

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

REACH COMMUNITY DEVELOPMENT, et al.,

*Plaintiffs,*

v.

U.S. DEPARTMENT OF HOMELAND  
SECURITY, et al.,

*Defendants.*

**DECLARATION OF WHITFIELD  
TAYLOR IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION**

Case No. 3:25-cv-2257

I, Whitfield Taylor, declare as follows:

1. I make this declaration in support of Plaintiffs' Motion for a Preliminary Injunction based on my personal knowledge, information, and belief. If called as a witness at trial, I would be able to competently testify to the these matters.

2. I have been a resident in Gray's Landing for six and a half years. I have two children, who are plaintiffs in this action, A.T. and B.T. My children are aged 9 years old and 7 years old, and live with me at all times at Gray's Landing.

3. Our apartment is on the southwest corner of the Gray's Landing complex, at the closest point of Gray's Landing to the ICE facility. We can see the facility and the protests in front of it clearly from our bedroom windows. We also have a balcony that faces out towards Moody Street.

4. Protests at the ICE facility began in June 2025 and continued regularly ever since. I have seen many times the moments when federal officers begin firing tear gas on a given night. I have not seen the protesters being violent before the tear gas starts. Instead, the protesters are often playing music, yelling, or sometimes screaming at officers. The federal officers' use of tear gas also does not seem related to the size of the protests and any threats the officers face. I have seen officers using heavy amounts of tear gas when there are only a dozen or so protesters outside the ICE facility.

5. Officers will typically begin using tear gas by firing cannisters while standing on the ICE facility's roof. Cannisters often will strike Gray's Landing property. We have tried to prevent the gas and chemicals from entering our apartment, including by using towels under doors and to plug the gaps in the plexiglass, and I seal the windows. Despite those efforts, the gas and chemicals have frequently gotten into our apartment.

6. Law enforcement's response to the protests has caused me and my children significant physical and mental distress. When gas gets into our apartment, it burns our eyes and gives us severe throat irritation. My children and I often cannot sleep because of the chemicals, flashbangs, and bright lights right outside our apartment.

7. Both of my children have required medical attention for irritation in their noses and throats. I've taken them to urgent care treatment because of the effects of the tear gas and smoke grenades. It has also negatively impacted their sleep, which has impacted their ability to focus at school. They had to miss school as well due to the impact the use of chemicals by federal officers. Sometimes when federal officers are using gas and flashbangs, my children hide in the closet of my bedroom and build a fort there, to feel some sense of safety.

I declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

Dated: December 23, 2025

/s/ Whitfield Taylor  
Whitfield Taylor