

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

Richard Alceves Arevalo Seijas,

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,  
and

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

Respondents.

Case No. 26-cv-00902-SRB-JFD

**DECLARATION OF KIRA  
KELLEY IN SUPPORT OF  
PETITIONER'S EMERGENCY  
MOTION TO SHOW CAUSE**

I, Kira Aakre Kelley, declare under penalty of perjury under the laws of the United States of America that the following is true and correct to the best of my knowledge:

1. I am an attorney licensed to practice law in the state and federal courts of Minnesota, among other jurisdictions, and am counsel of record for Petitioner.
2. On February 6, 2026, at approximately 3:30 p.m. and repeatedly for the next approximately forty-five minutes, I attempted to contact the ICE/ERO field office in St. Paul by telephone. I had a number of matters to discuss with ICE/ERO, including the release of Mr. Arevalo Seijas and the return of property for other clients who Respondents had released, but whose property Respondents withheld.

I attempted to call the two numbers I have been given which I know to belong to this office a total of eight times on the afternoon of February 6, 2026. When I was able to navigate the phone tree to the proper division of the ERO/office, I let the phone ring for three to five minutes on each attempt, but received no answer. A few times, when I called I was met with a “busy tone” for a handful of seconds followed by the call disconnecting.

3. These numbers are: 612-843-0000 and 612-409-7799.
4. On previous occasions, I have requested from ICE/ERO and their attorneys a more efficient means of communicating with Respondents as to how I may better access my clients for legal visits with them when their whereabouts are unknown to me, coordinate with ICE/ERO for their release following a court order, and facilitate the return of their belongings. I have not received any guidance aside from instructions to call the two phone numbers which no one ever answers, or to email the St. Paul ICE/ERO field office, [StPaul.Outreach@ice.dhs.gov](mailto:StPaul.Outreach@ice.dhs.gov).
5. An ICE agent previously admitted to me, when I spoke to her on the phone after sending an order for another client’s release to the [StPaul.Outreach@ice.dhs.gov](mailto:StPaul.Outreach@ice.dhs.gov) email and hearing that my client was about to be transported from the Whipple to another facility notwithstanding a court order for her release, because no one had seen or reviewed that court order for my client’s release, that “we really need to get someone to check that email.” I took this to mean that no one reliably checks this email.

6. As of the filing of this affidavit, I have not received a response to the email, screenshotted below, which I sent on January 26, 2026. (I redacted two of my clients' A numbers and names from this screenshot, as well as my personal cell phone number).



Kira Kelley <kira@climatedefenseproject.org>

**Questions re: picking up client and belongings**

2 messages

**Kira Kelley** <kira@climatedefenseproject.org> Mon, Jan 26, 2026 at 11:46 AM  
To: "St Paul.Outreach" <stpaul.outreach@ice.dhs.gov>, caseview.ecf@usdoj.gov, "Merle, Catherine," <catherine.merle@usdoj.gov>, "Sheqem, Tara (USAMN)" <Tara.Sheqem@usdoj.gov>, usamn-immigrationhab@usa.doj.gov, "Barr, Abigail (USAMN)" <Abigail.Barr@usdoj.gov>, jim.s.stolley@ice.dhs.gov, "Voss, Ana (USAMN)" <ana.voss@usdoj.gov>

Hello all,

I know that we've been having some inconsistencies about who is allowed to enter the federal building or for what purpose, so I figured I'd reach out and try to get on the same page and work out a system that's efficient for everyone. I'd like to know how to make everyone's lives easier!

What's the best way for attorneys such as myself to get in contact with someone at ICE/ERO to arrange for the following circumstances:

- 1) to facilitate the pick up of a client who has a court order for release?
- 2) to arrange confidential legal visits with clients who are detained at the Whipple?
- 3) to retrieve clients' belongings from ICE/ERO that were not returned to the client upon their release?

For example, I'd like to arrange a pickup for a client of mine ( [REDACTED] ) who was ordered released today so that he's not outside waiting for a ride in negative ten degree weather. I've also been asked by another client ( [REDACTED] ) to see about how to get his identification documents back.

My cell is [REDACTED], if it's easier to talk through this on the phone. I'm happy to communicate any suggestions or responses from you all to my colleagues who are handling similar matters, so we can all get on the same page and hopefully smooth some of this coordination out collaboratively.

Best regards,

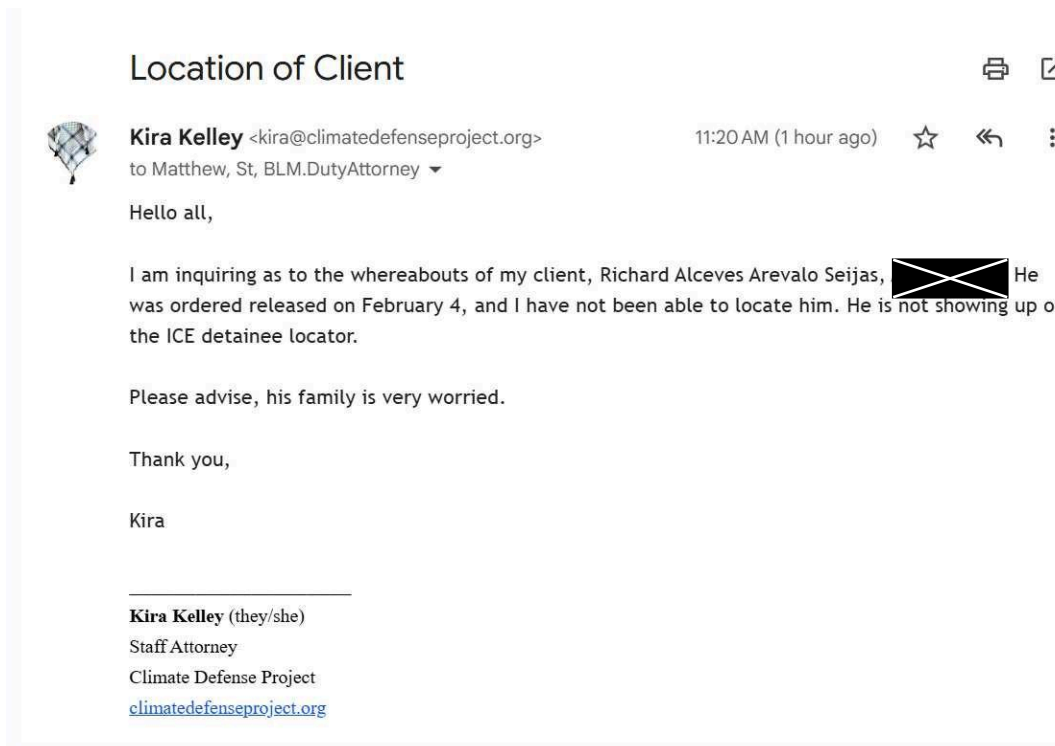
Kira

**Kira Kelley** (they/she)  
Staff Attorney  
Climate Defense Project  
climatedefenseproject.org

7. Petitioner's sister informed me this morning that she spoke with Petitioner on February 8, 2026, when he called her to request that she put some money on his commissary. To both of us, this request reflected his understanding that he would be remaining in detention for a while longer. When she told her brother that he had

a court order for his release, Petitioner's sister reported that Petitioner was confused. Respondents had given Petitioner no information about his release.

8. This morning, at 11:20 a.m., after confirming with my client's sister that she still had not heard from him and finding no results on the ICE Detainee locator for his name and A number, I sent an email to the attorney of record on this case for the federal respondents, as well as to the BLM desk attorney and the St. Paul ERO/ICE field office. A screenshot of this email is pasted below. As of the time of the filing of this case, I have not received a response.



9. As of February 9, 1:35 p.m., neither I nor Petitioner's sister have heard from him, nor have I received any communication from Respondents on this matter.

Date: Feb. 9, 2026

/s/ Kira A. Kelley

Kira A. Kelley, Esq.