

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

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

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 M. 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 S.
SCOTT, *in his official capacity as
Commissioner of U.S. Customs and Border
Protection*; U.S. BORDER PATROL;
MICHAEL W. BANKS, *in his official
capacity as Chief of U.S. Border Patrol*; and
GREGORY BOVINO, *in his official capacity
as Commander-at-Large of U.S. Border
Patrol,*

Defendants.

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

**DECLARATION OF
CHRISTIAN GLANVILLE**

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

SUSAN TINCHER, JOHN BIESTMAN,
JANET LEE, LUCIA WEBB,
ABDIKADIR NOOR, and ALAN
CRENSHAW, *on behalf of themselves and
other similarly situated individuals,*

Plaintiffs,

v.

KRISTI NOEM, Secretary, U.S.
Department of Homeland Security (DHS);
TODD LYONS, Acting Director, U.S.
Immigration and Customs Enforcement
(ICE); MARCOS CHARLES, Acting
Executive Associate Director,
Enforcement and Removal Operations
(ERO), ICE; DAVID EASTERWOOD,
Acting Field Office Director, ERO, ICE
Saint Paul Field Office; JOHN A.
CONDON, Acting Executive Associate
Director, Homeland Security
Investigations (HSI); The Department of
Homeland Security; Unidentified Federal
Agencies; and Unidentified Federal
Agents; *in their official capacities,*

Defendants.

Case No. 25-cv-04669-KMM-DTS

**DECLARATION OF
CHRISTIAN GLANVILLE**

I, Christian Glanville, declare as follows:

1. I am 32 years old and reside in Northeast Minneapolis, Minnesota, where I have lived for approximately nine years. I work as a museum employee. I have no criminal history.
2. I make the following declaration based on personal knowledge.

3. I have been concerned about the presence of U.S. Immigration and Customs Enforcement (“ICE”) agents in my community resulting from the federal government’s “Operation Metro Surge.”

4. On Friday, January 23, 2026, I engaged in peaceful, non-interfering observation of ICE agents near my children’s Waite Park Elementary school. I did so because parents in our community were concerned that ICE activity near an elementary school could traumatize students, disrupt childcare operations, and jeopardize the safety of students and families. I did nothing unlawful or obstructive. My actions were limited to observing from public streets, documenting events, and communicating safety information to other parents.

5. At approximately 10:30 a.m., I received a message from another parent indicating that an ICE agent was present near the school. I drove to the school area. Although regular school was not in session, extended childcare was operating through the Minneapolis Parks and Recreation, staffed by individuals who were not the usual employees of the school. This raised serious concern among parents, including me, that staff might not know the proper safety protocols in the event ICE agents approached or entered the building.

6. Upon arrival, I observed a light Jeep Wagoneer with heavily tinted windows idling near the school’s main entrance. I parked 8–10 feet away, rolled down my window, and monitored the vehicle for several minutes. I could see motion inside but could not identify the individuals due to the tint. The inability to see who was inside due to the heavy tint increased my concern, particularly because this was occurring just feet from a childcare

entrance. Other parents began arriving and coordinating positions to avoid blocking exits while maintaining observation.

7. The Wagoneer drove off and was followed by another parent. I later learned that the parent who followed it was led back to their house by the ICE vehicle. The fact that an ICE vehicle intentionally led a parent to their home was extremely alarming and suggested that agents were monitoring and intimidating observers, rather than conducting ordinary law enforcement activity.

8. Soon after, I observed a second, nearly identical Wagoneer which was also an ICE vehicle—this one without heavy tint and with Illinois plates. Mistaking it for the first, I followed it towards a liquor store parking lot before returning to the school after receiving reports of a third ICE vehicle at the school: a blue/green Subaru Outback containing four men in tactical gear.

9. Over the next 30–45 minutes, I alternated between monitoring these vehicles and returning to school grounds. At various points, at least five separate ICE vehicles—including a black Suburban and a white Ford Explorer—were circling the neighborhood. Parents coordinated via messages and agreed to maintain a visible presence around school grounds to deter escalation. Our presence was strictly non-confrontational and limited to watching from public streets.

10. Around noon, a white pickup truck circled the school area twice before parking. The driver—a roughly 50-year-old man dressed in plainclothes and a Yankees baseball cap—claimed he had heard that ICE was in the area. He took photos of each patrolling parent. I did not believe this individual was an ICE agent. I interpreted his

conduct as possible agitation. His photographing of each parent added to the sense that individuals who were lawfully and peacefully observing ICE were themselves being monitored.

11. Later in the afternoon, events escalated significantly. I observed the white Ford Explorer ICE vehicle rapidly accelerating in reverse toward an observer's vehicle, creating an imminent collision risk. The maneuver was abrupt and aggressive, and I believed in that moment that the observer's vehicle could be struck.

12. I witnessed ICE agents exit a black Suburban and confront an observer two cars ahead of me. I began honking continuously to draw attention. Shortly afterward, reports circulated that ICE agents in the black Suburban were pointing firearms at observers who had come outside to peacefully and safely observe, document, and whistle alerts.

13. While running toward another escalating scene, I saw agents forcibly placing an observer into the Subaru. The agents yelled for 20–30 seconds and then began driving away with their windows down. One agent leaned far outside the window holding what appeared to be a gas canister or flash-bang device and yelled at observers. I was roughly 15 feet away, parallel to the vehicle, filming the encounter. What appeared to be a whistle was thrown by an observer and hit the back of the ICE vehicle, after which the Subaru stopped briefly. The whistle did not strike any person, and I did not observe any injury or property damage as a result.

14. Despite this, the agent's response—lifting most of his body out of the vehicle while holding what appeared to be a chemical or explosive device—was extremely frightening. He looked as though he was going to throw it at the observers, which would

have been completely uncalled for and unjustified. Ultimately, he did not, and the vehicle drove away.

15. I returned to my vehicle and encountered the black Suburban again. I followed it briefly and then returned to the school grounds to coordinate with parents to form a healthy perimeter around the school for pick-up time. We did not further encounter ICE at the school that day.

16. At all times during my encounters with federal agents, I remained peaceful and maintained a safe distance. I did not interfere with, obstruct, impede, or threaten any federal agent. I never approached any agent, vehicle, or operation. Nothing about my behavior could have justified further interest in me or my home by ICE.

17. After returning home, my wife informed me that the black Suburban drove down our alley behind our house the following morning. The alley is narrow and only used by residents or people for a specific reason to be there. The next day, I personally observed the same black Suburban pass by our house twice within a ten-minute window, moving slowly enough that it was clear it was surveying our home. This was deeply unsettling, as there was no legitimate reason for an ICE-associated vehicle to be in our alley or circling our home.

18. There was absolutely no legitimate reason for this ICE-associated vehicle to repeatedly appear so close to my home on two consecutive mornings. This conduct, occurring immediately after I engaged in peaceful observation of ICE activity, felt like targeted surveillance. It severely escalated my fear that I was being watched or singled out for retaliation. The only thing that distinguished me from other observers was that I had

openly and peacefully observed and recorded ICE operations the day before, including following vehicles from a safe distance. The Suburban's repeated return—three separate times—sent a direct and chilling message: that simply watching federal agents could endanger me and my family. This has had a lasting impact on my sense of safety, privacy, and security in my own home and neighborhood. The idea that federal agents might be watching our house has left me feeling constantly on edge.

19. These events have caused severe and ongoing fear, anxiety, and disruption to my daily life. The fact that ICE-associated vehicles appeared not only at my children's school but then at my home—moving slowly and in a manner consistent with surveillance—has left me feeling paranoid, anxious, hypervigilant, and fearful for my family's safety. I immediately asked my wife and children to temporarily relocate because I no longer believed our home was safe. Since then, I have struggled to sleep, work, and carry out normal routines due to the fear that federal agents may be monitoring me.

20. Despite my intention to continue observing, I am concerned that exercising my rights may prompt federal agents to target or monitor me personally.

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

Signed on 1/28/2026 in Hennepin County, Minnesota.

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Christian Glanville

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

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

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

**DECLARATION OF
CONNOR FRADENBURGH**

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Director, Homeland Security
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Agencies; and Unidentified Federal
Agents; *in their official capacities,*

Defendants.

Case No. 25-cv-04669-KMM-DTS

**DECLARATION OF
CONNOR FRADENBURGH**

I, Connor Fradenburgh, declare as follows:

1. I am a resident of the City of Apple Valley, in Dakota County, in the state of Minnesota.
2. I am at least 18 years old.
3. I work as a software engineer.

4. I make the following declaration based on personal knowledge.

5. I have been concerned about the presence of U.S. Immigration and Customs Enforcement (“ICE”) agents in my community.

6. On January 17, 2026, I learned that an ICE vehicle had been seen at La Paz Market, a grocery store located at 2008 County Rd 42 W, Burnsville, Minnesota. I drove to the store at around 12:30 p.m. to be an observer and document what I saw. I parked in the La Paz Market parking lot. One other observer pulled into the parking lot at about the same time, in a separate vehicle.

7. At the La Paz Market, I saw a vehicle driving around the parking lot. It was a black or dark blue Jeep 4x4 Sport with a Florida license plate number 50B UCF. There were two individuals in the front seats of the car. Both had masks partially covering their faces. Based on their appearance and on an online database of ICE vehicle license plates, I concluded the individuals in the vehicle were ICE agents.

8. Below is a true and correct photo I took of this vehicle in the La Paz parking lot.



9. After a few minutes, the ICE vehicle pulled out of the parking lot and started driving around Burnsville. I followed the vehicle, staying a couple of car lengths behind. The other observer did not follow the ICE vehicle. At one point, the ICE agent in the passenger seat turned around and appeared to take a photo of my car license plate. After approximately ten minutes of driving around Burnsville, the ICE vehicle pulled into a Kwik Trip service station located at 501 Crystal Lake Road W., Burnsville, MN 55306. I also pulled into the station and waited in my car. The ICE agents did not leave the vehicle.

10. Approximately 10 minutes later, the ICE vehicle left the Kwik Trip and I followed it. The agents drove directly to my parents' house, which is located on a cul de sac at 1321 Fremont Court, Burnsville MN 55306. As the ICE vehicle turned onto Fremont Court, there was a second vehicle waiting at the corner. This vehicle was a large, black SUV, with a white man in the driver's seat. The man, who appeared to be in his late 30s or

early 40s, was wearing a tactical vest and sunglasses. As I drove past this vehicle, the driver smiled and waved at me and then pulled in behind me. Based on the man’s appearance and actions, I assumed he was an ICE agent.

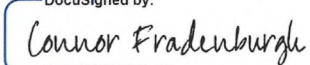
11. As I continued following the first ICE vehicle, with the second ICE vehicle behind me, it stopped directly in front of my parents’ house, waited for a moment, and then continued driving to turn around at the end of the cul de sac.

12. I continued following the first ICE vehicle, with the second ICE vehicle still behind me, as they drove to the Lakeville police department located at 9237 183rd Street W., Lakeville, MN 55044. The first ICE vehicle pulled into what appeared to be a restricted area. I did not follow but kept driving along the city streets. The second ICE vehicle followed the first into the restricted area.

13. I interpreted the ICE agents’ action of stopping in front of my parents’ house as an intimidation tactic designed to prevent me from exercising my rights. This incident frightened me and has caused me to have anxiety and difficulty sleeping.

I declare under penalty of perjury under the laws of United States of America that the foregoing is true and correct.

Signed on 1/22/2026 in Dakota County, State of Minnesota.

By 
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Connor Fradenburgh

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

MUBASHIR KHALIF HUSSEN,
MAHAMED EYDARUS, and JAVIER DOE
*on behalf of themselves and others similarly
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Case No. 0:26-cv-324-ECT-ECW

**DECLARATION OF
DAVID BURNS**

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

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Agencies; and Unidentified Federal
Agents; *in their official capacities,*

Defendants.

Case No. 25-cv-04669-KMM-DTS

**DECLARATION OF
DAVID BURNS**

I, David Burns, declare as follows:

1. I am a 44-year-old resident of Roseville, Minnesota, where I have lived for more than three years. I am a transportation planner and a father.
2. Over the past few weeks, I have grown increasingly concerned with U.S. Immigration and Customs Enforcement (“ICE”) activity in the Twin Cities area, especially

around my daughter's school in West St. Paul, Minnesota. I have also been on alert for suspicious vehicles in the neighborhood. Due to this activity, I began carrying a whistle with me in case I encountered federal agents.

3. On January 13, 2026, at or around 9:20 a.m., I dropped my daughter off at her school. After dropping her off, I began driving towards a shopping center, Signal Hills in West St. Paul, approximately two blocks away from the school to see if there was any activity that may potentially expose my daughter to ICE agents. I had suspected that ICE frequently parked in this lot.

4. I noticed a white Jeep Grand Cherokee parked in the shopping center lot at 1201 South Robert Street, West St Paul, Minnesota 55118 that did not have a front license plate, and the back license plate was blacked out and not readable. Two individuals, who appeared to be ICE agents based on the insignia on their vests, sat in the front seat of the Jeep Grand Cherokee. I drove into the lot and parked my vehicle 2-3 spots away from the Jeep Grand Cherokee to exercise my first amendment rights to observe the ICE agents. I made sure to park a safe distance away so as not to interfere with any ongoing activity.

5. After sitting in my vehicle for a few moments, the ICE agents appeared to become agitated and indicated for me to roll down my window.

6. I complied with the ICE agents' instructions to roll down my window and was immediately subjected to hostile, derogatory, and intimidating behavior by the ICE agents. As the ICE agents' behaviors and insults escalated, I became nervous and started to attempt to drive away. As I began to vacate the parking lot due to the unexpectedly hostile behavior, an agent began to mock me by calling me "an old one." At this point I became

extremely nervous and began recording the interaction on my phone. After I started recording, the ICE agents' behavior escalated even further, and they became more hostile. One ICE agent started mocking me and stated, "Blow your whistle! Blow it all you want!"

7. At this point, I did begin blowing my whistle as I was sitting in my vehicle by myself and I wanted to alert anyone else who may be around of a potential ICE interaction. The ICE agents began laughing and clapping their hands after I blew my whistle

8. I yelled back at the ICE agent, "what did you say?" and was troubled by how hostile, aggressive, and unprofessional they were being as law enforcement officers.

9. It was at this point that I felt an immediate need to remove myself from the situation as there did not appear to be any ongoing activity and the agents were acting in an unprofessional manner. I stopped recording and began driving away. As I started driving away, the ICE agents immediately trailed me, causing me to stop the car prior to exiting the parking lot. Their vehicle got within one foot of the rear of my vehicle. At this point, my window was still rolled down on the passenger side of my vehicle.

10. The ICE agents did not get out of their vehicle, but yelled at me "Oh, you're going to enjoy your ride!" I took this to mean that they planned to arrest me and take me for a ride in their car to a detention center. I started to become fearful as I had not done anything besides observing and briefly recording the ICE agents from my vehicle. One of the ICE agents then yelled "We'll see you on County Road B", which is the street I live on in Roseville, Minnesota. It was clear that they were trying to intimidate me by making me aware they knew where I lived.

11. I quickly contacted the West St. Paul Rapid Response team, which is a group of ICE observers that are trained to document, ask about warrants, observe whether rights of individuals are being respected, and capture evidence that can protect individuals in court. The Rapid Response team helped guide me through the situation and told me to drive to the St. Paul Police Department to report my interaction, which I did.

12. This interaction had a profound effect on me, especially the intimidation by the officers threatening that I was “going to enjoy my ride” and that they knew where I lived. These do not appear to be empty threats. Since January 13, 2026, I have noticed ICE agents parked outside of my house, which I have taken as them trying to intimidate me. It is working.

13. Since January 13, 2026, I have not gone back out to observe ICE agents for fear they will retaliate against me or make good on their threats. My kids are also afraid to leave the house as they have noticed the effects my interaction with ICE agents has had on me.

14. While I want to continue exercising my first amendment rights to calmly and peacefully observe what is happening in my community and think it is important, especially around my kids’ school, I do not feel safe doing so at this time.

I declare under penalty of perjury that everything I have stated in this document is true and correct.

Signed on 1/23/2026 in Ramsey County, Minnesota.

DocuSigned by:
David Burns
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David Burns

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

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MAHAMED EYDARUS, and JAVIER DOE
*on behalf of themselves and others similarly
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**DECLARATION OF
KATHERINE HENLY**

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Defendants.

Case No. 25-cv-04669-KMM-DTS

**DECLARATION OF
KATHERINE HENLY**

I, Katherine Henly, declare as follows:

1. I am a resident of the Standish-Ericsson neighborhood in the City of Minneapolis, County of Hennepin, Minnesota.
2. I am at least 18 years old.
3. I work as a project manager.

4. I make the following declaration based on personal knowledge.

5. I have been concerned about the presence of U.S. Immigration and Customs Enforcement (“ICE”) agents in my community.

6. On January 21, 2026 I learned that there had been significant ICE activity in my neighborhood, including an incident where another legal observer was rear-ended by an ICE car and then pulled out of their car and detained. So, when I had a break from work, I messaged our neighborhood group and a neighbor, and I went out in my car to observe the ICE activity in our neighborhood and offer any support to our community.

7. Shortly into our drive we saw a suspicious-looking vehicle that was driving around aimlessly. We sent the license plate number into our neighborhood group and were informed that it was an ICE truck.

8. We followed the car for about just a few minutes to see if they were conducting any targeted immigration actions but instead found that they were just driving back and forth aimlessly, in what felt like an attempt to intimidate and scare our neighbors.

9. While we were at a stop sign another suspicious SUV drove past us and blew past the stop sign. We again sent the license plate to the group and learned that it was also an ICE vehicle. We had been following the vehicles for just a few minutes at this time.

10. We followed both vehicles which still appeared to be driving around without a specific purpose, just to intimidate the community, when I suddenly recognized the street we had turned into, because it was my own. The ICE vehicles stopped in front of my house, and an agent stuck a professional looking camera out the window and began photographing my home extensively.

11. This seemed like a clear attempt to intimidate me and my family. We are having construction work done on our home, and I have become very scared that ICE will come back to harass the workers completing the project on my home.

12. I continued to follow the ICE vehicles for another few minutes, before the cars went in two opposite directions. We continued the way we had been going, following one of the two vehicles at a safe distance for about ten city blocks until the car blew through a stoplight, where we lawfully stopped.

13. Because of the ICE actions earlier in the day, we were able to learn from other observers where the car had gone. We caught up with them, and followed at a safe distance behind them for another two blocks. At this point another observer joined the observation, following behind us in their own car.

14. Suddenly, at a stop sign the ICE vehicle in front of us stopped and four ICE agents got out. Another ICE vehicle had pulled up behind the observer who was behind us. The agents were masked, and I could not see any visible badges. One agent began photographing us, my car, my license plate, my face, and the observer behind me, and their car. Another ICE agent approached the driver's side window, carrying a large gun, which he needed two hands to support, and a third ICE agent approached the passenger's side window and began shouting that we had to stop following because we were impeding their work.

15. We were not impeding their work, we had remained at a safe distance behind them, and the ICE agents were not conducting any immigration enforcement. Instead, they

were driving around aimlessly, in an apparent attempt to scare our neighbors, and to scare me by driving to my home.

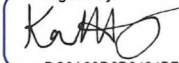
16. Once they had taken a large number of photographs, which seemed to just be another attempt to scare me, they returned to their car and continued driving. We followed them for another few minutes before I dropped off my neighbor and returned home.

17. This experience left me extremely shaken and scared. I also have two young children, and I am worried about their safety with random masked, and heavily armed agents driving around our neighborhood, knowing where they live, sleep, and play. I am also afraid that the photos taken of me, my home, and my car will end up in a database permanently and will be used against me in the future. Lastly, I am worried that my lawful actions will be used as a pretense to harass my neighbors, and our construction workers.

18. However, I will continue to stand up for my community and neighborhood, where I actually live, and engage in lawful observation and recording of ICE.

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

Signed on 1/28/2026 in Hennepin County, Minnesota.

Signed by:

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Katherine Henly

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

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MAHAMED EYDARUS, and JAVIER DOE
*on behalf of themselves and others similarly
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**DECLARATION OF
KRISTIN BERGQUIST**

UNITED STATES DISTRICT COURT
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JANET LEE, LUCIA WEBB,
ABDIKADIR NOOR, and ALAN
CRENSHAW, *on behalf of themselves and
other similarly situated individuals,*

Plaintiffs,

v.

KRISTI NOEM, Secretary, U.S.
Department of Homeland Security (DHS);
TODD LYONS, Acting Director, U.S.
Immigration and Customs Enforcement
(ICE); MARCOS CHARLES, Acting
Executive Associate Director,
Enforcement and Removal Operations
(ERO), ICE; DAVID EASTERWOOD,
Acting Field Office Director, ERO, ICE
Saint Paul Field Office; JOHN A.
CONDON, Acting Executive Associate
Director, Homeland Security
Investigations (HSI); The Department of
Homeland Security; Unidentified Federal
Agencies; and Unidentified Federal
Agents; *in their official capacities,*

Defendants.

Case No. 25-cv-04669 (KMM/DTS)

**DECLARATION OF
KRISTIN BERGQUIST**

I, Kristin Bergquist, declare as follows:

1. I am a resident of Minneapolis; I live in the Bancroft neighborhood. I am over 18 years of age. I'm a United States citizen.

2. On January 21, 2026, I was with one of my neighbors driving in and around the area where we live. We were in my vehicle and my neighbor was driving.

3. We were looking for ICE activity to keep our neighborhood safe.

4. We were exercising our First Amendment rights to observe ICE agents.

5. As we were driving around, we saw a vehicle that, based on the license plate, was known to be an ICE vehicle ("ICE Vehicle").

6. We drove behind the ICE Vehicle. After a few minutes, I realized the ICE Vehicle was driving towards my house, and I started video recording.

7. The ICE Vehicle stopped directly in front of my house.

8. The implication was clear: they knew where I lived. I believe they were trying to intimidate and retaliate against me for exercising my First Amendment rights.

9. I was offended that they were trying to do this.

10. The ICE Vehicle stayed in front of my house a short time and then drove away.

11. We continued to drive behind the ICE Vehicle after it drove away. Eventually, due to traffic, we lost track of the ICE Vehicle.

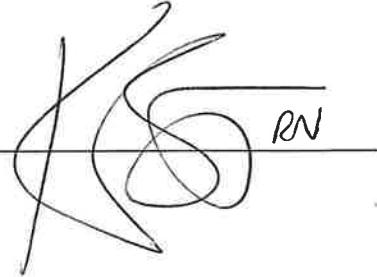
12. The actions of the ICE agents during these occurrences are very concerning to me. My Constitutional rights, and those of my neighbors, are being violated.

13. The actions of the ICE agents make me fearful for the physical safety of my neighbors.

I declare under penalty of perjury that everything I have stated in this document is true and correct.

Dated and signed on 2 FEBRUARY, 2026 in Hennepin County, State of Minnesota.

Kristin Bergquist

A handwritten signature in black ink, appearing to be 'KB' with a large loop and a horizontal line extending to the right. The initials 'RN' are written in a smaller, simpler font to the right of the signature.

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

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

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 M. 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 S.
SCOTT, *in his official capacity as
Commissioner of U.S. Customs and Border
Protection*; U.S. BORDER PATROL;
MICHAEL W. BANKS, *in his official
capacity as Chief of U.S. Border Patrol*; and
GREGORY BOVINO, *in his official capacity
as Commander-at-Large of U.S. Border
Patrol,*

Defendants.

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

**DECLARATION OF
LUIS RAMIREZ OROZCO**

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

SUSAN TINCHER, JOHN BIESTMAN,
JANET LEE, LUCIA WEBB,
ABDIKADIR NOOR, and ALAN
CRENSHAW, *on behalf of themselves and
other similarly situated individuals,*

Plaintiffs,

v.

KRISTI NOEM, Secretary, U.S.
Department of Homeland Security (DHS);
TODD LYONS, Acting Director, U.S.
Immigration and Customs Enforcement
(ICE); MARCOS CHARLES, Acting
Executive Associate Director, Enforcement
and Removal Operations (ERO), ICE;
DAVID EASTERWOOD, Acting Field
Office Director, ERO, ICE Saint Paul
Field Office; JOHN A. CONDON, Acting
Executive Associate Director, Homeland
Security Investigations (HSI); The
Department of Homeland Security;
Unidentified Federal Agencies; and
Unidentified Federal Agents; *in their
official capacities,*

Defendants.

Case No. 25-cv-04669-KMM-DTS

**DECLARATION OF
LUIS RAMIREZ OROZCO**

I, Luis Ramirez Orozco, declare as follows:

1. I am a resident of Faribault, County of Rice, Minnesota.
2. I am at least 18 years old.

3. I work as an owner of a Mexican grocery store located in Shakopee, Minnesota.
4. I make the following declaration based on personal knowledge.
5. I have been concerned about the presence of U.S. Immigration and Customs Enforcement (“ICE”) agents in my community.
6. On or about January 15, 2026, I had several interactions with federal agents where they tried to harass me, intimidate me, and subsequently pepper sprayed me while I was driving my car.
7. Specifically, on the morning of January 15, 2026, I was delivering groceries at Hunter’s Ridge, which is an apartment complex in Shakopee, Minnesota.
8. Before making my delivery, I decided to get breakfast at McDonald’s. I started turning left across oncoming traffic into the McDonald’s parking lot on Marshall Road when an older, black Ford Expedition two cars in front of me suddenly made a U-turn into oncoming traffic. I almost hit the Expedition due to its unexpected U-turn.
9. I was angry at the Expedition’s unsafe maneuver and flipped off the individuals in the vehicle. At this point, I noticed the Expedition contained what appeared to be federal agents due to their vests and face coverings.
10. I continued driving into the McDonald’s parking lot, parked my car, and exited the vehicle. A different black Ford Expedition suddenly turned into the

McDonald's parking lot and parked directly behind my vehicle. This Ford Expedition was newer than the one that made the unsafe driving maneuver.

11. The driver of this Ford Expedition rolled down his window, and I realized that the two individuals in the vehicle appeared to be federal agents as it stated "Federal Agents" on their vests. They also wore face coverings over their face.

12. The federal agent in the driver seat asked, "What is your problem?" I assumed he was referring to the fact that I flipped off one of their vehicles when I almost hit them turning into the McDonald's parking lot. I responded that, "Your agents need to learn how to drive!"

13. At this point, an unmarked, silver Dodge Journey turned into the McDonald's parking lot, drove past my vehicle, made a U-turn, and parked the vehicle facing me approximately 15-20 yards away. This vehicle also appeared to contain two federal agents with face coverings.

14. One of the federal agents in the silver Dodge Journey yelled at me, "Go back to your country!" I interpreted this to mean that I should go back to Mexico because I am Latino. The federal agent who yelled at me appeared to be of African descent so I yelled back, "You should go back to Africa, and I'll go back to Mexico, and we can just leave this land back to the Natives!"

15. I was not fearful of the federal agents because I am a U.S. Citizen and I had not done anything wrong.

16. At this point, workers from McDonald's started to come outside and record the interaction. I wanted to remove myself from the situation, so I got back in my vehicle and started driving to Hunter's Ridge to deliver the groceries.

17. As I was driving to Hunter's Ridge, I observed the federal agents in the Ford Expedition from the McDonald's parking lot following me.

18. As I was again about to turn left through oncoming traffic into the Hunter's Ridge parking lot, a tan F-150 pickup, which was coming towards me in oncoming traffic, suddenly slowed down in front of the Hunter's Ridge entrance as I was trying to turn into the lot. I immediately hit my brakes and waited for the F-150 pickup to continue and made my way safely into the parking lot.

19. I parked and as I was exiting the vehicle to deliver my groceries, the tan F-150 pickup suddenly pulled up behind me, and two federal agents exited the vehicle. A third federal agent stayed in the backseat of the vehicle.

20. One of the federal agents yelled, "Why are you trying to crash into us?" I responded, "No one is trying to crash into you. I'm just here doing my delivery. I didn't even know you were federal agents."

21. At this time, the federal agents in the black Ford Expedition from the McDonald's drove into the Hunter's Ridge parking lot and parked beside me.

22. The third federal agent from the F-150 pickup also jumped out of the backseat and asked if I wanted to go to jail?

23. I responded that I did not want to go to jail and that I was just trying to make my delivery; however, I could not deliver the groceries while all of the federal agents were there.

24. The federal agents continued harassing me and trying to intimidate me. Finally, one of the federal agents from the Ford Expedition tried to defuse the situation and, after a few minutes, the federal agents all got back in their vehicles and left the parking lot.

25. After delivering the groceries to the recipients in the apartment, I was leaving the Hunter's Ridge parking lot when I noticed a group of four federal agents in a Dodge Durango rush a car with an elderly Hispanic woman and child.

26. An unmarked Jeep containing additional federal agents suddenly turned into the Hunter's Ridge parking lot through oncoming traffic without using their turn signal and parked next to the Durango. Due to the way the federal agents parked their vehicles, I could not exit the parking lot without going around them.

27. As I was driving around the federal agents' vehicles, I asked the federal agent in the Jeep if he spoke English or Spanish and whether he knew how to use his turn signal. The federal agent responded that, "We do whatever the fuck we want!" I was shocked at all of the federal agents' unprofessionalism, lack of safety in driving their vehicles, and that they were harassing what appeared to be two Latino individuals.

28. I responded, "Fuck you then." I drove way around the federal agents' vehicles so I could exit the parking lot and started driving away.

29. I was stopped at a red light at the intersection of Marshall Road and 4th Avenue waiting in the turn lane to turn left when the four federal agents in the Dodge Durango came up behind me. The federal agents swerved and pulled up on the left-hand side of my vehicle. My driver's side window was still rolled down and the federal agent in passenger seat of the Dodge Durango suddenly reached out, and pepper sprayed me through the window of my vehicle.

30. When the federal agent pepper sprayed me, I accidentally hit the gas pedal and my vehicle jolted forward through the intersection due to the unexpected and painful chemical irritant in my left eye.

31. The federal agents laughed, turned left, and drove away, leaving me in my vehicle.

32. I immediately called the local police dispatch to report the incident.

33. Since January 15, 2026, federal agents have parked outside or shown up at my family-owned grocery store. Federal agents have sometimes shown up at my grocery store up to three times in a single day. It appears the federal agents are trying to intimidate me, as well as keep customers away from my store, which is hurting my small, family-run business.

34. I am extremely frustrated that the federal government not only is trying to intimidate me and my community due to our ethnicity, but these federal agents are

actively harassing, intimidating, and using unnecessary force and chemical irritants against citizens like me.

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

Signed on January 30, 2026 in Rice County, Minnesota.

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

Luis Ramirez Orozco

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

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

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 M. 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 S.
SCOTT, *in his official capacity as
Commissioner of U.S. Customs and Border
Protection*; U.S. BORDER PATROL;
MICHAEL W. BANKS, *in his official
capacity as Chief of U.S. Border Patrol*; and
GREGORY BOVINO, *in his official capacity
as Commander-at-Large of U.S. Border
Patrol,*

Defendants.

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

**DECLARATION OF
NOAH LEVY**

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

SUSAN TINCHER, JOHN BIESTMAN,
JANET LEE, LUCIA WEBB, ABDIKADIR
NOOR, AND ALAN CRENSHAW, *on behalf
of themselves and other similarly situated
individuals,*

Court File No. 25-cv-04669
(KMM/DTS)

Plaintiffs,

v.

KRISTI NOEM, Secretary, U.S. Department
of Homeland Security (DHS); TODD LYONS,
Acting Director, U.S. Immigration and
Customs Enforcement (ICE); MARCOS
CHARLES, Acting Executive Associate
Director, Enforcement and Removal
Operations (ERO), ICE; DAVID
EASTERWOOD, Acting Field Office
Director, ERO, ICE Saint Paul Field Office;
JOHN A. CONDON, Acting Executive
Associate Director, Homeland Security
Investigations (HSI); The Department of
Homeland Security; Unidentified Federal
Agencies; and Unidentified Federal Agents; *in
their official capacities,*

**DECLARATION OF
NOAH LEVY**

Defendants.

I, Noah ADD, state as follows:

1. I am a 53-year-old resident of Saint Paul, Minnesota.
2. On January 6, 2026, at approximately 8:00 to 8:30 a.m., my wife received information from a friend that ICE agents were staging at a nearby shopping center, located approximately 4 blocks from our house at the corner of Pascall Street North and University Avenue West in Saint Paul.

3. My wife and I decided to drive to the area where the ICE agents were staging with the intent of observing and reporting their actions to members of our community.

4. When we arrived, we observed eight vehicles with what we believed to be ICE agents standing nearby. Many of the agents were masked and all wore tactical gear, at least some of which had the word "Police" written on the front.

5. We circled the group of agents once in our car, never approaching closer than 20 feet and maintaining a suitable speed for a parking lot, and then parked approximately 50 yards away and continued to observe them.

6. Shortly after we arrived, several of our neighbors arrived at the parking lot in five other cars to observe as well.

7. Approximately five minutes later, the agents got into their vehicles and exited the parking lot onto Pascall Street North and began heading north toward University Ave. My wife and I followed the agents in our car along with our neighbors.

8. I had my whistle with me and intended to blow it as the ICE vehicles neared groups of people to alert the public that the agents were approaching.

9. We had traveled less than half a block toward University Ave. when the first car in our group was stopped by ICE. One ICE vehicle blocked the road leading toward University, while others surrounded the first car. Agents exited from the vehicles and approached our car, as well as our neighbors' vehicles.

10. The agents then began taking pictures of our license plates and of us inside our vehicles. At this point, I started to film the agents with my phone.

11. Below are true and correct screenshots of the video I took of the agents on January 6th. The first photo on the left depicts agents surrounding our neighbor's vehicle on Pascall Street. The photo on the right shows an agent approaching our vehicle and taking photos of us in our car.



12. My wife and I remained in our vehicle for the duration of this encounter. I did not observe any of our neighbors exit their vehicles.

13. Eventually, the agents returned to their vehicles and continued east onto University Ave. I followed, again with the intent of observing and recording the agents' activities and ultimately informing members of our community of those activities.

14. As we followed, the agents eventually lead us to our home. They parked directly in front of our house. Rather than stay and/or enter our own home, and out of concern for our safety, we went to a nearby Target for a while before returning home.

15. I was, and continue to be, completely shaken by the encounter described above. I still get flushed when retelling what happened to us that day. The encounter has made me afraid to continue to observe and/or protest the actions of ICE and other federal enforcement agencies in Minnesota. I have observed ICE activities on one other occasion since January 6, but I am hesitant to do so again.

16. I am committed, however, to finding other ways to support those observing and directly protesting the ICE presence in Minnesota. I will continue to help because I care deeply about my neighbors and strongly oppose what ICE is doing in our communities, which is in direct opposition to my world view.

17. At no point in my interactions with ICE described above did I physically interact with any agent. I never impeded their freedom of movement or operations. I always maintained a safe driving distance between our car and the ICE vehicles while following and obeyed all applicable traffic laws.

18. I took video of portions of the encounter with ICE both on Pascall Street as well as in front of our home. I posted these videos to Facebook to inform my neighbors and community of ICE and other federal enforcement agencies' activities in Minnesota.

I declare under penalty of perjury under the laws of United States of America that the foregoing is true and correct.

Dated: 1/12/2026
County: Ramsey

DocuSigned by:

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Noah Levy

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

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

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 M. 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 S.
SCOTT, *in his official capacity as
Commissioner of U.S. Customs and Border
Protection*; U.S. BORDER PATROL;
MICHAEL W. BANKS, *in his official
capacity as Chief of U.S. Border Patrol*; and
GREGORY BOVINO, *in his official capacity
as Commander-at-Large of U.S. Border
Patrol,*

Defendants.

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

**DECLARATION OF
RACHEL LANDSEM**

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

SUSAN TINCHER, JOHN BIESTMAN,
JANET LEE, LUCIA WEBB,
ABDIKADIR NOOR, and ALAN
CRENSHAW, *on behalf of themselves and
other similarly situated individuals,*

Case No. 25-cv-04669

Plaintiffs,

**DECLARATION OF RACHEL
LANDSEM**

v.

KRISTI NOEM, Secretary, U.S.
Department of Homeland Security (DHS);
TODD LYONS, Acting Director, U.S.
Immigration and Customs Enforcement
(ICE); MARCOS CHARLES, Acting
Executive Associate Director,
Enforcement and Removal Operations
(ERO), ICE; DAVID EASTERWOOD,
Acting Field Office Director, ERO, ICE
Saint Paul Field Office; JOHN A.
CONDON, Acting Executive Associate
Director, Homeland Security
Investigations (HSI); The Department of
Homeland Security; Unidentified Federal
Agencies; and Unidentified Federal
Agents; *in their official capacities,*

Defendants.

I, Rachel Landsem, declare as follows:

1. I am a 31-year-old resident of the Webber-Camden neighborhood of Minneapolis, Minnesota. I have lived in that neighborhood for a year-and-a-half.

2. On Friday, January 16, 2026, at approximately 8:30 a.m., I was driving in the area of North Emerson Avenue and 23rd Avenue North in Minneapolis.

3. At that time, I observed four or five ICE agents detaining an individual (the “individual”). The ICE agents had blocked the individual’s vehicle against the side of the street with three ICE vehicles. The ICE agents’ vehicles blocked the front, back, and side of the individual’s car, so that it was trapped against the curb.

4. When I saw this, I pulled over and exited my vehicle to observe and record the ICE agents. This was an exercise of my First Amendment rights. I identified myself and began filming the ICE agents.

5. The ICE agents were wearing law enforcement vests that had the words “ICE”, “POLICE”, or similar identifiers on them.

6. When I exited my vehicle and began filming, one of the ICE agents came towards me and told me to get back in my car. As he neared me, he continued to tell me to get back in my car, raising his voice with each successive repetition until he was yelling in my face. A few of the other ICE agents approached behind him as well but did not speak.

7. At that point, I was the only observer at the scene, and the ICE agent’s actions of yelling at and approaching me intimidated me and deterred me from continuing to exercise my First Amendment rights. Because of the ICE agent’s actions, at that point I stopped exercising my First Amendment rights and got back into my car.

8. The ICE agents then left that location in their vehicles.

9. At approximately 8:35 a.m., I learned that there were ICE agents present in the area of Morgan Avenue North and 34th Avenue North in Minneapolis. I drove to that location to observe and record ICE. This was an exercise of my First Amendment rights.

10. When I arrived at that location, I observed two agents standing outside of a dark grey pickup truck that was parked in front a house. The ICE agents wore dark blue ICE vests and dark balaclavas. There was a third agent inside the pickup truck.

11. There were three other observers at this location. There was one vehicle with two observers in it, and a second vehicle with one observer in it. The other observers and I stopped our vehicles, honked the horns of our vehicles, and blew whistles.

12. I did not roll down my car window but could hear one of the ICE agents tell myself and the other observers to “stop” and leave the ICE agents alone, while waving his arms, making gestures, and making other indiscernible statements.

13. The other ICE agent who was outside of the pickup truck then took out a phone and began taking pictures or videos of myself, my vehicle, and the other observers and their vehicles. This included the ICE agent taking a picture or video of my vehicle’s license plate.

14. At approximately 8:40 a.m., the ICE agents left that location, and the other observers and I left that location as well.

15. At that time, I learned that there were ICE agents in the area of James Avenue North and Lowry Avenue North in Minneapolis.

16. I arrived in the area of James Avenue North and Lowry Avenue North at approximately 8:45 a.m. When I arrived, I observed an unmarked, dark grey SUV with a

rear Colorado license plate, and no front license plate. The SUV was parked in front of a house. There were at least two ICE agents in the SUV. The agents wore tactical gear with the ICE logo on it, vests with the words "ICE" or "POLICE" on them, and dark balaclavas.

17. When I arrived at that location, there was one other observer there in a vehicle.

18. I was at that location to observe ICE activity as an exercise of my First Amendment rights.

19. Shortly after I arrived at that location, the ICE vehicle drove away. The other observer and I then followed the ICE vehicle in our vehicles at a safe distance for approximately ten to fifteen minutes. The ICE vehicle drove erratically and appeared to break many traffic laws.

20. As I followed the ICE vehicle, I became concerned that it was driving to my residence.

21. The ICE vehicle eventually drove to my residence near the intersection of Dowling Avenue North and Aldrich Avenue North in Minneapolis. The ICE vehicle stopped in front of my house. The ICE vehicle then continued driving, went around a roundabout at the end of the street, and drove back to my residence before stopping in front of my house again. The ICE vehicle then drove away.

22. I believe the ICE agents knew where my residence was located because, earlier that morning, an ICE agent had taken pictures of my car's license plate and my face.

23. I felt threatened, frightened, and intimidated by the ICE agents' actions of leading me to my own home and stopping outside. Because of the ICE agents' actions, I stopped exercising my First Amendment rights of observing and recording ICE activity.

24. I believe the ICE agents threatened me in this way, letting me know they knew where I lived, because I observed and recorded their activity in Minneapolis as an exercise of my First Amendment rights. I believe the ICE agents pulled over in front of my residence as a further effort to intimidate and retaliate against me for exercising my First Amendment rights.

25. Because the ICE agents led me to, and pulled over in front of, my residence, I became concerned for my physical safety, and the physical safety of my partner, who lives with me.

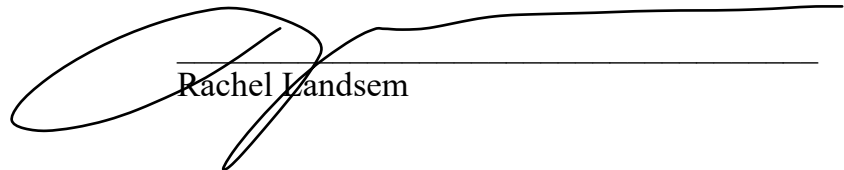
26. Because the ICE agents led me to, and pulled over in front of, my residence, I have been afraid that they will return to my home. This fear has made it difficult for me to sleep and has made me hypervigilant.

27. In addition, the day after the ICE agents led me to my home, on Saturday, January 17, 2026, I used my partner's vehicle, rather than my own, to ensure that ICE would not notice my vehicle if I encountered them in or around Minneapolis. The actions of the ICE agents have also made me temporarily cease exercising my First Amendment rights of observing and recording ICE activity.

28. Even though ICE attempted to intimidate and threaten me so that I would no longer exercise my First Amendment rights, I intend to continue to protest, observe, and record ICE activity in the future.

I declare under penalty of perjury that everything I have stated in this document is true and correct.

Signed on January 27th, 2026 in Hennepin County, State of Minnesota.



Rachel Landsem

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

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

Plaintiffs,

v.

KRISTI NOEM, *in her official capacity as
Secretary of the U.S. Department of
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HOMELAND SECURITY; U.S.
IMMIGRATION AND CUSTOMS
ENFORCEMENT; TODD M. 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 S.
SCOTT, *in his official capacity as
Commissioner of U.S. Customs and Border
Protection*; U.S. BORDER PATROL;
MICHAEL W. BANKS, *in his official
capacity as Chief of U.S. Border Patrol*; and
GREGORY BOVINO, *in his official capacity
as Commander-at-Large of U.S. Border
Patrol,*

Defendants.

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

**DECLARATION OF
RILEY KELLERMEYER**

DECLARATION OF RILEY KELLERMEYER

I, Riley Kellermeyer, declare as follows:

1. I am a resident of Northeast Minneapolis. I've lived in the Twin Cities since 2023. I'm 32 years old. I'm a biologist.
2. On Sunday, December 7, 2025, at about 9:00 am, I was in South Minneapolis near 31st and Stevens. I saw an SUV with dark black windows and Texas plates that I believed to belong to immigration agents—the same license plate had previously been shared in one of my community group chats as an ICE vehicle. I decided to follow the car to report its whereabouts and activities to the community. For me, observing and documenting federal agents is part of how I express my displeasure with the government's actions against my neighbors and community.
3. I followed the car for a few blocks, and then another SUV with Indiana plates and dark tinted windows started following me very closely. I pulled over to let that car pass. Both SUVs drove back toward 35W. I decided to just go home, which meant I also went towards 35W. The Indiana plates car got on 35W before I did, but I was not trying to follow at that point. We drove north and the Indiana plates car got off on at my exit before I did.
4. When I got to my house, that car was already there—they were pulled up next to my house like they were waiting for me. I wasn't about to go home while they were there so I drove past them. They turned around to follow me. I called my husband and told him

what was happening and that I was going to a public place. I decided to go to the Home Depot in the Quarry Shopping Center on 18th and Johnson in Northeast.

5. While I was waiting to turn left into the Quarry Shopping Center parking lot, the car with Indiana plates nosed in front of me to make it harder for me to move. The driver, a Latina woman wearing a mask and a vest, rolled down the window and started screaming at me. She told me to “stop fucking following them” and said I was “impeding” them, that this was my “one and only warning” before I would be arrested. She said what I was doing is illegal. She repeated herself a few times and then they drove off down 35W.
6. I drove into the parking lot and just tried to calm down. I felt scared—they were at my house! I know they were trying to intimidate me and I felt intimidated and vulnerable. I felt unsafe. Federal agents with guns went to my house to threaten me. That’s not right.
7. I follow them because they do things like this—they are here to terrorize us, not to keep us safe or stop crime. They’re committing crimes. I want them to be held accountable for what they’re doing. So I won’t stop following and observing and protesting them, it’s too important.
8. If I had let them intimidate me into stopping observing and protesting, I wouldn’t have been able to record them pepper spray a man full in the face who was simply standing on the road as they drove past him on Wednesday, December 10, 2025.
9. That morning, I heard from a community chat that ICE was trying to enter the high-rise towers in Cedar Riverside in Minneapolis and people were needed to protest and observe. I first drove past around 8:45 am and didn’t see anything. But about ten minutes later, I got an update that ICE had gone inside the building by going through as someone else

was leaving. So I went back to park on Cedar Ave., got out of my car, and grabbed my megaphone.

10. There was a group of about 30 people standing around just outside the high-rise towers at 420 Cedar Ave. and yelling at ICE. They were telling ICE to leave and that they didn't want ICE there. There was already orange marking on the ground from where ICE had sprayed chemical irritants before I got there.
11. ICE had a sort of "news crew" with them, filming what was happening. They filmed me for a while.
12. I was standing on the west side of Cedar Ave, farther away than many of the protesters to get a good view of what was going on. I was filming and also got on my megaphone, chanting things like "ICE get out" and calling them "f**king terrorists."
13. At one point, I saw a man in a green jacket standing several feet from one of the ICE vehicles, a blue Subaru. He seemed to be saying something to the agents and the "news crew" who were also standing there. After the agents got into the blue Subaru, he moved next to the car. It looked like he was on the sidewalk, but it was hard to tell because of the snow. He seemed to be watching the car as it left, and as it turned right onto Cedar Ave to leave, he moved to stand on the mound of snow at the edge of the sidewalk and then the edge of the street. As he stood there, another ICE vehicle drove by (a white SUV with Florida plates) and sprayed him right in the face. You could see the blast of orange so clearly against the white of the car and of the snow. He wasn't in the way of the car or throwing anything or doing anything but protesting.

14. The only reason for ICE to act like this is to terrorize. They're not here to keep people safe. How do you stand up to a federal government that's doing illegal things and hurting your community? By documenting and showing up and bearing witness.

I declare under penalty of perjury that everything I have stated in this document is true and correct.

Dated and signed on 15/12/2025 in Hennepin County, State of Minnesota.

Riley Kellermeyer
Riley Kellermeyer (Dec 15, 2025 15:04:28 CST)

RILEY KELLERMEYER

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

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

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 M. 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 S.
SCOTT, *in his official capacity as
Commissioner of U.S. Customs and Border
Protection*; U.S. BORDER PATROL;
MICHAEL W. BANKS, *in his official
capacity as Chief of U.S. Border Patrol*; and
GREGORY BOVINO, *in his official capacity
as Commander-at-Large of U.S. Border
Patrol,*

Defendants.

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

**DECLARATION OF
RYAN DOXSEY**

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

SUSAN TINCHER, JOHN BIESTMAN,
JANET LEE, LUCIA WEBB,
ABDIKADIR NOOR, and ALAN
CRENSHAW, *on behalf of themselves and
other similarly situated individuals,*

Plaintiffs,

v.

KRISTI NOEM, Secretary, U.S.
Department of Homeland Security (DHS);
TODD LYONS, Acting Director, U.S.
Immigration and Customs Enforcement
(ICE); MARCOS CHARLES, Acting
Executive Associate Director,
Enforcement and Removal Operations
(ERO), ICE; DAVID EASTERWOOD,
Acting Field Office Director, ERO, ICE
Saint Paul Field Office; JOHN A.
CONDON, Acting Executive Associate
Director, Homeland Security
Investigations (HSI); The Department of
Homeland Security; Unidentified Federal
Agencies; and Unidentified Federal
Agents; *in their official capacities,*

Defendants.

Case No. 25-cv-04669-KMM-DTS

**DECLARATION OF
RYAN DOXSEY**

I, Ryan Doxsey, declare as follows:

1. I am 42 years old, work as a software engineer, and am a resident of the City of Richfield, in Hennepin County, Minnesota.
2. I have lived here for more than a decade. I am married and my wife and I have a six-year old son who attends elementary school in Richfield.

3. I make the following declaration based on personal knowledge.

4. I care deeply about my community and have been deeply concerned about the heavy presence of U.S. Immigration and Customs Enforcement (ICE) and Customs and Border Protection (CBP) agents in my community. In particular, I have witnessed, and continue to witness, a heavy presence of masked federal agents roaming around Richfield schools including the school where my son attends. These masked agents, typically multiple agents in unmarked SUVs with heavily tinted windows, dressed in tactical gear, regularly descend on schools at pick-up and drop-off times, creating fear and intimidation for children and their families.

5. In an effort to foster a sense of safety and help protect our neighbors, I regularly volunteer with others in my community. We take turns driving around Richfield schools, particularly at morning drop-off and afternoon pick-up times when children are coming in and out. I generally volunteer for drop-off times. We share information about ICE presence to warn children and their families. We often see the same ICE vehicles day after day and have become able to recognize them because of their heavily tinted windows, the license plate numbers we write down and share, and their reckless driving behavior.

6. On Monday, January 27, 2026, at approximately 7am, I was volunteer patrolling in front of Richfield Stem School at morning drop-off time. As I was waiting to turn east onto 70th St., I saw a white Ford Expedition with Texas license plates. The windows were tinted but I could make out that there were at least three adult men in the car.

7. I ended up behind them, with one car in between us. The car in between us turned off, leaving me directly behind them. I maintained a normal distance and observed. I was able to see their license plate (TX XHH 3128) and confirm that it was a match for a known ICE vehicle. At this time, I honked 5-6 times to warn the community, the school children, and parents that ICE agents were in the immediate area. I want the community to know I'm there to support them and I want the ICE agents to know we're there and watching them.

8. The vehicle drives away from the schools, and I follow for about four minutes. I drove the speed limit, I didn't honk my horn, I didn't break any traffic laws. I maintained a safe driving distance as we drove through the neighborhood.

9. On 67th St. between 13th Ave. and 14th Ave., the ICE vehicle turned around and drove directly at my car. They kept approaching my car, so I had to reverse to maintain a safe distance. Then they turned on red and blue flashing lights. I stopped and remained calm and continued to observe and communicated with my neighborhood group. One agent, dressed in tactical gear and a mask, got out of the SUV and approached me. It looked like he had a gun in a holster on his right leg. He came to my passenger side window and ordered me to roll it down. We could hear each other fine so it did not feel necessary or safe to do so. I did not roll down my window. The agent said that this was my "one warning to stop impeding." I did not argue and only responded with "Ok."

10. The agent took a photo of my license plate and a photo of my face and said that I would be added to a list of domestic terrorists. He also said that if I continued

following, he would call for backup and I would be arrested and detained. I have dash cam footage of the interaction that I have shared.

11. After they pulled away, I drove to Centennial, another school in Richfield. The same ICE vehicle was in that area. I went into the school and warned the office staff about ICE agents in the area and then left to go home.

12. This wasn't the first time federal agents have tried to intimidate me for observing them. On January 23, I was getting ready to leave the house when I saw what I believed was an ICE vehicle drive past my house. I left the house about a minute later.

13. I saw which way the vehicle had turned and went to look for it. I guessed which way they might go, and I was right. I found them on the street next to ours. I followed them for a block or so. Once I got close enough to see the license plate, they pulled over and let me pass. I drove by and gave them a stern look. I made a few turns and didn't see them in my rearview. I drove back towards my house and then saw them parked directly in front of my house. I imagine that they ran my plates somehow to find my address and went there to let me know they knew where I lived. I parked a safe distance from them and just sat there until they left about ten minutes later. A few other observers ended up coming to my house as well to document that they were there.

14. Federal agents keep roaming our neighborhoods, sometimes parking outside of our homes as if they are surveilling us and our neighbors. Their military gear, masked faces, and surveillance feel it like they are deliberately trying to intimidate our community for our work to protect our neighbors.

15. The impact of the constant presence of federal agents is taking a real toll on me, my family and my neighbors and community. And I'm not even a target of their so-called immigration enforcement. By nature, I am an introvert, so it does not come easy for me to go out and volunteer in this way. But I'm doing what I think is right and what I know I'd want others doing for me. I have had to become hypervigilant about being followed and am having difficulty sleeping. My wife and I have tried to shield our son from the scary things happening around him, but as the school community grapples with the loss of cherished students and their families, we know and feel that it is affecting his sense of safety and security.

16. Despite these effect, I will continue to engage in community observation efforts because I want to protect my family and community.

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

Signed on Feb 11, 2026 in Hennepin County, Minnesota.

Ryan Doxsey

Ryan Doxsey (Feb 11, 2026 06:33:21 CST)

Ryan Doxsey

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

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

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 M. 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 S.
SCOTT, *in his official capacity as
Commissioner of U.S. Customs and Border
Protection*; U.S. BORDER PATROL;
MICHAEL W. BANKS, *in his official
capacity as Chief of U.S. Border Patrol*; and
GREGORY BOVINO, *in his official capacity
as Commander-at-Large of U.S. Border
Patrol,*

Defendants.

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

**DECLARATION OF
SAMUEL ROSEMARK**

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

SUSAN TINCHER, JOHN BIESTMAN,
JANET LEE, LUCIA WEBB,
ABDIKADIR NOOR, and ALAN
CRENSHAW, *on behalf of themselves and
other similarly situated individuals,*

Case No. 25-cv-04669

**DECLARATION OF
SAMUEL ROSEMARK**

Plaintiffs,

v.

KRISTI NOEM, Secretary, U.S.
Department of Homeland Security (DHS);
TODD LYONS, Acting Director, U.S.
Immigration and Customs Enforcement
(ICE); MARCOS CHARLES, Acting
Executive Associate Director,
Enforcement and Removal Operations
(ERO), ICE; DAVID EASTERWOOD,
Acting Field Office Director, ERO, ICE
Saint Paul Field Office; JOHN A.
CONDON, Acting Executive Associate
Director, Homeland Security
Investigations (HSI); The Department of
Homeland Security; Unidentified Federal
Agencies; and Unidentified Federal
Agents; *in their official capacities,*

Defendants.

I, Samuel Rosemark, declare as follows:

1. I am a resident of the Oakdale neighborhood.
2. I am a member of the School Board of Independent School District 622 (North St. Paul – Maplewood – Oakdale). Through that role, I learned that ICE was targeting a mobile home community at 102 Dellwood Square North, Landfall, MN, which

has many BIPOC residents. Specifically, I learned that an adult education student had been detained.

3. On January 7, 2026, ICE agents arrested a resident of the mobile home community as she was on her way to pay her bill at the leasing office. They had no warrant.

4. On January 9, 2026, in an effort to observe and document any further ICE activity, I drove to the mobile home community. I was in my car at the entrance to the mobile home community where I observed two ICE agents outside of their vehicle near a home. I drove past the ICE agents and turned around at the end of the street. I honked my horn and they honked back. I then followed that vehicle for approximately five to ten minutes. During that time, another ICE vehicle pulled up behind me and started following me. I pulled over and let the second ICE vehicle pass me and continued to follow both ICE vehicles about two to three car lengths behind. The second ICE vehicle then pulled over and I passed it and it continued to follow me. The vehicle I was following then drove to my mother's house at 2671 Gresham Avenue North, Oakdale, MN. After the cars parked, four agents in the first car and one agent from the second car got out of their vehicles and started taking photos and videos of my mother's house while laughing. Another agent from the ICE car parked behind me was out of his car standing at the car behind me. They asked if I was going to pull into my driveway. I recorded this.

5. The address on my driver's license is still my mother's address, which is my former address. I have since moved to an apartment building.

6. I felt threatened by the agents leading me to my mother's home. I believe the agents threatened me in this way, believing they were letting me know they knew where I

lived, because I observed and photographed their activity at the home in the Landfall community and continued to videotape their activity after they left the community.

I declare under penalty of perjury that everything I have stated in this document is true and correct.

Signed on 1/20/2026 in Hennepin County, State of Minnesota.

Signed by:



908D87D1A182473...

Samuel Rosemark

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

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

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 M. 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 S.
SCOTT, *in his official capacity as
Commissioner of U.S. Customs and Border
Protection*; U.S. BORDER PATROL;
MICHAEL W. BANKS, *in his official
capacity as Chief of U.S. Border Patrol*; and
GREGORY BOVINO, *in his official capacity
as Commander-at-Large of U.S. Border
Patrol,*

Defendants.

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

**DECLARATION OF
SHAMSO IMAN**

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

SUSAN TINCHER, JOHN BIESTMAN,
JANET LEE, LUCIA WEBB,
ABDIKADIR NOOR, and ALAN
CRENSHAW, *on behalf of themselves and
other similarly situated individuals,*

Case No. 25-cv-04669-KMM-DTS

Plaintiffs,

**DECLARATION OF
SHAMSO IMAN**

v.

KRISTI NOEM, Secretary, U.S.
Department of Homeland Security (DHS);
TODD LYONS, Acting Director, U.S.
Immigration and Customs Enforcement
(ICE); MARCOS CHARLES, Acting
Executive Associate Director,
Enforcement and Removal Operations
(ERO), ICE; DAVID EASTERWOOD,
Acting Field Office Director, ERO, ICE
Saint Paul Field Office; JOHN A.
CONDON, Acting Executive Associate
Director, Homeland Security
Investigations (HSI); The Department of
Homeland Security; Unidentified Federal
Agencies; and Unidentified Federal
Agents; *in their official capacities,*

Defendants.

I, Shamsso Iman, declare as follows:

1. I am thirty-four years old, and I have been a resident of Northeast Minneapolis for the past three years. Before that, I lived in St. Cloud, where my family still resides.

2. I work as a licensed drug and alcohol counselor, and I am also attending school for clinical social work. I have no criminal history.

3. I make the following declaration based on personal knowledge.

4. I have been concerned about the presence of U.S. Immigration and Customs Enforcement (“ICE”) agents in my community resulting from the federal government’s “Operation Metro Surge.”

5. I am submitting this declaration to describe two encounters I had with ICE agents—one in Minneapolis and one in St. Cloud. During both encounters, I did nothing unlawful or obstructive. I was engaged in observing, documenting, and following ICE agents from a safe distance for the purpose of making sure my community was safe. The only reason ICE targeted me and my family was because I exercised my constitutional right to observe and document their actions. Their actions were unjustified and clearly intended solely to intimidate, retaliate, and harm me for engaging in protected First Amendment activity.

6. The first incident occurred in Northeast Minneapolis on Sunday, January 18, at approximately 2:28 p.m. I was about to leave my home when I heard neighbors whistle—the signal we use to alert one another that ICE is present in the neighborhood. When I stepped outside, I saw an ICE vehicle parked near my home, in a residential area where families and children were present, which immediately caused concern.

7. I parked behind it and attempted to honk, but when my horn stopped working, I quickly went back to my house to dress in warmer clothes so I could safely remain outside in the frigid winter temperatures to observe ICE. I returned outside. Several of my

neighbors were already out observing and documenting the ICE vehicle parked on the side of the street. One observer told me that one of the ICE agents was Black.

8. When I approached the ICE vehicle, I saw clearly with my own eyes that the agents had “ICE” on their vests. They were in tactical gear, vests, wearing masks, and had pepper spray and guns. There were three agents—two in front and one in the back—inside the vehicle. The agent sitting in the passenger seat was a Black man. I stood on the sidewalk parallel to his window. I positioned myself on the sidewalk, plainly visible, with my hands in view, and made no movements toward their vehicle.

9. I expressed my disbelief and disapproval to them. I said to him, “Are you fucking kidding me? You’re Black. Do you know what ICE does to Black people?” I was standing a few feet away from the side of their vehicle. I did not touch their car, maintained a safe distance from their vehicle, remained on the public sidewalk, and did not attempt to interfere, threaten, harm, or impede with their actions in any way. My hands were visible.

10. The ICE agent did not say anything to me. Instead, he lowered his window, and pepper sprayed me directly in the face at extremely close range. At no point did ICE give any kind of warning, order, or instruction—not even a verbal “back up”—before pepper spraying me. Had the agent issued even the simplest verbal instruction, I would have complied immediately. I was not there to do anything illegal or to impede officers. I was only there to exercise my First Amendment right to free speech. Instead, he chose force without any attempt at communication or de-escalation.

11. The pepper spray hit and entered my mouth, throat, stomach, eyes, neck, face, and covered my jacket. Although the agent directly aimed the pepper spray at my face,

some of the pepper spray went in the direction of an observer standing next to me. Without another word, the ICE agents then drove away.

12. There were several other observers in the area also whistling, documenting, and protesting the ICE vehicle and agents. No other observers were pepper sprayed. I believe I was singled out and pepper sprayed solely because of my speech. My words expressed a non-threatening and protected political viewpoint. The agent's response was a direct retaliation to my protected speech and expression.

13. There was no justification for his using pepper spray toward me. His use of force was sudden, aggressive, and entirely unnecessary. His attack was unwarranted and was clearly meant to punish and intimidate me for speaking out.

14. The pain from the pepper spray was instantaneous—within seconds, it felt like my face and body had been set on fire. I could not open my eyes. The burning was immediate, overwhelming, and completely incapacitating. The pepper spray was sticky and adhered directly to my eyes, mouth, neck, face, and hair. The burning was unlike anything I had experienced.

15. My neighbors witnessed the entire thing and recorded parts of it. They came to help me immediately, flushing my eyes. I then walked home where I continued to wash my face and body. I tried repeatedly to wash the pepper spray off my jacket for several hours. However, the residue penetrated the material, and it continues to burn my skin to this day whenever I touch it.

16. I experienced intense pain, headaches, stomach pain, and lingering symptoms the next day. I ultimately went to the doctor for treatment.

17. The second incident occurred two days later in St. Cloud on January 20, 2026, at approximately 11:20 a.m. My sister and I heard that ICE was operating in the area of the Global Market, a neighborhood with a large Somali community. We decided to observe them from our vehicle because we grew up there and knew the streets well. I drove my sister's car while she sat in the passenger's seat.

18. We observed an ICE vehicle with agents in full ICE gear—vests, identification, and tactical equipment—as they looped around the Global Market area. They drove a black Suburban SUV. We followed them from a safe distance of about two car lengths, whistling to alert others.

19. The agents left the market area and continued circling, apparently trying to lose us. My sister and I stayed back, recording. At all times, we maintained a safe distance in our vehicle, did not interfere with, obstruct, impede, block, approach, or threaten any ICE agents. We never got out of our vehicle to approach any agent, vehicle, or operation. Nothing about our behavior could have justified further interest in us or our home by ICE.

20. Despite maintaining a safe distance and engaging only in lawful observation, one of the agents instructed us to stop following them. My sister and I informed the agent that we are U.S. citizens and that we were exercising our constitutional rights to observe and document their actions. Despite that, the agents deliberately photographed our faces and license plate, an action that felt targeted and punitive. This was the moment it became clear they intended to identify us personally.

21. The license plate for my sister's car is associated with the home address of our mother's house.

22. The agents then led us directly back to our mother's house, which is where little children who are our family members also reside. Once there, the ICE vehicle drove slowly back and forth in the cul-de-sac in a way that clearly appeared to be surveillance. They circled repeatedly at a speed suggesting they were scrutinizing the home and anyone inside it.

23. Another ICE vehicle (white Jeep) arrived shortly thereafter, and then the two vehicles stationed themselves at the entry and exit to the cul-de-sac, thereby completely blocking us and preventing us from leaving the neighborhood. We took video footage of this and preserved that footage.

24. None of the ICE agents ever spoke to us or explained their actions. They simply watched us, recorded us, and repeatedly circled our mother's home.

25. There was no lawful justification for ICE to look up our license plate, obtain our mother's address, lead us to that home, block the street, or survey the property, including where little children live. Their actions were deeply unsettling. We had not committed any crime. We had not interfered with them. We had only observed them from a safe distance.

26. Their conduct—surveilling a family home, photographing us, circling repeatedly, and creating a physical blockade—was deliberately intimidating and deeply traumatizing, particularly because young children and family members reside in that home.

27. It was clear to both me and my sister that ICE was retaliating against us because we had lawfully followed and observed them. Their behavior escalated only after we began following them at a safe distance. The decision to obtain our license plate, go to

our family home, and conduct surveillance there had no purpose other than to retaliate against us for exercising our constitutional rights.

28. If we had not chosen to lawfully observe and record them, they never would have targeted us or our family in this terrifying way. Their actions sent a direct and chilling message: simply watching federal agents could endanger me and my family. This has had a lasting impact on my sense of safety, privacy, and security. The idea that federal agents might be watching me and my family has left me feeling constantly on edge.

29. After they left, I experienced a panic attack. We called 911, but law enforcement told us there was nothing they could do.

30. Since these events, my mental health has severely declined. I have spoken to my therapist about the fear, panic, and hypervigilance I now experience daily. I have struggled to eat or sleep after the incidents and still battle intense worry that ICE may try to retaliate against me for exercising my constitutional rights or target me again. These events have caused severe and ongoing fear, anxiety, and disruption to my daily life.

31. Despite everything ICE has done to me, I intend to continue peacefully observing because there are people more vulnerable than I am, and I believe it is our duty as Americans to stand up for the Constitution.

32. But there is no question that these encounters have taken a significant toll on my mental health, my sense of safety, and my daily life. ICE's actions were unjustifiable, excessive, and meant solely to intimidate me for engaging in protected First Amendment activity. They served no legitimate law-enforcement purpose. They targeted me only

because I exercised my constitutional rights under the First Amendment, and their conduct has had lasting, harmful effects on me and my family.

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

Signed on 1/29/2026 in Hennepin County, Minnesota.

Signed by:

3C01B81C5A6E4D6

Shams Iman