

ELLEN F. ROSENBLUM
Attorney General
SHEILA H. POTTER #993485
Deputy Chief Trial Counsel
STEVEN M. LIPPOLD, OSB #903239
Chief Trial Counsel
Department of Justice
100 SW Market Street
Portland, OR 97201
Telephone: (971) 673-1880
Fax: (971) 673-5000
Email: Sheila.Potter@doj.state.or.us
Steve.Lippold@doj.state.or.us

Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

ELLEN ROSENBLUM, Oregon Attorney
General,

Plaintiff,

v.

JOHN DOES 1-10; the UNITED STATES
DEPARTMENT OF HOMELAND
SECURITY;
UNITED STATES CUSTOMS AND
BORDER PROTECTION; the UNITED
STATES MARSHALS SERVICE and the
FEDERAL PROTECTIVE SERVICE,

Defendants.

Case No. 3:20-cv-01161-MO

SECOND DECLARATION OF MARK
PETTIBONE IN SUPPORT OF
ROSENBLUM'S MOTION FOR A
TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION

I, Mark Pettibone, declare:

Page 1 - SECOND DECLARATION OF MARK PETTIBONE IN SUPPORT OF ROSENBLUM'S
MOTION FOR A TEMPORARY RESTRAINING ORDER AND PRELIMINARY
INJUNCTION

SP3/db5/#10342025-v1A

Department of Justice
100 SW Market Street
Portland, OR 97201
(971) 673-1880 / Fax: (971) 673-5000

1. I am a resident of Portland, Oregon and a citizen of the United States of America. I make this affidavit based on my own personal knowledge and I am competent to testify about the matters contained in this declaration.

2. I was terrified when an unmarked van stopped near me and men in military fatigues jumped out and approached me without identifying themselves.

3. At the time I was abducted by these individuals, I was not wearing a helmet. I was wearing eyeglasses.

4. As far as I am aware, there is no video of my abduction.

5. I have seen a widely circulated video of a person who, like me, was detained and placed into an unmarked minivan by two individuals wearing military-like fatigues. That person was wearing a black helmet and was not wearing eyeglasses. That person is not me.

6. I was detained for ^{upto MP}over two hours.

7. No one informed me as to which agency had abducted, detained or questioned me. I am still unaware as to which agency or agencies were involved in my abduction, detention and questioning.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on July 20, 2020.


MARK PETTIBONE

ELLEN F. ROSENBLUM
Attorney General
SHEILA H. POTTER #993485
Deputy Chief Trial Counsel
STEVEN M. LIPPOLD, OSB #903239
Chief Trial Counsel
Department of Justice
100 SW Market Street
Portland, OR 97201
Telephone: (971) 673-1880
Fax: (971) 673-5000
Email: Sheila.Potter@doj.state.or.us
Steve.Lippold@doj.state.or.us

Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

ELLEN F. ROSENBLUM, Oregon Attorney
General,

Plaintiff,

v.

JOHN DOES 1-10; the UNITED STATES
DEPARTMENT OF HOMELAND
SECURITY; UNITED STATES CUSTOMS
AND BORDER PROTECTION; the UNITED
STATES MARSHALS SERVICE and the
FEDERAL PROTECTIVE SERVICE,

Defendants.

Case No. 3:20-cv-01161-MO

DECLARATION OF JENNIFER ARNOLD

1. My name is Jennifer S. Arnold. I make this declaration in support of Oregon Attorney General Ellen Rosenblum's Motion for Temporary Restraining Order in the above captioned action.

2. I am a resident of the State of Oregon and have been since 1999. I currently reside in Multnomah County. I am a registered nurse employed by a major regional medical provider. My duties include providing support to patients being tested for and diagnosed with the novel coronavirus, COVID-19, and I am considered an “essential worker”.

3. I am currently the sole provider for my household as my spouse has become unemployed as a result of the COVID-19 pandemic.

4. I have participated in Women's Marches, Reproductive Health, and LGBTQIA (Pride) Marches/Events in Portland, Oregon. During such events I have felt safe in the exercise of my rights to assemble and express my views on political, cultural, and social matters. A number of people of my acquaintance participated in protests in downtown Portland on July 19, 2020, including in the peaceful gathering known as the “Wall of Moms”. I wished to participate to support the Black Lives Matter activists in their efforts to end police brutality but chose not to participate due to fear of detention.

5. On or about July 17, 2020 I learned via social media and news reports that multiple armed, unidentified individuals with military or quasi-military equipment detained an unarmed, non-resisting pedestrian in downtown Portland, forced him into an unmarked vehicle, and departed without identifying themselves to the individual detained, or bystanders.

6. I have seen video of an individual being abruptly detained on the streets of Portland by unidentified armed men.

7. Since that time I have learned additional information indicating that the armed persons who detained the pedestrian were employed by one or more federal agencies.

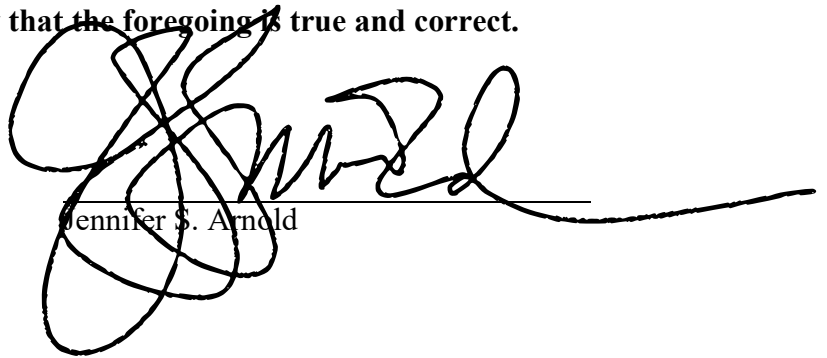
8. I do not feel comfortable with the risk of being abruptly detained for an indefinite period because I am the sole provider financial provider for my spouse and children. Any disruption to my employment would be disastrous for my family. In addition, the nature of my work providing support to vulnerable Oregonians means the impact of my possible detention and

unavailability to perform my job would affect people in particular need of medical services during the pandemic.

9. The lack of explanation given for detaining pedestrians, the unidentified armed individuals, and unmarked vehicle associated with the events above causes me to fear being in the vicinity of the federal courthouse during BLM and anti-police brutality events and assemblies.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on July 20, 2020.



Jennifer S. Arnold

ELLEN F. ROSENBLUM
Attorney General
SHEILA H. POTTER #993485
Deputy Chief Trial Counsel
STEVEN M. LIPPOLD, OSB #903239
Chief Trial Counsel
Department of Justice
100 SW Market Street
Portland, OR 97201
Telephone: (971) 673-1880
Fax: (971) 673-5000
Email: Sheila.Potter@doj.state.or.us
Steve.Lippold@doj.state.or.us

Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

ELLEN F. ROSENBLUM, Oregon Attorney
General,

Plaintiff,

v.

JOHN DOES 1-10; the UNITED STATES
DEPARTMENT OF HOMELAND
SECURITY; UNITED STATES CUSTOMS
AND BORDER PROTECTION; the UNITED
STATES MARSHALS SERVICE and the
FEDERAL PROTECTIVE SERVICE,

Defendants.

Case No. 3:20-cv-01161-MO

DECLARATION OF TERRI PREEG
RIGGSBY

1. My name is Terri Preeg Riggsby. I make this declaration in support of Oregon Attorney General Ellen Rosenblum's Motion for Temporary Restraining Order in the above captioned action.

2. I am a resident of the State of Oregon and have been since 1998. I currently reside in Multnomah County.

3. I have participated in marches, community events, including such activities in Portland, Oregon, such as the 2017 Women's March. During such events I have felt safe in the exercise of my rights to assemble and express my views on political, cultural, and social matters.

4. I am a parent of 13 year old and believe working for social justice, including an end to police brutality and racial inequity, is important to create a better world for my child and part of my obligations as parent and as a citizen.

5. On or about July 17, 2020 I learned via social media and news reports that multiple armed, unidentified individuals with military or quasi-military equipment detained an unarmed, non-resisting pedestrian in downtown Portland, forced him into an unmarked vehicle, and departed without identifying themselves to the individual detained, or bystanders.

6. I have seen video footage of this abrupt and violent detention.

7. Since that time I have learned additional information indicating that the armed persons who detained the pedestrian were employed by one or more federal agencies.

8. I do not feel safe participating in Black Lives Matter ("BLM") or other community events in the vicinity of the Mark Hatfield Federal Courthouse in Portland due to the risk of being detained by unidentified paramilitary personnel.

9. I have recently recovered from back surgery and have permanent limited mobility. I would like to participate in public demonstrations supporting Black Lives Matter activists, and demanding an end to police brutality. Friends and acquaintances have invited me this week to participate in the unarmed, peaceful, assembly of protestors known as the "Wall of Moms" in downtown Portland, but I declined because of my disability and high risk of injury.

10. As a child I resided with my family in Haiti, during the Duvalier regime. Militarized police presence, unchecked police violence, detention of dissidents, and paramilitary intimidation created a climate of fear and discouraged public criticism of the government. This

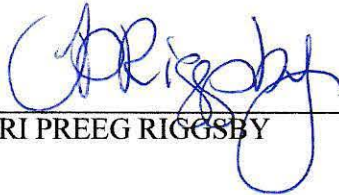
early formative experience reinforced for me the importance of democratic, constitutional norms in policing.

11. The lack of explanation given for detaining pedestrians, the unidentified armed individuals, and unmarked vehicle associated with the events above all cause me to fear being in the vicinity of the federal courthouse during BLM and anti-police brutality events and assemblies.

12. I do not feel comfortable with the risk of being abruptly detained for an indefinite period because the effect such a traumatic event could have on my child, my spouse, and my physical wellbeing.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on July 20, 2020.



TERRI PREEG RIGGSBY

ELLEN F. ROSENBLUM
Attorney General
SHEILA H. POTTER #993485
Deputy Chief Trial Counsel
STEVEN M. LIPPOLD, OSB #903239
Chief Trial Counsel
Department of Justice
100 SW Market Street
Portland, OR 97201
Telephone: (971) 673-1880
Fax: (971) 673-5000
Email: Sheila.Potter@doj.state.or.us
Steve.Lippold@doj.state.or.us

Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

ELLEN F. ROSENBLUM, Oregon Attorney
General,

Plaintiff,

v.

JOHN DOES 1-10; the UNITED STATES
DEPARTMENT OF HOMELAND
SECURITY; UNITED STATES CUSTOMS
AND BORDER PROTECTION; the UNITED
STATES MARSHALS SERVICE and the
FEDERAL PROTECTIVE SERVICE,

Defendants.

Case No. 3:20-cv-01161-MO

DECLARATION OF TIFFANY L.
CHAPMAN

1. My name is Tiffany L. Chapman. I make this declaration in support of Oregon Attorney General Ellen Rosenblum's Motion for Temporary Restraining Order in the above captioned action.

2. I am a resident of the State of Oregon and have been since 2012. I currently reside in Clackamas County. I am employed in Multnomah County in the field of human services and community organizing.

3. I have participated in public marches, community events, including such activities in Portland, Oregon as the 2017 & 2020 Womxn's Marches, the 2019 Lights for Liberty Rally & March, and the 2019 PDX Climate Strike. During such events I have felt safe in the exercise of my rights to assemble and express my views on political, cultural, and social matters. I have never been arrested or detained by law enforcement as a result of participation in such an event.

4. On Tuesday June 9, 2020, I participated in a local BLM protest organized by black youth at the Milwaukie Riverfront Park. Several local elected officials saw me there. The City of Milwaukie worked with the organizers and there was very minimal police presence. The protest was entirely peaceful—I felt safe bringing my child.

5. On or about July 17, 2020 I learned via social media and news reports that multiple armed, unidentified individuals with military or quasi-military equipment detained an unarmed, non-resisting pedestrian in downtown Portland, forced him into an unmarked vehicle, and departed without identifying themselves to the individual detained, or bystanders.

6. I have seen video footage of what I understand to be the incident above.

7. Since that time I have learned additional information indicating that the armed persons who detained the pedestrian were employed by one or more federal agencies.

8. I do not feel safe participating in Black Lives Matter rallies or other community events in the vicinity of the Mark Hatfield Federal Courthouse in Portland due to the risk of being detained by unidentified paramilitary personnel.

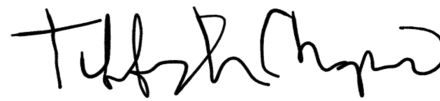
9. I do not feel comfortable with the risk of being abruptly detained for an indefinite period because I am a single parent. I do not have a family support system in the area and I am the sole financial support and caregiver for a minor child. Disruption of our lives by loss of

income or isolating me from her would not only cause her trauma and immediate physical danger, but would risk the loss of our housing and financial stability.

10. The lack of explanation given for detaining pedestrians, the unidentified armed individuals, and unmarked vehicle associated with the events above causes me to fear being in the vicinity of the federal courthouse during BLM and anti-police brutality events and assemblies.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on July 20, 2020.

A handwritten signature in black ink, appearing to read 'Tiffany L. Chapman', written over a horizontal line.

Tiffany L. Chapman

ELLEN F. ROSENBLUM
Attorney General
SHEILA H. POTTER #993485
Deputy Chief Trial Counsel
STEVEN M. LIPPOLD, OSB #903239
Chief Trial Counsel
Department of Justice
100 SW Market Street
Portland, OR 97201
Telephone: (971) 673-1880
Fax: (971) 673-5000
Email: Sheila.Potter@doj.state.or.us
Steve.Lippold@doj.state.or.us

Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

ELLEN F. ROSENBLUM, Oregon Attorney
General,

Plaintiff,

v.

JOHN DOES 1-10; the UNITED STATES
DEPARTMENT OF HOMELAND
SECURITY; UNITED STATES CUSTOMS
AND BORDER PROTECTION; the UNITED
STATES MARSHALS SERVICE and the
FEDERAL PROTECTIVE SERVICE,

Defendants.

Case No. 3:20-cv-01161-MO

DECLARATION OF STEPHANIE DEBNER

1. My name is Stephanie Debner. I make this declaration in support of Oregon Attorney General Ellen Rosenblum's Motion for Temporary Restraining Order in the above captioned action..

2. I am a resident of the State of Oregon and have been since 2006. I currently reside in Multnomah County. I am employed in Multnomah County in the field of post-secondary education.

3. I have participated in public community events, including such activities in Portland, Oregon. During such events I have felt safe in the exercise of my rights to assemble and express my views on political, cultural, and social matters. I have never been arrested or detained by law enforcement as a result of participation in such an event.

4. On or about July 17, 2020 I learned via social media and news reports that multiple armed, unidentified individuals with military or quasi-military equipment detained an unarmed, non-resisting pedestrian in downtown Portland, forced him into an unmarked vehicle, and departed without identifying themselves to the individual detained, or bystanders.

5. I have seen the video of what I understand to be the incident described above.

6. Since that time I have learned additional information indicating that the armed persons who detained the pedestrian were employed by one or more federal agencies.

7. I was prepared to participate in the protest events in Portland on the evening of July 19, 2020; I was prepared for the discomfort of being in a large crowd and other ordinary risks of attending an event like this. However, I do not feel safe participating in Black Lives Matter rallies or other community events in the vicinity of the Mark Hatfield Federal Courthouse in Portland due to the risk of being detained by unidentified paramilitary personnel.

8. The lack of explanation given for detaining pedestrians, the unidentified armed individuals, and unmarked vehicle associated with the events above causes me to fear being in the vicinity of the federal courthouse during BLM and anti-police brutality events and assemblies.

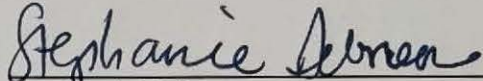
//

//

9. I do not feel comfortable with the risk of being abruptly detained for an indefinite period because I am the primary wage-earner in my household and have several health conditions that require regular and timely medication.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on July 20, 2020.


Stephanie Debner