

STEPHEN W. MANNING, OSB # 013373
stephen@innovationlawlab.org,
smanning@ilgrp.com
JORDAN CUNNINGS, OSB # 182928
jordan@innovationlawlab.org
NELLY GARCIA ORJUELA, OSB # 223308
nelly@innovationlawlab.org
KELSEY LYNN PROVO, OSB # 145107
kelsey@innovationlawlab.org
ROSA SAAVEDRA VANACORE* NY# 5625611
rosa@innovationlawlab.org
INNOVATION LAW LAB
333 SW 5th Ave., Suite 200
Portland, OR 97204-1748
Telephone: +1 503-922-3042

**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 C-J-V-M- IN
SUPPORT OF PLAINTIFFS'
MOTION TO ENFORCE**

DECLARATION OF CJVM IN SUPPORT OF PLAINTIFFS' MOTION TO ENFORCE

I, CJVM, under penalty of perjury, do solemnly declare:

1. My name is CJVM. I am over 18 years of age and have personal knowledge of the facts described herein.
2. I am a resident of Medford, Oregon. I have lived in the Medford-area for over two years. I live there with my partner and two children. I work as a general employee at a McDonald's.
3. I came to the United States seeking asylum and have a pending asylum application.
4. On June 13, 2026, I left my home at around 3:00 am to go to work. I start my shift very early in the morning around 4:00 am. As a general employee, I do tasks as needed, take deliveries, maintenance, food preparation or anything that is needed in the restaurant.
5. As I was about to leave for work, a coworker texted me that there were ICE cars in the parking lot and told me to be careful. Over the past days, we had seen the ICE cars in the parking lot and they had taken a couple of people who worked with us.
6. I arrived to work at around 4:05 am. As I parked in the McDonald's parking lot, two vans boxed my car in so I could not go anywhere. One was directly behind my car and the other one on the side of my car.
7. Two agents got out of the vans and started yelling and knocking on my car. Before I could do anything within less than 30 seconds, one of the agents broke the driver side window. Shattered glass got into my ear. The agent then opened my door, unbuckled my seatbelt and pulled me out of the car.
8. Both agents kept yelling in English and Spanish. They grabbed me forcibly by the arm, turned me around with my hands behind my back and handcuffed me immediately. At that

time, they had not asked my name or told me why they were arresting me. They only claimed they had a warrant. I asked them why they were arresting me, and they only said because they had run my plates and because I did not open my car door. They told me I had to do everything they told me to do.

9. One of the agents the put his hand in my pocket and took my wallet out. It wasn't until then that they asked for my name. I told them my name. They asked me whose car I was driving and at the point I asserted my right to remain silent. One of the agents said that if I did not cooperate, they were not going to let me go. Then, I told him the name of the car's owner.
10. The agent said they were looking for that person and that whenever an officer told me to stop, I had to fully comply. After that, the agent grabbed what seemed to be a phone and took a picture of my face. The agent then said they were just running my picture and investigating me, and when they were done they would either take me or let me go.
11. After a couple minutes passed, the agent said they had confirmed I had an open case and asked where I attended my regular check-ins with ICE. Eventually, the agent apologized and told me I was free to go. He also said they would pay for the broken window.
12. The same cars kept showing up to the McDonald's parking lot at the same time for about three consecutive weekends. Most workers at that location are Latinx or Hispanic, like me. Because of this, the manager decided to set up transportation for the employees so we would not be at risk when driving to work.
13. After this incident, I had to go to the doctor because the glass in my ear was hurting and making it difficult for me to hear properly.

I declare that the foregoing is true and correct under penalty of perjury of the laws of the United States.

Executed on August 19, 2026, Medford, Oregon.

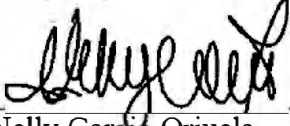


CJVM

CERTIFICATE OF TRANSLATION

I, Nelly Garcia Orjuela am competent to interpret between English and Spanish and certify that I have read the contents of this declaration to the Declarant in Spanish. Declarant stated that they understood its contents and verified that they were true and accurate.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



08/19/2026

Nelly Garcia Orjuela
INNOVATION LAW LAB
333 SW 5th Ave., Suite 200
Portland, OR 97204-1748
Telephone: +1 971-353-4663

Date