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

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

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

1. My name is **C-R-D-**. 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 am afraid that federal law enforcement may retaliate against and target me, my school, or my students if my identity becomes public as a result of my participation in this lawsuit.
4. I currently serve as a middle school English Language Arts teacher in Arkansas.
5. I am a member of the National Education Association (NEA).
6. My school is extremely diverse; 91% of students are English Language Learners.
7. Before January 2025, I never had to think or worry about immigration operations in or around schools. But when I learned through media and my union that schools could now be targets, I was immediately concerned for my students.
8. Since then, I find myself constantly looking up laws and policies that affect my job as a teacher, including those related to immigration.
9. Kids are on edge because they feel like they could get picked up anywhere, anytime – including school. My students have repeatedly ask me: “what if ICE [Immigration and Customs Enforcement] comes to the school?” In class, they seem much more agitated than usual and have shorter fuses.

10. Following a recent snowstorm in mid-January of 2026, a staff member announced to students that they should be careful because “there was ice outside,” referring to the weather conditions. But the students panicked, thinking that the staff member was referring to “ICE” as in Immigration and Customs Enforcement.
11. Several of my colleagues have also expressed concern that ICE will come to our workplace – especially service employees such as food workers and custodians.
12. For a long time, our school has run initiatives to help the community, such as a professional clothing drive and free English classes for adults. But because parents and other community members are now afraid to come to school, we have seen much less engagement with these programs. Because our school funding is partly tied to family and community engagement, this decrease also means less money for employment contracts as well as fewer resources for students.
13. I know that some students who have recently left my school have either left the district entirely or transferred to virtual schools due to fears of immigration enforcement. I am also aware that the number of kids who see the school counselor has skyrocketed recently. It is my understanding that this is because they are anxious about immigration enforcement activity at school.
14. Some students from my class have simply disappeared and I don’t know what happened to them. I also suspect that this is because of the fear of immigration enforcement activity at school.
15. Knowing that I cannot guarantee students’ safety *in my own classroom* is a day-to-day stressor that wears me down. To begin with, I knew that part of my job could involve

protecting my kids from someone with a gun. Now, in addition to that, I have to worry that there might be masked federal agents about to swarm in with guns, too.

16. I feel exhausted at the end of every day from the emotional and mental toll of not feeling safe at school.

17. I have sought help from my therapist for my fears about not being able to protect my students. My physician even recommended that I start taking medication to help manage this severe stress.

18. When I don't feel safe, I can't teach effectively. And when students don't feel safe, they can't learn.

19. I truly wish I could still tell parents that I could without a doubt protect, feed, and educate their children for 8 hours each day. It would improve attendance vastly, and it would be a huge load off of my shoulders as well.

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 [REDACTED], Arkansas on 02/09/2026

/s/ CRD

C [REDACTED] D [REDACTED]

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***Pro hac vice application forthcoming*

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