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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 H-F-M-J-
IN SUPPORT OF PLAINTIFFS'
MOTION TO ENFORCE**

DECLARATION OF H-F-M-J IN SUPPORT OF PLAINTIFFS' MOTION TO ENFORCE

I, H-F-M-J-, under penalty of perjury, do solemnly declare:

1. My name is H-F-M-J-. I am over 18 years of age and have personal knowledge of the facts described herein.
2. I am a resident of Eugene, Oregon. I have lived in the U.S. for over three years. I have three minor children and provide for them financially. I work as a landscaper.
3. On the morning of July 3, 2026, I left my home to go to work at about 7:15am, driving a vehicle that I had borrowed from a family member. I traveled with a roommate, who was also a coworker. Work normally starts at 7:30am.
4. I saw what I believed were ICE vehicles following me. We pulled into the parking lot to meet our boss and they pulled behind my car after we parked. They drove three vehicles, two black SUVs and one gray van. There were three ICE officers who all wore masks. One officer spoke a little bit of Spanish. My coworker got out of the car and walked to the building door and ICE told him to stop. I stayed in the car. I watched the officers arrest my coworker and then they approached me in the car. They told me to “get out of the car, we’re arresting you. We have an arrest warrant.” But they never showed me any papers.
5. They asked if I had any papers that allowed me to be in the United States. I said no and they told me to give them all my stuff, including my keys and my wallet. I gave it all to them. They handcuffed me and put me in a van. That’s all they said to me; I never heard any officer say my name at any point.
6. When we got to the ICE office, the officers read our names from our ID cards, then I was separated from my co-worker. They asked me questions about my family.

7. They told me that if I wanted to fight my case, I would stay in detention for months. They gave me a form to sign, but I did not understand it. I signed it because I did not want to be locked up. Then the ICE officer told me it was a voluntary departure form, but I did not really want to leave the country.
8. I understand that a federal judge ordered ICE to release me. They released me that day. After I was released, some friends who had arrived at my home around 6:30am earlier that same morning told me that they had seen a suspicious black SUV parked out front. But I never noticed it myself, but I assume that's when they started following me.

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

Executed on August 26, 2026, Eugene, Oregon.

s/ H-F-M-J-

H-F-M-J-

CERTIFICATE OF TRANSLATION

I, Alma Sandoval 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.

s/ Alma Sandoval

August 26, 2026

Alma Sandoval
CCSLC
1055 Charnelton St.
Eugene, OR 97401

Date