

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Civil No. 25-2183 (LMP/DLM)

Nadeem KHALID)	
)	
Petitioner,)	
)	DECLARATION OF
)	THOMAS P. MURPHY
v.)	
)	
Pam Bondi, Attorney General of the)	
United States; Kristi Noem, Secretary of)	
the Department of Homeland Security;)	
Todd Lyons, Director of Immigration and)	
Customs Enforcement; Kenneth Genalo,)	
Acting Executive Associate Director,)	
Enforcement and Removal Operations;)	
and Joel Brott, Sheriff of Sherburne)	
County)	
)	
Respondents.)	

Thomas P. Murphy, Deportation Officer, United States Immigration and Customs Enforcement (“ICE”), Department of Homeland Security, for his declaration under 28 U.S.C. § 1746, hereby states as follows:

1. The following declaration is based on a review of the Petitioner’s alien file, statements, and e-mails.

2. I am and have been employed with ICE since April 1, 2007. I began my career as an Immigration Enforcement Agent, later promoted to a Deportation Officer. I have been a Deportation Officer since May 3, 2015.

3. As a Deportation Officer, my assigned duties are to identify, locate, and arrest aliens illegally present in the United States. Additionally, I am charged with the responsibility of overseeing the cases of aliens in removal proceedings. These duties include the review of alien files for sufficiency, the detention and release of aliens in ICE custody, monitoring the progress of cases through the hearing process, and enforcement of the immigration court's decision, including the execution of removal orders. I am also responsible for presenting criminal immigration cases to the United States Attorney's Office for possible criminal prosecution.

4. On June 23, 2025, KHALID was scheduled to be removed via commercial airline. On that day, prior to departing the ERO St. Paul office, KHALID stated he would not cooperate with the scheduled removal and refused to comply with removal efforts. Escorting officers and a supervisor spoke with KHALID and advised him of potential consequences of his failure to comply with removal efforts. (*See* ECF No. 13-1.)

5. On June 25, 2025, a Failure to Comply letter and an I-229(a) were sent to the Sherburne County jail via certified mail. (*See* ECF No. 13-2.) The next day on June 26, 2025, ERO St. Paul transferred KHALID to Florence, Arizona, for staging for a Special High-Risk Charter (SHRC) scheduled to depart for Pakistan on July 30, 2025.

6. On July 29, 2025, ERO St. Paul received a renewed travel document for KHALID with an expiration date of September 23, 2025.

7. On August 1, 2025, ERO Phoenix notified ERO St. Paul that KHALID was hospitalized on July 31, 2025, and again on August 2, 2025. KHALID is currently out of the hospital and in stable condition.

8. On August 3, 2025, ERO Phoenix transferred KHALID to ERO Harlingen.

9. On August 5, 2025, ERO St. Paul requested KHALID be returned to Minnesota for scheduling of a commercial removal flight from the Minneapolis-St. Paul International Airport.

10. On August 7, 2025, ERO St. Paul confirmed KHALID'S transfer from ERO Harlingen to ERO St. Paul is scheduled for August 11, 2025. On the same date, ERO St. Paul began arraigning commercial removal of KHALID for early September 2025.

11. ICE will continue to keep SHRC options available as those have been occurring regularly. Due to issues of operational security, third country considerations, and officer safety, ICE does not disclose specific dates and times of forthcoming removal itineraries. On this basis, I believe there is a significant likelihood that KHALID will be removed in the reasonably foreseeable future.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Further your affiant sayeth not.

THOMAS P MURPHY Digitally signed by THOMAS P MURPHY
Date: 2025.08.08 11:25:47 -05'00'

Thomas P. Murphy, Deportation Officer
U.S. Immigration and Customs Enforcement

August 8, 2025