

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

DAVID STREEVER,

Plaintiff,

v.

MARKWAYNE MULLIN, in his official
capacity as Secretary of the Department of
Homeland Security, et al.,

Defendants.

Civil Action No.: 1:26-cv-02356-RC

**DECLARATION OF THE REV. HILARY STREEVER
IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION**

I, the Rev. Hilary Streever, declare as follows:

1. I am over the age of 18, am competent to testify, and have personal knowledge of the facts and information set forth in this declaration.
2. I am married to David Streever, the Plaintiff in this action.
3. David is an author, journalist, and father of two children, including our seven-year-old daughter.
4. I am a priest of The Episcopal Church.
5. On June 23, 2026, I arrived at our Rochester home, still wearing my clergy collar, and encountered two federal agents leaving our front porch.
6. The agents told me they were looking for David Streever.

7. I identified myself as his wife and informed the agents that David was in Europe until Friday, June 26, 2026.

8. One of the agents told me they were looking for David because he "may or may not have" sent an email threatening the Director of ICE.

9. I told the agents that David would not have sent a threat.

10. One of the agents told me they needed to speak to David.

11. The agent handed me a document entitled "WARNING NOTICE." A true and correct copy of the "WARNING NOTICE" is attached to the Verified Complaint as Exhibit 2.

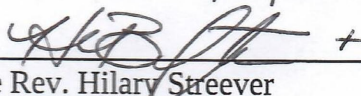
12. The agent handwrote a telephone number on the back of the "WARNING NOTICE" and the following: "Homeland Security Investigations Special Agent Abbi Henry."

13. I recognize the second of the two agents from recent news reports identifying him as Special Agent David Brodie (or Brody).

14. I did not tell the agents (or anyone else) the name of the hotel where David would be staying in New York City.

15. The agents' visit to our home, their repeated telephone messages to David, their visit to his hotel, their apparent surveillance of his travel, and ICE's claims that his email to Todd Lyons was a threat of violence have caused me and our family anxiety and distress, including fear of further retaliation from federal agents for his email or future criticism of ICE and DHS policies and actions.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 7/6/2026

The Rev. Hilary Streever