

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

STATE OF OREGON and THE CITY
OF PORTLAND

Plaintiffs

v.

DONALD TRUMP, *et al.*

Defendants.

Case No.: 3:25-cv-01756

**AMENDED DECLARATION OF
ROBERT CANTU**

I, Robert Cantu, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. This declaration is based on my personal knowledge and information made available to me in the course of my official duties.
2. Paragraph 18 in my October 2, 2025 Declaration stated in part, that “to date, 115 FPS officers have had to deploy to Portland to maintain a 24/7 operational tempo.” That number was based on information I received from a member of my staff in response to a request I made on September 30, 2025. I asked to know the number of deployed FPS personnel to Portland. The response that I received showed that 115 FPS officers deployed to Portland as of that date.
3. While my statement described “officers” it appears that others understood “officers” to be limited to only “inspectors” for FPS. Additionally, it appears that others understood the 115 to include only individual officers, not number of deployments. When factoring out the officers who deployed to Portland more than

Declaration of Robert Cantu

once, the number of individual officers who deployed to Portland as of September 30, 2025 is approximately 86 not 115.

4. Accordingly, I would like to amend my original declaration to clarify that as of September 30, 2025, approximately 86 FPS officers have deployed to Portland to maintain a 24/7 operational tempo rather than the 115 previously stated. Additionally, approximately 65 of those officers are inspectors. The remaining individuals are all law enforcement officers including supervisors, Special Agents, and other law enforcement roles within FPS.

5. Even with these clarifications, I still maintain that FPS is unable to sustain having its officers deploy to Portland in order to protect the Lindquist Federal Building 24/7. FPS requires additional assistance in order to maintain the operational tempo in Portland and ensure operational readiness nationwide.

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

Executed on October 28, 2025, at Portland, Oregon

ROBERTO R
CANTU

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