

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

J. DOE,)
)
Movant,) Case No. 3:25-MC-80325-PHK
)
v.)
)
UNITED STATES DEPARTMENT)
OF HOMELAND SECURITY,)
)
Respondent.)
)

DECLARATION OF ERIC D. MCLOUGHLIN

I, Eric D. McLoughlin, declare as follows:

1. I currently serve as the Special Agent in Charge (SAC) for the U.S. Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI) in Philadelphia, Pennsylvania. I have held this position since on/about November 1, 2025. Prior to this position, I served as Deputy Assistant Director for the Cyber and Operational Technology division within HSI from on/about August 2024 to on/about August 2025.
2. On September 11, 2025, HSI issued two summonses to Meta via Meta's online portal seeking certain subscriber information after receiving information concerning the stalking and gathering of intelligence on federal agents involved in ICE operations, among other allegations. Summons No. HSI-PH-2025-082814-001 sought subscriber information for the Facebook account <https://www.facebook.com/61576856776412>, consisting of name, postal code, country, all email address(es) on file, date of account creation, registered

telephone numbers, IP address at account signup, and logs showing IP address and date stamps for account accesses from 02/01/2025 to the present. Summons No. HSI-PH-2025-082819-001 sought the same information for the Instagram account <https://www.instagram.com/montcowatch>.

3. The deadline for production set forth in the Summonses was September 25, 2025.
4. On September 26, 2025, after additional correspondence from Meta, HSI responded to Meta by citing “18 U.S.C § 115” and explaining “It’s a federal crime to assault, kidnap, or murder—or threaten to do so—a federal law enforcement officer with the intent to impede, intimidate, or interfere with them in the performance of their official duties. This deals with the open organization of people to impede immigration[-]based investigations and operations. This is also a serious threat to law enforcement officer safety.”
5. The information HSI sought from Meta is relevant to an investigation within HSI’s mission and investigative authority.

I declare, under penalty of perjury under 28 U.S.C. § 1746, that the foregoing is true and correct to the best of my knowledge and belief, and that this declaration is based on my personal knowledge, as well as the information provided to me by other employees of the Department of Homeland Security.

DATED: December 2, 2025

Eric D. McLoughlin
Special Agent in Charge
Homeland Security Investigations
Philadelphia, Pennsylvania
U.S. Immigration and Customs Enforcement