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Attorneys for Plaintiffs-Petitioners

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

INNOVATION LAW LAB and LUIS
JAVIER SANCHEZ GONZALEZ by
XOCHITL RAMOS VALENCIA as next
friend,

Plaintiffs-Petitioners,

v.

KIRSTJEN NIELSEN, Secretary, Department
of Homeland Security, THOMAS HOMAN,
Acting Director, Immigration and Customs
Enforcement, ELIZABETH GODFREY,
Acting Field Office Director, Seattle Field
Office of ICE, JEFFERSON BEAUREGARD
SESSIONS, III, U.S. Attorney General,
HUGH J. HURWITZ, Acting Director,
Federal Bureau of Prisons, JOSIAS
SALAZAR, Warden, FCI Sheridan Medium
Security Prison, in their official capacity only,

Defendants-Respondents.

Case No. 3:18-cv-01098

**DECLARATION OF CHELSEA
STRAUTMAN IN SUPPORT OF
PLAINTIFFS-PETITIONERS' EX PARTE
APPLICATION FOR TEMPORARY
RESTRAINING ORDER**

SWORN DECLARATION OF CHELSEA STRAUTMAN

I, Chelsea Strautman, being of sound legal age, state as follows:

1. I am an attorney, licensed in the State of Colorado, and am a member in good standing of the Colorado State Bar. My Colorado Attorney Registration number is 44844. My practice in Oregon is limited in scope to federal immigration law.
2. On Wednesday, June 20, 2018, at approximately 2:00PM, I entered the Sheridan Federal Detention Center (FDC) to attempt to meet with immigrant detainees. Upon approaching the facility, the road was free from any security blockade or gate closure. I was able to drive straight to the central building.
3. I presented myself at the front desk as an immigration attorney and inquired with Officer Mitchell about gaining entry to meet with immigrant detainees. He made an internal phone call and was instructed to give me the main phone number (503-843-4442) and to ask for Mr. Price. He instructed me to leave the facility and to make calls from my vehicle in the parking lot.
4. From my vehicle, I called the main number and spoke with Ms. Baumeister. She told me Mr. Price was in a meeting, and I left him a voicemail at approximately 2:30PM. Ms. Baumeister advised me to leave a message with Ms. Newman, the executive assistant for public information, as well, which I did.
5. I then reentered FDC and Officer Mitchell, Ms. Baker and another FDC staff member named Travis (he did not give me his last name) were standing behind the front desk.
6. Ms. Baker initiated a conversation with me, asking what I was trying to do. I introduced myself as an immigration attorney and handed her my business card and

1 explained that I was attempting to meet with the immigrant detainees. She asked if I
2 had a registration number for a specific inmate. I replied that I did not. She advised
3 me to connect with Lisa Hay with the Federal Public Defender's office to obtain a
4 registration number.
5

6 7. Ms. Baker also informed me that I would need to obtain permission from Immigration
7 and Customs Enforcement (ICE) as well. She suggested I call Michael Louie from the
8 Portland ICE office. I called the main phone number for the Portland ICE office and
9 left a message.
10

11 8. On Thursday, June 21, 2018, I was contacted by Sheridan Pro Bono Project and
12 ACLU Oregon staff who requested that I meet them again at FDC. Upon knowledge
13 and belief, they had been given authorization from ICE to meet with immigrant
14 detainees.
15

16 9. At approximately 12:30PM, I drove myself into the FDC complex behind Ian
17 Philabaum, authorized paralegal for Stephen Manning, and Leland Baxter-Neal,
18 ACLU of Oregon staff attorney. Both of our vehicles were stopped by a gate closure
19 at the security checkpoint. Our vehicles were approached by Officer Palominos and
20 two males wearing unmarked desert camouflage uniforms who identified themselves
21 as FDC staff and offered their first names only. Officer Palominos spoke first with
22 Philabaum and Baxter-Neal, and then approached my vehicle.
23

24 10. Officer Palominos stated that there were already attorneys from the public defender's
25 office inside the FDC facility who were authorized by ICE and that no other attorneys
26 would be allowed entry today. I responded that I had met with Ms. Baker yesterday
27
28

1 who told me to contact Lisa Hay at the Federal Public Defender’s office. I replied that
2 we were authorized by ICE to enter.

3
4 11. I showed Officer Palominos the BOP number of the immigrant detainee I was
5 attempting to meet with. He then radioed the central office and disclosed that he was
6 speaking to Ms. Baker. I heard him tell Ms. Baker:

7 “This lady said she met with you yesterday and she actually has the BOP
8 number of the person she’s trying to see.”

9 I heard Ms. Baker reply through the radio handset:

10 “I don’t know who she is, I don’t recall meeting with anyone yesterday. They
11 told us that these people are gonna try and gain entry and lie and tell us that
12 they have names of ICE agents and that they’re authorized to get in. Don’t
13 listen to them. It’s not true.”

14 12. At that point, I stepped out of my vehicle and spoke with Officer Palominos and the
15 other two personnel directly. Philabaum and Baxter-Neal also exited their vehicle and
16 came together to speak. One of the unidentified personnel said that we would likely
17 not be allowed entry today, but that he was willing to take our names and go inside to
18 present our names to staff.

19
20 13. I handed Officer Palominos my business card and Philabaum and Baxter-Neal wrote
21 their names on the back of the card. Officer Palominos told us to exit the complex and
22 drive to a gravel parking lot down the road and wait 10 minutes while they turned in
23 our names. He said we should drive back up after 10 minutes and he would have an
24 answer for us about whether we would be allowed inside.
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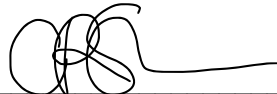
1 14. We waited 10 minutes and drove back to the security checkpoint. Officer Palominos
2 approached our vehicles and told us that we would not be allowed entry to meet with
3 the immigrant detainees today.
4

5 15. We thanked them for their time and departed.

6 I swear, under penalty of perjury, that the foregoing is true and correct to the best of my
7 knowledge, information, and belief.
8

9
10
11 June 21, 2018

12 Date



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