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Attorneys for Defendants

**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**PINEROS Y CAMPESINOS  
UNIDOS DEL NOROESTE, et al.,**

Case No.: 6:25-cv-00699-AA

Plaintiffs,

v.

**KRISTI NOEM, et al.,**

**DECLARATION OF PATRICK J.  
CONTI IN SUPPORT OF  
DEFENDANTS' MOTION TO  
DISMISS**

Defendants.

I, PATRICK J. CONTI, declare and state as follows:

1. I am an Assistant United States Attorney for the District of Oregon, and an attorney of record for Defendants in this matter. If called as a witness to testify, I could and would competently testify to the matters stated herein.

2. Attached as **Exhibit 1** is a true and correct copy of a memorandum

from James A. Puleo, Acting Assoc. Comm'r, Immigration & Naturalization Service, subject: "Enforcement Actives at Schools, Places of Worship, or at funerals or other religious ceremonies," dated May 17, 1993.

3. Attached as **Exhibit 2** is a true and correct copy of a memorandum from John Morton, Director, U.S. Immigration and Customs Enforcement ("ICE"), subject: "Enforcement Actions at or Focused on Sensitive Locations," dated October 24, 2011.

4. Attached as **Exhibit 3** is a true and correct copy of a memorandum from Alejandro N. Mayorkas, Secretary of Homeland Security, subject: "Guidelines for Enforcement Actions in or Near Protected Ares," dated October 27, 2021.

5. Attached as **Exhibit 4** is a true and correct copy of a memorandum from Benamine C. Huffman, Acting Secretary of Homeland Security, subject: "Enforcement Actions in or Near Protected Areas," dated January 20, 2025.

6. Attached as **Exhibit 5** is a true and correct copy of a memorandum from Caleb Vitello, Acting Director of ICE, subject: "Common Sense Enforcement Actions in or Near Protected Areas," dated January 31, 2025.

7. Attached as **Exhibit 6** is a true and correct copy of a Reporter's Transcript for a "Hearing on TRO" held on March 7, 2025, in *Denver Public Schools v. Noem*, No. 1:25-cv-00474-DDD-KAS (D. Colo.).

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed this 21st day of July, 2025, in Portland, Oregon.

/s/ Patrick J. Conti

PATRICK J. CONTI