

**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 SAID OSMAN**

## DECLARATION OF SAID OSMAN

I, Said Osman, pursuant to 28 U.S.C. § 1746, declare as follows:

1. My name is Said Osman. I was born in Somalia in 1997, and I am currently 29 years old. My family is Somali, and in 2015, I—along with my parents and siblings—arrived in the United States from Kenya as refugees. I have lived in the United States continuously since arriving as a refugee. When we first arrived in the United States, my family lived in Kentucky, and I live in Louisville Kentucky today.

2. I have had a green card since 2017, and am eligible to become a naturalized United States citizen. I have not done so, primarily because of the cost, but I do intend to pursue naturalization. There is no other country in which I hold citizenship.

3. I work for United Parcel Service at the Louisville airport, unloading packages that arrive at the airport.

4. My mother and siblings recently moved to Minneapolis, Minnesota. I came with them to Minneapolis to help them move. I arrived in Minneapolis on Wednesday evening, January 7, 2026, and left on Friday, January 9, 2026.

5. On Thursday, January 8, 2026, I was at Khalid Binu Walid mosque, near Karmel Mall. I have written some religious books, and I was at the mosque to present these books to see if they wanted to offer them at the mosque.

6. After visiting Khalid Binu Walid, I started off on foot to visit Alhikma mosque with my books. I understand that the neighborhood in which I was walking is one in which many Somali Americans live, worship, shop, and work.

7. I was walking on either 31<sup>st</sup> or Lake Street when I saw a black SUV driving up next to me. The windows were tinted so that I could not see into it. The car pulled over.

8. Two guys came from the car. They were wearing masks.

9. They asked if I was a citizen. I told them I am legal to be here. They did not answer me, or ask me for my ID. Instead, they started grabbing and pulling on my arm.

10. They were trying to put me into the car. They had not identified themselves, or looked at my ID, which is what I would expect them to do. I did not know if they were legitimate law enforcement. I was worried that I was being kidnapped. I told them to let me go, and I refused to enter the car.

11. When I refused, they started physically pushing on me and they pinned me to the ground. As they were pushing me to the ground, one of the guys said—are you willing to listen and enter the car, or we will have to use force against you—or words to that effect.

12. I said: Why don't you ask me for my ID? Why do you have to force me into the car? I kept saying that they could just ask me for my ID and I would show it to them, but they would not let me. My ID was in my left pocket the entire time, and they would not let me present it.

13. After they pinned me down on top of the snow and ice, they kept pushing me into the car. They used a lot of force. They caused me to drop my bag. One of my shoes fell off.

14. They pushed and shoved me into the back of the car. There were 2 additional agents in the car. The agents put my bag and my shoes in the front seat. My bag was full of books.

15. Once I was in the car, they drove away with me. One agent asked me why I was resisting, and why I did not listen, or words to that effect. I responded that they did not ask me for my ID, and I didn't know where they came from. I told them that you can't just force people into a car without asking for an ID.

16. One of the agents responded, saying—we are trying to implement the law of the land; if you are good, and you are okay, we will let you go—or words to that effect. I responded by saying “That is not how to implement the law. You have to ask for my ID and tell me who you are. Then anyone could put on a mask and uniform on and act like law enforcement and kidnap people!” or words to that effect.

17. They seemed to think their detention of me was funny, and they made jokes about me that I did not find funny.

18. At one point, they asked me if I speak Spanish, and when I said no, they spoke to each other in Spanish. They did finally take my ID and look at it. They took a photo of my face. Then, an agent seemed to check my immigration status on his phone.

19. After that, they received a call that seemed to be from a supervisor, and an agent reported that I was good and that they were going to drop me off, and then they talked about how they had to be somewhere around 8:00.

20. While we were in the car, my phone made a sound like an alarm. This is called Adhan, the Muslim call to prayer, and it happens 5 minutes before it is time to pray.

As Muslims, we pray 5 times a day, and that is a practice I keep that is important to me. Normally, when I receive the call to prayer, I pray. When they heard the Adhan, the agents told me that I had to put my phone in my pocket. They said that I was detained, and I could not use my phone, or words to that effect.

21. After they told me I was good, the agents brought me back to the spot where they had picked me up. They left me there on the street. I had been in their car for about 15 minutes. Then, they gave me back my belongings and they drove away.

22. Before they did that, one of the agents said—You see. We are just good guys. We are trying to implement the law. Trump is the president. This is what he wants. He is the president, and we have to listen to him—or words to that effect.

23. At no time during the encounter did any agent ask me about my ties to the community, where I lived, how long I had lived there, my family here, or anything else about my circumstances.

24. I believe I was stopped because of the color of my skin and what I was wearing. It was clear that the agents did not know who I was, they did not present any warrant or any paper, and they did not say why I was stopped, or why I was being detained. They seemed to come after me because they were in a neighborhood that is known to be where Somali Americans live, and I appear to be Somali American.

25. They also seemed to be targeting me because I was wearing clothing that does not represent white culture. My clothing suggests I am Muslim, the majority religion of Somali Americans. I was wearing a kufi, a Muslim skull cap that we wear on our head. And I was wearing a long dress, which we call a khamees, also traditional Muslim clothing.

26. In addition, I noticed at least one other person on the street who was white and who the federal agents did not stop or detain.

27. Being targeted for my race, culture, and religion is deeply offensive to me and goes against the rule of the United States.

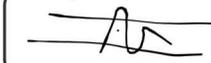
28. Since this happened to me, I keep thinking about how wrongly the agents behaved. It was as if they wanted me to be confused and they were going to put me in their car, no matter what.

29. After they dropped me off, I kept thinking that these guys are crazy, and they didn't seem to care about hurting me or following any rules. They do not seem to know how to implement the rule of the land. And they did not seem to be trying to follow any rule of law that I have been taught. The more they keep doing the types of things they did to me, the more harm will come to people.

30. An observer captured what happened to me on her phone, and she sent it to me. I reviewed the video, and it shows me being taken by the federal agents. Attached to this Declaration as Exhibit A is a true and correct copy of the video.

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

Dated and signed on January 14, 2026 in Jefferson County, State of Kentucky.

Signed by:  
  
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SAID OSMAN

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**PLACEHOLDER FOR EXHIBIT A  
TO THE DECLARATION OF  
SAID OSMAN**

**(TO BE FILED PUBLICLY)**

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Physical Object (description):

Non Graphical/Textual Computer File (audio, video, etc.) on CD or other media: **Video of  
Said Osman on USB**

Other (description):

File this Placeholder in ECF in place of the item filed conventionally. File a copy of this Placeholder and  
a copy of the NEF with the Clerk's Office along with the conventionally filed item(s).