

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

JESUS ALBERTO PEREZ,

Petitioner,

v.

Pamela Bondi, Attorney General,

Kristi Noem, Secretary, U.S. Department
of Homeland Security,

Todd M. Lyons, Acting Director of
Immigration and Customs Enforcement,

David Easterwood, Acting Director, St.
Paul Field Office Immigration and
Customs Enforcement.

Respondents.

Case No. 0:26-cv-00261

**DECLARATION OF
JONAH ALFRED GIESE**

I, Jonah Alfred Giese, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a resident of Minneapolis, Minnesota.
2. I am a Volunteer Legal Worker with the National Lawyers Guild - Minnesota.
3. I help administer the National Lawyers Guild Protest Support Hotline. This hotline connects detained individuals with legal advice and counsel.
4. In this capacity, I have spoken with United States Citizens (“U.S. Citizens”) that have recently been detained at the Bishop Whipple Federal Building during ‘Operation Metro Surge.’
5. Detained U.S. Citizens have described abhorrent detention conditions inside the Bishop Whipple Federal Building, including, but not limited to:
 - a. Significant overcrowding (more than eight people being crowded into one cell);
 - b. Systematic denial of access to legal counsel;

- c. Severely limited access to phone calls; and
 - d. Severely limited access to medical care.
6. Moreover, detained U.S. Citizens have explained that these conditions are especially harsh for detained immigrants. One detained individual described the experience of witnessing hundreds of detained immigrants as “haunting.”
 7. In one instance, a detained U.S. Citizen that was no longer being investigated for a crime was only released from custody when overnight staff found her alone in her cell (all Immigration and Customs Enforcement staff had allegedly departed for the day).
 8. In my capacity as a Legal Worker volunteer for the National Lawyers Guild, I have also been providing assistance for attorneys supporting detained noncitizens in Minnesota. To this end, I have spent several hours a week in conversation with the families and loved ones of detained noncitizens, as well as looking up detained individuals on the ICE Detainee Locator website, <https://locator.ice.gov/>.
 9. Through this volunteer work, I have observed firsthand that ICE is very frequently sending detained individuals to Texas within a day of taking them into custody. Once these individuals reach Texas, it becomes exponentially harder for them to contact attorneys and other legal recourse in Minnesota.

I declare under penalty of perjury that everything I have stated in this declaration is true and correct to the very best of my knowledge.

Signed on January 13, 2026 in Hennepin County, Minnesota.

/S/ Jonah Alfred Giese
Jonah Alfred Giese