

EXHIBIT 20

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CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

PEDRO VASQUEZ PERDOMO, et al.,)
)
Plaintiffs,)
) CASE No.
v.) 2:25-cv-05605-MEMF-SP
)
MARKWAYNE MULLIN, in his official)
capacity as Secretary, Department)
of Homeland Security, et al.,)
)
Defendants.)
_____)

*** CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER ***

VIDEOTAPED DEPOSITION OF G PII A PII
Los Angeles, California
Friday, July 10, 2026

Reported by:
RENEE A. PACHECO, RPR, CLR
CSR No. 11564
Job No. 8241593

PAGES 1 - 314

Page 1

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1	INDEX		
2	DEPONENT		EXAMINATION
3	GPII [REDACTED] APII [REDACTED]		
4	BY MR. SHREFFLER		13
5	BY MR. KIM		275
6	BY MS. SAFAVI		307
7			
8			
9	EXHIBITS		
10	PLAINTIFF'S		PAGE
11	Exhibit 200	Amended Notice of Videotaped	17
12		Deposition of GPII [REDACTED] APII [REDACTED]	
13	Exhibit 201	13-page Organizational Chart	36
14	Exhibit 202	Fourth Amendment Refresher	70
15		Training	
16	Exhibit 203	Immigration Enforcement and	73
17		Fourth Amendment: A Refresher	
18	Exhibit 204	E-mail chain	97
19	Exhibit 205	PowerPoint	104
20	Exhibit 206	Report of Investigation,	107
21		Control No. GOV672	
22	Exhibit 207	E-mail chain	108
23	Exhibit 208	Executive Summary	116
24	Exhibit 209	E-mail	121
25	Exhibit 210	E-Mail chain	190

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EXHIBITS

PLAINTIFF'S	PAGE
Exhibit 211 Forensic Report of Text Messages	195
Exhibit 212 Declaration Signed By GSA Jr.	266

INFORMATION REQUESTED

(None)

INSTRUCTION NOT TO ANSWER

(None)

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 Electronics.

2 And then you transitioned to federal
3 service. And then you started at the TSA. And then
4 you transitioned to the Border Patrol and then
5 C.B.P. Office of Field Operations, and then HSI; is 09:39AM
6 that correct?

7 A Correct.

8 Q When did you join TSA?

9 A In September of 2006.

10 Q What was your role at TSA? 09:39AM

11 A I was a transportation security officer.

12 Q Were you at an airport?

13 A Yes, I was.

14 Q Which airport?

15 A O'Hare. 09:39AM

16 Q O'Hare.

17 Are you originally from the Midwest?

18 A I am.

19 Q How long were you a TSA officer at O'Hare?

20 A Until 2008. 09:39AM

21 Q And then you went to Border Patrol?

22 A Correct.

23 Q How long were you at Border Patrol?

24 A From 2008 to 2014.

25 Q What was your title at Border Patrol? 09:40AM

Page 30

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 A I was a Border Patrol agent.

2 Q What sector were you stationed in?

3 A El Centro Sector.

4 Q Which station in El Centro Sector were you
5 stationed in?

09:40AM

6 A El Centro Station.

7 Q Were you stationed at the El Centro Station
8 your entire time at Border Patrol?

9 A Yes.

10 Q And what were your -- at high level, what
11 were your duties as a Border Patrol agent?

09:40AM

12 A So I would pretty much drive around the
13 desert or other areas along the border. And looking
14 for anyone trying to cross the border.

15 Additionally, aside from, like, those
16 duties, I was also a prosecutions officer. Where I
17 would pretty much go through court proceedings for
18 anyone that was being prosecuted for violating laws.

09:40AM

19 And I was, also, on our strategic planning
20 team, where we kind of went over a broad view of how
21 to implement -- like Border Patrol's like strategic
22 plan throughout our sector.

09:40AM

23 Q Were you ever -- you ever assigned to any
24 specialized details within El Centro sector such as
25 smuggling detail or trafficking detail or anything

09:45AM

Page 31

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 like that?

2 A I was a prosecution officer. I was on a
3 strategic planning team.

4 DEPOSITION REPORTER: I need to go off the
5 record real quick. 09:45AM

6 MR. SHREFFLER: We're going off the record.

7 THE VIDEOGRAPHER: We're going off the
8 record the time is 9:41 -- sorry. 9:40 a.m.

9 (Recess.)

10 THE VIDEOGRAPHER: All right. We are back 09:45AM
11 on the record. The time is 9:45 a.m.

12 BY MR. SHREFFLER:

13 Q Thanks for bearing with us there,
14 Agent Airdo.

15 Before we went off the record, we were 09:45AM
16 talking about your time at Border Patrol. And you
17 had told me that you had served in the El Centro
18 Sector at the El Centro Station. And at one point
19 you told me you were a prosecuting officer?

20 A Yes. 09:45AM

21 Q Could you tell me what kinds of federal
22 laws you were enforcing as a prosecuting officer?

23 A Generally violations of immigration laws,
24 like reentering the United States after being
25 deported, smuggling, stuff like that. 09:45AM

Page 32

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 Q If you know, were these laws -- were you
2 generally enforcing federal criminal laws?

3 A Yes.

4 Q Did you ever enforce federal civil laws in
5 your role as prosecuting officer?

09:46AM

6 A No.

7 Q And then you left Border Patrol in 2014;
8 correct?

9 A Correct.

10 Q And you went to the CBP Office of Field
11 Operations; correct?

09:46AM

12 A Correct.

13 Q Why did you make that transition?

14 A Because I was offered a promotion.

15 Q Well, congratulations, sir.

09:46AM

16 What were your duties in the Office of
17 Field Operations?

18 A I was a -- as a supervisor. So I
19 supervised CBPOs at L.A.X.

20 Q And how long were you at Office of Field
21 Operations?

09:46AM

22 A From 2014 to 2016.

23 Q And you said CBPOs. Could you just tell me
24 what that term means?

25 A Customs and border protection officers.

09:47AM

Page 33

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 Q And what do CBPOs do?

2 A They -- I mean, there's a wide variety of
3 things that they do. Generally, they admit people
4 into the country. So they -- they'll check visas
5 passports, stuff like that.

09:47AM

6 Q So when you come back internationally and
7 your waiting in line --

8 A Yes.

9 Q You're interacting with a CBPO?

10 A Correct.

09:47AM

11 Q Understood. And then in 2016 you
12 transitioned from Office of Field Operations to HSI;
13 correct?

14 A Correct.

15 Q Why did you make that transition?

09:47AM

16 A To be frank, I -- I kind of just despise
17 being at the airport. Having to go to the airport
18 every day is not a fun experience. So I -- so I
19 wanted some -- a job where I wouldn't have to go to
20 the airport.

09:48AM

21 Q I hope you didn't have to take that
22 employee shuttle at L.A.X. that everyone has to
23 take?

24 A Luckily, I did not have to take a shuttle.

25 Q Well, I cannot blame you for wanting to not

09:48AM

Page 34

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 work at L.A.X. every day.

2 And so what was your first position in
3 Homeland Security Investigations?

4 A I was a special agent.

5 Q And what is your current title and 09:48AM
6 position?

7 A Still a special agent.

8 Q So you've been a special agent from 2016 to
9 the present?

10 A Yes. 09:48AM

11 Q Have you been in the Los Angeles field
12 office for that entire decade?

13 A Yes.

14 Q I want you to think back to early June
15 2025, if you can. What was your -- well, I know 09:48AM
16 that your title in June 2025 was special agent.

17 What were your duties as a special agent in
18 June 2025?

19 A So in May and part of June, I was on
20 parental leave. I just had a -- a kid. 09:49AM

21 Q Congratulations.

22 A Thank you.

23 And then when I returned from parental
24 leave, I went back to my assigned group which was a
25 drug group. And I somewhere -- probably sometime in 09:49AM

Page 35

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 June, I was informed I was going to be participating
2 in Operation At Large.

3 Q So you used the term Operation At Large a
4 few times, and we will get there. Could you, just
5 for now, tell me how -- what you define that term to 09:49AM
6 be?

7 A It was an -- a surge in immigration
8 enforcement in the Los Angeles area.

9 Q When did Operation At Large begin?

10 A I don't recall the exact date it began. 09:49AM

11 Q We can put a pin in this for now.

12 MR. SHREFFLER: I am going to show you a
13 document that I have -- will mark as Exhibit 201.

14 I'm passing a copy to the court reporter
15 which she will pass to you. I am also passing 09:50AM
16 copies to Ms. Savafi.

17 MS. SAFAVI: Thank you.

18 MR. SHREFFLER: And my lapel pin has fallen
19 off.

20 And I'm passing copies to my co-counsel, 09:50AM
21 the intervenor, and to a client representative.

22 (Plaintiff's Exhibit 201 was marked
23 for identification.)

24 MR. SHREFFLER: Exhibit 201.

25 DEPOSITION REPORTER: Give me one second. 09:50AM

Page 36

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 BY MR. SHREFFLER:

2 Q Exhibit 201 is a 13-page document. It was
3 produced to us in discovery by the Government in
4 this case. And it bears Control No. GOV3868.

5 Do you -- have you ever seen Exhibit 201 09:51AM
6 before?

7 A I don't know if I've seen this specific org
8 chart, but I've seen our org charts in the past.

9 Q I'd like you to turn to the second page.
10 These are single-sided pages. 09:51AM

11 MS. SAFAVI: We're going to object on
12 foundation.

13 Go ahead.

14 BY MR. SHREFFLER:

15 Q Do you see at the bottom of the page that 09:51AM
16 this document has the legend June 2025?

17 A Yes.

18 Q And then let's go back to the first page.
19 There's a title at the bottom of the document. The
20 title of the document is, "Homeland Security 09:51AM
21 Investigations, Office of the Special Agent in
22 charge, Los Angeles, California."

23 Do you see that?

24 A Yes, I do.

25 Q Is that what you would call the HSI field 09:52AM

Page 37

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 office in Los Angeles?

2 A Yes.

3 Q So am I reading correctly -- am I reading

4 this title correctly to be saying that this is an

5 org chart of the HSI field office in Los Angeles?

09:52AM

6 A Yes.

7 Q What's your understanding of the geographic

8 area that HSI's Los Angeles field office is

9 responsible for?

10 A The Los Angeles area.

09:52AM

11 Q And that's the definition that we used

12 earlier?

13 A Yes.

14 Q All seven counties in the Central District?

15 A Yeah. Yes, generally in the Central

09:52AM

16 District of California.

17 Q Do you ever -- do you ever have operations

18 to take you outside the Central District?

19 A Yes.

20 Q Do those operations take you within

09:52AM

21 California?

22 A Within California?

23 Q Within California, yes.

24 A Yes.

25 Q Do they take you outside of California?

09:52AM

Page 38

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 A Yes.

2 Q But you yourself you -- you're -- when you
3 go to the office, you go to an office in
4 Los Angeles; correct?

5 A Yes.

09:53AM

6 Q Let's go to the ninth page of the document
7 which has the Control No. 3876. Hopefully, printed
8 vertically on the left-hand side of the page.

9 In the -- are you there?

10 A Yes, I am.

09:53AM

11 Q In the second column from the right, do you
12 see where it says, "OCDETF strike force

13 **LES** "?

14 A Yes, I do.

15 Q And if we go below that, we see your name
16 in the right-hand column of the three columns that
17 report up to that unit?

09:53AM

18 A Yes.

19 Q And it says your title is special agent.

20 And I spent some time in federal service, so I think
21 I know what this is.

09:53AM

22 But can you tell me what GS181113 means?

23 A So -- so that's a special, like,
24 designation for my job series which is a criminal
25 investigator special agent, which is 1811.

09:54AM

Page 39

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 Q So the 1811 in your job series, it means
2 that you're a federal criminal investigator?

3 A Yes.

4 Q And you're at the GS11 -- GS13 pay scale?

5 A Yes. 09:54AM

6 Q And does this chart -- does this org chart
7 correctly show your assignment in June 2025 as a
8 member of the OCDETF Track Task Force?

9 MS. SAFAVI: Objection; confusing.

10 Go ahead and answer the question. 09:54AM

11 THE DEPONENT: I was a part of the LES ,
12 which was kind of like grouped together with that.

13 BY MR. SHREFFLER:

14 Q Understood. So this -- in the org chart,
15 there is a collection of officers. And you're 09:55AM
16 telling me that this represents both the OCDTF
17 Strike Force and the LES group, but they're
18 separate units but they're grouped together for an
19 organizational purpose?

20 A So they're grouped together because they 09:55AM
21 have the same supervisor. The same supervisor
22 supervises both groups. But the groups were
23 separate.

24 Q Understood. But you were a part of
25 LES ? 09:55AM

Page 40

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 A Yes.

2 Q What does LES stand for?

3 A LES And
4 then LES is the group number, Group No. LES.

5 Q And does LES have a specific 09:55AM
6 geographical focus?

7 A Los Angeles area.

8 Q And what's the mission of LES

9 A To interdict and investigate drug
10 trafficking organizations in the Los Angeles area. 09:56AM

11 Q And do you see where it says, "LES," in
12 all caps?

13 A Yes.

14 Q Is gangs an acronym for anything?

15 A I don't believe it is. 09:56AM

16 Q And I suspect I know the answer to this,
17 but can you tell me what the -- is gangs a separate
18 task force that also reported to Agent MPII

19 A Yes. It's a -- I believe -- I believe the
20 agents that were assigned to the gangs group were 09:56AM
21 attached to other, like, task forces, and they
22 reported to MPII.

23 Q And so in your day-to-day work, you worked
24 on LES

25 A Yes. 09:57AM

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 Q Is there a shorthand that you would use in
2 your work to describe this group other than the
3 acronym?

4 A I mean, we'd call LES.

5 Q LES. Can you describe the mission of 09:57AM
6 LES?

7 A Investigating drug trafficking
8 organizations in the Los Angeles area.

9 Q And can you describe your responsibilities
10 as a -- you know, for the record, I'm just going to 09:57AM
11 call it LES.

12 Can you tell me your responsibilities as a
13 special agent assigned to LES?

14 A Yes. I'd work closely with drug
15 enforcement administration personnel to conduct 09:57AM
16 investigations.

17 Q Anything else?

18 A I mean, do you want me to go into the full
19 breadth of what an investigation details or --

20 Q Yeah. 09:57AM

21 MS. SAFAVI: Objection; calls for law
22 enforcement privilege.

23 Go ahead and answer to the extent that you
24 can.

25 THE DEPONENT: I mean, we would conduct 09:58AM

Page 42

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 instruction whatsoever that -- or let me take that
2 back.

3 Have you ever been party to conversations
4 where someone further up in the chain of command has
5 given an explicit instruction to officers that they 11:10AM
6 needed to increase the number of immigration arrests
7 that they were personally making?

8 A No. Like I said, I was part of a drug
9 group. So we generally didn't focus on immigration
10 related stuff. So no conversations like that ever 11:10AM
11 trickled down my way.

12 Q What about when you were detailed with
13 Border Patrol?

14 A I -- I wasn't privy to any of their, like,
15 management conversations. My dealings with Border 11:10AM
16 Patrol was generally with Border Patrol agents, and
17 just executing the operation for that day.

18 Q Has anything about your job changed as part
19 of the surge?

20 A I mean, when I was a part of that Operation 11:10AM
21 At Large that, you know, impacted me anywhere from,
22 like, one to three days a week, because I would be
23 going out with Border Patrol. But other than that,
24 not too much.

25 Q So other than Operation At Large, was HSI 11:11AM

Page 81

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 involved in other aspects of the immigration surge?

2 A Like I said, I recall them soliciting for
3 people to help out with ERO. I don't know if that
4 was considered as part of Operation At Large or not.

5 Q So you told me earlier that at some point 11:11AM
6 you were told that you were going to be -- going to
7 be working with Operation At Large.

8 Do I have your testimony correct?

9 A Yes.

10 Q When were you told that you were going to 11:11AM
11 be helping out with Operation At Large?

12 A I don't recall if it was when I was on
13 leave or if it was like right when I got back from
14 leave. It was sometime around there. So I don't
15 know if it was, like, end of May or beginning of 11:12AM
16 June or -- or when. But I recall being told I was
17 going to be assigned to help out.

18 Q And who told you?

19 A My supervisor.

20 Q Is that Agent M[REDACTED]? 11:12AM

21 A Yes, it is.

22 Q Did you have any say in the matter?

23 A I did not.

24 Q What were you told about your assignment to
25 Operation At Large? 11:12AM

Page 82

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 A That they would -- I don't think Supervisor
2 MPII really knew much about it. I think he told
3 me, like, someone will contact me and tell me, give
4 me more specific details about, like, when it is,
5 where it is. It seemed like he was given my name
6 and told to tell me.

11:12AM

7 Q Do you know how your name was selected?

8 A I think because a lot of people in my
9 office were like -- were cycling through, like,
10 other related details and stuff.

11:13AM

11 And since I was on leave, and I hadn't --
12 you know, I was largely left alone even up to this
13 day largely get left alone from having to go to
14 other places.

15 So I'm probably going to be up soon again
16 somewhere, who knows. But, yeah, I hadn't done
17 anything in a while.

11:13AM

18 Q And when you got back from leave, did you
19 have a conversation with supervisor MPII about
20 going on Operation At Large?

11:13AM

21 A Not much. I don't think he really knew
22 much about what it was from what I recall. I think
23 he just told me that -- that I was going to be -- my
24 name was given to our management, and that I would
25 be given details later.

11:13AM

Page 83

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 Q How did you feel about that at the time?

2 A I felt like it took away from my main
3 operational duties. But, like, I understand that,
4 like, I have -- I have the authority to enforce
5 immigration law.

11:14AM

6 So it's not really outside of my scope of
7 duty, per se. It's just not a group that I'm
8 assigned to.

9 Q So after you learned that you'd be hearing
10 more about your involvement in Operation At Large
11 what happened next?

11:14AM

12 A I don't recall specifics, but eventually
13 I'm -- I received, like, an e-mail perhaps. There
14 was, like, a group conference call kind of saying,
15 like, where we're going to report to. And then
16 just, like, typically I would receive, like, an
17 e-mail the day before saying you're going to meet at
18 this time, at this place and your liaison is going
19 to be this particular person.

11:14AM

20 Q And do you now if other HSI agents detailed
21 to Operation At Large were assigned the same way as
22 you?

11:14AM

23 A We would all be on, like, a group e-mail
24 and that's -- yes, we would all get kind of the
25 same, like, assignment daily.

11:15AM

Page 84

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 I'll pass a copy to the court reporter,
2 please. Two to defense counsel.

3 MS. SAFAVI: Thank you.

4 MR. SHREFFLER: And then --

5 (Plaintiff's Exhibit 211 was marked 03:12PM
6 for identification.)

7 BY MR. SHREFFLER:

8 Q Agent A[REDACTED], I'm going to represent to you
9 that this is what the government has told us is a
10 forensic report of text messages extracted from the 03:12PM
11 cell phone of Agent W[REDACTED]. Am I saying her name
12 right?

13 A I believe so.

14 Q It's a long document, and I'm sorry about
15 that, and I'm sorry for the trees involved. Could 03:12PM
16 you please turn to Page 10542, which is about 15
17 pages before the end of the document. Let me know
18 when you're there.

19 A I'm there.

20 Q At the top of the page, do you see your 03:12PM
21 name?

22 A Yes, I do.

23 Q Is that your phone number next to it?

24 A Yes, it is.

25 Q Is that phone number associated with your 03:13PM

Page 195

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 personal phone or your government-issued phone?

2 A My government-issued phone.

3 Q And below, it says (as read):

4 "Local user."

5 Do you see that?

03:13PM

6 A Yes.

7 Q And because we're referring to what I

8 understand to be an extract from Agent WPII [REDACTED]'s

9 phone, would you agree that it's safe to say that

10 the local user in this case is Agent WPII [REDACTED]?

03:13PM

11 A Yes.

12 Q The first message in the conversation is

13 from you to Agent WPII [REDACTED], and you tell her that

14 you're (as read):

15 "... doing this B.P. stuff,

03:13PM

16 plus got assigned as TL for this

17 op."

18 Which operation are you referring to?

19 A I believe that was part of Operation Broken

20 Blade, which is separate from the B.P. stuff.

03:14PM

21 Q And what was Operation Broken Blade?

22 A It was a large multi-takedown of -- of

23 criminals associated to like sex trafficking in --

24 in Los Angeles.

25 Q What were your responsibilities as a team

03:14PM

Page 196

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 Q Have a lot going on?

2 A Yes.

3 Q Having Operation At Large on top of your
4 ordinary responsibilities?

5 A Yes.

03:17PM

6 Q So there's a text messages at the bottom of
7 that Page, 10:06 p.m. on August 11th. You write to
8 Agent WPII that you had complained about the Home
9 Depot stuff saying that you thought it violates the
10 TR0?

03:17PM

11 A Yes.

12 Q And by "Home Depot stuff," are you
13 referring to the Paramount operation that we
14 discussed earlier?

15 A Yes. To the Home Depots at the Paramount,
16 but then they kept doing Home Depots also after
17 that.

03:17PM

18 Q Did you make another complaint after?

19 A No. Just the one.

20 Q Just the one.

03:17PM

21 But you're referring to not just the
22 Paramount operation here but the --

23 A I complained about just the one Paramount.
24 That's the one I complained about. But --

25 Q But the sentiment applies to the other Home

03:18PM

Page 199

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 Depot operations as well?

2 A Yes.

3 Q Why did you tell Agent WPII [REDACTED] that you had
4 complained?

5 A I don't recall why I specifically mentioned 03:18PM
6 it to her.

7 Q On the next page, you -- well, did you
8 think it was something that she ought to know how
9 you felt about it?

10 A I could've been trying to see like what her 03:18PM
11 thoughts on it were. Because I -- I forgot that I
12 even talked to her about this. But I haven't really
13 talked to too many people about it, so I was just
14 kind of like probably interested to know what
15 someone else thinks. 03:18PM

16 Q Were you close with Agent WPII [REDACTED]?

17 A Before this, no, not particularly. I got
18 to know her a little bit more because we tend to
19 work on the same days together.

20 Q So you would both be in Long Beach together 03:18PM
21 in the mornings?

22 A Well, I don't think that's considered
23 Long -- Terminal Island, is that San Pedro I think?

24 DEPOSITION REPORTER: I don't know if any
25 of that got on the record. You guys were talking 03:19PM

Page 200

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 over each other.

2 MR. SHREFFLER: For a clear record, I asked
3 whether he -- Agent A[REDACTED] and Agent W[REDACTED] worked
4 together in Long Beach. And Agent A[REDACTED] rightly
5 corrected me and said that the Coast Guard base was
6 on Terminal Island.

03:19PM

7 BY MR. SHREFFLER:

8 Q Would you agree?

9 A Yes.

10 Q Was it at the Coast Guard base on Terminal
11 Island where you got to know Agent W[REDACTED] a little
12 bit better?

03:19PM

13 A That's where I started to begin talking to
14 her a little more, yes.

15 Q Did you work with her on any specific
16 operations in the field before that day?

03:19PM

17 A I believe so on a couple occasions. But
18 she wasn't someone I regularly worked with.

19 Q Did you work with Agent W[REDACTED] during
20 field operations as part of Operation At Large?

03:20PM

21 A Mostly just like I said, at the Coast Guard
22 base. Generally, we got assigned to different
23 teams.

24 Q And as of -- well, the next page, your
25 first message. (As read):

03:20PM

Page 201

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 "Since then they haven't
2 assigned me to any of those again."

3 Do you see that?

4 A Yes.

5 Q As of August 11th, had anybody in a 03:20PM

6 position of authority in your chain of command

7 spoken to you about your complaint at the Paramount

8 operation other than the conversations we've

9 previously spoke about with Agent M[REDACTED] and Agent

10 C[REDACTED]? 03:20PM

11 A No.

12 Q You just knew that you hadn't been assigned
13 to any operations like the Paramount operation since
14 you complained?

15 A I saw that they were still doing Home Depot 03:21PM
16 operations, but I have not been assigned to any.

17 Q And Agent W[REDACTED] tells you (as read):

18 "Yeah, I'm pretty sure it does,
19 especially Ninth Circuit."

20 She's agreeing with you that she thinks 03:21PM
21 that violates the TRO too?

22 MS. SAFAVI: Objection; calls for
23 speculation.

24 THE DEPONENT: That's my understanding.

25 ///

Page 202

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 BY MR. SHREFFLER:

2 Q She told you that she's pretty sure that
3 the Home Depot stuff violates the TRO?

4 MS. SAFAVI: Objection; speculation, legal
5 conclusion.

03:21PM

6 BY MR. SHREFFLER:

7 Q Do you know -- did you ever ask Agent
8 WPII if she had complained to her supervisors
9 about these operations at Home Depots?

10 A I don't believe I did.

03:21PM

11 Q And Agent WPII tells you that she's glad
12 she has professional liability insurance; correct?

13 A Yes.

14 Q That's what PLI stands for?

15 A She clarifies it in the message. I didn't
16 understand what it meant at the time.

03:21PM

17 Q That's right. She does.

18 And you respond (as read):

19 "For sure."

20 What did you mean when you said for sure?

03:22PM

21 A She said she was glad she has professional
22 liability insurance, and I said -- I'm pretty much
23 agreeing saying that I'm -- you know, it's probably
24 a good thing you do because a lot of the stuff
25 happening -- if we -- if we think it's going to

03:22PM

Page 203

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 violate something, it's probably good to have some
2 sort of coverage.

3 Q Do you have professional liability
4 insurance?

5 A I do not. 03:22PM

6 Q Did you ever think about getting
7 professional liability insurance during this time?

8 A I thought about it. I -- I have not gotten
9 it though.

10 Q Tell me the reasons why you thought about 03:22PM
11 it, getting professional liability insurance.

12 A Just in case I do something that's -- I
13 would need some sort of -- I would need like a
14 personal attorney for, I guess, to represent me.

15 But I -- I personally believe that I covered myself 03:23PM
16 in my scope of duty, so it's not necessary.

17 Q And you believed that you might need a
18 personal attorney if you had been asked to violate a
19 court order and you did then violate a court order?

20 MS. SAFAVI: Objection; form, 03:23PM
21 mischaracterizes testimony.

22 BY MR. SHREFFLER:

23 Q You can answer.

24 A I -- can you say it -- can you --

25 Q You believed that had you been asked to 03:23PM

Page 204

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 violate a court order and then actually did go out
2 and violate a court order, that you might need
3 professional liability insurance?

4 MS. SAFAVI: Objection; form.

5 BY MR. SHREFFLER: 03:23PM

6 Q Had you done so.

7 A Had I done so, yeah. I mean, any time you
8 break the law, like there's a -- a chance you may
9 need an attorney.

10 Q And so you're -- and so you then go on to 03:24PM
11 say (as read):

12 "Still, they shouldn't ask us
13 to do anything that violates a
14 court order."

15 And you're referring to the Paramount 03:24PM
16 operation on August 3rd there?

17 A Yes.

18 Q When you say in that message "they," who
19 are you referring to?

20 A I think I was referring to just our 03:24PM
21 management.

22 Q By "our management," what do you mean?

23 A Homeland Security Investigation management.

24 Q You weren't referring to Border Patrol?

25 A I guess I could have been referring to like 03:24PM

Page 205

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 the whole -- the situation as a whole, whether it's
2 our management or whether it's Border Patrol or
3 whether it's them working together or not.

4 Being put in a position where we're asked
5 to be put in a position of having to decide whether 03:25PM
6 something violates it or not, we're not -- we don't
7 have the legal knowledge to determine that.

8 Q Just to be clear, as of August 11th, you
9 had still not received any guidance from your
10 supervisors on the scope of the TR0; correct? 03:25PM

11 A I had not.

12 Q Had you received any guidance from your
13 daily briefings in Long Beach, your daily briefings
14 at Terminal Island on the scope of the TR0?

15 A I had not. 03:25PM

16 Q Had you received any guidance whatsoever
17 from anybody at DHS on the scope of the TR0?

18 A I had not.

19 Q Agent WPII says (as read):

20 "I think they only know one way 03:26PM
21 to operate. See bodies, chase
22 bodies."

23 Tell me how you interpreted her message.

24 A That Border Patrol tends to be very focused
25 on their mission of arresting anyone in the country 03:26PM

Page 206

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 illegally. So when they see people, they just
2 chase.

3 Q Do you think that fairly describes Border
4 Patrol's way of operating?

5 MS. SAFAVI: Objection; form. 03:26PM

6 THE DEPONENT: I think it -- it's -- I
7 don't think it's unfair to say.

8 BY MR. SHREFFLER:

9 Q Are there specific circumstances where you
10 saw Border Patrol, so to speak, "see bodies, chase 03:27PM
11 bodies"?

12 A In a few instances, yes.

13 Q Tell me about those instances.

14 A We spoke about at least a couple of them at
15 the car washes. They -- we'd go in, and they just 03:27PM
16 chase after pretty much everyone who went running.
17 I can't say whether or not they were targets or not.

18 I wasn't really included in all those
19 conversations afterwards. I was never debriefed on
20 who they arrested, and I never saw their 213s or 03:27PM
21 anything.

22 But I did see them exit their vehicles,
23 people went running, and they chased after the
24 people that went running.

25 Q And those people who went running when you 03:28PM

Page 207

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 saw those people go running, did those people appear
2 to be Latino?

3 A At the time they went running, I couldn't
4 say for sure. I mean, I -- I wasn't trying to put
5 myself in a position where I was going to chase 03:28PM
6 anyone. I was kind of more responding to be present
7 for when they -- they were trying to effect any
8 arrests so I could hold security around them.

9 I can't really speak to what race they were
10 when they took off running. I wasn't there to 03:29PM
11 observe that.

12 Q When you saw Border Patrol run after people
13 who went running, do you know if Border Patrol had
14 any information about those people other than the
15 location they were at and the fact that they were 03:29PM
16 running?

17 MS. SAFAVI: Objection; asked and answered,
18 calls for speculation.

19 THE DEPONENT: Like I said, I know whenever
20 we went out, we would have targets. And we were 03:29PM
21 looking for those specific targets. Now, whether or
22 not the people running were the targets, I couldn't
23 say.

24 BY MR. SHREFFLER:

25 Q You had no way to know? 03:29PM

Page 208

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 A Yeah.

2 Q Do you know if Border Patrol had super --
3 do you know if Border Patrol had superior
4 information to you in identifying targets in the
5 field in the moment?

03:30PM

6 MS. SAFAVI: Objection; ambiguous.

7 THE DEPONENT: I can't speak to every
8 Border Patrol agent's vision to -- what they were in
9 a position to see, what they knew. I can only speak
10 to what I -- what I saw.

03:30PM

11 BY MR. SHREFFLER:

12 Q And just to tie this off, you then respond
13 to Agent WPI (as read):

14 "Which is my argument to why
15 these ops violate the TRO and
16 aren't being done in good faith."

03:30PM

17 So you're saying your argument for why
18 these operations violate the TRO is that Border
19 Patrol sees bodies and chases bodies; correct?

20 MS. SAFAVI: Objection; mischaracterizes
21 testimony.

03:30PM

22 Go ahead and answer.

23 THE DEPONENT: I would say to clarify what
24 I was saying is that Border Patrol, they may go to
25 these places with targets in mind. But they're

03:31PM

Page 209

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 often going to wind up catching people who are
2 collateral to their targets.

3 And are they -- I don't -- I can't speak to
4 their intent. Intent is hard to speak to. So
5 whether their intent is only to go after people
6 they're targeting or knowing that they're going to
7 get collaterals that are in those locations because
8 of what those locations are.

03:31PM

9 But I did not feel that like they were
10 solely going after targets.

03:31PM

11 BY MR. SHREFFLER:

12 Q And so you said the up -- or withdraw that
13 question.

14 Tell me the reasons why you did not feel
15 that they were going solely after targets?

03:31PM

16 A I just think that kind of like she said,
17 "see bodies, chase bodies," that once they see
18 people running, they're going to chase.

19 Once they see people -- Border Patrol
20 presence is going to cause people to want to be out
21 of the area that they're in. And then they're going
22 to see people running, and they're just going to
23 chase them whether they're targets or not.

03:32PM

24 And, I mean, our typical facts and totality
25 of the circumstances and everything, does that give

03:32PM

Page 210

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 them reasonable suspicion to stop those people?

2 That's up to those agents. They're stopping them.

3 Q And you also said that these ops, quote,
4 (as read):

5 "Aren't being done in good 03:32PM
6 faith."

7 What did you mean by that?

8 A I think that Border Patrol knew that when
9 they went out to these public areas, that they were
10 going to get large amounts of people to run and that 03:33PM
11 was going to give them people to chase after.

12 They weren't just going to these -- to
13 these locations solely to target specific people.

14 Q They're going to these locations to find
15 people who they knew nothing about before the 03:33PM
16 operation?

17 MS. SAFAVI: Objection; mischaracterizes
18 testimony.

19 THE DEPONENT: I mean, I don't know
20 everyone that Border Patrol does or does not have 03:33PM
21 intel on. I just know the targets that I saw them
22 present to me that we were going after and then if
23 we arrested more people than targets we had, it's
24 fair to say they're arresting collaterals.

25 ///

Page 211

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 BY MR. SHREFFLER:

2 Q Did you feel that these operations at Home
3 Depots were designed to arrest collaterals?

4 MS. SAFAVI: Objection; speculation.

5 THE DEPONENT: I mean, I don't have any 03:34PM

6 specific knowledge saying that. I would say it's

7 probably -- I don't know how to answer that. I

8 guess I think there's a high probability of

9 arresting nontargets when you go to areas like Home

10 Depots. 03:34PM

11 BY MR. SHREFFLER:

12 Q And that's why you felt that these

13 operations weren't designed in good faith?

14 MS. SAFAVI: Objection; mischaracterizes

15 testimony. 03:34PM

16 THE DEPONENT: I feel that they weren't in

17 good faith because they weren't solely going after

18 just the targets that they had like the i-200s

19 immigration warrants for.

20 BY MR. SHREFFLER: 03:34PM

21 Q You felt that they were doing these

22 operations so that they could go after collaterals?

23 MS. SAFAVI: Objection.

24 THE DEPONENT: I wouldn't say that they

25 were doing them solely to go after collaterals, but 03:35PM

Page 212

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 knowing that there's a large amount of people in
2 these areas, I think that's specifically why they
3 were choosing these areas because they could get
4 multiple arrests.

5 BY MR. SHREFFLER:

03:35PM

6 Q Going back to this. Do you know why they
7 were choosing these locations, Home Depots
8 specifically?

9 MS. SAFAVI: Objection; calls for
10 speculation.

03:35PM

11 THE DEPONENT: I was not a part of like any
12 of the planning of these operations. So I don't --
13 I don't know. I can't say that.

14 BY MR. SHREFFLER:

15 Q So going down, Agent WPII says (as
16 read):

03:35PM

17 "Makes we wonder how much
18 longer they're going to last.
19 They're headed to Chicago and
20 Boston soon, and they told me they
21 wanted to bring HSI L.A. agents
22 with them. I told them no chance."
23 And then you respond (as read):

03:35PM

24 "I was told the original op was
25 funded through August. Not sure if

03:36PM

Page 213

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 agenda" on the next page.

2 What did you mean by that?

3 A They marched to a democratic governor's
4 press conference. It seemed to be purely political.

5 It did not seem like there was a good operational 04:48PM
6 basis to be doing that. To me, it appeared
7 political.

8 Q And Mr. Bovino didn't tell you that you
9 were -- the plan was to march to Governor Newsom's
10 press conference; correct? 04:49PM

11 A No.

12 Q And you said (as read):

13 "Hopefully, I can get replaced
14 soon."

15 And you sent that early in the morning of 04:49PM
16 August 15th.

17 You wanted to get taken off of your duty
18 with Operation At Large at this time?

19 A Yes.

20 Q And tell me was -- was this the straw that 04:49PM
21 broke the camel's back for you?

22 A It was definitely one of them, yes.

23 Q What were the others?

24 A I mean, the Home Depot was like -- being
25 put in a position to potentially violate like a TR0. 04:49PM

Page 234

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 Then like this was just, I thought, ridiculous as
2 I've stated.

3 Q Any others beyond the Home Depots and this?

4 A I mean, I thought the -- just the overall
5 aggression that Border Patrol pursued this mission 04:50PM
6 with seemed a little intense for like a large city.
7 Yeah.

8 Q And how did you see that aggression
9 manifest?

10 MS. SAFAVI: Objection; vague. 04:50PM

11 THE DEPONENT: I guess in like ways that we
12 spoke about. Like, you know, see bodies running,
13 you chase after bodies, right? It seemed to be
14 pushing into like public spaces, you know, more and
15 more frequently. It seemed to be escalating to less 04:50PM
16 and less targeted.

17 BY MR. SHREFFLER:

18 Q You felt that over time, the operations
19 became less and less targeted?

20 A That was my perception, yes. 04:50PM

21 Q To the point where on August 14th, you
22 weren't given any targets at all?

23 A Yes.

24 Q Did you see Border Patrol use physical
25 aggression during Operation At Large? 04:51PM

Page 235

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 the individual agents like media attention, I don't
2 know.

3 Did Border Patrol management and like
4 Gregory Bovino like media attention? That's also
5 speculation, but they were definitely on -- in the 04:56PM
6 media often.

7 Q When you were a Border Patrol agent, I
8 think you just said that you never saw us going into
9 the interior like this and conducting these types of
10 operations. 04:56PM

11 Can you tell me a little bit more about
12 what you meant.

13 A Well, I was a Border Patrol agent from 2008
14 until 2014. I was only assigned to one station and
15 one sector, so I didn't get to see the entire Border 04:56PM
16 Patrol, you know, area of responsibility.

17 But when I was in El Centro Station at El
18 Centro Sector, we patrol -- we had a set area that
19 we patrolled. And, generally, we stayed pretty
20 close to the border, right? 04:56PM

21 Like, some people would go like a little
22 bit further in, but like we're talking like -- we're
23 talking about like, you know, anywhere from like 25
24 to 50 miles. We're not like, you know, hours away
25 from the border. 04:57PM

Page 239

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 Q And in your experience as a Border Patrol
2 agent in the El Centro Sector, what are some ways
3 that the operations that you were familiar with 20
4 to 25 miles from the border were different from
5 urban operations in Los Angeles? 04:57PM

6 A So I was never assigned to like an urban
7 environment. I know that Border Patrol just -- they
8 have -- they have agents in like San Diego. They --
9 we have like a office in like Indio.

10 So they -- I know they have offices like in 04:57PM
11 other locations, some that are possibly more urban
12 than where I was stationed.

13 Where I was stationed is very rural. Like
14 we were in a lot of desert, a lot of farmlands,
15 mountains. We rarely ever went into populated 04:58PM
16 cities at all. And much of the border is
17 unpopulated. It is like, you know, uninhabited much
18 like that.

19 Q And so does that change how you conduct
20 operations? 04:58PM

21 A I think you encounter a lot less people.
22 And it's a lot more of a controlled environment in
23 the sense of like people that you're encountering.
24 When I was in the Border Patrol, we have cameras all
25 throughout the desert. So you have like so much of 04:58PM

Page 240

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 the area is under video surveillance.

2 So you could literally see when someone

3 walks across the border. So there's like no

4 question as to whether or not they crossed the

5 border illegally, if they were in the country

04:58PM

6 illegally because you -- the cameras actually saw

7 them.

8 So I think it's a much different

9 environment where people are living in a populated

10 city.

04:59PM

11 Q Are there any other ways that it's a

12 different environment operating in an urban setting

13 compared to at the border, at the border in the El

14 Centro Sector?

15 A Like I said, it's mostly just like the

04:59PM

16 terrain, the density of people. They're very

17 different. You're -- you're having to create more

18 reasonable suspicion I'd imagine like away from the

19 border.

20 Like I said, when you're on the border, you

04:59PM

21 literally can follow someone's footprints as they

22 cross the border. It's a lot easier to, you know,

23 gather those facts, so it's a much different job.

24 It's a job I've never performed having to be in a

25 urban environment trying to --

05:00PM

Page 241

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, Registered
3 Professional Reporter, Certified Live Note Reporter,
4 do hereby certify:

5 That the foregoing proceedings were taken
6 before me at the time and place herein set forth;
7 that any witnesses in the foregoing proceedings,
8 prior to testifying, were duly sworn; that a record
9 of the proceedings was made by me using machine
10 shorthand which was thereafter transcribed under my
11 direction; that the foregoing transcript is a true
12 record of the testimony given.

13 Further, that if the foregoing pertains to
14 the original transcript of a deposition in a Federal
15 Case, before completion of the proceedings, review
16 of the transcript [] was [] was not requested.
17 I further certify I am neither financially
18 interested in the action nor a relative or employee
19 of any attorney or party to this action.

20 IN WITNESS WHEREOF, I have this date
21 subscribed my name this 13th day of July, 2026

22
23 

24 RENEE A. PACHECO

25 CSR No. 11564 RPR, CLR