

SCOTT E. BRADFORD, OSB #0628245

United States Attorney

District of Oregon

BENJAMIN HICKMAN, DCB #498167

Assistant United States Attorney

Benjamin.Hickman@usdoj.gov

1000 SW Third Avenue, Suite 600

Portland, Oregon 97204-2936

Phone: (503) 727-1000

Attorneys for Respondents

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

S.F.,

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

Petitioner,

v.

DECLARATION OF DEPORTATION
OFFICER ENRIQUE RODRIGUEZ
IN SUPPORT OF RESPONDENTS'
RESPONSE BRIEF

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

Respondents.

I, Enrique Rodriguez, 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 am currently assigned to the ERO office at the Northwest ICE Processing Center ("NWIPC") in Tacoma, Washington, under the ERO Seattle Field Office.

I have been employed by ICE since August 2024. My current duties include, among other tasks, reviewing and processing cases for aliens detained in ICE custody through the entirety of the immigration case; this includes preparing for and facilitating the removal of aliens subject to final orders of removal.

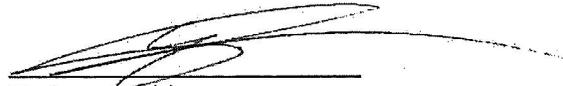
2. I am familiar with the case of S.F. ("Petitioner"), agency number AXXX-XXX-755. This declaration is based upon my personal knowledge as well as knowledge obtained from various records and systems maintained by ICE in the regular course of business. I provide this declaration based on the best of knowledge, information, belief and reasonable inquiry in the above-captioned case.
3. A request for a travel document to Iran has been submitted and is currently pending.
4. ICE is not currently assessing or pursuing third country removal for Petitioner. My colleague Deportation Officer Mihaela Hammer explained in her declaration of July 1, 2025, that "ICE intends to seek a travel document to Iran and is assessing the case for potential third country removal." ¶ 15. At this time, ICE has not taken any steps to effectuate third country removal because ICE still is attempting to remove S.F. to Iran.
5. On September 9, 2025, I was informed by ERO Headquarters Removal and International Operations ("HQ-RIO") that there is a charter removal flight to Iran scheduled for the first week of October and that they expect some travel documents to be issued before that date. As the process is ongoing, I have not

been informed whether Petitioner's travel document is among those expected or if he would need a travel document to be placed on the charter flight.

Depending on how the process plays out, Petitioner could be a candidate for placement on the charter flight.

I declare under penalty of perjury that the foregoing declaration is true and correct to the best of my knowledge and belief.

Respectfully submitted this 9th day of September 2025.



Enrique Rodriguez
Deportation Officer
United States Department of Homeland Security
United States Immigration and Customs Enforcement
Tacoma, Washington