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Attorneys for Petitioner

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

Portland Division

L-J-P-L-, an adult,

Petitioner,

v.

CAMMILLA WAMSLEY, Seattle Field Office Director, Immigration and Customs Enforcement and Removal Operations ("ICE/ERO"); TODD LYONS, Acting Director of Immigration Customs Enforcement ("ICE"); U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT; KRISTI NOEM, Secretary of the Department of Homeland Security ("DHS"); U.S. DEPARTMENT OF HOMELAND SECURITY; and PAMELA BONDI, Attorney General of the United States,

Respondents.

Case No. 25-cv-01390-IM

Agency No. AXXX-XXX-629

DECLARATION OF PETITIONER IN SUPPORT OF PETITION FOR WRIT OF HABEAS CORPUS

DECLARATION OF PETITIONER IN SUPPORT OF PETITION FOR WRIT OF HABEAS CORPUS

I, L-J-P-L-, under penalty of perjury, do solemnly declare:

1. I am the Petitioner in the current matter.
2. I was born in 1990 in Todos Santos Chuchumatan, Guatemala. I identify as part of the indigenous Mam community and speak the Mam language. Mam is my native language and I consider it my first language. I have learned Spanish as a second language and can speak it at a rudimentary level and use it for simple interactions in daily life because Spanish was widely spoken in Guatemala.
3. I have very limited literacy in both Spanish and Mam.
4. I have been together with my current partner for several years and have 2 children together. I decided to flee to the United States because back in Guatemala my brother was killed and, the same group who perpetrated the murder persecuted me for years and threatened to kill me. My fear increased once I started a family, I was afraid they could try to harm them as well.
5. I came to the United States to seek asylum on or around February 14, 2024 along with my daughter.
6. When I crossed into the U.S., I looked for immigration agents because I wanted to turn myself to them. Once I turned myself in, border patrol agents took me and my daughter into custody to process us. An officer interviewed me. We spoke in Spanish, even though Mam is my best language. Nevertheless, I answered his questions to the best of my ability and provided all truthful information about my name, my family, and the address I

intended to reside if I was released. My photograph was taken; my fingerprints were taken. I told him that I wanted to seek asylum.

7. I was released on an Order of Release on Recognizance and was required to report to the ICE Offices in Eugene, Oregon as I had provided an address where I was going to stay in Woodburn, Oregon. Additionally, I was advised that my first hearing in immigration court would happen on November 18, 2026 at 8:30 a.m. in the Seattle Immigration Court.
8. I complied with all my scheduled ICE check-ins on June 4, 2024, August 6, 2024, August 27, 2024, January 7, 2025, and April 1, 2025. My next scheduled check-in was set for October 7, 2025. I was scheduled for a check-in on July 30th, 2024, which I attempted to attend, but when I arrived at the Eugene ICE office on that date, an officer came out to the parking lot to inform me that the office was closed that day. The officer instructed me to return the following week, and I presented myself exactly one week later, on August 6, 2024.
9. After getting help from a free legal services program, I submitted my asylum application on February 14, 2025.
10. In order to be able to provide for my family, I looked for a job to make some money while I was waiting to qualify for a work permit. I started working in the fields in the Woodburn area. As a farmworker, I worked in different places during the season and with different contractors who paid me and drove me to the fields.
11. I worked hard every day to be able to provide for my children and partner—who often was working alongside me—even if I was paid very low wages.
12. On August 7, 2025, I went to work as usual with my partner. At around 5:25a.m., we were picked up in a van to get transported with other workers to the farm. We had just

started working with a new contractor, so we were not too familiar with any of the other workers but many of them spoke Mam as well.

13. That morning, the usual person who drives was out of town so another worker was driving. There were around seven people in the car, including my partner and me.
14. While we were on the road, I saw a van behind us that started to flash some lights into our van. I thought it was the regular police and others in the van thought so too because that was what they said. Everyone appeared startled. So the driver pulled over, I saw that we were surrounded by around four different vans and our van was directed to a private driveway where they pulled us over.
15. When we stopped, several people surrounded the van. A few minutes after they surrounded our van, one of the men broke the window on the driver side and pulled the driver out of the van. I was ordered out of the van. After that, they opened the rest of the doors and I saw my partner and the others get out of the van.
16. One agent asked if I had a pending immigration case and I told them yes. They took my picture, handcuffed me and put me in the back of one of their vans.
17. I was very scared because I did not understand why they were arresting me. I had been let into the country and I had been complying with all they asked, and I have my asylum case pending with the court. I have never committed any crimes or had any problems with anyone. I was just working while waiting for my court hearing.
18. I was taken to a building where they put ankle shackles on me and gave me more documents, but I did not want to sign because I did not understand them or the agent. I did not want to sign anything because I did not want to get tricked into signing for my

deportation. They took my fingerprints again. I wanted a lawyer but they never asked me if I wanted to speak with an attorney.

19. Many hours passed while I was waiting in a cell with other men. Then, an agent told me that I was going to the detention center in Tacoma, Washington.

20. I am very afraid that I will be deported and will be separated from my family. Every day I think of my partner and my children. My partner has a medical condition and I am afraid she will get worse because she will have to work more. I also think of my children every day and how much this affects them. I want to go back home to them in Oregon. I want to go back and continue with my asylum case and work to support my family.

I HEREBY DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

Dated: August 18, 2025.

J. P. L

L-J-P-L-
Petitioner

CERTIFICATE OF TRANSLATION

I, Kathleen Pritchard, declare that on August 18, 2025, I caused the foregoing declaration to be translated faithfully and accurately into Mam for Petitioner through the telephonic certified interpreter service offered by the Linguava Interpreters. Before the translation, I confirmed that Petitioner was able to understand the interpreter. After I finished translating the foregoing declaration via the interpreter, Petitioner verified that the contents of the declaration are true and accurate.

Kathleen Pritchard

08/18/2025
Date

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