

**SCOTT E. BRADFORD, OSB #062824**

United States Attorney  
District of Oregon

**JAMES A. BLUM, OSB #257369**

**TSECHU DOLMA, WSBA #64665**

Assistant United States Attorneys  
1000 S.W. Third Avenue, Suite 600  
Portland, OR 97204-2936

james.blum@usdoj.gov

tsechu.dolma@usdoj.gov

Telephone: (503) 727-1000

Attorneys for United States

**UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON**

**NAPHTALI RENSHAW; SUSAN  
BARNHART; TYRRAS WARREN;  
MICHAEL CARRIGAN; CHRISTOPER  
ROMPALA; and CHARLES AREFORD,**

Plaintiff,

v.

**GENERAL SERVICES  
ADMINISTRATION,**

Defendant.

Case No. 6:26-cv-01127-MTK

**DECLARATION OF RYAN J.  
ANDERSON IN SUPPORT OF  
DEFENDANT UNITED STATES'  
RESPONSE TO PLAINTIFF'S MOTION  
FOR PRELIMINARY INJUNCTION**

I, Ryan J. Anderson, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

1. I am currently employed as the Building Manager for the Public Buildings Service ("PBS") Eugene Federal Office Building, located at 405 E. 8th Avenue, Eugene OR 97401 (the "Facility" or the "Eugene FOB"). PBS is a division of the United States General Services Administration ("GSA"). I have served in this capacity for 17 years. Prior to this role, I worked as an Electrician for 10 years. I have been employed by GSA for 17 years.

2. Since 2025, the Eugene FOB has experienced large protest activity on a regular basis. Over time, this activity created increasing safety, security, and operational concerns for the federal agencies assigned to the Facility, the employees who work there, members of the public seeking services, and the Facility's infrastructure.

3. Beginning in or around January 2026, the protest activity escalated and began to involve more aggressive and confrontational conduct. Agitators confronted members of the public who were attempting to access services within the Eugene FOB, as well as employees assigned to the Facility. These incidents raised serious concerns regarding safe access and egress, employee safety, public safety, continuity of agency operations, and the protection of the federal building asset.

4. By mid-January 2026, the Facility Security Committee ("FSC") for Eugene FOB discussed whether a security fence could be obtained and installed to deter aggressive protestors from interfering with agency missions, accessing the courtyard, and disrupting Facility operations. The purpose of the proposed fencing was to provide an additional layer of protection for federal employees, visitors, tenants, and Facility infrastructure.

5. On January 21, 2026, the Veterans Health Administration ("VHA") held a meeting with senior agency leadership and myself regarding these encounters and expressed significant concerns about protestors gaining access to the Eugene FOB courtyard and aggressively interacting with veterans seeking services. VHA representatives reported that veterans coming to the facility were being adversely affected by the protest activity. In some instances, veterans with post-traumatic stress disorder reported being severely triggered by interactions with aggressive protestors.

6. As a result, VHA determined that it could no longer safely and reliably meet its mission at Eugene FOB under existing conditions. Discussions ensued regarding the need for VHA to immediately vacate the building because the protest activity had materially interfered with VHA's ability to provide services to veterans in a safe, secure, and accessible environment.

7. On January 22, 2026, the FSC held a meeting and a vote regarding installation of a security fence to protect the tenants, members of the public, federal employees, and the Facility. By January 23, 2026, a majority of the FSC voted "yes", and FSC directed GSA to acquire a security fence similar to the fencing used at the Hatfield Courthouse during prior civil unrest.

8. On January 23, 2026, I made an inquiry to the Office of Facilities Management and Office of the General Counsel regarding the fencing proposal to ensure that the process was handled appropriately. I made this inquiry in part because of prior issues involving fencing at the Hatfield Courthouse and related litigation. I wanted to ensure that the Eugene FOB fencing process was completed correctly and in accordance with applicable requirements.

9. On January 29, 2026, I submitted an official project request to my supervisor seeking assistance with generating a project package that could be awarded for the security fencing.

10. On January 30, 2026, the Eugene FOB experienced a large-scale riot or civil disturbance. At approximately 3:30 p.m., I was coordinating with the Federal Protective Service to vacate Eugene FOB of all occupants because protestors were beginning to surround the Facility. After the building was evacuated and proper building controls were verified, including mechanical equipment and lighting controls, the main lobby lighting was darkened. During this process, it became unable to safely leave the Facility.

11. I sheltered on the third floor near the Federal Bureau of Investigation's ("FBI") office and began taking photographs and videos of the protest activity as it became violent. Protestors

began breaking windows in the plaza area. Once the main lobby was breached through the breaking of large windows, I sheltered with FBI personnel inside their office.

12. While sheltered, the fire alarm activated after Federal Protective Services (“FPS”) deployed munitions to move protestors back from the building. I immediately contacted my supervisor to seek emergency funding for the cleanup and repairs that were expected to be necessary the following day. Once the Eugene Police Department (“EPD”) arrived, declared a riot, and assisted FPS in moving protestors off the property, I was able to access the main lobby and photograph the damage.

13. That evening, I coordinated with GSA leadership and contracting personnel to obtain funding approval for emergency damage repairs which was approved the same evening. At approximately 9:30 p.m., several FBI personnel and I were escorted by EPD from the Eugene FOB to our vehicles.

14. On the morning of January 31, 2026, I coordinated a large group of contractors to board up the Eugene FOB and begin cleanup efforts. Those efforts were successful in securing the Facility that Saturday. The following day, Sunday, GSA and the Operations & Maintenance contractor refined the plywood boarding over the damaged windows and continued cleanup of glass and debris in the main lobby.

15. For the next week, the Eugene FOB remained closed to tenants and the public to allow for proper cleanup, damage mitigation, and safety verification before re-occupancy. I believe the Facility reopened to tenants and the public on or about Monday, February 9, 2026.

16. The following several weeks were focused on the acquisition process for installing the security fence to ensure the safety and security of federal employees, members of the public, tenant agencies, and the Facility in addition to repairing the damage that occurred. During this

period, FPS coordinated a significant security presence to provide needed protection for the Eugene FOB and those entering or working inside the Facility. In addition, GSA was cleaning up graffiti and trash on a regular basis in the courtyard, plaza and surrounding federal property.

17. Between the January 30 riot and the installation of the security fence, I conducted daily early-morning site inspections. These inspections identified numerous recurring issues, including additional broken windows, graffiti, and trash throughout the property. These conditions required daily cleanup and collection efforts.

18. The amount of graffiti in the courtyard, plaza, and surrounding areas was substantial and required the diversion of normal building services and resources to address cleanup and mitigation. Much of the graffiti contained vulgar and hateful language, further contributing to concerns regarding the safety, security, and overall condition of the Eugene FOB and surrounding property.

19. On April 28, 2026, GSA began preparations for installation of the fence, which was fully installed on the morning of April 30, 2026. Since the fence was erected, protest activity has continued in the lower plaza and surrounding areas, but has shifted away from the core building courtyard. As a result, Federal agencies have been able to carry out their missions with substantially fewer major disruptions. For example, on February 2, 2026, a rock was thrown through a second-floor window of an SSA Administrative Law Judge's office. Since the fence has been in place, no similar incidents have been recorded.

20. The fence has improved the safety and security posture of the Eugene FOB by helping protect employees, visitors, tenant agencies, and the physical infrastructure of the facility. It has also helped preserve the ability of agencies within the Facility to continue providing services to the public. Although daily protests continue, on the lower plaza which is not fenced in, including

some instances involving the use of bullhorns that disrupt federal agency operations, the installation of the fence has reduced the ability of protestors to interfere directly with access to the building, courtyard, employees, visitors, and agency missions.

21. Several main lobby windows remain broken and boarded up, and GSA is currently in the process of procuring a project to harden the main lobby and exterior doors. Given the current condition of the lobby, removal of the fence would compromise the security of the facility. The hardening project is in the early stages of procurement. GSA has scheduled a pre-proposal site walk with contractors for June 17. Once the request for proposal process is complete, GSA will proceed with awarding the project. The project may take approximately 18 months to complete due to long lead times associated with the riot glazing GSA intends to install. However, the final schedule will not be fully known until the project is awarded, material submittals have been reviewed and approved, and a formal project schedule has been developed. .

22. As of the date of this statement, my office has not received a Use of Space permit associated with the protest activities currently taking place at the Federal Building, including the fenced-off courtyard area. Records available to my office reflect prior Use of Space permit submissions, including one from Tracy Jocelyn dated June 5, 2024, and one from Colleen Colley dated August 2, 2022. Michael Carrigan has also previously submitted Use of Space permits, with the most recent known submission dating back to November 2020. To my knowledge, the Use of Space permit process, submitted through GSA Form 3453, remains in place, has not been suspended, and continues to be available to members of the public for submission.

23. The installation of the fence has not prevented or deterred individuals from peaceably assembling or engaging in protected expressive activity on the lower plaza. Daily protest activity continues around the perimeter of the Federal Building. Importantly, ADA-accessible access to


the lower plaza remains available, with measured clearances of approximately 48 inches between the security bollard planters, providing an accessible route into the area.

24. I make this declaration to document the history of escalating protest activity at the Eugene FOB, the resulting safety and security concerns, the impact on VHA's ability to provide services to veterans, the damage sustained at the Facility, and the need for security fencing to protect federal employees, the public, tenant agencies, and the building infrastructure.

25. In my view, the installation of the security fence was necessary to protect the safety and security of federal employees, members of the public, veterans seeking services, tenant agencies, and the Eugene FOB. The events leading up to and including January 30, 2026, demonstrated that the then-existing security posture was insufficient to prevent serious disruption, property damage, and interference with federal missions. The fence has since served as an important protective measure and has allowed federal agencies to continue operating with fewer major disruptions.

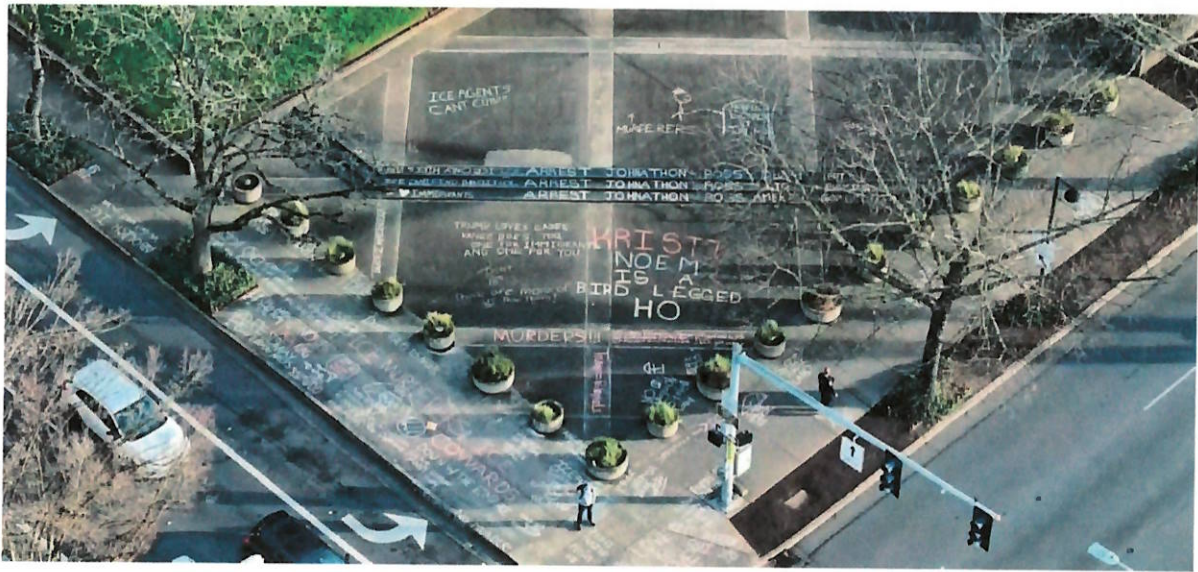
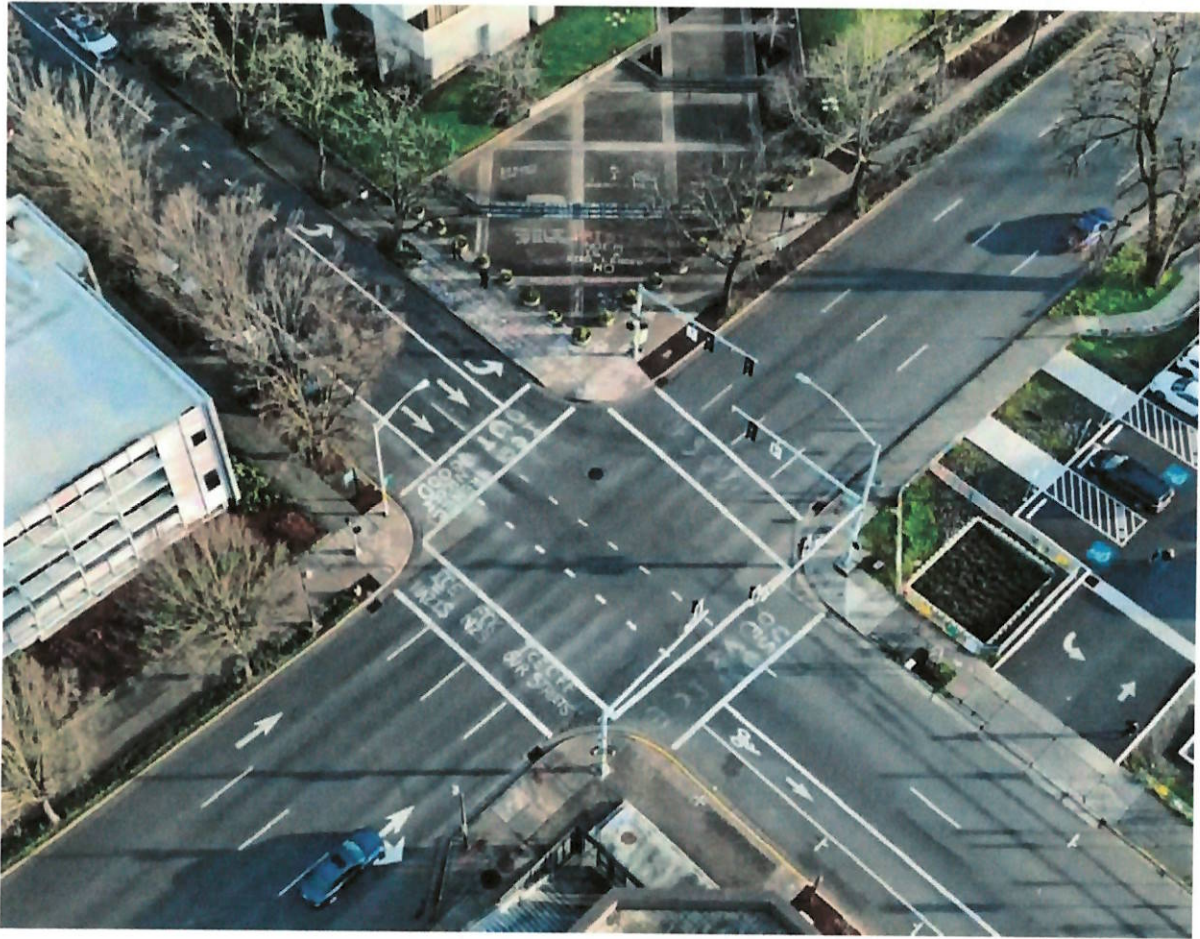
I declare under penalty of perjury that the foregoing is true and correct.

Executed in Lane County this 17th day of June 2026.

  
/s/ Ryan J. Anderson

Lower Plaza Photos before fence installation





**Press conference from complainants June 9, 2026 gathered on the lower plaza**



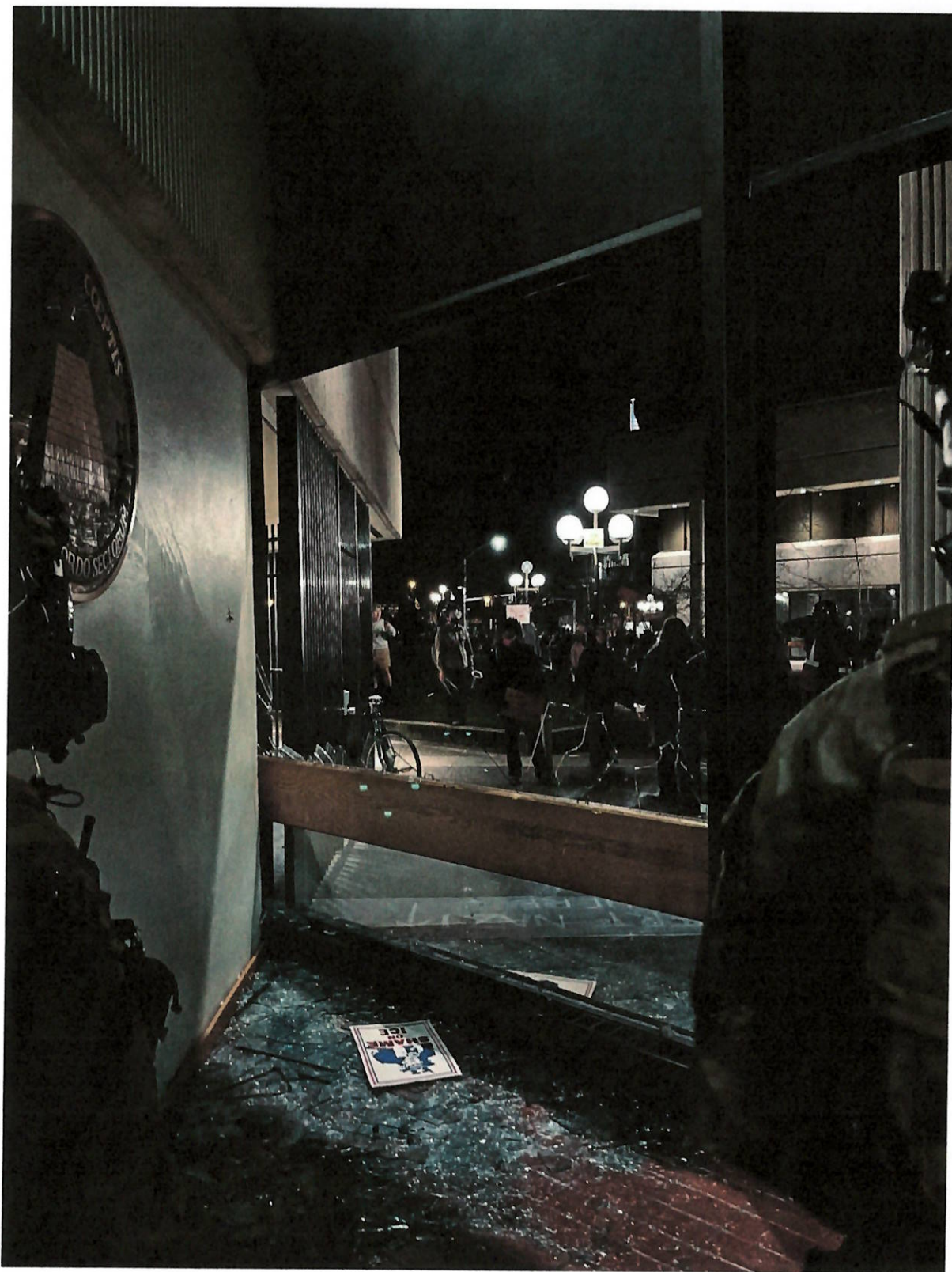
Taken Jun 12, 2026-lower plaza



Pictures from the night of January 30th and morning of Jan 31, 2026

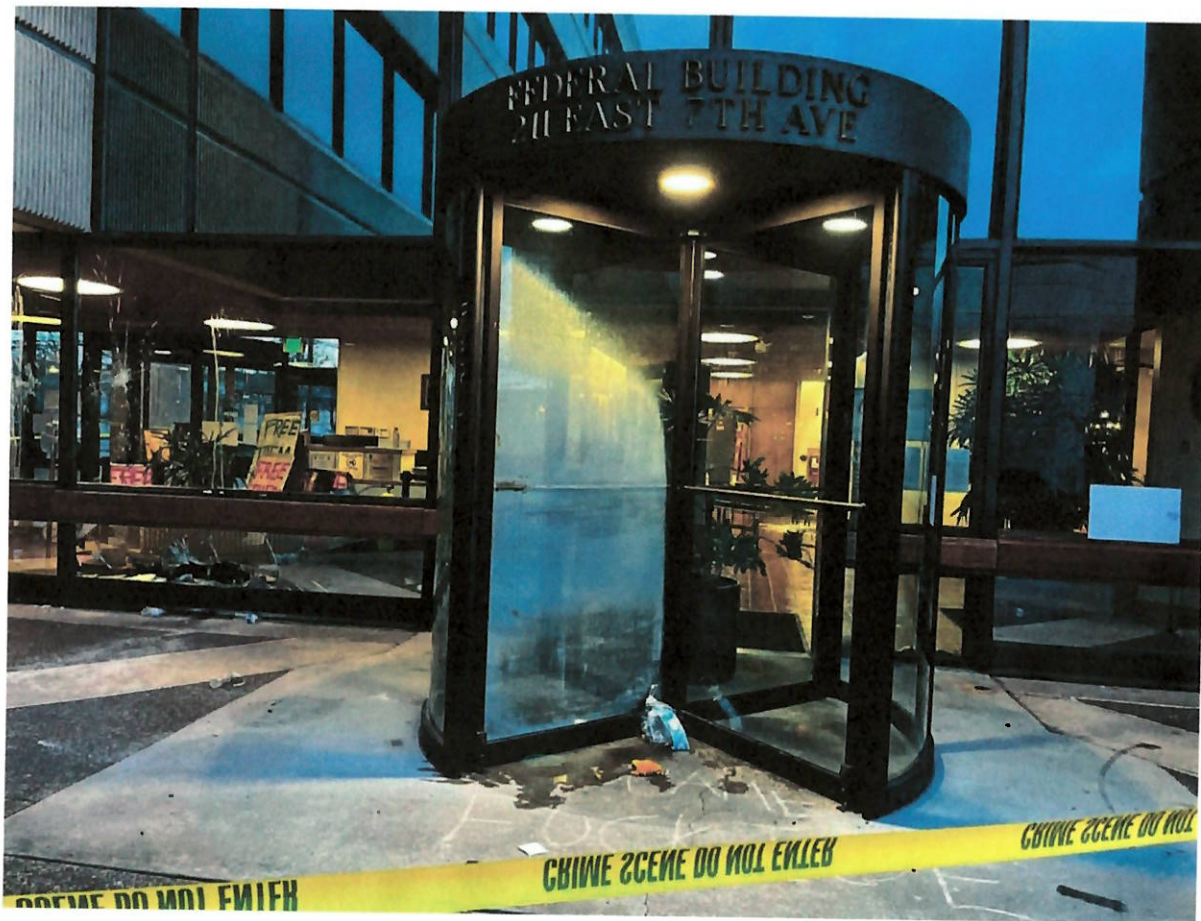






















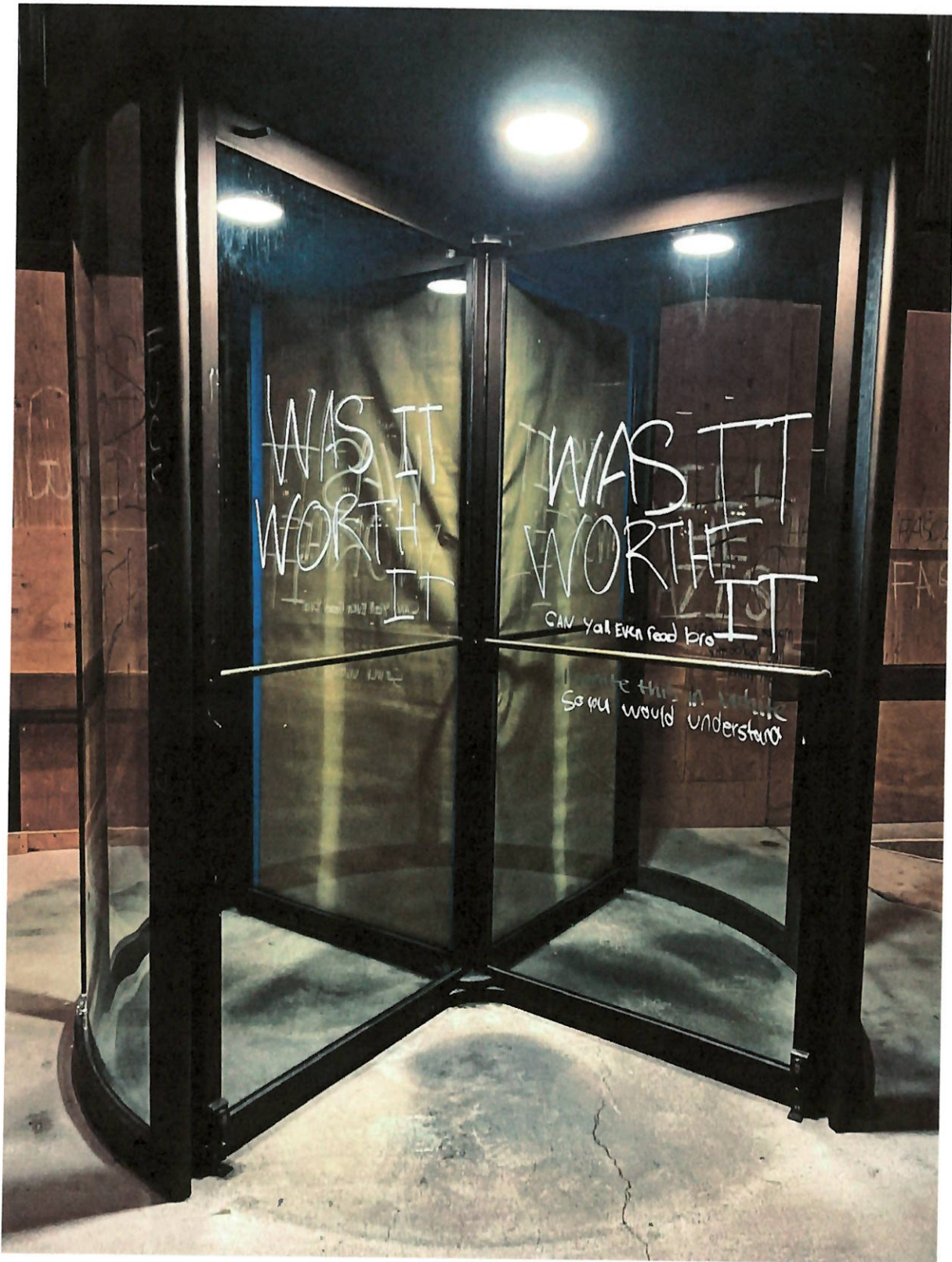


Photos taken after Jan 31, 2026













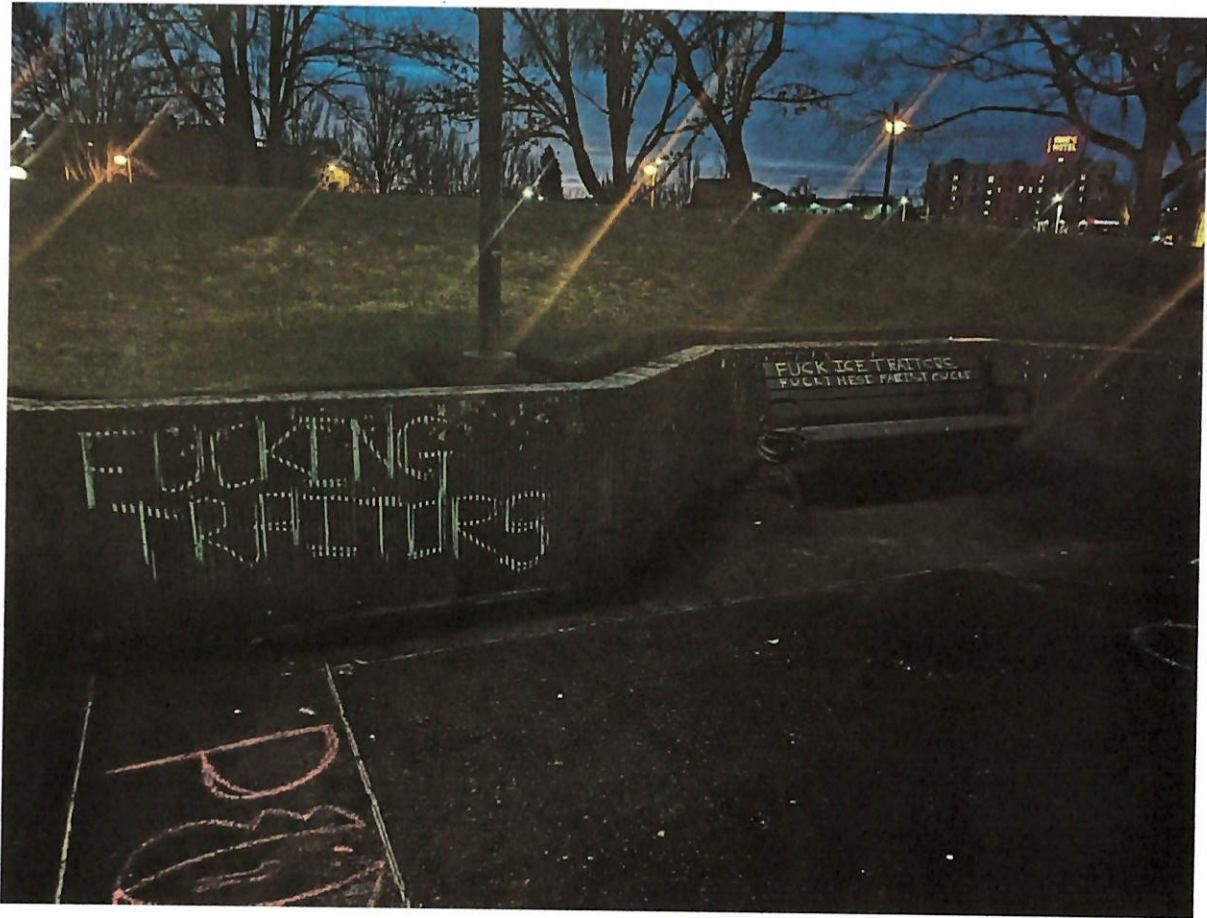












Rock thrown from Courtyard into SSA adjudication Judges office February 2cd 2026





Protest Flyers

## **PROTEST ICE AT THE FEDERAL BUILDING**

211 E 7th Avenue, Eugene, OR

### **MONDAYS:**

1:00 - 2:00 PM: Veterans for Peace Chapter 159 Protest

### **TUESDAYS:**

12:00 - 1:00 PM: Interfaith "Singing for our Lives" Protest & Vigil

1:00 - 2:00 PM: Indivisible Silent Protest

2:00 - 5:00 PM: Love and Rage Protest

### **WEDNESDAYS:**

12:00 - 1:00 PM: SURJ (Showing Up for Racial Justice) Protest

1:00 - 4:00 PM: 50501 Protest

3:00 - 5:30 PM: Planet vs. Pentagon Protest

### **THURSDAYS:**

10:00 AM - 12:00 PM: Indivisible's "Signs of Fascism" Protest

### **FRIDAYS:**

12:00 - 2:00 PM: Raging Grannies

### **SUNDAYS:**

1:00 - 2:00 PM: SLUG Queens Resist!

2:00 - 4:00 PM: Eugene Inflatables Protest & Seated Meditation

### **LAST TUESDAY OF EVERY MONTH:**

11:00 AM - 3:00 PM: Lane County Immigrant Defense  
Network Protest

Bookmark [EugeneTogetherStrong.org](https://EugeneTogetherStrong.org) to stay updated!

## REPOST & SHARE

### What To Bring:

- Backpack!
- Water bottle(s)
- Non-spicy snacks
- Facecovering  
AND/OR air  
filtration system  
(Preferably a  
painters mask)
- Goggles
- Extra clothes
- Ear plugs/mufflers
- Offline camera
- Friends!!!

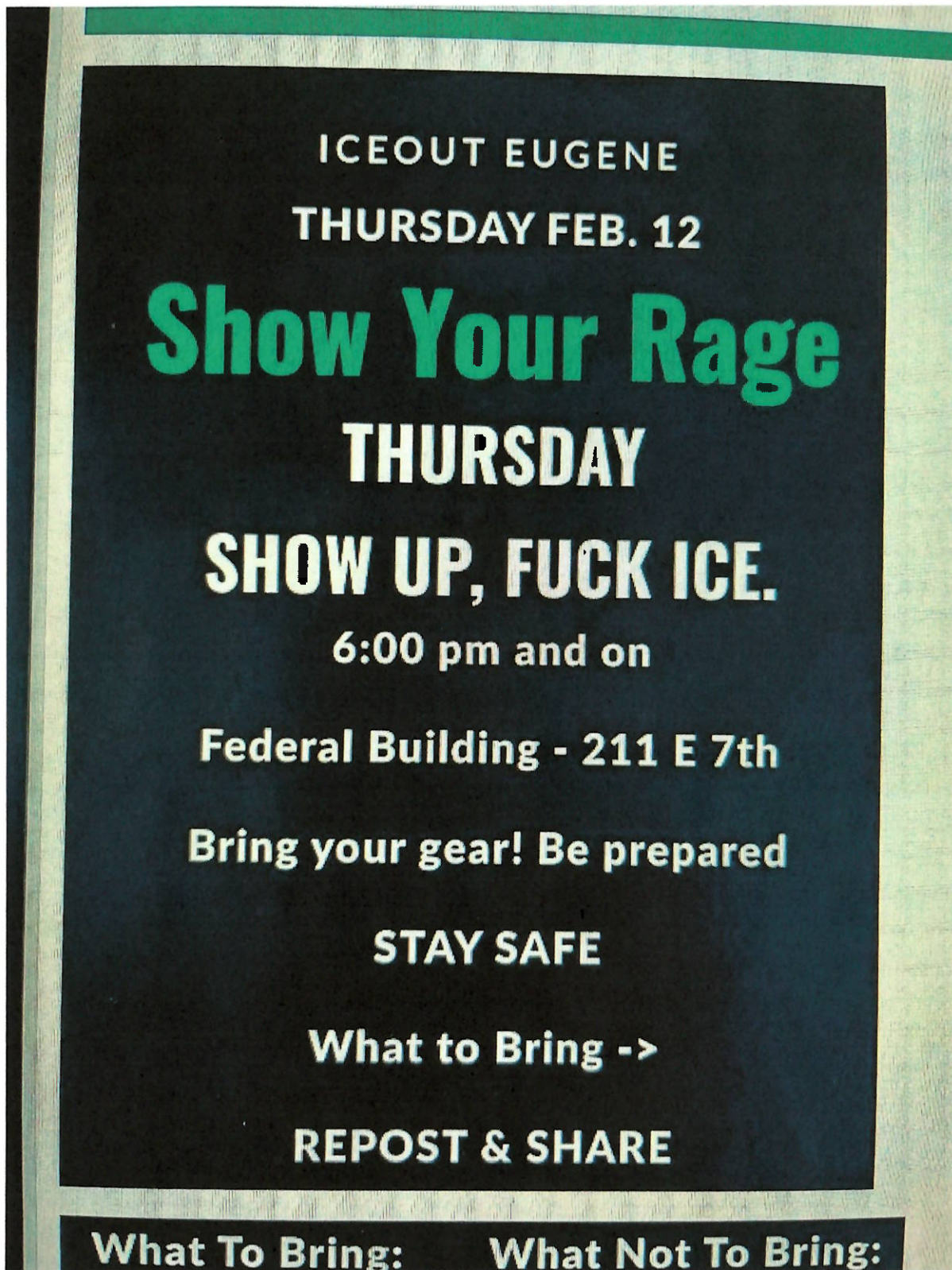
### What Not To Bring:

- Makeup (traps  
teargas powder!!)
- Jewelry
- Weapons
- Anything you don't  
want if arrested
- Anything of super  
high value  
(personal or  
monetary)
- Phones with  
face/touch ID

### What To Expect there:

- Possibly some food/water (Dont count on  
it)
- Limited sign supplies - Only use it if you  
need it!
- Some people may carry spare whistles to  
hand out

Alissa Soleshee

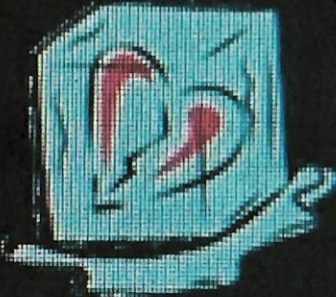


**ICE OUT NOW!**  
**WALKOUT PROTEST**

Friday feb 13 . **LOCATED :**  
10:40- 2:00 **Williamate**  
**plaza, Eugene**  
**Oregon**

Network charter school is doing a walkout protest to refuse to comply and stay silent while ICE kidnaps, murders, and abuses are community.

**Join us!**  
**Are power is in numbers!!**





350eugene · 2h



# I've Had Enough! protest 47' birthday

Rally · Volunteer organized

**Sunday, June 14**  
1 – 3pm PDT

**Old Federal Courthouse**  
211 E 7th Ave  
 Eugene, OR 97401



350eugene Join [@indivisibleeugene](#) and other like minded folks who are fed up with Trump's destruction and dismantling of Democracy on June 14th (flag day) bring flags (if you can) your voice and signs. Democrasonic Response Team ( a brass band) will be performing!!

RSVP: <https://mobilize.us/s/PEhFW>

# I've Had Enough! protest 47' birthday

Rally · Volunteer organized



## 📅 Time

**Sunday, June 14**  
1 – 3pm PDT

## 📍 Location

**Old Federal Courthouse**  
211 E 7th Ave  
Eugene, OR 97401  
[Map](#)

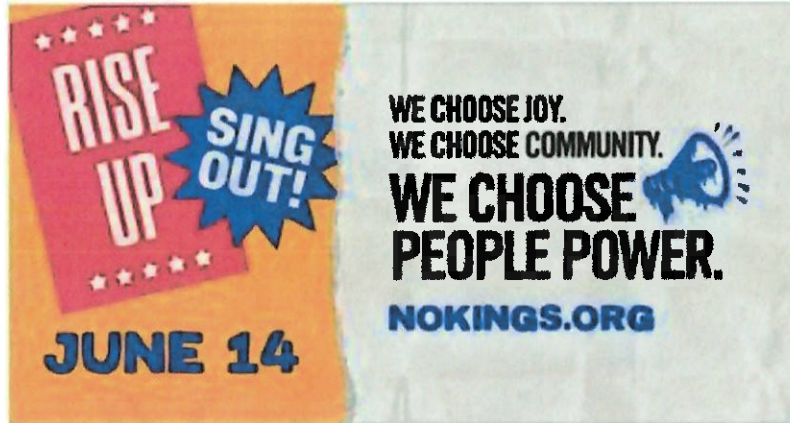
## About this event

This a local Indivisible event! Join me and other like minded folks who are fed up with Trump's destruction and dismantling of Democracy on June 14th ( flag day) bring flägs(if you can) your voice and signs. Democrasonic Response Team ( a brass band) will be performing!!

*A core principle behind all Indivisible events is a commitment to nonviolent action. We expect all participants to seek to de-escalate any potential confrontation with those who disagree with our values.*

## Rise Up, Sing Out Eugene Watch Party

Community Event - Volunteer organized



**📅 Time**  
**Sunday, June 14**  
5 - 7pm PDT

**📍 Location**  
711 E 7th Ave  
Eugene, OR 97401  
[Map](#)

### Security Fence Layout

