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**IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF OREGON  
 EUGENE DIVISION**

PINEROS Y CAMPESINOS UNIDOS DEL NOROESTE; AUGUSTANA LUTHERAN CHURCH; OUR LADY OF GUADALUPE PARISH; SAN FRANCISCO INTERFAITH COUNCIL; WESTMINSTER PRESBYTERIAN CHURCH; NATIONAL EDUCATION ASSOCIATION; AMERICAN FEDERATION OF TEACHERS; AMY LOMANTO; HANNA MAE ANDERSON; LAUREN FONG; and CAROLINE KEATING MEDEIROS,

*Plaintiffs,*

*v.*

KRISTI NOEM, in her official capacity as Secretary of Homeland Security; U.S. DEPARTMENT OF HOMELAND SECURITY; TODD LYONS, in his official capacity as Acting Director of Immigration and Customs Enforcement; U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT; RODNEY S. SCOTT in his official capacity as Commissioner of Customs and Border Protection; U.S. CUSTOMS AND BORDER PROTECTION,

*Defendants.*

Civil Action No.: 6:25-cv-699-AA

**DECLARATION OF A-R- IN SUPPORT OF PLAINTIFFS NATIONAL EDUCATION ASSOCIATION AND AMERICAN FEDERATION OF TEACHERS' MOTION FOR STAY UNDER 5 U.S.C. § 705**

**DECLARATION OF A-R- IN SUPPORT OF PLAINTIFFS NATIONAL EDUCATION ASSOCIATION AND AMERICAN FEDERATION OF TEACHERS' MOTION FOR STAY UNDER 5 U.S.C. § 705**

I, A [REDACTED] R [REDACTED] ("A-R-"), upon my personal knowledge, hereby declare under penalty of perjury as follows:

1. My name is A-R-. The facts set forth in this declaration are based on my personal knowledge, unless otherwise indicated, and, if called as a witness, I could and would testify thereto. I am over eighteen years of age and of sound mind to declare to the facts stated herein.
2. I am offering this Declaration in my individual capacity and not on behalf of the institution that employs me.
3. I currently serve as a high school teacher in a California High School.
4. I am a member of the National Education Association (NEA). I am also co-chair of the immigrant student justice committee for our school district.
5. I have been aware of the federal government's sensitive locations protections since I was a child. I was aware that undocumented people sought safety from immigration enforcement at both schools and churches.
6. I heard about the revocation of the sensitive locations protections in January 2025 by listening to the national news. The loss of that protection was incredibly upsetting to me in my role as educator tasked with protecting my students.
7. Shortly after the revocation of the sensitive locations protections, my union pushed to create a sanctuary team, and brought the revocation of protections for sensitive locations to the attention of my school district. The district stated that they already had a policy not to let immigration officials into the schools.

8. I worked with my union to recommend a sanctuary policy to have schools go into lockdown, meaning no one can leave or enter the premises, when immigration enforcement officials are in the area near a school. However, the school district committee wouldn't make this change in policy and instead instructed the union to ask each individual school to adopt this policy. Most schools have not chosen to adopt the new policy, so it is only in place in about 15-20 out of 1,000 schools in my school district.
9. Although my school has adopted the policy regarding lockdown, the administration has not complied with it, either refusing to lock down or lifting lockdowns even when immigration enforcement is right outside of my school.
10. Some schools in my district have the policy that they will only go into lockdown if ICE is actually trying to enter the building. Administrators also sometimes refuse to identify the presence of other immigration enforcement officials very close to our school as a threat, and won't go into lockdown if ICE in particular is not present.
11. In my union role on the immigrant student justice committee, I have spent a lot of time and energy trying to get administration to make changes to its policies related to immigration enforcement.
12. In June 2025, I saw immigration enforcement officials outside my school with a caravan of military vehicles. My principal refused to go into lockdown even though students were really scared.
13. On or about Oct. 14, 2025, I was at school when I saw immigration enforcement officials right outside of my school. It appeared that those officials were trying to get into a factory across the street from the school. They shot a community member, who was a local reporter, a half block away from my school. A student at my school saw the shooting, and sent me a related picture.

My school went into lockdown, but this lockdown was lifted about 30 minutes later even though the immigration enforcement officials were still outside the school for several more hours. I tried to talk to principal and asked that the school go back into lockdown, but the principal refused after her suggestion that she was following direction from the district.

14. During this incident in October 2025, students in my school could see the officers while school was still in session and they were really scared.
15. Since Spring 2025, students in my school have also reported to me and my colleagues on a regular basis that they are being stopped by immigration enforcement officials on the way to and from school, and the officials stopping them are asking about their immigration status. This activity has been reported to my school's administration but the administration has done nothing about it. The students are scared and it doesn't feel good. They express fear and anxiety about this happening.
16. Since Spring 2025, there have been numerous immigration enforcement actions in the neighborhood near my school as well.
17. On December 12, 2025, I was at school when we learned that men with guns were outside of my school and the school went into lockdown. We understood that these men were immigration enforcement officials who were raiding an apartment building right next to the school, where some of my school's students live. The students heard a pop and were really afraid that it was a shooting.
18. The presence of immigration at or near our school causes constant trauma for the students. The revocation of the sensitive locations protection for schools has significantly affected my students and my teaching. Since Spring 2025, students are hyper aware of the risk of immigration enforcement at our school, and they have been asking many questions about ICE. Students have

expressed to me a feeling that ICE is trying to kill them. I try to help them understand through history, soothe their fears, and empower them.

19. The presence of immigration at or near our school causes parents to be desperate to have their students picked up after school rather than having them walk home as was the custom for many students prior to the recent immigration enforcement actions. One special education student was so scared when immigration enforcement officials were present, that I got called asking when she was going to be released from school, because she was “freaking out.” The parents’ and students’ concern about immigration enforcement at or near the school means that I need to take additional time to interact with them to hear their concerns and try to find solutions. These concerns also cause the students to have a lack of focus in class, which creates a negative learning environment and creates pressure on me to find ways to engage the students despite their fears. The fear of immigration enforcement at school among parents and students is causing a sharp decline in attendance. Numerous students at my school are chronically absent because of these fears, including two of my students who I’ve only seen 2-3 times all fall semester because they fear encountering immigration enforcement officials on their way to or from school. These absences create extra work for me because I need to ensure that the absent students receive and understand the material covered in class and complete the assignments.

20. Because of the threat of immigration enforcement at my school, student performance has really declined, so much so that the fear is overwhelmingly crushing their souls. They are saying “why should I try” when they are going to get taken by immigration enforcement. This fear creates extra work for me to motivate the students in class to learn and complete their assignments.

21. Students are showing a lot of despair about the threat of immigration enforcement, and they are more “needy” and want attention. Some students get disruptive to get attention, because they are looking for validation and to know that someone cares about them. This makes my teaching more difficult and stressful.
22. A student of mine who is 14 years old and a citizen and whose parents are citizens has told me that he is scared about immigration enforcement. I have tried to reassure him, because he’s a citizen, but he said, “why are you telling me it’s ok when it’s not,” expressing fear that he will get detained by immigration enforcement officials at or near our school simply because of the color of his skin and making statements like, “why should I try.”
23. Since immigration enforcement has been taking place at and near my school, I feel like I’ve stopped being a whole person and that I have to put the needs of my students in front of my own. My focus is on keeping them safe, and I’m exhausted from the constant stress and effort.
24. I spend much of my time addressing concerns and issues relating to immigration enforcement at school, which interferes with my performance of my teaching responsibilities. As an example, it now sometimes takes me twice as long to grade assignments – up to two weeks versus my past practice of one week or less.
25. The threat of immigration enforcement at or near my school is also frustrating for me because administrators aren’t taking this seriously, and so I need to take the extra time to address student absenteeism and performance issues.
26. The threats also affect my mental health and motivation because it’s upsetting for me when my students are affected. I hate not being able to tell my students that it’s going to be ok. I feel like our survival and safety are on the line.

27. I am afraid that members of my community, members of the public, or my employer will retaliate against or harass me and my family if my identity becomes public in connection with this lawsuit. I am also afraid that federal law enforcement may target me, my school, or my students as a result of my participation in this lawsuit.

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.

Executed in \_\_\_\_\_, California on 02/10/2026.

/s/ AR

A \_\_\_\_\_ R \_\_\_\_\_

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*\*Pro hac vice*

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