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3
4 UNITED STATES DISTRICT COURT FOR THE
5 WESTERN DISTRICT OF WASHINGTON
6

7 E-A-T-B-

8 v.
9 Petitioner,

10 Bostock, *et al.*,

Case No. 2:25-cv-1192-KKE

11
12 DECLARATION OF CLEVELAND
13 WILSON

14
15 Respondents.

16 I, Cleveland Wilson, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

17 1. I am a Supervisory Detention and Deportation Officer (“SDDO”) employed by the
18 United States Department of Homeland Security (“DHS”), United States Immigration and
19 Customs Enforcement (“ICE”), Office of Enforcement and Removal Operations (“ERO”). I am
20 currently assigned to the Northwest ICE Processing Center (“NWIPC”) in Tacoma, Washington,
21 under the ERO Seattle Field Office.

22 2. I am familiar with the case of E-A-T-B- (“Petitioner”). I make this declaration
23 based upon my personal and professional knowledge, obtained from various records and systems
24 maintained by ICE in the regular course of business, including but not limited to the alien
registration file, DHS databases, and notes from the previous and current officers in charge of the
case relating to Petitioner. I provide this declaration based on the best of my knowledge,
information, belief, and reasonable inquiry in the above-captioned case.

1 3. A contractor administers the ICE's Alternatives to Detention Program ("ATD")
 2 and violation information is sent to ICE's Enforcement Alien Removal Module ("EARM"), which
 3 is reviewed by ERO.

4 4. Due to limited resources, including staffing, ERO cannot immediately respond to
 5 every violation.

6 5. Petitioner's ATD violations came to ERO's attention in June during routine
 7 reviews of aliens with upcoming immigration court hearings. When Petitioner's ATD violations
 8 were discovered during the review, I as SDDO made a determination that revocation of the Order
 9 of Release on Recognizance ("OREC") was appropriate.

10 6. When Petitioner was brought into custody following revocation of OREC, ERO
 11 informed him that he was being brought into custody for ATD violations.

12 7. ERO has not located any submission from Petitioner that the noted ATD violations
 13 are incorrect. However, Petitioner continues to have the ability to present that information to
 14 ERO.

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

17 Executed in Portland, Oregon, on this 11th day of April 2025.

18
 19  Digitally signed by
 20 CLEVELAND WILSON
 21 Date: 2025.08.15
 22 07:47:08 -07'00'
 23
 24

 25 CLEVELAND WILSON
 26 Deportation Officer
 27 U.S. Department of Homeland Security
 28 U.S. Immigration and Customs Enforcement
 29 Enforcement and Removal Operations
 30 Portland, Oregon