

SCOTT E. BRADFORD, OSB #062824

United States Attorney

District of Oregon

SUSANNE LUSE, OSB # 142489

Assistant United States Attorney

Susanne.Luse@usdoj.gov

1000 SW Third Ave., Suite 600

Portland, Oregon 97204-2936

Telephone: (503) 727-1000

Facsimile: (503) 727-1117

Attorneys for Defendants

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

EUGENE DIVISION

**NEWPORT FISHERMEN'S WIVES;
LINCOLN COUNTY, et al.**

Case No. 6:25-cv-02165-AA (Lead)
Case No. 6:25-cv-02172-AA (Trailing)

Plaintiffs,

v.

**UNITED STATES COAST GUARD;
KRISTI NOEM, et al.**

**DECLARATION OF RALPH
FERGUSON IN SUPPORT OF
DEFENDANTS' MOTION TO EXTEND
DEADLINES TO RESPOND TO
COMPLAINTS**

Defendants.

I, Ralph Ferguson, pursuant to 28 U.S.C. § 1746 and in my official capacity, hereby declare the following:

1. I am the U.S. Immigration and Customs Enforcement (ICE) Enforcement and Removals Operations (ERO) acting Assistant Director for the Operations Support Division. In this role, I oversee the Human Resources Management Division, Mission Support Division, and Fiscal Management.
2. I joined ICE in 2016 as a Supervisory Accountant. I was assigned to ERO in 2017 and served in several supervisory positions within ERO from 2019 to the present. In 2024, I was promoted to the position of ERO's Deputy Assistant Director of the Fiscal Management Division. On January 2, 2025, I was promoted to be the Acting Assistant Director of ERO Operations Support.
3. The Office of Asset and Facilities Management, Parole and Law Enforcement Programs Unit (OAFM-PPMU) within ICE had begun environmental compliance activities necessary to allow the U.S. Coast Guard (USCG) Air Facility at Newport, Oregon to be utilized by ICE-ERO as a proposed temporary holding/processing facility until notice was received on December 4, 2025 that the Commandant for the USCG was removing the site from ICE-ERO's availability. Upon receipt of this determination, the OAFM-PPMU ceased further action on this site environmental preparations.
4. Only initial steps were taken toward completing Environmental Due Diligence Analysis (EDDA) between USCG and ICE environmental staff.
5. Environmental compliance activities had only just begun when USCG withdrew the Newport AIRFAC site from consideration. No construction has taken place and there had been no irretrievable commitment of resources during their initial assessment of

the site.

6. ICE is not presently building a temporary holding/processing facility in or around Newport Municipal Airport. In addition, ICE has no plan or intention to begin construction or open an ICE facility in the City of Newport or at Newport Municipal Airport between now and until May 1, 2026.

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

Signed this 27th day of January 2026.

**RALPH F
FERGUSON**

Digitally signed by RALPH
F FERGUSON
Date: 2026.01.27 19:13:11
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Ralph Ferguson
Acting Assistant Director, Operations Support Division
Enforcement and Removal Operations
U.S. Immigration and Customs Enforcement