIP: GRANDMA.

LEGAL US STATUS

I hereby give permission to the legal team of the Democracy Movement to act on our behalf before any United States agency, department or entity. The Democracy Movement does not assure any outcome.

Signature: Dolores NOA Witness [Signature] Date 05/22/2016.

**10**

AFFIDAVIT IN SUPPORT OF PLAINTIFF'S PETITION FOR DECLARATORY AND INJUNCTIVE  
RELIEF

BEFORE ME, the undersigned authority, personally appeared REINALDO MAGARI MILIAN ALVAREZ who being first duly sworn, deposes and says as follows:

1. That his/her true and correct name is, REINALDO MAGARI MILIAN ALVAREZ, a lawful CITIZEN of the United States who resides at 3151 NW 133 STREET, OPA LOCKA, 33054
2. That he/she is the FATHER of MARIA DE LA CONCEPCION MILIAN CARRILLO (d/o/b: 08/15/1986) AND the UNCLE of ANDY OLIVA CARRILLO, (D/O/B: 10/18/1991).
3. That he/she learned on Friday 5/20/16 that his/her SON AND NEPHEW had arrived to the United States by boat.
4. That he/she also discovered through the news that his/her SON AND NEPHEW were among the Cubans that were physically on the American Shoal Lighthouse located East of the Saddlebunch Keys just offshore from Sugarloaf Key.

That the affiant understands that this Affidavit may be disclosed to the United States Courts and other agencies and that any false statements contained herein could be punished by fine, imprisonment or both.

That the undersigned under penalties of perjury, declares that he/she has examined this affidavit and to the best of his/her knowledge and belief is true, correct and complete, and the undersigned further declares that they have the authority to sign this document.

FUTHER AFFIANT SAYETH NAUGHT

REINALDO MAGARI MILIAN ALVAREZ

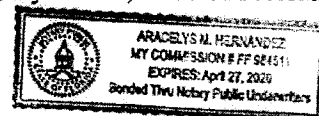
STATE OF FLORIDA )

COUNTY OF MIAMI DADE )

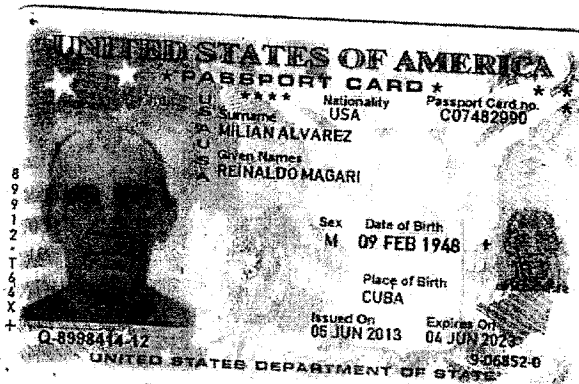
Sworn to, subscribed and acknowledge before me this 22<sup>nd</sup> day of May 2016, by  
Reinaldo Magari Milian Alvarez I used his Florida Driver's License number: N 454-733-45-049-0

Aracelys M. Hernandez  
Notary Public, State of Florida

My commission expires: April 27 2020







FOR 2

## INFORMATIONAL SHEET

SUBJECT: \_\_\_\_\_

NAME: ANDY OLIVA CANILLO MARIA DE LA CONCEPCION MILION CANILLO

DATE OF BIRTH: 10/18/1991 8/15/1986

ADDRESS IN CUBA: 1409 Ave 35 # 14 y 16 CAJALCEN VC, Cuba CAJALCEN # 3120A 9/31 y 33

POLITICAL PRISONER: YES/NO: \_\_\_\_\_

IF SO, EXPLAIN  
SITUATION: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

DEPARTURE: 5/14/16

VESSEL TYPE: embarcacion rustica

DISTRICT OF DETENTION: DNA

FAMILY MEMBER MAKING CLAIM: Renevaldo Magari Milion Alvarez

NAME: Father Renevaldo Magari Milion Alvarez

ADDRESS: 3151 NW 133RD ST OPALOCKA, FL 33064

TELEPHONE: (786) 712-3682

E MAIL: \_\_\_\_\_

RELATIONSHIP: Father

LEGAL US STATUS

I hereby give permission to the legal team of the Democracy Movement to act on our behalf before any United States agency, department or entity. The Democracy Movement does not assure any outcome.

Signature: [Signature] Witness: [Signature] Date: 5/22/16

AFFIDAVIT IN SUPPORT OF PLAINTIFF'S PETITION FOR DECLARATORY AND INJUNCTIVE  
RELIEF

BEFORE ME, the undersigned authority, personally appeared OSCAR CARRILLO, who being first duly sworn, deposes and says as follows:

1. That his/her true and correct name is, OSCAR CARRILLO, a lawful PERMANENT RESIDENT of the United States who resides at 485 EAST THRASHER DRIVE, BRONSON, FLORIDA 32621.
2. That he/she is the UNCLE of MARIA DE LA CONCEPCION MILIAN CARRILLO (d/o/b: 08/15/1986) AND THE UNCLE OF ANDY OLIVA CARRILLO, (D/O/B: 10/18/1991).
3. That he/she learned on Friday 5/20/16 that his/her NIECE AND NEPHEW had arrived to the United States by boat.
4. That he/she also discovered through the news that his/her NIECE AND NEPHEW were among the Cubans that were physically on the American Shoal Lighthouse located East of the Saddlebunch Keys just offshore from Sugarloaf Key.

That the affiant understands that this Affidavit may be disclosed to the United States Courts and other agencies and that any false statements contained herein could be punished by fine, imprisonment or both.

That the undersigned under penalties of perjury, declares that he/she has examined this affidavit and to the best of his/her knowledge and belief is true, correct and complete, and the undersigned further declares that they have the authority to sign this document.

FUTHER AFFIANT SAYETH NAUGHT

STATE OF FLORIDA )

COUNTY OF MIAMI DADE )

OSCAR CARRILLO

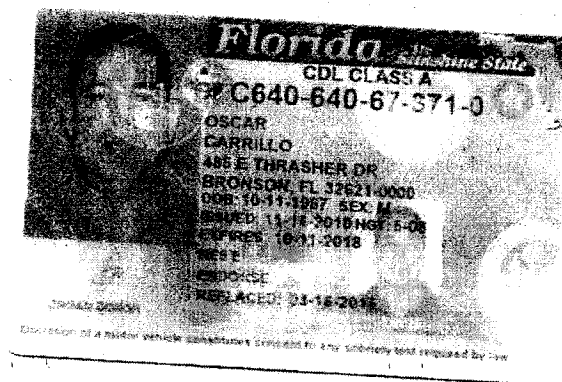
Sworn to, subscribed and acknowledge before me this 22<sup>nd</sup> day of May 2016, by  
Oscar Carrillo I used his Florida Driver's License number: C640-640-67-371-0

My commission expires: April 27 2020

Notary Public, State of Florida



ARACELYS M. HERNANDEZ  
MY COMMISSION # FF 964311  
EXPIRES: April 27, 2020  
Bonded Thru Notary Public Underwriters



For 2

## INFORMATIONAL SHEET

SUBJECT: \_\_\_\_\_

NAME: Andy Oliva Carrillo- MARIA DE LA CONCEPCION Nilon Carr

DATE OF BIRTH: 10-18-1991 08-15-1986.

ADDRESS IN CUBA: 1407 Ave 35 of 14 y 16 = Calle 18 #3120A E/31 y 33  
caibarien VE cuba Caibarien. VE. Cuba

POLITICAL PRISONER: YES/NO: \_\_\_\_\_

IF SO, EXPLAIN  
SITUATION: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

DEPARTURE: 05/14/2016

VESSEL TYPE: Construction Rusted

DISTRICT OF DETENTION: DNA

FAMILY MEMBER MAKING CLAIM: Uncle

NAME: OSCAR Carrillo

ADDRESS: 2325 W 60 Street Apt #205E Hialeah, FL 33016

TELEPHONE: (786) 580-8188

E MAIL: OCinvest@Live.com

RELATIONSHIP: Uncle

LEGAL US STATUS Resident

I hereby give permission to the legal team of the Democracy Movement to act on our behalf before any United States agency, department or entity. The Democracy Movement does not assure any outcome.

Signature: [Signature] Witness [Signature] Date 05/22/2016

AFFIDAVIT IN SUPPORT OF PLAINTIFF'S PETITION FOR DECLARATORY AND INJUNCTIVE  
RELIEF

BEFORE ME, the undersigned authority, personally appeared DOLORES NOA who being first duly sworn, deposes and says as follows:

1. That his/her true and correct name is, DOLORES NOA, a lawful CITIZEN of the United States who resides at 485 EAST THRASHER DRIVE, BRONSON, FLORIDA 32621.
2. That he/she is the GRANDMOTHER of MARIA DE LA CONCEPCION MILIAN CARRILLO (d/o/b: 08/15/1986) AND THE GRANDMOTHER OF ANDY OLIVA CARRILLO, (D/O/B: 10/18/1991).
3. That he/she learned on Friday 5/20/16 that his/her GRANDDAUGHTER AND GRANDSON had arrived to the United States by boat.
4. That he/she also discovered through the news that his/her GRANDDAUGHTER AND GRANDSON were among the Cubans that were physically on the American Shoal Lighthouse located East of the Saddlebunch Keys just offshore from Sugarloaf Key.

That the affiant understands that this Affidavit may be disclosed to the United States Courts and other agencies and that any false statements contained herein could be punished by fine, imprisonment or both:

That the undersigned under penalties of perjury, declares that he/she has examined this affidavit and to the best of his/her knowledge and belief is true, correct and complete, and the undersigned further declares that they have the authority to sign this document.

FUTHER AFFIANT SAYETH NAUGHT

Dolores Noa  
DOLORES NOA

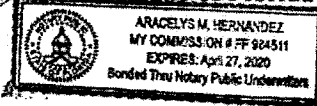
STATE OF FLORIDA )

COUNTY OF MIAMI DADE )

Sworn to, subscribed and acknowledge before me this 22<sup>nd</sup> day of May 2016, by  
Dolores NOA I used his Florida Driver's License number: N000-160-47-608-0

My commission expires: April 27 2020

Notary Public, State of Florida







For 2

## INFORMATIONAL SHEET

SUBJECT: \_\_\_\_\_

NAME: Andy Oliva Larrillo - Mario de la Concepción Nilius Gari

DATE OF BIRTH: 10-18-1991 08-15-1986

ADDRESS IN CUBA: 1407 Ave 35 #1416 - Calle 18 #3120A E/31133  
Caibarien V.C, Cuba. Caibarien V.C, Cuba.

POLITICAL PRISONER: YES/NO: \_\_\_\_\_

IF SO, EXPLAIN  
SITUATION: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

DEPARTURE: 05/14/2016

VESSEL TYPE: Construction Rusted

DISTRICT OF DETENTION: DIA

FAMILY MEMBER MAKING CLAIM: Dolores NOA GRANDMA

NAME: Dolores NOA

ADDRESS: 485 E THRASHER DR, BRONSON, FL 32621

TELEPHONE: (352) 949-2960

E MAIL: \_\_\_\_\_

RELATIONSHIP: GRANDMA

LEGAL US STATUS

I hereby give permission to the legal team of the Democracy Movement to act on our behalf before any United States agency, department or entity. The Democracy Movement does not assure any outcome.

Signature: Dolores NOA Witness [Signature] Date 05/22/2016



# Exhibit F

1. Leonides Pena Parra D.O.B.: 03/05/1976
2. Yasel Kalet D.O.B.: 09/15/1987
3. Carlos Alberto Jorge Quevedo D.O.B.:09/15/1987
4. Marco Antonio Pastoriza D.O.B.:11/19/1980
5. Alexea Batista D.O.B.: 08/15/1989