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**Admitted Pro Hac Vice*

Attorneys for Petitioner

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
Eugene Division

M-J-M-A-; VICTOR CRUZ GAMEZ,
Plaintiffs,

v.

JULIO HERNANDEZ, Seattle Field Office
Director, Immigration and Customs
Enforcement and Removal Operations
("ICE/ERO"); DAVID VENTURELLA,
Acting Director of Immigration Customs
Enforcement ("ICE"); U.S.
IMMIGRATION AND CUSTOMS
ENFORCEMENT; MARKWAYNE
MULLIN, Secretary of the Department of
Homeland Security ("DHS"); U.S.
DEPARTMENT OF HOMELAND
SECURITY; and TODD BLANCHE, Attorney
General of the United States,

Defendants.

Case No. 6:25-cv-02011-MTK

**DECLARATION OF ALYSSA
WALKER KELLER IN
SUPPORT OF PLAINTIFFS'
MOTION TO ENFORCE**

**DECLARATION OF ALYSSA WALKER KELLER IN SUPPORT OF PLAINTIFFS'
MOTION TO ENFORCE**

I, Alyssa Walker Keller, do declare under penalty of perjury that the following is true and correct to the best of my ability and belief:

1. My name is Alyssa Walker Keller. I reside in Portland, Oregon, I am over 18 years of age and I make the following declaration based on my personal knowledge.
2. I am the Co-Executive Director for the Portland Rights Immigrant Rights Coalition (“PIRC”). My role consists mainly in helping manage the different projects PIRC has, in particular the legal observer and community watch volunteer programs, our resource center near the ICE Portland office, coordinate with other local organizations around the state and run the hotline that receives statewide reports of ICE enforcement.
3. PIRC works to empower immigrants, unite families, and build a just community in Portland and all of Oregon. PIRC works to equip immigrants with vital knowledge about their rights, provides training on ICE interactions, and seeks to foster a well-informed community.
4. PIRC operates a statewide, toll-free hotline as part of Oregon’s rapid response system. The hotline is a free service for the community. It enables anyone impacted by an ICE detention or enforcement action to call a single number and get connected with necessary resources, including legal representation through Equity Corps of Oregon (ECO), Oregon’s statewide universal representation program.
5. The hotline is staffed by trained operators. The hotline receives calls around the clock, but most of the calls reporting detentions and ICE encounters occur in the morning or early afternoon.
6. PIRC’s general protocol is relatively simple: calls come into the hotline and trained operators route the calls to the correct point in the rapid response system. For reports on ICE detention, operators take detailed notes to understand what happened and collect information about the

arrest or detention and the relevant biographical details of the person who was detained. This can include their immigration case number and other facts, all of which are confidentially, securely and safely recorded. In order to record and process a report about an ICE detention, we confidentially collect information about the caller.

7. Usually, when the call to report a detention comes from a family member or acquaintance of the person detained, we ask them for a brief description of how the person was detained and if they have an attorney.
8. After a fall and winter of an unprecedented number of reported ICE detentions across the state, in February 2026 there was a sudden drop in reports of detentions to the PIRC hotline.. While detentions were still happening there were less than five per week. This lasted for around two to three months. We believe that this was in large part due to the preliminary injunction issued by the District Court.
9. Since May 2026, we have experienced a sustained increase in calls to the hotline to report ICE detentions and activity and from community members requesting legal assistance. While there are a few reports of people detained during a check-in at the ICE offices, the majority of the reports have been of arrests happening after a traffic stop in the street or interaction at a local courthouse, or in public parking lots.
10. The following is a breakdown of the reports of detentions the PIRC hotline has received in the months since the preliminary injunction was issued, the vast majority of which were reported as occurring in Oregon:
 - a. Through the month of February 2026, the hotline received reports of 16 detentions.
 - b. Through the month of March 2026, the hotline received reports of 15 detentions.
 - c. Through the month of April 2026, the hotline received reports of 30 detentions.

- d. Through the month of May 2026, the hotline received reports of 47 detentions.
- e. Through the month of June 2026, the hotline received reports of 84 detentions.
- f. Through the month of July 2026, the hotline received reports of 69 detentions.
- g. Through the month of August 2026, until August 31, the hotline received reports of 92 detentions.

I DECLARE UNDER PENALTY OF PERJURY AND UNDER THE LAWS OF THE UNITED STATES THAT THE FOREGOING IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.

Signed in Portland, Oregon this 31st day of August, 2026.



Alyssa Walker Keller