

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

IN THE MATTER OF HABEAS	)	
PETITIONS FILED REGARDING	)	<b>DECLARATION OF</b>
DETENTION PURSUANT TO	)	<b>DEPUTY FIELD OFFICE</b>
OPERATION METRO SURGE	)	<b>DIRECTOR TAURIA RICH</b>
	)	
	)	

Tauria Rich, Deputy Field Office Director, St. Paul Field Office, United States Immigration and Customs Enforcement (ICE), Department of Homeland Security (DHS), for her declaration under 28 U.S.C. § 1746 hereby states as follows:

- 1) The following declaration is based on my personal knowledge as well as a review of alien files, official records, and information relayed to me by other officials.
- 2) I am and have been employed with ICE since April 2, 2006. I have held the Deputy Field Office Director-GS15 position since April 7, 2024.
- 3) As a Deputy Field Office Director, my assigned duties are to identify, locate, and arrest aliens who are 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 noncitizen 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 decisions, 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) I submit this Declaration in connection with petitions for writs of habeas corpus by aliens who have been arrested and detained during Operation Metro Surge. While this declaration cannot address each individual's circumstances, it explains the process for the operation and ICE efforts to comply with any court order resulting from the operation.

5) When an alien is encountered during Operation Metro Surge, ICE first determines whether he or she is unlawfully in the United States. If so, ICE arrests the alien and transports him or her to the Enforcement and Removal Operations (ERO) group's St. Paul Field Office in Fort Snelling, Minnesota. There, the alien is fingerprinted, photographed, screened for any parental interest that needs to be resolved before transfer, and screened by ICE Health Services Corps for any medical concerns.

6) Due to a lack of bed space available locally, the alien is transferred out of Minnesota on the next available flight in order to minimize the amount of time the alien must wait in the holding area. As a federal agency, ICE utilizes bed space in various locations when it is limited in one area.

7) Given the high number of detentions in Minnesota in recent weeks, the agency's current practice is to transport all aliens detained as part of Operation Metro Surge to facilities outside of Minnesota where there is open bed space, unless there is a particular reason why that person cannot or should not be transferred, such as a court order or a parental interest that requires coordination with the local juvenile coordinator. No detainee is ever transferred because the detainee has contacted or retained counsel, has filed a petition for habeas corpus, or is deemed likely to do so.

8) The complex logistics of quickly moving aliens across the country to places with

available bed space are handled by a team of ERO officers, and it would be impossible to identify the individual officers for each case.

9) ERO consistently strives to comply with all orders from the immigration courts, federal district courts, and appellate courts. If a district court orders that a petitioner be released, ERO diligently coordinates with its components and contract jails to promptly effectuate that release in a safe or orderly manner.

10) If a district court orders that a petitioner should not be moved out of Minnesota, ICE officials quickly note the order in an online system so that all personnel are aware. The ERO officers who coordinate moving detainees check for such notations before arranging any transfer. Currently, the ERO officers are checking again for a district court order preventing transfer before the detainees board the charter flights.

11) If a district court orders that a petitioner be returned to Minnesota, ERO diligently works to return him or her to Minnesota as soon as practicable. The ERO officers quickly determine the next available charter flight from the petitioner's detention location, book a seat for the petitioner on that flight, and contact the personnel at the detention location, informing them that they will need to bring the petitioner to the flight line at the appointed time, along with their alien file and all belongings (which would include their documents, identification, money, medicine, clothing, etc.).

12) Use of commercial airlines for the transfer of detainees is unpracticable because of the extremely difficult logistics involved and because doing so would require more manpower and more time than use of charter flights. Instead, the ERO logistics team is working on routing charter flights to return petitioners to Minnesota as quickly as possible.

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

**TAURIA L RICH** Digitally signed by TAURIA L RICH  
Date: 2026.02.02 07:06:24 -06'00'

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Tauria L. Rich  
Deputy Field Office Director  
U.S. Immigration and Customs Enforcement

DATED: February 2, 2026