

Civil Division, 15 Kellogg Blvd. West, 400 City Hall Saint Paul, MN 55102 Tel: 651-266-8710 | Fax: 651-298-5619

December 19, 2025

David Easterwood
Acting Director
Saint Paul Field Office
United States Immigration and Customs Enforcement
1 Federal Drive
Suite 1601
Fort Snelling, MN 55111
United States

Dear Director Eastwood or whom it may concern:

I am the City Attorney for the City of Saint Paul, Minnesota.

It has come to my attention that the Department of Homeland Security ("DHS"), through US Homeland Security Investigations ("HSI") and Immigration and Customs Enforcement ("ICE"), has been using parking lots owned by the City of Saint Paul without authorization, to stage enforcement actions in Saint Paul. Specifically, we are concerned about HSI and ICE's unauthorized use of the parking lots at Newell Park (900 Fairview Avenue N, Saint Paul, MN 55104) on November 18, 2025, and the parking lot at the Conway Recreation Center (2090 Conway Street, Saint Paul, MN 55119) on December 13-16, 2025.

Both Newell Park and the Conway Recreation Center are property owned by the City of Saint Paul, operated by the Department of Parks and Recreation, and expressly reserved for park uses. The Saint Paul City Charter reserves the use of park property, including parking lots, for park purposes and the Saint Paul Legislative Code restricts the use of park parking lots to being only for use by those using park facilities. Any use of a park parking lot that is not for the parking of vehicles while utilizing park facilities or walking to and from lawfully parked vehicles without delay, requires a permit authorized by the Department of Parks and Recreation. DHS/HSI/ICE's use of park parking lots for non-park purposes without a permit is an unlawful use of City property that constitutes an encroachment and unlawful parkland diversion.

For the reasons outlined in this letter, you must immediately cease and desist from any further use of these parking lots as well as any other Saint Paul Park parking lot. The City reserves all rights and remedies available to it under the law and will not hesitate to enforce those rights in the event that you fail to cease and desist.

Sincerely,

Lyndsey Olson City Attorney

CC:

Melvin Carter, Mayor

Andy Rodriguez, Parks and Recreation Director

CITY OF SAINT PAUL MELVIN CARTER, MAYOR

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