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

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

I, J-C-C-V-, under penalty of perjury, do solemnly declare:

1. My name is J-C-C-V-. I am over 18 years of age and have personal knowledge of the facts described herein.
2. I am a resident of The Dalles, Oregon. I live there with my wife and two children. I arrived to the United States over three years ago. I applied for Asylum in 2024, and those proceedings continue. Before it was rescinded, I held Temporary Protected Status.
3. On June 19, 2026, I headed to work in the morning at around 7:30 am and arrived at the Hood River Walmart parking lot around 8:00 am. I noticed cars were following me. I was waiting for delivery orders for work. My brother was also in the lot waiting for orders, in his car. He drives a Toyota Camry, and I drive a Toyota Corolla, and we were each in our respective cars.
4. I got a delivery order for about two miles away and started to go. I noticed two cars following me. Three or four minutes later, five cars stopped me. An agent approached me as I was in my car. He didn't present any paperwork or anything; he just told me to get out.
5. I complied with all the agent's instructions as I understood them. I got out of the car and the agents immediately arrested me. They did not ask me anything or say why they were arresting me. They put handcuffs on me and put chains on my waist and legs.
6. The agents put me in the back of a Ford Fusion and took me to Cascade Rock beside a train track. There the agents started to ask me questions, about who I was and where I was from, they took my wallet and then took my fingerprints. I told them my name and that I had an open case, but they didn't seem to care.

7. The agents then drove me to Portland. We got there maybe 45 min later. We got to a parking lot surrounded by construction and trash. The place was hidden away from the public. They had me wait about two hours in the car. Meanwhile I was handcuffed and chained at my waist and feet. Outside of the vehicle I was in, the officers seemed to be dealing with something, which I think was a mistake they had made with my arrest. I think they were putting together paperwork about my arrest.
8. After the hours of waiting, they took me out of the car and immediately grabbed me by the hair painfully and, in Spanish, said to sign here. They didn't say what it was. I didn't have any other option but to sign the paper. They intimidated me into signing it.
9. After that, they took me to the detention center in Tacoma, and I have been in detention since.
10. About eight or ten days after getting to Tacoma, an officer gave me documents about the arrest. It included false information, noting that I was arrested in a car in which I had not been, claiming that I was in a Toyota Camry when they arrested me. My car, the one I was driving when they stopped me, is a 2010 Toyota Corolla.
11. I believe they were not looking for me, but possibly my brother, who is the registered owner of the car that they put on the paperwork.
12. Before my detention, I diligently complied with all that was required from me: I attended court hearings, updated my addresses as I moved homes, attended all my reporting appointments whether in person or through the phone application.
13. I do not understand why they arrested me if I was doing everything right. I worked hard to provide for my family and never had any problems with anyone. I miss my wife and children every day and it has been hard being away.

14. Being in detention has been very hard, the food they provide us is not enough and it has been hard for my family to make ends meet and deposit money in my account so I can talk to them.

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

Executed on August 24, 2026, Tacoma, WA.

/s/JCCV

J-C-C-V-

CERTIFICATE OF TRANSLATION

I, Patrick Podesta, 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/Patrick James Podesta

08/24/2026

Patrick James Podesta
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Date