

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION**

STATE OF OREGON, et al.,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity as
President of the United States, et al.,

Defendants.

Case No. 3:25-cv-01756-SI

DECLARATION OF CAMERON BAILEY IN
SUPPORT OF MOTION FOR TEMPORARY
RESTRAINING ORDER

I, Cameron Bailey, declare under penalty of perjury as follows:

1. I am familiar with the information in the statements set forth below either through personal knowledge, consultation with Oregon State Police (OSP) staff, or from my review of relevant documents and information. If called as a witness, I could competently testify to the facts averred herein.

2. I am the Criminal Investigations Captain with the Oregon State Police. I have been a law enforcement officer for over 19 years and have worked for OSP the entirety of my law enforcement career. Starting in June 2017, I became Sergeant for OSP's Mobile Response Team (MRT). In 2020, I was assigned as a Sergeant out of the OSP Portland Area Command, overseeing a Major Crimes Unit and simultaneously serving as the Assistant Team Commander for MRT. I became the full-time Sergeant for MRT in 2021, and then Lieutenant over the Training & Recruiting Section in 2022. I was promoted to Captain in 2023, and in 2024 I started my current role as the Criminal Investigations Division Captain.

3. I have received extensive training in order to perform the duties and functions of my job. I served in the United States Army for seven years and am a combat veteran. I then

joined OSP and completed the 22-week Oregon State Police Academy, meeting all DPSST certification requirements. I receive approximately 55 hours of annual ongoing training to cover all basic DPSST requirements, including but not limited to, firearms and defense tactics.

4. Part of the MRT's mission is to provide tactical responses to effectively deal with civil unrest. In my role as an MRT sergeant, from 2017 through 2022, I was a field leader for MRT's squads when deployed. When on duty as the MRT lead Sergeant, I usually commanded my own MRT squad as well as squads under other sergeants or MRT personnel. I communicated with the incident commander and directed the deployment of MRT resources throughout the city in support of the overarching mission.

5. OSP is a public safety agency of nearly 1,400 employees, including approximately 700-800 sworn officers at any given time. Employees are assigned to the Superintendent's Office, Police Services Bureau, Field Operations Bureau, Public Safety Services Bureau, Forensic Science & Pathology Bureau, Gaming and Business Services Bureau, Workforce Development & Support Bureau, as well as divisions within these. OSP enforces the traffic laws on the state's roadways, investigates and solves crimes, conducts post-mortem examinations and forensic analysis, and provides background checks and law enforcement data. OSP also regulates gaming, the handling of hazardous materials, and fire codes, and educates the public on fire safety and enforce fish, wildlife, and natural resource laws.

6. OSP operates throughout the state of Oregon, and in many areas of Oregon we are the primary law enforcement presence. Three quarters of our sworn workforce serves outside the North Willamette region, which is the most population-dense area of the state.

7. OSP works to ensure that all troopers are trained to safely and effectively carry out their duties in accordance with the law. All troopers attend the DPSST academy training and the ongoing annual training I previously outlined. OSP training provides real-world, interactive use-of-force scenarios in the areas of critical incident training, tactical judgment, and de-

escalation training. This includes classroom instruction, use of a virtual reality simulation, and hands-on scenario-based activities. OSP provides extensive training in patrol and defensive tactics, which focus on de-escalation, only utilizing that degree of force reasonably necessary to effect the arrest.

8. OSP routinely collaborates with other law enforcement agencies, including local and federal law enforcement, on investigations concerning the safety of Oregonians.

9. Since 2017, every OSP trooper receives eight hours of training on crowd management during their OSP specific post-academy. Troopers who are expected to regularly respond to large demonstrations, civil unrest or crowd management situations become part of the public order team and receive specialized training. Team members attend an initial 30-hour training that encompasses report writing, legal training, decision making strategies, physical assessment, and tactic and scenario training. Following this, the team receives an additional 70 hours of training annually. OSP has provided this training to other law enforcement agencies, as well.

10. The public order team includes troopers from all divisions and from across the state. When this team is deployed, offices can run short-staffed, especially in rural counties. This means a decrease in services such as hunting regulation, traffic safety and control, and major crimes investigations.

11. OSP responds to requests from local law enforcement who request assistance for situations outside the ability of a single agency to control. The agency sends a request directly to OSP, and any response is decided by the Superintendent's Office. As an example, if a request by the Portland Police Bureau (PPB) is approved, OSP will operate within OSP's mission and policy guidelines under the direction of the Portland Police Bureau's incident commander, as part of the incident command structure.

12. Like all law enforcement agencies, OSP depends on the trust of the public to carry out its mission. We build that trust through constitutional, community policing, and by holding ourselves to the highest ethical standard. As members of the communities we serve, our officers have a strong incentive to maintain the public's trust. Our officers' deep knowledge of local communities and conditions in Oregon enhances our effectiveness and is essential to carrying out our law enforcement mission.

13. OSP stands ready to assist our law enforcement partners. To my knowledge, PPB has not made a request for assistance at the time of this declaration, but OSP has the capability to assist should such a request be made.

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

EXECUTED in the United States on September 28th, 2025.

s/ Cameron T. Bailey
CAMERON T. BAILEY
Oregon State Police
Criminal Investigations Captain

CERTIFICATE OF SERVICE

I certify that on September 29, 2025, I caused to be served the foregoing
DECLARATION OF CAMERON BAILEY IN SUPPORT OF MOTION FOR TEMPORARY
RESTRAINING ORDER upon the parties hereto by the method indicated below, and addressed
to the following:

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s/ Scott Kennedy _____
SCOTT KENNEDY
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