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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 L-J-P-L- IN SUPPORT OF HIS MOTION TO RECONSIDER

DECLARATION OF PETITIONER L-J-P-L- IN SUPPORT OF HIS MOTION TO RECONSIDER

I, L-J-P-L-, hereby declare under penalty of perjury pursuant to 28 U.S.C. §1746 that the foregoing is true and correct to the best of my knowledge and belief:

1. I am the Petitioner in this matter. I have been identified in these filings as L-J-P-L-.
2. As I mentioned in my previously-filed declaration, immigration officials attempted to deport me last week (the week of September 15-19, 2025), but when we landed in my home country of Guatemala, the officers did not let me off the plane and instead flew me back to the United States.
3. When the government returned me to the U.S. from Guatemala, they brought me back to Camp East Montana at Fort Bliss in El Paso, Texas.
4. I stayed at Camp East Montana until September 25, 2025. On that date, guards woke me up at about 3:00 in the morning and took me out of the warehouse where I was being held. I have noticed that usually when the guards are going to transport a detainee, they will bring a whole group of detainees that are going to the same place, but that morning the guards only took me. They put me in handcuffs and shackled my legs I asked a guard where they were taking me, and he told me that he thought that they were going to deport me. I started to cry and I almost fainted because I felt terrified and uncertain about what was going to happen to me.
5. The guards put me on an airplane, and it was only once I was on the plane that an officer told me that I was not being deported, rather they were taking me to Washington State. I stayed handcuffed and with shackles on my legs for the entire flight.

6. The flight went directly from El Paso to Washington State without stopping anywhere. I was the only person on the flight besides the officers who traveled with me.
7. When we landed, I asked an ICE officer why they had brought me back and they told me that they couldn't deport me yet, because I have "two cases" and because I "still have to see a judge in Seattle." Then the officers took me back to the detention center in Tacoma where I had previously been held. I have asked to see a doctor since returning to the detention center in Tacoma, and they took me to see the doctor once. I told the doctor that my chest hurt, and the doctor gave me Ibuprofen. The doctor told me that the pain in my chest is likely related to the trauma and anxiety I have from experiencing so much uncertainty and from feeling so helpless as ICE sent me to different detention centers, to Guatemala, and back to the U.S. and now back to Tacoma. I have a bed here at the detention center in Tacoma, but they do not give us much food and most days I go to bed still hungry.
8. I feel really confused and desperate. I do not understand what is going on and why I am being moved around. I now am able to speak to my partner and daughters, but it is really hard for me to be away from my family and not knowing what can happen the next day or if I will be able to speak with them again.
9. On September 26, 2025, some guards came to our pod in the detention center with a list of detainees. They called my name off of the list and they took the group of detainees who had been on the list to speak to an ICE officer. The ICE officer told us about a program where the U.S. government would give us $1,000 to voluntarily accept deportation. After the officer presented to the group, he spoke with several detainees one-

on-one, including me. When the officer spoke with me, he asked if I wanted to accept the $1,000 but I told him I did not want to, and that I still have to see a judge.

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

Dated: October 2, 2025.

J. P. L

L-J-P-L-
Petitioner

CERTIFICATE OF TRANSLATION

I, Nelly Garcia Orjuela, declare that on October 2, 2025, I caused the foregoing declaration to be translated faithfully and accurately into Mam for the witness through the telephonic certified interpreter service offered by Linguava Interpretation Services. Before the translation, I confirmed that the witness was able to understand the interpreter. After I finished translating the foregoing declaration via the interpreter, the witness verified that the contents of the declaration are true and accurate.

Nelly Garcia Orjuela
Innovation Law Lab
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Portland, OR 97240
503-922-3042

October 2, 2025
Date