

DECLARATION OF JOSEPHINE MOBERG

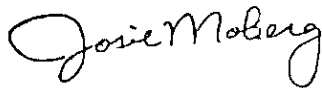
I, Josephine Moberg, hereby declare:

1. I write this declaration based on the arrest of Daixon Jose Ramirez Tesara. I write this declaration based on notes that I made regarding the incident on the same day, August 18, 2025. As an attorney working with grassroots legal support efforts at the ICE office in Portland, Oregon, I responded to an arrest on August 18, 2025. The following is a timeline of my efforts to meet with my client that day, including the responses I received from the facility's agents.
2. At around 10:31am, community members staffing a table outside of the Macadam Facility notified me that a client, Daixon Jose Ramirez Tesara who had signed a G-28 Notice of Representation for me to represent him before ICE–Enforcement Removal Operations, had been detained. They told me that Daixon was an active member of the Asylum Seeker Solidarity Collective (ASSC), a local migrant support organization, and had a great deal of support from the community. They also told me that he was the primary breadwinner for his child, who lives with him in Portland and is a U.S. Citizen.
3. I arrived at the Macadam facility at around 11:25am and took the signed Form G-28 to the main entrance of the facility. I presented the G-28 to the ICE agent who came out to meet me when I pushed the buzzer to request assistance. I told the agent that I was Daixon's legal counsel and needed to meet with him immediately. The agent took the form back inside and asked me to wait. He came back out a few minutes later and told me that I had to come back in 15 minutes, without providing an explanation as to why.
4. At around 11:35am, I went back and again requested to see my client. The ICE agent told me that my client would be transported to Tacoma, where I could meet with him. I

1 responded that I needed to speak with the ICE agent or supervisor who was giving the
2 orders, since they were denying him access to counsel, and under the ICE National
3 Detention Standards 2025, rule 5.5(G) "each detainee may meet privately with current or
4 prospective legal representatives and their legal assistants." The ICE agent replied that no
5 other agents were available to speak with me and that his supervisors were all busy
6 "trying to help my client." I was told that I could not enter the facility or meet with
7 anyone inside.

8 5. At around 11:15am, I also requested a business card with the names and titles of the ICE
9 agents involved. At around 12:04pm, the ICE agent came back out of the building. He
10 handed me a blank piece of paper with "OPLA (503) 326-2059" handwritten on it. I told
11 the agent that this was not what I asked for. He told me he didn't even know what OPLA
12 stood for but that he wasn't able to give me anyone's names, any other information, and I
13 could still not enter the building or speak with my client or any ICE agents.

14 I, Josephine Moberg, declare under penalty of perjury of the laws of the United States
15 that the foregoing is true and correct.

16 

09/04/05

Date

17 Josephine Moberg
18 Staff Attorney, CLEAR Clinic
19 jodie.moberg@clear-clinic.org
20 971-258-2659
21 PO Box 11288
22 Portland, OR 97211
23