

# Exhibit 1

## Declaration of Christopher Martinez Marvan (July 9, 2025)

Molly E. Danahy  
Andres Haladay  
Rylee Sommers-Flanagan  
Upper Seven Law  
P.O. Box 31  
Helena, MT 59624  
(406) 998-6067  
molly@uppersevenlaw.com  
andres@uppersevenlaw.com  
rylee@uppersevenlaw.com

*Counsel for Petitioner*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA**

CHRISTOPHER MARTINEZ MARVAN,

*Petitioner,*

v.

JESSE SLAUGHTER, Cascade County Sheriff, ANDREW SCHARNWEBER, Chief Patrol Agent, Havre Sector, U.S. Border Patrol; BRUCE SCOTT, Warden, Northwest Immigration and Customs Enforcement Processing Center; DREW BOSTOCK, Seattle Field Office Director, Enforcement and Removal Operations, United States Immigration and Customs Enforcement; TODD M. LYONS, Acting Director, United States Immigration and Customs Enforcement; KRISTI NOEM, Secretary, United States Department of Homeland Security; PAMELA BONDI, Attorney General of the United States, *in their official capacities,*

*Respondents.*

**Civil Action No. 6:25-cv-00049-DLC**

**DECLARATION OF CHRISTOPHER  
MARTINEZ MARVAN**

Pursuant to 28 U.S.C. § 1786, I declare:

1 – Declaration of Christopher Martinez Marvan

1. My name is Christopher Martinez Marvan. I am married to Maria Pacheco, who is a U.S. Citizen. We have four children, who are also U.S. Citizens. I reside in Helena, Montana.
2. On July 30 at approximately 5:30 P.M., I was driving on Canyon Ferry Road. I was driving between two other vehicles, one in front and one behind, maintaining the same speed. The three vehicles passed a Lewis and Clark County Sheriff's Deputy. The Deputy activated his lightbar, ignored the other two vehicles, and pulled me over. The Officer asserted that I was speeding but did not issue a me citation for speeding.
3. The Sheriff's Deputy issued me a Notice to Appear and Complaint for § 61-5-102, MCA, Drivers to be Licensed. The Sheriff's' Deputy did not mention anything about expired plates. They did not ask me about my citizenship status. At the request of the officer, Maria and I switched places, and then we went on our way without further incident.
4. And approximately 12:00 noon on July 1, 2025, I received a call from Spas of Montana about a part I had ordered for a hot tub that I was repairing. I drove to Spas of Montana in the same Red Dodge truck I was driving on July 30.
5. When I arrived at Spas of Montana, I backed my truck into a parking spot, which is how I usually park. I entered Spas of Montana, obtained the hot tub part, returned to my vehicle, and drove away. I did not see any law enforcement at or around Spas of Montana.

6. On the way back, I stopped to wait for a train at the railroad crossing on Montana Avenue. After the train passed, I was driving south when an officer startled me by pulling out of a parking lot so abruptly that I was afraid the police vehicle would strike my truck. The officer pulled behind me and activated the vehicle's lightbar approximately 30 seconds later.
7. I turned right onto a side street off Montana Avenue and stopped my car. I immediately called my wife Maria to let her know that I had been pulled over.
8. A police officer eventually approached me on the driver's side of my truck at the same time that another man approached the passenger window. I understood the man on the passenger side to be an ICE officer.
9. The police officer told me that he had stopped me because the truck's registration had expired.
10. I provided the officer my name and birth date.
11. The person I believed to be an ICE officer then began asking me about my immigration status.
12. The police officer then asked whether I had a license or identification. The officer then grabbed me and yanked me from my truck. I was handcuffed and told that I was detained. I have a bad back due to a destroyed ligament. The Officers' grabbing, pulling and twisting of my arms aggravated this injury.
13. The officer brought me towards three unidentified ICE officers who began asking me questions about someone named "Andersen." They placed me on the bumper of the police car and continued asking questions.

14. One of the ICE officers showed me his phone with pictures of two men that I did not recognize. The ICE officer told me that the only way I could be saved was if I knew the two individuals and told ICE where they were. I did not recognize the men. I told the ICE officers I did not know who the men were. They told me that was too bad.
15. I was then taken by the ICE agents. They helped me into a large suburban. I needed assistance due to the pain in my back.
16. I did not receive a traffic citation from the Helena Police.
17. In the car, the ICE officer told me that they'd try to "make it fast," by taking me to Washington where I could be processed and deported. The ICE officer stated, "we thought you were the guy," referring to one of the two Venezuelans, and "it's not your day." The ICE officer complimented me because I remained calm and did not resist arrest.
18. The ICE officer took me to the Lewis and Clark County Detention Center. I was ordered to put on an orange jumpsuit and placed in a holding cell with another individual who appeared to be drunk. I asked detention center staff why I was there and no one gave me an answer. One staff member told me that I would be there for four days until ICE picked me up. I asked for phone access to call Maria, and detention center officers told me that I was not allowed to have phone calls based on ICE's orders. I was nervous and confused.
19. After about an hour-and-a-half, a detention officer took me out of the cell and told me that I would be fingerprinted. The officer explained that I would be at

the detention center for more than four hours and therefore needed to be documented. But before I was fingerprinted, the detention center officers ordered me to put on my personal clothes. I was then taken to a parking lot where the ICE officer was waiting along with another ICE Detainee. I was put in leg shackles and placed in the ICE vehicle.

20. The ICE agent was frustrated that there were people outside of the jail. He exited the garage and started driving fast and checking his mirrors for cars following him. He told me that we needed to move fast because of my wife and “the lawyers.” I did not know which lawyers the agent was referring to.

21. As he drove, the ICE officer spoke on the radio. The ICE officer stated that they intended to move me from place to place. The Officer stated “he’s going to go, but first he needs to graduate.” I later found out that “to graduate” is slang for going to jail from the streets.

22. The ICE officer drove to Cascade County Detention Center and parked outside. After about 20–25 minutes, a Customs and Border Protection (“CBP”) car arrived and Officers placed me and the other detainee in the CBP vehicle. After approximately 40 minutes to an hour, I arrived at a CBP facility. CBP officers gave me a document that stated I was in the Custody of CBP and had the option to request a lawyer. I requested a lawyer. A CBP officer took my phone, medication and shoes, put them in a bag, and informed me that they would be destroyed if no one picked them up within 20 days.

23. I remained in this location overnight but got almost no sleep. At some point during the night, a CBP officer removed me from my room and interrogated me, asking how many kids I had, my parents' names, where I was born and how long I had been in the United States. I answered these questions and was allowed to go back to bed. A few hours later, another officer came, removed me from my cell and subjected me to the same interrogation. About two hours after that, another officer removed me from my cell and repeated the process again. Each time I was questioned, CBP required me to sign something in a small black box. I was not able to see what I was signing, and the CBP officers claimed it was just to acknowledge that I had answered their questions. After the third round of questioning two other CBP officers came in and took pictures of my tattoos. Finally, CBP officers informed me that I would remain at the CBP facility for a few days before I was picked up by ICE.

24. About six hours later, CBP officers called me out and informed me that I was going to be moved again. This time, CBP officers drove me to Cascade County Detention Center. Cascade County Detention Center staff cuffed me and left me in some sort of holding cell for about eight hours. The other people in the room appeared to be people charged with crimes. I was forced to wait there for many hours, with no bathroom access. I asked to go to the bathroom but was not taken for two hours. I almost urinated on myself.

25. When I was finally moved out of the holding cell, I was put in an outdoor cell for about five hours. The only bathroom facility was a port-a-potty. At about 4

A.M., detention center staff moved me to another outside cell, and ordered me to change into an orange jumpsuit. Detention Center staff informed me that I was detained by ICE but did not provide any additional information.

26. Detention center staff then took me to a room and told me that I could make phone calls. However, I was not registered in the system. The detention center staff told me that they would figure it out later and took me away without a phone call.

27. I continue to be detained at the Cascade County Detention Center.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 9th day of July, 2025.

  
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Christopher Martinez Marvan