UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
CASE 0:25-cv-04770-JMB-ECW

Ijeoma Miriam CHANTHAVONG
Petitioner,

v.

DEPARTMENT OF HOMELAND SECURITY, DHS; IMMIGRATION AND CUSTOMS ENFORCEMENT, ICE; DIRECTOR OF ST. PAUL FIELD OFFICE ICE; ADMINISTRATOR SHERBURNE COUNTY JAIL; and ACTING DIRECTOR ST. PAUL FIELD OFFICE ICE, *et al.*,

Respondents.

Case No. 0:25-cv-04770-JMB-ECW

DECLARATION OF CHRISTOPHER A. CAMPBELL DEPORTATION OFFICER

I, CHRISTOPHER A. CAMPBELL, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a Deportation Officer ("DO") employed by the United States Department of Homeland Security ("DHS"), United States Immigration and Customs Enforcement ("ICE"), Office of Enforcement and Removal Operations ("ERO"). I am and have been employed with ICE since May 11, 2026.
2. I have been tasked with reviewing and responding to a request for records regarding Ijeoma Miriam CHANTHAVONG. This declaration is supplemental to the previously filed declaration in this case, 25-cv-4770.
3. I make this declaration based on my personal and professional knowledge, my review of records and systems maintained by ICE in the regular course of business, and information provided by other agents and officers.

4. CHANTHAVONG is a native and citizen of Nigeria who is subject to a final order of removal who is detained at Sherburne County Jail.
5. CHANTHAVONG's primary medical concerns include moderate anemia secondary to chronic abnormal uterine bleeding from uterine fibroids, ongoing pain (costochondritis), and a recent episode of loss of consciousness. She requires continued monitoring, outpatient gynecological and neurological evaluation, and management of her anemia and pain. These issues are being addressed by the ICE Health Services Corps and physicians as part of her ongoing care plan, with close follow-up to prevent complications and ensure appropriate treatment.
6. On July 2, 2026, Sherburne County Jail transported CHANTHAVONG to Fort Snelling, MN so that ICE/ERO could process her for removal on a commercial flight for that same day, July 2, 2026. At approximately 9:15 a.m., CHANTHAVONG physically resisted and failed to obey officer's commands to go to the airport for her flight. Due to this resistance, ICE/ERO was unable to take CHANTHAVONG to her scheduled removal flight.
7. On July 13, 2026, ICE/ERO served CHANTHAVONG with Notice of Failure to Comply, a true and accurate copy attached hereto.
8. On July 14, 2026, CHANTHAVONG'S emergency travel document for Nigeria expired.
9. On July 22, 2026, ICE/ERO requested a new emergency travel document from the Consulate of Nigeria in New York. Because the Consulate recently issued a travel document for CHANTHAVONG in April, ICE/ERO expects they will reissue without delay. CHANTHAVONG will thus be able to return to Nigeria without issue once pending litigation is resolved.

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

CHRISTOPHER A CAMPBELL Digitally signed by CHRISTOPHER A CAMPBELL Date: 2026.07.22 14:59:55 -05'00'

CHRISTOPHER A. CAMPBELL, Deportation Officer

U.S. Immigration and Customs Enforcement

DATED: July 22, 2026