

# EXHIBIT 5

*(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*,

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

**DECLARATION OF C.M.**

*(Redacted Version)*

Defendants.

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

**DECLARATION OF C.M.**

Defendants.

DECLARATION OF C [REDACTED] M [REDACTED]

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

1. My name is C [REDACTED] M [REDACTED]. I am a citizen of the United States. I live in Coon Rapids, MN.

2. On January 12, 2026, I was driving to the mechanic. As I was driving, I saw a car parked in an alleyway filled with men wearing masks. Once they saw me, they pulled out to follow me.

3. I figured they were ICE and were after me because to them I look Hispanic. They didn't have any lights on and I knew they didn't have authority to stop me because I'm a USC so I kept driving.

4. After following me for a few blocks, they put their lights on and, on Portland near 34<sup>th</sup> and 35<sup>th</sup>, they rammed my car off the road. We didn't even go half a block once they turned their lights before ramming me.

5. An agent came up to my window, asking if I was a citizen. I was furious. I told them I was a citizen and they damaged my car.

6. Instead of apologizing, they demanded that I produce documents to prove I was a US citizen. I was too angry. I told them again that I was a US citizen and I didn't have to prove it to them.

7. I yelled at them about who was going to pay for my car.

8. At this point, ICE observers showed up and started blowing whistles.

9. One agent kept demanding that I prove that I was born here.

10. I was very hot and yelled at him. Another agent who seemed more in control intervened. I asked him who was going to pay for my damages, he said they would, an agent reassured me that they would pay for the car repair. An agent said they had called the Police and they were waiting for them to come so they could write the report and exchange information, the police never arrived during the event and I called 911 after Ice left to get a report.

11. During the incident, the agents took pictures and recorded me.

12. I believe they ran my license plate which would have confirmed that I was a US citizen.

13. The entire episode lasted about 45-60 minutes, with ICE agents constantly demanding my ID, NAME, Place of birth.

14. After about 45-60 minutes, the ICE agents drove off. They never gave me insurance information.

15. I believe that I was stopped and arrested because of the color of my skin, my appearance.

16. Even though I am a United States citizen and I was carrying proof of my citizenship with me, ICE agents didn't believe me.

17. This experience angered me. I felt intense fear and shock, I was unsure if I was going to be seriously injured or killed.

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

Date: January 20, 2026

  
[REDACTED] (Jan 20, 2026 12:20:46 CST)  
[REDACTED] C [REDACTED] M [REDACTED]