

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

MUBASHIR KHALIF HUSSEN,
MAHAMED EYDARUS, and JAVIER DOE
*on behalf of themselves and others similarly
situated,*

Plaintiffs,

v.

Case No. 0:26-cv-00324-ECT-ECW

KRISTI NOEM, *in her official capacity as Secretary
of the U.S. Department of Homeland Security; U.S.
Department of Homeland Security; U.S. Immigration
and Customs Enforcement; TODD LYONS, in his
official capacity as Acting Director of U.S.
Immigration and Customs Enforcement; DAVID
EASTERWOOD, in his official capacity as Acting
Director, Saint Paul Field Office, U.S. Immigration
and Customs Enforcement; ; U.S. Customs and Border
Protection; RODNEY SCOTT, in his official capacity
as Commissioner of U.S. Customs and Border
Protection; U.S. Border Patrol; MICHAEL W.
BANKS, in his official capacity as Chief of U.S.
Border Patrol; and GREGORY BOVINO, in his
official capacity as Commander of the U.S. Border
Patrol,*

in their official capacities,

Defendants.

Declaration of Sam Olson

I, Sam Olson, hereby declare as follows:

1. I am employed by the Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Enforcement and Removal Operations (ERO) as Field Office Director (FOD) with the St. Paul Field Office. I have held this position since October 5, 2025.

2. I have been employed by ICE since July 2006. Since that time, I have held several positions with ICE: Immigration Enforcement Agent (2006-2007); Deportation Officer (2007-2016) 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 (2016-2020) responsible for first-line supervision of Criminal Alien Program (CAP) and fugitive operations teams; Assistant Field Office Director (2020-2021) 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; Deputy Field Office Director with programmatic oversight over all enforcement and removal operations for the St. Paul Area of Responsibility; and Field Office Director (2024-2025) for ERO Chicago with oversight over all ERO operations within the six-state Chicago Area of Responsibility.

3. Operation Metro Surge was an exclusively federal operation which mission was to significantly increase “at-large” arrests of illegal aliens in the Twin Cities metropolitan area, focusing on criminal aliens and individuals with executable final orders. This effort was a joint effort between ICE ERO and ICE Homeland Security Investigations (HSI), with assistance from other federal components. No State, County, or Municipal officials from Minnesota participated in Operation Metro Surge.

4. During Operation Metro Surge, approximately 3,000 additional ERO officers and HSI agents were detailed to the St. Paul Field Office. These details have come at different times and for varying lengths of time. Typically, the ERO St. Paul Office is staffed with approximately 190 officers covering the five states of Minnesota, North Dakota, South Dakota, Nebraska, and Iowa. In the Twin Cities of St. Paul and Minneapolis, ERO has approximately 80 officers.

5. As of February 23, 2026, there are approximately 270 ERO officers and 700 HSI agents on detail to the St. Paul Field Office.

6. After February 25, 2026, approximately 107 ERO officers will remain on detail to the St. Paul Field Office. HSI anticipates that there will be approximately 300 agents on detail to the St. Paul Field Office by March 2026.

7. Operation Metro Surge led to the successful arrest and apprehension of criminal aliens, including aliens with convictions for murder, aggravated assaults, domestic abuse/violence, drug trafficking, counterfeiting, identity theft, robbery with a dangerous weapon, sexual assault and rape convictions. During Operation Metro Surge, ICE successfully arrested more than 4,000 illegal aliens.

8. I understand that the court was interested in ICE's arrests in various neighborhoods. Based on available data, ICE conducted arrests in locations that included Worthington, MN; Austin, MN; Willmar, MN; Afton, MN; and Excelsior, MN.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed on this 23rd day of February, 2026.

**SAMUEL J
OLSON**

Digitally signed by SAMUEL
J OLSON
Date: 2026.02.23 16:45:41
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Sam Olson