

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-00324-ECT-ECW

**DECLARATION OF  
PEDRO MORENO**

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I, Pedro Moreno, pursuant to 28 U.S.C § 1746, declare as follows:

1. My name is Pedro Moreno. I am lawful permanent resident since 2024.
2. I currently work in construction.
3. On January 13, 2025 around 7:00am at least 6 ICE trucks arrived to my work site in the morning. I saw the agents when I was working inside a house. I stayed working where I was, I figured that I would be safe because I'm a greencard holder.
4. I saw agents split up and went to each of the townhouses/buildings where we were working as plumbers/carpenters/electricians/construction workers, etc.
5. At least two agents came into the room and one agent moved in front of me and one stood behind me. The agent said, "hey you, where you from." I was on my knees working in the kitchen. I put my hands up and stood up and told them I was from Mexico.
6. There was a Spanish-speaking agent who talked with me and asked me my status. I showed them my official green card from my wallet, and handed him my greencard. He actually took my wallet and then grabbed my greencard. He said it was fake and that they had no way to prove it is real.
7. They told me to put my hands behind my back. He kept my greencard and driver's license together and then put them in my pocket but he kept my wallet. They took my hardhat and tools off of me and led me outdoors.
8. They were hurrying me. They pushed me up against the wall and put handcuffs on me. They took me to their truck and put me inside, handcuffed.
9. I had to watch as they rounded up more brown-skinned workers from the site. I had to watch as they pursued a fleeing man and broke his windows and dragged him into a car.
10. They put me in the backseat of a car. They drove around the job site. While driving around, I asked the driver if I can my wife (an American citizen) and he ignored me.
11. Then I asked why my greencard wasn't working for them. But he just told me to not talk.
12. My boss called my wife after I was taken to let her know what had happened.

13. As we started driving to the Fort Snelling detention place, I listened to their conversations. One agent asked another "Did you check his document?" and the other replied "Yes but it is fake."

14. One of the agents told me that they would check documents at the office.

15. They asked me how long I have been in the USA. They asked me when the last time I was in Mexico. They scolded me and said "Why haven't you become a naturalized citizen yet??" and I said "My lawyers have said I cannot apply until November 2026".

16. When we arrived to the building, there were long lines. They took my wallet, my phone, my airpods, and my bag. When I was able to speak with the administrative person, who looked over my green card documents, he yelled at me and said "Why didn't you tell them [the agents] that you are a permanent resident?" and I said "I did." Then, another man came and said "Well, I want to say that I am sorry. You will be able to go. You're okay."

17. They brought me back to one of their trucks and drove me back to my work site. They gave me back my items.

18. At first, I was worried they had stolen my cash but they just moved it from my wallet to my bag.

19. On the way, I listened to the agents' conversations again. They said things like "It happens. Are you going to post this on social media? What do you think about all of this shit?". When one agent said "Serves you right for running away/trying to flee", the other agent corrected him and said "He didn't run." and the first agent shut up.

20. On the way back, they also mentioned having had a warrant with no names on it for one person. I never saw this nameless document. They left me at my worksite.

21. I got back to the worksite around 9am so the whole ordeal took about two hours.

22. I think the agents profiled me because I looked Hispanic.

23. The agents weren't nice. They didn't think I was legal even though I had a greencard. They were aggressive.

24. Even though I am a lawful permanent resident and I was carrying proof of that with me, ICE agents arrested me.

25. I was scared.

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

Date: Jan 16, 2026

*Pedro Moreno*

[Pedro Moreno \(Jan 16, 2026 07:42:16 CST\)](#)

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Pedro Moreno

# For signature - Declaration of Pedro Moreno

Final Audit Report

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