

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

Joe Neguse, et al.,

Plaintiffs,

v.

U.S. Immigration and Customs Enforcement,  
et al.,

Defendants.

Civil Action No. 1:25-cv-02463-JMC

**DECLARATION OF DAVID EASTERWOOD**

I, David Easterwood, declare the following under 28 U.S.C. § 1746, and state that under penalty of perjury the following is true and correct to the best of my knowledge and belief:

1. I am employed by the United States Department of Homeland Security (DHS), U.S. Immigration and Customs Enforcement (ICE), Enforcement and Removal Operations (ERO) as the Deputy Field Office Director (DFOD) of the ERO St. Paul Office. I have held this position since April 2025.
2. I have been employed by ICE since September 2015. Since that time, I have held several positions with ICE: Deportation Officer (2015-2019) with experience in all aspects of the identification, arrest, case management, and removal of aliens present in the United States in violation of law; Supervisory Detention and Deportation Officer (2019-2022) responsible for first-line supervision of custody management and fugitive operations teams; and Assistant Field Office Director (2022-2025) managing a portfolio of programs that included the fugitive operations teams, criminal alien program, criminal prosecutions, intelligence, special response

team, and sub-offices in South Dakota and North Dakota.

3. ICE ERO manages and oversees all aspects of the removal process within ICE, including domestic transportation, detention, alternatives to detention programs, bond management, supervised release, and removal to more than 170 countries around the world. As the DFOD of the ERO St. Paul Office, I direct and oversee ICE's enforcement of federal immigration laws in the states of Minnesota, Iowa, Nebraska, North Dakota, and South Dakota.
4. I provide this declaration based on my personal knowledge and information obtained in my official capacity.
5. On January 10, 2026, three members of Congress appeared at the Whipple Federal Building located at 1 Federal Drive, Fort Snelling, and requested immediate entry into the ICE facilities.
6. Although initially allowed into the detention area of the building, an ERO employee whose position is funded by the One Big Beautiful Bill Act (OBBBA) later met with the group and advised they were unable to enter the facility absent prior authorization.
7. The three members of Congress departed the location without further incident. ERO St. Paul has not received a subsequent request to visit the facility from these individuals since this interaction.

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

Executed this 13<sup>th</sup> day of January, 2026.

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Deputy Field Office Director  
Enforcement and Removal Operations  
U.S. Immigration and Customs Enforcement