

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

---

MUBASHIR KHALIF HUSSEN,  
MAHAMED EYDARUS, and JAVIER DOE  
*on behalf of themselves and others similarly  
situated,*

Case No. 0:26-cv-324-ECT-ECW

Plaintiffs,

v.

KRISTI NOEM, *in her official capacity as  
Secretary of the U.S Department of  
Homeland Security*, U.S. DEPARTMENT OF  
HOMELAND SECURITY; U.S.  
IMMIGRATION AND CUSTOMS  
ENFORCEMENT; TODD LYONS, *in his  
official capacity as Acting Director of U.S.  
Immigration and Customs Enforcement*;  
DAVID EASTERWOOD, *in his official  
capacity as U.S. Immigration and Customs  
Enforcement Field Office Director for St.  
Paul, Minnesota*; U.S. CUSTOMS AND  
BORDER PROTECTION; RODNEY  
SCOTT, *in his official capacity as  
Commissioner of U.S. Customs and Border  
Protection*; U.S. BORDER PATROL;  
MICHAEL BANKS, *in his official  
capacity as Chief of U.S. Border Patrol*;  
Director, Homeland Security  
and GREGORY BOVINO, *in his official  
capacity as Commander-at-Large of U.S.  
Border Patrol*,

**DECLARATION OF MARTY C.  
RAYBON SR.**

Defendants.

---

I, Marty C. Raybon Sr., hereby declare as follows:

1. I am employed by U.S. Customs and Border Protection (CBP). CBP is charged with enforcing the Nation's immigration laws to protect national security and uphold the integrity of the immigration system. As part of this mission, Border Patrol agents and CBP officers are responsible for preventing the unlawful entry of individuals into the United States, apprehending those who attempt to enter illegally or who have violated the immigration laws. Through these activities, CBP seeks to secure the border, disrupt human smuggling and trafficking networks, and ensure consistent enforcement of the immigration laws of the United States.

2. I entered on duty with the U.S. Customs Service - a legacy agency to CBP - as a Canine Enforcement Officer in 1999. During my career with U.S. Customs and CBP, I have held various positions with management responsibilities at CBP's Headquarters in Washington, D.C. and at numerous field locations, to include: Executive Director of the National Targeting Center (NTC) within the Office of Field Operations (OFO); the Executive Port Director for the Port of New York/Newark; Acting Director, Field Operations for the New York Field Office; Port Director for the Port of Detroit, Michigan; Executive Consultant, Office of Intelligence, Washington D.C.; Acting Director of Field Operations (DFO), Detroit Field Office; Acting Deputy Executive Director, Planning, Program Analysis and Evaluation (PPAE) and; Acting Assistant Director, Tactical, NTC-P in Virginia.

3. Since March 2024, I have served as the DFO for the Detroit Field Office in Michigan. In this role, I oversee 1,800 employees and all CBP OFO operations throughout the state of Michigan, which includes air, land and sea operations. I also oversee the Automotive and Aerospace Center for Excellence and Expertise, with employees assigned across the country.

4. On February 3, 2026, I was assigned as CBP's Lead Field Coordinator (LFC) for U.S. Immigration and Customs Enforcement's (ICE) Minneapolis operation, Operation Metro Surge. In this role, I am responsible for all CBP assets and personnel assigned to Operation Metro Surge, and I ensure that CBP employees have everything they need to perform their duties, including equipment and supplies. As the LFC, I also ensure CBP closely collaborates and coordinates with other participating federal agencies.

5. The statements contained in this declaration are based upon my personal knowledge and information made available to me in the course of my official duties.

6. In early January 2026, CBP personnel began mobilizing in Minneapolis to assist ICE Enforcement and Removal Operations (ERO). As part of Operation Metro Surge, CBP personnel, along with personnel from partner federal agencies, participated in a variety of law enforcement actions in and around Minneapolis. These enforcement actions primarily involved immigration enforcement authorities granted under Title 8 of the U.S. Code but may have also involved enforcement of certain portions of the U.S. criminal code under Title 18.

7. On February 3, 2026, the day I began my duties as the LFC, approximately 1029 CBP employees (including CBP officers, Border Patrol agents, Air and Marine Operations (AMO) personnel and support staff) were assigned to Operation Metro Surge. This number does not include CBP employees assigned to other responsibilities within the Minneapolis/St. Paul area, such as CBP officers assigned to ports of entry.

8. On February 4, 2026, CBP demobilized approximately 680 CBP officers and Border Patrol agents assigned to Operation Metro Surge, leaving approximately 349 CBP officers, Border Patrol agents, AMO personnel and support staff to assist the operation. CBP continued to draw down personnel during the next two and a half weeks.

9. On February 12, 2026, CBP demobilized approximately 200 CBP officers, Border Patrol agents, and AMO personnel leaving approximately 149 CBP officers, Border Patrol agents, AMO personnel and support staff to assist the operation. Four days later, CBP demobilized approximately 82 additional employees, which included CBP officers, Border Patrol agents, AMO personnel and support staff, leaving approximately 67 CBP officers, Border Patrol agents, AMO personnel and support staff to assist the operation.

10. CBP will demobilize the remaining 67 CBP employees assigned to Operation Metro Surge by February 23, 2026.

I declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 23rd day of February 2026 at Detroit, Michigan.

---

Marty C. Raybon, Sr.