

# **EXHIBIT 15**

*(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 K.D.**

*(Redacted Version)*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA

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Defendants.

Case No. 0:26-cv-00324-ECT-ECW

**DECLARATION OF K.D.**

**DECLARATION OF K [REDACTED] D [REDACTED]**

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

1. My name is K [REDACTED] D [REDACTED]. I am 23 years old, and I am a mechanic in Richfield, Minnesota. I was born in Minnesota in 2002 and have lived here my entire life. I am Latino, and I have been a United States citizen since birth. I currently live in Burnsville, Minnesota.
2. On January 11, 2026, at approximately 4:50 p.m., I was leaving the Walgreens on the corner of Portland Avenue South and American Boulevard East on the border of Richfield and Bloomington, Minnesota.
3. I had purchased a pack of mints inside, and I was walking to the car while opening the mints. I had just come from work nearby, and I was wearing work clothes, including dirty boots and dirty clothes.
4. Suddenly, without warning, a dark-colored vehicle—I later recognized it as a Ford Excursion SUV—pulled up right in front of me, and four to five people jumped out of the vehicle and surrounded me.
5. One of the people, a Caucasian male, said something to me that sounded like “U.S. immigration investigation.” I was startled and put my hands up, and I could not wrap my head around what was happening. I recognized the people as Immigration & Customs Enforcement (ICE) officers because they had masks covering their face and vests that said “Police” and “ICE” on them.
6. Two of the ICE officers—both of whom were Hispanic or Latino—began speaking to me in Spanish. I think that they assumed that I did not speak English because I am Latino.
7. The officers began peppering me with questions. They first asked where I was born. I answered “here.” One of the officers responded, “Where is here? I don’t know that place.”

I said that I was born in Minneapolis, Minnesota. They asked me whether I was a citizen.

I said that, yes, I am a citizen.

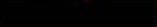
8. They asked for my identification, so I gave over my driver's license. The officers took a picture of my identification. Although I was talking to one of the other officers at the time, I believe I saw an officer take a picture of me as well.
9. As I was standing there, I was surrounded by the ICE officers. It was clear that I could not leave, as they said that they were conducting an investigation and did not give me any space where I could leave. I made no attempt to resist or run away.
10. At the end of the interaction, a crowd started forming to observe the officers, and people began making noise. One of the officers said to the crowd, "If you don't fucking stop, we're going to take you too." Hearing this stressed me out: I didn't understand what he meant by "too," since they had no need to detain me.
11. About ten minutes after the officers first stopped and surrounded me, the officers just left. They did not say a word to me after: they did not apologize. They did not even say that I was free to go.
12. 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 my name prior to stopping me. Nor did any of them ask me any questions about my ties to the community, how long I've been living or working in Minnesota, my family here, or anything else about my circumstances.
13. Throughout my entire life in this country, other than for minor traffic violations, this is the first and only time I was stopped by law enforcement. I have not had any other interactions with law enforcement, and besides those traffic violations, I have never been convicted of

any crime/offense.

14. I am concerned by this incident and no longer feel at ease when leaving home. I am constantly looking over my shoulder, taking different routes to work and other places, and changing my routine entirely out of fear that I will be stopped again. My workplace has also seen a sharp decline in customers since ICE arrived in the area.
15. 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.
16. I live in Burnsville and work in Richfield, down the road from the Walgreens where I was stopped. There is a significant ICE presence in the area around my work and I have seen ICE officers hanging around my workplace on more than one occasion. The specter of ICE is all around in Richfield, which is home to many Latino people. I have no idea why they stopped me in the first place, and I do not know if they have any record of the fact that they stopped me, so I am scared that I may be stopped again.

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

Executed on January 30, 2026.

  
 Jan 30, 2026 12:22:32 CST  
K  D 