UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MAINE

ELINOR HILTON, COLLEEN FAGAN, POLYXENIA PANTOS, and CARLYN WILLIAMS, on behalf of themselves and all others similarly situated, Plaintiffs, v. MARKWAYNE MULLIN, Secretary of Homeland Security; TODD LYONS, Acting Director, U.S. Immigration and Customs Enforcement; JOHN A. CONDON, Acting Executive Director, Homeland Security Investigations; RODNEY SCOTT, Commissioner, U.S. Customs and Border Protection; MICHAEL BANKS, Chief, U.S. Border Patrol; THE U.S. DEPARTMENT OF HOMELAND SECURITY; U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT; HOMELAND SECURITY INVESTIGATIONS; U.S. CUSTOMS AND BORDER PROTECTION; U.S. BORDER PATROL; UNIDENTIFIED FEDERAL AGENCIES; and UNIDENTIFIED FEDERAL AGENTS, Defendants.	Case No. 2:26-cv-00092-JAW

DECLARATION OF ALICE HAINES

Pursuant to 28 U.S.C. § 1746, I declare as follows:

1. My name is Dr. Alice Haines.

2. I am a current resident of Auburn, Maine.

3. I retired from my practice as a family physician a few years ago but have an active medical license and practice medicine as a volunteer at a local clinic and warming shelter.

4. I am deeply concerned about the way the government is carrying out immigration enforcement across the country and in my community. In February, 2026, I began to become involved in monitoring ICE activities that occur in public. I do so to report on their activities for historical purposes and to respond to detainee needs, such as documenting their names and ensuring they have access to a lawyer.

5. I also observe ICE activities because I feel it is a moral imperative that citizens send a message to the agents in the field, and to the federal government, by doing so. I am hoping to convey to the agents and the federal government that they are being watched, which hopefully deters them from abusing people, and that citizens disagree with their actions. I also want my immigrant neighbors to know that they are valued and that there are many Americans who oppose the government's actions as anti-American.

6. I also believe that the abuses and detentions now targeting the immigrant community have been a step toward the government deploying these same abuses against other vulnerable communities and will soon be deployed against other targeted groups of citizens. I think it is important to stand up for those being targeted, and I began to do so after learning how to legally and safely observe law enforcement in communities.

7. As part of these efforts, I have observed and photographed DHS/ICE ("ICE") activity in public locations on several occasions. I have witnessed and documented a few detentions and do so from between 12 and 30 feet away from the ICE agents. I have done so silently and have not interfered with their movements, including detentions.

8. Recently, it became known that ICE was targeting people inside the Lewiston County courthouse by pulling the arraignment calendars to identify potential immigrants, waiting for them to arrive at their arraignments, and detaining them before or after their court appearances.

9. Based on this information, I and other legal observers also obtain arraignment calendars from the court clerk to identify any individuals whose surnames might be identified by ICE as potential immigrants. We show up on the days that vulnerable persons are identified on the calendar to ensure that they don't disappear into the system if they are detained and assist them in hopefully getting a lawyer.

10. On October 5, 2026, I reviewed the arraignment calendar and identified a person with a foreign surname whose arraignment was on October 7, 2026. I and other legal observers went to the courthouse on arraignment day to observe ICE activity related to this person.

11. I was outside of the courthouse on October 7, 2026 when a man who appeared to be of Hispanic descent came up and asked about an address and then showed me a letter with the court's heading and his name. I pointed him to the courthouse entrance. His name was not on the arraignment list, so I knew he was not facing criminal charges and his business with the court was relatively private.

12. About 20 minutes later, I went into the courthouse. I saw two ICE agents go upstairs and went upstairs to observe the agents. When I got to the top of the stairs, I saw the two ICE agents speaking to the man that I had spoken with outside. I knew he was not on the arraignment calendar. I saw the ICE agents with papers in their hands, gesturing toward the man and receiving another document. They passed the papers between themselves for inspection and then handed the papers back to the man. I was standing approximately 8 feet behind them. I

watched them interact with the man for a few moments, being careful to stay at least 8 feet from the interaction.

13. After the ICE agents finished interacting with the man, because I feared they had racially profiled him and were about to detain him, I asked if they had a warrant. The taller of the two agents waved the man to go downstairs and then said to me "you're getting very close to impeding justice." I responded that I was many feet away from him and that I had not interfered at all, I waited until they were finished interacting before I said anything. At this point, he pulled out his cellphone to show me the definition of impeding justice and read the definition out loud. I repeated that I was not "impeding justice," that I was many feet away when he was interacting with the man. I turned to walk downstairs when the agent said to me, "well, Alice – that is your name, right?"

14. That the agent used my name to show me that he knew who I was felt disconcerting. The agent then looked me in the eye and said to me "Alice, you need to go home" and proceeded to tell me about my home. With chilling detail, the agent described my home. For example, he said that I live "out in [redacted]," that I live "in [redacted]," and that my home sits "on [redacted]." These non-public details about my home and property sent a very clear message that he knew who I was and where I lived. The message was a clear threat and an effort to intimidate me and deter me from continuing my advocacy efforts.

15. In response, and in an effort to communicate a brave face, I said something along the lines of: 'I don't care if you know where I live because I know what I am doing is right.' Nonetheless, I was shaken up by his intimidating message. I started to leave the courthouse based on his directions that I needed to leave.

16. After my initial emotional response passed, I composed myself and decided that I needed to continue the important work of observing ICE and helping my neighbors despite the intimidation and veiled threat the ICE agent had communicated.

17. I have interacted with the same ICE agent several times in the past. The first time was in May, 2026 when I observed this same agent sitting in an ICE vehicle in front of a hospital in Lewiston. He appeared to me to be staking out the hospital looking for potential immigrants. Because it was intimidating to people seeking care, I approached his car and told him that I was a physician and that I did not think it was right that he was sitting in front of the hospital, that it was not fair to patients. He responded by loudly repeating the phrase: "You're full of shit" as I was speaking. I did not tell him my name in this interaction.

18. On another occasion, on September 5, 2026, I heard about an ICE vehicle sitting in a parked location. I realized that it was parked around the corner from another observer's home who communicated that it had paused in front of their home and that an ICE vehicle actually parked in front of her home recently. I believe this was another attempt to deter observers. I identified the ICE vehicle and knocked on the driver's window because the darkness of his windows prevented me from seeing him. The agent rolled his window down and said something like "you startled me." He glanced at me and then started to roll his window back up. I tapped again and when he began to roll his window down I took his picture to document that he was there. This was the same agent who intimidated me in the courthouse on October 7, 2026. Moments later, I saw the other observer who looked upset and asked if they were ok. They told me that they were upset that ICE had been in front of their home again.

19. I have no idea how this ICE agent had my personal information, but it had to have happened one of two ways – either: 1) ICE agents captured either my vehicle information, which

I suspect, or they used some kind of facial recognition software when I was observing them in public, or 2) they saw a news article in which I criticized their actions and looked up my information to use against me.

20. The reason I was quoted in a news article was because I attended a protest against the manager of an apartment building who appeared to have conspired with ICE to help them detain immigrants which is now against state law. Journalists covered this protest and I was quoted in the Lewiston *Sun Journal* and *Amambo Africa* along with other protestors, many of whom, unlike myself, did not provide their full name for fear of retribution from the government.

21. The entirety of the information that was published in *Amambo Africa* on September 16, 2026 about me, which is accurate, was as follows:

> Dr. Alice Haines, a retired family physician who runs a small free clinic, said she has seen the effects of fear surrounding immigration enforcement among people in the community. “I see people every day that have been traumatized by ICE,” Haines said. She said some families are dealing with the consequences of fathers being detained and that she has seen people struggling with trauma. Haines also expressed concern that fear of immigration enforcement could prevent people from seeking medical care and other essential services. “We can’t serve people if they’re afraid to go to their doctor,” she said. “People need to be able to go and get help. Go and get food. It is not fair.” Haines said she has also seen ICE vehicles near Central Maine Medical Center and St. Mary’s Regional Medical Center. The concerns extend beyond health care, she said, because people who are afraid to leave their homes may also avoid food pantries and other community resources.

22. A similar story was published in the Sun Journal news site on the same day.

23. From the interaction I had with the ICE agent in the courthouse it appears that ICE has information about observers and uses that information in an intimidating way to deter us.

24. It upsets me to know that ICE agents use their access and authority to identify people, like myself, who are engaging in First Amendment activities and then use that

information, as they did with me, to threaten my freedom and safety. It makes me think twice about whether to continue to use my privilege to stand up for those who are being targeted. Despite the risk, I continue to engage in observing and helping because I want the country that I live in to be a just county.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 16, 2026.

/s Alice Haines
Alice Haines