

EXHIBIT 14

(Redacted)

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 M.G.

(Redacted Version)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

MUBASHIR KHALIF HUSSEN,
MAHAMED EYDARUS, and JAVIER
DOE

*on behalf of themselves and others
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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 M.G.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

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

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY, et al.,

Defendants.

No. 26-324

DECLARATION OF M [REDACTED] G [REDACTED]

I, M [REDACTED] G [REDACTED], pursuant to 28 U.S.C. § 1746, declare as follows:

1. My name is M [REDACTED] G [REDACTED]. I am 32 years old and I am a legal secretary. I was born in Minnesota and have lived here most of my life. For a time, I lived in the state of Georgia, but I moved back here to Minnesota in 2021. I am Latina and I have lived in the United States and been a citizen of the United States since birth. My mother is a long-time permanent legal resident, and my two young children were born in this country and are U.S. citizens. I attended public school in the Highland Park neighborhood of St. Paul, Minnesota, attended the University of Minnesota-Twin Cities for college, and now work as a legal secretary in Minneapolis. I currently live in the Reserve at Eden Prairie Apartments in Eden Prairie, Minnesota, where I am an active member of my community. My kids attend kindergarten and first grade at nearby Oak Point Elementary.
2. On January 14, 2026 at approximately 7:45 a.m., I was driving in my car a few blocks away from Oak Point Elementary, my kids' school. In the parking lot of Flagstone Senior Living

facility near the intersection of Columbine Road and Castlemoor Drive in Eden Prairie, I was trapped and stopped by ICE agents. My car is registered under my name, and I was driving within the speed limit.

3. On the morning of January 14th, I was driving through near my kids' school, keeping an eye out for ICE presence, as they had been near Oak Point Elementary during drop-offs nearly every morning the past week or so. I was behind a white pickup truck that I suspected had ICE agents in it when I came to a stop sign at the intersection of Columbine Road and Garden Lane. While stopped at the stop sign, I snapped a picture of the pickup truck's license plate with my cell phone: Iowa JKL 665. I then turned onto Columbine Road. At the intersection of Columbine and Castlemoor Drive was a traffic calming island, and the white pickup pulled up onto the traffic calming island, leaving me no choice but to turn onto Castlemoor Drive and into the parking lot of Flagstone Senior Living. As I did so, the white pickup followed me into the parking lot with its emergency lights flashing. As they did so, I was panicked, wondering why they were pulling me over as I was a citizen. I attempted to reverse my car and then drive forward again, all the time wondering why I was being stopped. The white pickup then aggressively sped ahead of me and blocked me from driving forward.

A man dressed in a black ICE vest came to my driver's side window and demanded identification. I had recently misplaced my driver's license, which had been stored in back of my cell phone when my cell phone case fell off my phone. I therefore showed the man my employee identification through the window. The man said that the ID was not enough and demanded that I roll down my window, but I was scared to do that and believed it would be better if I kept silent and showed my ID through the window. He

removed a tool from his vest that appeared to be sharp and used for breaking windows. I panicked that he would break my car window, and rolled my window down. I said that I didn't want my window broken. He replied, that's why you roll your window down. I told him I didn't have my ID because I misplaced it, but I was a U.S. citizen. He said that's not good enough and asked if I had a passport. I informed him I was not privileged enough to have a passport but I did have photos of my Georgia driver's license in my phone, which I showed him. He asked to take my phone and I refused and said I didn't understand why they were doing this. He asked what I was afraid of, and I replied that he had just killed my neighbor. He said, no, and said he didn't even know that guy. I asked if he was denying that the person who killed Renee Good was an ICE agent. He did not deny it but made disturbing arguments about why Good had deserved it. I told him I didn't understand why he was doing this. Another ICE agent suggested taking a photo of my driver's license photo on my phone, which they eventually did, using his phone camera.

In the white pickup there were three agents, all male and all similarly dressed in a black ICE vest. Two appeared to be white and the third appeared to be a light-skinned Black man. The light-skinned black man is the one who took the photograph of my driver's license. At no point did any of the men identify themselves, either verbally or on their uniform, except for the ICE insignia on their vests. At no point did any of them ask me about my immigration status.

4. I did not make any attempt to resist arrest or run away. During the stop, I was still and did not make or have any intention to drive away.
5. None of the agents at any point ever identified themselves, presented a warrant, explained why they stopped me, or indicated that they knew me or knew my name prior to stopping

me. Nor did any of them ask me any questions about my ties to the community, how long I'd been living and working in Minnesota, whether I had family here, or anything else about my circumstances.

6. This is the first and only time I was stopped by law enforcement. Other than minor traffic misdemeanors, I have not had any other interactions with law enforcement, and I have never been convicted of any crime.
7. I am deeply concerned and scared by the ICE traffic stop. As a result of this incident, I have been under significant stress, which has manifested in sleeplessness, increasing worry, difficulty in focusing and concentrating, and increased agitation. I am unable to perform my normal household responsibilities, such as cooking, cleaning, and caretaking, as I'm used to performing them. I have had to take time off from work. Because of this fallout, I have incurred expenses such as increased food costs (for takeout when I cannot cook), in addition to having to use Paid Time Off. While I have not seen a doctor yet, I am pursuing a therapy assessment to help with my mental health difficulties.
8. My personal relationships have suffered as well. My two young children are getting less attention and care from me than normal. My mother, who temporarily lived with me for a couple weeks when ICE was really intense in my neighborhood, also bore the brunt of my symptoms described above, including my increased agitation. As a result of the stop and other ICE activity in my neighborhood, I am increasingly worried about my kids and my mother, as well as about my own safety.
9. I believe I was stopped and arrested solely because of the color of my skin and my appearance, as it was clear that the arresting officer did not know who I was, did not present any warrant, and did not say why I was stopped and/or why I was being arrested. I live in

Minnesota in a diverse community, my kids go to school in this community, and I take the same route to go to work each day. I am very scared that I may be arrested and detained again.

10. I am a trained constitutional observer, and I have witnessed other activity by ICE and other federal agents in my community. ICE agents have been in my neighborhood almost daily. I believe the ICE agents are here so often because it is a diverse neighborhood.

11. For example, on January 19, 2026, at 11:12 a.m., I witnessed approximately eight men in ICE vests walking around inside the Atwood Eden Prairie building at 14030 Chestnut Drive, which is across the street from my apartment complex. I went to the building to observe any ICE activity. When I arrived at the building the doors were propped open, so the building was no longer secure. I was told that ICE agents were on the first floor.

I went to the first floor and blew my whistle. After I blew my whistle, an ICE agent approached me and asked me if I knew who they were looking for. I asked him if he had a warrant. He told me that I was “a nobody” and he did not have to show me a warrant. I said to him “you’re here because the office is closed.” I also said to him “you don’t have permission to be here.”

Then another ICE agent approached me, and I asked him if he had a warrant. He did not answer my question, instead he said that I was not related to the person they were looking for so he did not need to show me the warrant. The second ICE agent then said that when I blow my whistle I am impeding their activity, and if I continued to blow my whistle he would arrest me. He then got really close to me and I backed away. Both agents ended up leaving without detaining anyone that day.

12. I felt frightened when the ICE agent threatened to arrest me and when he stepped physically

close to me. I believe that he threatened me because I was observing their activity.

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

Executed on 02/01/26.


Feb 1, 2026 16:29:59 CST
M  G 