

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA,

v.

LaMONICA McIVER.

Hon. Jamel K. Semper

Crim. No. 2:25-cr-00388-JKS

**DECLARATION OF LEE M. CORTES, JR. IN SUPPORT OF CONGRESSWOMAN
LaMONICA McIVER'S REPLY BRIEFS**

I, Lee M. Cortes, Jr., declare under penalty of perjury:

1. I am an attorney admitted to practice law before this Court. I am a Partner at the law firm of Arnold & Porter Kaye Scholer LLP, counsel for Congresswoman LaMonica McIver in this matter. I make this Declaration to provide the Court with additional evidence cited in Congresswoman McIver's Reply Briefs.

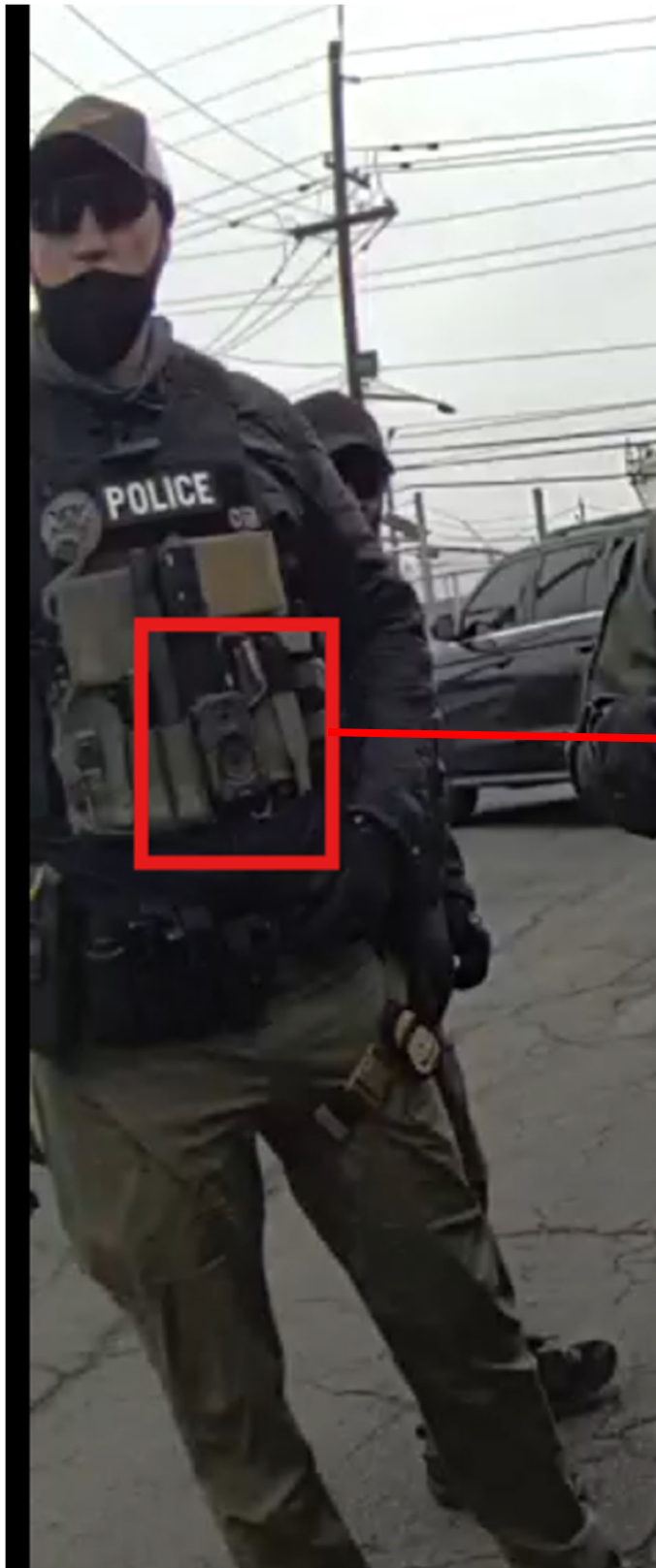
2. Attached are the following true and correct copies of Exhibits N – V, which are social media posts:

Exhibit Number	Document Name
N	May 9, 2025 20:00 @DHSgov
O	May 9, 2025 21:04 @DHSgov
P	May 10, 2025 13:07 @DHSgov
Q	May 13, 2025 23:07 @DHSgov
R	May 14, 2025 14:42 @DHSgov

Exhibit Number	Document Name
S	May 20, 2025 14:50 @DHSgov
T	May 9, 2025 19:14 @TriciaOhio
U	May 10, 2025 12:51 @TriciaOhio
V	Sep. 22, 2025 14:48 @joeymdfox

3. Attached as Exhibit W is a true and correct copy of Axon_Body_4_Video_2025-05-09_1415_D01AA350X, which is a video recording that the United States Attorney’s Office has produced in discovery in this case. Based on the name of the video, as well as the text overlaid upon the footage produced in discovery, the officers with body worn cameras (“BWCs”) at Delaney Hall on May 9, 2025, were equipped with Axon devices.

4. Below is a still image from Ex. W at 00:57, depicting an ICE officer wearing what appears to be an AXON BWC:



5. Below is a copy of a photograph of an Axon Body 4, from Axon's online product catalog page; the BWC is similar to the one worn by the officers at Delaney Hall on May 9, including the officer above in Paragraph 4:



Axon Body 4

See <https://www.axon.com/products> and <https://www.axon.com/products/axon-body-4>.

6. Below is a still image from Exhibit B to Cortes Declaration (see ECF No. 19-4), at 1:12:33, which is a BWC recording that the government provided in discovery. This image depicts a different ICE officer with what appears to be a BWC on his vest:



Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: September 25, 2025

By: 
Lee M. Cortes, Jr.

CERTIFICATE OF SERVICE

I certify that true and accurate copies of the this declaration and the attached exhibits were sent by FTP file transfer to the Court and counsel of record on September 25, 2025.



Lee M. Cortes