

WILLIAM M. NARUS, CAB #243633

Acting United States Attorney

District of Oregon

BENJAMIN T. HICKMAN, DCB #498167

Assistant United States Attorney

Benjamin.Hickman@usdoj.gov

1000 S.W. Third Avenue, Suite 600

Portland, Oregon 97204-2936

Telephone: (503) 727-1000

Attorneys for Respondents

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

S.F.,

Case No. 3:25-cv-01084-MTK

Petitioner,

v.

**DREW BOSTOCK; KRISTI NOEM;
PAMELA BONDI; TODD LYONS;
U.S. DEPARTMENT OF
HOMELAND SECURITY; U.S.
IMMIGRATION AND CUSTOM
ENFORCEMENT; U.S.
DEPARTMENT OF JUSTICE,**

**DECLARATION OF
DEPORTATION OFFICER
MIHAELA HAMMER IN SUPPORT
OF RESPONDENTS' RESPONSE
IN OPPOSITION TO
PETITIONER'S MOTION FOR A
TEMPORARY RESTRAINING
ORDER**

Respondents.

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UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF OREGON
AT PORTLAND

S.F.,

Petitioner,

v.

DREW BOSTOCK, *et al.*,

Respondents.

Case No. 2:25-cv-01084-MTK

DECLARATION OF DEPORTATION
OFFICER MIHAELA HAMMER

I, Mihaela Hammer, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a Deportation Officer (“DO”) employed by the U.S. Department of Homeland Security (“DHS”), U.S. Immigration and Customs Enforcement (“ICE”), Office of Enforcement and Removal Operations (“ERO”). I have been employed by ICE since February 2008. I am currently assigned to the Northwest ICE Processing Center (“NWIPC”) in Tacoma, Washington, under the ERO Seattle Field Office.

2. I am familiar with the case of S.F. (“Petitioner”), agency file number A077-823-755. This declaration is based upon my personal knowledge as well as knowledge obtained from various records and systems maintained by ICE in the regular course of business.

3. As a DO, my duties include management of all aspects of the immigration enforcement process, including the identification and arrest, transportation, detention, case management and removal of aliens who violate immigration law.

1 4. Petitioner is a native and citizen of Iran, who entered the United States on or
2 about August 6, 1999 with a B-2 visitor visa and remained in the United States for a period
3 longer than authorized.

4 5. Petitioner was placed in removal proceedings on a nondetained docket before the
5 Immigration Court in Detroit, Michigan pursuant to the filing of a Notice to Appear (“NTA”),
6 dated October 12, 2000, charging him with removability pursuant to section 237(A)(1)(B) of the
7 Immigration and Nationality Act (“INA”) as a nonimmigrant overstay.

8 6. On or about June 9, 2002, an immigration judge denied Petitioner’s applications
9 for relief from removal, which included an application for asylum, and entered an order of
10 removal.

11 7. On January 2, 2004, the Board of Immigration Appeals (“BIA”) dismissed
12 Petitioner’s case appeal, rendering the removal order administratively final.

13 8. On December 7, 2005, Petitioner was taken into ICE custody in Portland, Oregon
14 and subsequently transferred to the Northwest Detention Center (now NWIPC) in Tacoma,
15 Washington.

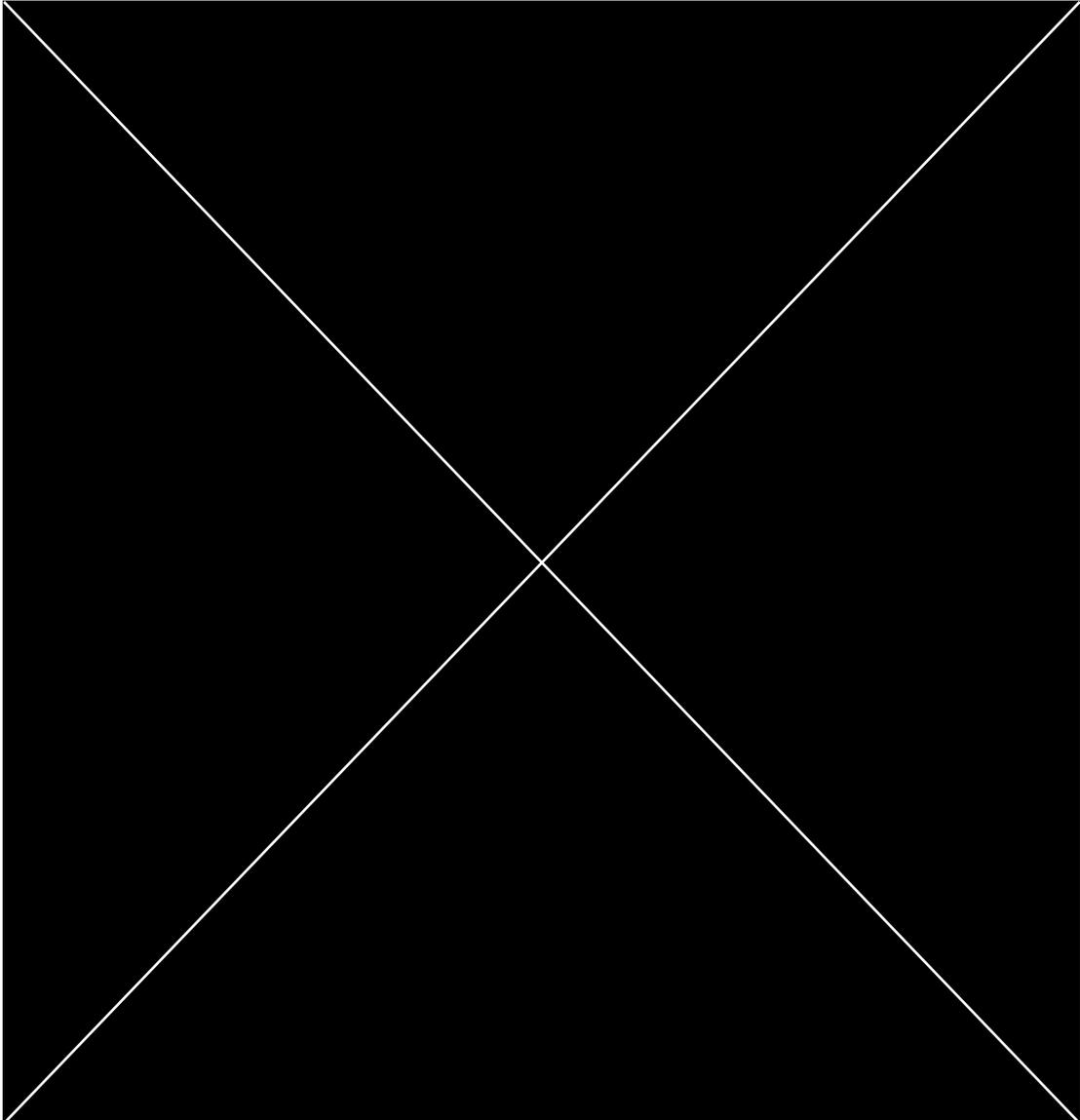
16 9. ICE was unable to obtain a travel document to Iran and Petitioner was released
17 from custody on an Order of Supervision (“OSUP”) on or about April 14, 2006.

18 10. Petitioner remained on OSUP, appearing for regularly scheduled check-ins with
19 ERO, from that time until his recent detention on June 24, 2025.

20 11. Standard in OSUP forms is a condition that the alien not commit any crimes while
21 on OSUP.

22 12. While on OSUP, Petitioner has been arrested multiple times for various criminal
23 offenses. Some of these arrests have resulted in criminal convictions. Since his last release from
24 ICE custody, Petitioner’s criminal history includes the following:

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13. Following a determination that Petitioner was in violation of the conditions of his OSUP and that release was no longer appropriate, ERO apprehended Petitioner on June 24, 2025 and revoked Petitioner's OSUP pursuant to 8 C.F.R. § 241.4(l). ERO issued him a Notice of Revocation of Release explaining that Petitioner violated the release terms of his OSUP with his theft conviction.

14. In a Form I-213, Record of Deportable/Inadmissible Alien, ERO officers noted that Petitioner's order of removal became final in January. The officers recited Petitioner's

1 criminal history. The officers noted that “because of the seriousness of the criminal activities,
2 [Petitioner] will be transported to the Northwest Immigration Processing Center for repatriation
3 arrangements.”

4 15. ICE intends to seek a travel document to Iran and is assessing the case for
5 potential third country removal.

6 16. Petitioner is currently detained at the NWIPC pursuant to INA § 241.
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9 I declare under penalty of perjury that the foregoing declaration is true and correct to the
10 best of my knowledge and belief.

11 Executed at Tacoma, Washington, on July 1, 2025.

12 **MIHAELA**
13 **HAMMER**

Digitally signed by
MIHAELA HAMMER
Date: 2025.07.01
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14 Mihaela Hammer
15 Deportation Officer
16 U.S. Department of Homeland Security
17 U.S. Immigration and Customs Enforcement
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