UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
CASE 0:26-cv-03168-JWB-DJF

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. 0:26-cv-03168-JWB-DJF

DECLARATION OF BENJAMIN NORTHWOOD DEPORTATION OFFICER

I, Benjamin Northwood, 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 December 15, 2025
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 declarations in this c
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. On August 21, 2026, the Consulate of Nigeria in New York issued another travel document valid for a single journey to Nigeria, valid for 30 days from date of issuance.
6. Petitioner has a significant likelihood of removal and is scheduled to be removed to Nigeria on a flight on a date certain between September 4-18, 2026.
7. ICE/ERO had scheduled Petitioner for a hysterectomy appointment. The Petitioner was scheduled to attend the surgical appointment, but the appointment did not proceed on the date of the procedure due to her refusal. Facility staff reported that Petitioner stated she needed to speak with her attorney because she was unsure how to proceed. Petitioner also advised nursing staff the previous evening that she needed a cardiology appointment first and asked when that appointment was scheduled. Staff were unable to disclose that information at that time. Petitioner then became upset that the nurse did not provide the cardiology appointment information and Petitioner left the clinic area.
8. The facility considers this a refusal because Petitioner did not report to booking or otherwise follow the required process to attend the scheduled surgical appointment. As a result, she would not have been able to be transported to or attend the appointment. Additionally, she did not return or notify staff that she intended to proceed with the appointment, which created safety concerns related to movement and transport.

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

BENJAMIN E NORTHWOOD

Digitally signed by BENJAMIN E NORTHWOOD
Date: 2026.08.31 15:39:59 -05'00'

BENJAMIN NORTHWOOD, Deportation Officer

U.S. Immigration and Customs Enforcement

DATED: AUGUST, 31, 2026