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

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

I, M████ D████ ("M-D-"), upon my personal knowledge, hereby declare under penalty of perjury as follows:

1. My name is M-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 currently teach at an alternative school in a suburb of Minneapolis, Minnesota. The school draws students from everywhere in the district.
4. I am a member of the National Education Association (NEA) and the American Federation of Teachers (AFT).
5. The student population of my high school includes approximately 40% students of color. We also have students who require English Language Learner services.
6. I was aware of the sensitive locations policy because of my involvement with my union. Therefore, I was not concerned about immigration enforcement taking place at school in my prior 15 years as a teacher.
7. Similarly, I learned about the policy's rescission through my union in early 2025. When federal immigration agents started flooding Minneapolis in December 2025, I became concerned that it could actually happen at my own school.
8. Law enforcement activity is not totally unheard of at an alternative school like mine.

Occasionally, local police have come to my school to execute a warrant for a student. In  
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UNDER 5 U.S.C. § 705

those cases, the student is actually suspected of some sort of crime or parole violation, it is local law enforcement officers, and it is always handled by school administration. But that feels completely different than the prospect of immigration enforcement—it isn't federal agents coming to throw people in jail for what is a civil offense and then deport them.

9. I learned in the first week of February 2026 that Immigration and Customs Enforcement (ICE) snatched one of my homeroom students from his school bus stop, roughed him up, and released him at 3 A.M. the next morning. I have not seen that student since then.
10. Another of my students turned to me for support a few weeks ago and told me of a harrowing encounter with ICE at his home. I felt angry and fearful on his behalf.
11. My school is a block and a half away from the county courthouse – a location where federal immigration agents frequently operate. Our close proximity to these “stake outs” of the courthouse makes it very difficult to make my school feel like a safe place for students.
12. Several students have asked whether ICE can come onto our campus. I can no longer reassure them that campus is safe from ICE. This is distressing, especially because as a smaller, alternative program, my school emphasizes building relationships of trust and safety with students.
13. Many more students than usual have been absent on a regular basis since the beginning of January. I have had to put in extra time keeping track of these students so that they are not automatically dropped from our school system due to absenteeism. I know of at least four students who are not coming to school because they are afraid of encountering immigration enforcement at school or at the school bus stop.

14. The staff at my school is in the process of figuring out whether it is feasible for us to offer a virtual option for students who are not coming to school given the large amount of extra work that would entail.

15. My colleagues and I feel on edge every day due to concern for our vulnerable students. We particularly worry about them on the way to and from school, since they take school buses from the various home high schools in our district. Those schools are much larger, and I have heard that ICE has been present near some. This means that we must worry about our students getting caught up with immigration enforcement not only at our own building, but also at several other school buildings.

16. 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.

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], MN on February 9<sup>th</sup>, 2026.

/s/ MD

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M [REDACTED] D [REDACTED]

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