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Attorneys for Petitioner

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

Portland Division

Y-Z-L-H-, an adult,

Petitioner,

v.

DREW BOSTOCK, Seattle Field Office
Director, Immigration and Customs
Enforcement and Removal Operations
("ICE/ERO"); TODD LYONS, Acting
Director of Immigration Customs
Enforcement ("ICE"); U.S. IMMIGRATION
AND CUSTOMS ENFORCEMENT; KRISTI
NOEM, Secretary of the Department of
Homeland Security ("DHS"); U.S.
DEPARTMENT OF HOMELAND
SECURITY; and PAMELA BONDI, Attorney
General of the United States,

Respondents.

Case No. Case 3:25-cv-00965-SI

Agency No. A XXX-XXX-204

**PETITIONER'S DECLARATION IN
SUPPORT OF MOTION FOR BAIL
PENDING ADJUDICATION OF
HABEAS PETITION**

**PETITIONER'S DECLARATION IN SUPPORT OF MOTION FOR BAIL PENDING
ADJUDICATION OF HABEAS PETITION**

I, Y-Z-L-H, under penalty of perjury, do solemnly declare:

1. I am the Petitioner in the current matter.
2. I was born on November 24, 2000 in Cuernavaca, Morelos, Mexico. I have been identified in these filings as "Y-Z-L-H--".
3. I fled to the United States because I feared for my life in Mexico. The chief of police and a cartel known as the "Familia Michoacana" had threatened me in Mexico.
4. I came to the United States to seek asylum on or around July 21, 2023. I made an appointment through the CBP One app to enter the United States. On that date, I attended my appointment, answered some questions, and was granted parole and permitted to enter the United States. I was advised that my first hearing in immigration court would be in El Paso, Texas on May 7, 2024. I went to live in Portland, Oregon with a friend and later received a notice in the mail that my first court hearing was rescheduled for June 5, 2025 in Portland, Oregon.
5. I timely filed my asylum application with the Portland Immigration Court. I also filed an application for a work permit and completed biometrics in conjunction with that application. I received my work permit soon after. I recently applied to renew my work permit, and my roommate told me that the application was approved.
6. On June 5, 2025, I went to my first immigration court hearing in Portland, Oregon as instructed. This was my first court appearance. The judge said that he would grant any request for more time to find an attorney. I asked for more time to find an attorney and

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the judge agreed. He told me that I would receive a notice in the mail of my next hearing date. After that, the government attorney asked to dismiss my case. I told the judge I did not want dismissal. I wanted my asylum case to go forward. I told the judge that I wanted to speak with a lawyer. The judge denied my request and granted the government's motion. I did not understand why my case was dismissed.

7. When the judge dismissed my case, I felt helpless and stressed because I did not know why the judge dismissed my case or what would happen next. When I left the courtroom, about five or six agents with their faces covered surrounded me. They showed me their badges, took me by the arm, and told me to go with them. They took me to a room where no one could see me. They took my cell phone and other belongings and placed me in handcuffs. I felt very afraid. I had never been arrested before. I did not understand why they were handcuffing me. The agents did not explain why they were arresting me. They did not tell me whether they were going to detain me or deport me.
8. I felt very bad because I had never committed a crime and I had complied with the requirements of immigration court and I did not understand why this was happening.
9. I felt very scared because their faces were covered and I felt alone. There was no one with me who I trusted who I could talk to about what was happening to me. From there, the agents took me to the elevator and put me in a car. I do not know where I was taken next. I believe it was somewhere about 10-20 minutes away from the court. The agents did not tell me where we were or why I was taken there.
10. When we arrived at this unknown location, the agents took my fingerprints, put shackles on my ankles, removed my handcuffs, and put me in a cell alone. I was alone in the cell for about a couple hours. The agents spoke very little Spanish. I asked to speak with my

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lawyer and an agent told me that there was no need to call my lawyer because my lawyer would arrive there in 20 minutes. After about 20 minutes, an agent asked if I was ready and I said yes because I thought it was to talk to my lawyer. Instead, they put handcuffs back on my hands and took me to a car and brought me to another patrol that took me to Tukwila, Washington. I still have marks on my hands from the handcuffs being too tight.

11. When I arrived at Tukwila, I was placed in a cell with about seven other people. The agents did not tell me why I was there or how long I would be there. They gave us cookies and instant soup to eat. They gave me a mylar sheet and I had to try to sleep on the floor. I could not really sleep because I was very afraid and cold. I did not know what was happening to me. No one told me why I was there.
12. On Friday afternoon, June 6, 2025, I was transferred to the Northwest ICE Processing Center (NWIPC) in Tacoma while handcuffed and with shackles on my legs. I was placed in a very small cell with one other person. We had to sleep on the floor again. This time, we did not have a blanket or sheet or anything. It was very cold. A GEO guard told me that there were about 110 too many people at the facility and that there was no space for them to sleep at the NWIPC.
13. On Saturday morning, I was transferred to another cell at the NWIPC with a bed. I have been here for almost a week now, and no ICE officer or GEO officer has told me why I was arrested and why I am being detained.
14. The NWIPC is like what I have seen of jails in the movies. The water tastes like chlorine and I cannot sleep well because the lights are always on. I have not been permitted to go outside to the yard. A GEO guard told me that we were supposed to have time outside yesterday morning but we were not taken outside.

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15. Being detained here feels very bad. I am not a dangerous person and I am not a criminal.

I do not have any criminal history in the United States or Mexico or anywhere else. I do not understand why I am being treated this way. I feel afraid being detained here. I do not know for how long I will be detained here or why I am being detained. I followed the rules to seek asylum in the correct way but the judge dismissed my case before I had the chance to explain why I need asylum and before I could find a lawyer to help me prepare my case.

16. I am afraid to return to Mexico. It is difficult to obtain evidence for my asylum case while

I am detained. I want the opportunity to continue with my asylum case and explain to an immigration judge why I cannot return to Mexico.

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I HEREBY DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

Dated: June 5, 2025.

/s/ YZLH

Y-Z-L-H

Petitioner

CERTIFICATE OF TRANSLATION

I, Lynn Stopher, am competent to interpret between English and Spanish and certify that I have read the contents of this declaration to Petitioner in Spanish. Petitioner 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.



Lynn Stopher

June 12, 2025

Date

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