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

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

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

1. My name is J-G-. 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 English as a Second Language (ESL) teacher in Maryland.
4. My high school is made up of approximately 35% Hispanic students.
5. I hold a master's degree in education and a second masters degree in equity in education.
6. I am a member of the National Education Association (NEA).
7. Prior to January 2025, I was generally aware that immigration enforcement should not take place at or near schools, and during my previous years of teaching, I never knew of any immigration enforcement taking place at any schools, including the school where I teach.
8. Shortly after January 2025, I learned that the sensitive locations protection for schools had been removed by the federal government. I immediately began thinking of what needed to be done to protect my students and began connecting with other community groups that could provide resources for them.
9. Since the fall of 2025, immigration enforcement officials have been a consistent presence

near my school and other schools in my district.

10. In November 2025, immigration enforcement officials apprehended 2 different individuals in front of two different middle schools, both of which feed into my high school, and one of which is less than a mile from my school. This took place in view of the middle school students being dropped off at school or getting off the bus.
11. In the fall of 2025, there was a lot of immigration enforcement official presence outside of one of the elementary schools in my district while parents were picking up students. When the principal saw this activity, he held an impromptu parent meeting at the school to keep those parents safe, and the parents stayed at the school for several hours.
12. Immigration enforcement agents often park very close to school property and “lie in wait.” For example, in early January 2026, immigration enforcement officials were parked in the fire station that is right next door to my school.
13. The constant presence of immigration enforcement agents near my school has led students to express their fears about immigration raids at or near school. They try to cover up with false bravado, saying things like “whatever happens, happens,” but their fears make it hard for them to concentrate on their schoolwork.
14. Students’ concern and fear about immigration enforcement is exemplified by a student walkout about three weeks ago, in which 200 students participated. The sole focus of that walk out was on immigration enforcement affecting students.
15. As an experienced educator, I worry about the cumulative effect on students’ stress and fear from the presence of immigration enforcement near my school, which could have a negative long-term effect on their academic progress.
16. Since immigration enforcement activity started to take place near our school, student

attendance has dropped dramatically. Many students, especially those at risk of being targeted by immigration enforcement based on their background, have been chronically absent with 15-20% missed days since immigration enforcement near our school started last fall.

17. Student absences create extra work and anxiety for me, because I need to help them learn material they missed and make up missed assignments. Much of this work takes place outside of my regular work hours, during the evenings and weekends.
18. It is not sustainable for me to support the learning of so many absent students because it detracts from my ability to prepare and provide instruction and grade assignments for the in-person students. This additional burden also detracts from my ability to provide the best possible instruction for all students, and negatively affects my personal well-being.
19. The threat of immigration enforcement at or near our school has also interfered with events planned at my school. For example, we typically hold a Hispanic Heritage event in the fall, and that event was always held in the evening so that families could attend. Because of the threat of immigration enforcement at or near our school, the event was moved to a time during the school day in Fall 2025. This decision was made to bolster the school's position that the event would be considered to be held in a private space that would be inaccessible by immigration enforcement officials absent a judicial warrant. I also had one student tell me already that he will not come to the graduation ceremony I am helping to plan because he is afraid of immigration enforcement there.
20. The constant presence of immigration enforcement near my school has created a stressful situation for me because I am constantly worried about immigration enforcement happening at or near our school.

21. I also have concerns about my job security because our enrollment of newcomers is much lower than previous years. Typically at this time of year we have as many as 70 newcomers in up to 4 ESL sections, but this spring we only have 1 newcomer section with 5 students in it. It is my understanding that this enrollment decline is attributable to the immigration enforcement occurring at or near our school. Our district could decide to eliminate at least one ESL position based on this low enrollment, and I could be reassigned or laid off.

22. 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 [REDACTED] Maryland on February 9, 2026.

/s/ JG
J [REDACTED] G [REDACTED]

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