

EXHIBIT 6

(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 H.S.

(Redacted Version)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

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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 H.S.

I, H■■■■ S■■■■, pursuant to 28 U.S.C. § 1746, declare as follows:

1. My name is H■■■■ S■■■■. I am 34 years old. I moved to the St. Cloud, Minnesota area in 2014. I am Somali American, and became a naturalized United States citizen in 2018.

2. I live with my husband, H■■■■■■■■■■ H■■■■■■■■■■, and our five children, including our newborn child. H■■■■ is originally from Somalia, and came to the United States in 2017. He is a legal permanent resident of the United States. H■■■■ works as a truck driver, and I currently stay at home to take care of our children, although on January 12, 2026, at the time I was detained by ICE agents, our four older children were visiting family in Africa.

3. On January 12, 2026, I was on my way to the Dollar Tree store to do some shopping. I left the baby with my husband. My baby was approximately one month old, and this was the first time that I had left the baby at all since the baby was born. I only intended to be away for a short time.

4. Immediately after I parked my car, when I was about to get out of my car, at least four ICE agents pulled up in two cars. Two of the agents were driving a big, red pickup truck. The agents were wearing ski masks that covered almost their entire faces. They were wearing military style gear, and their vests said Police and ICE on the front.

5. The agents came up to my car, and did not identify themselves or explain who they were. They did not have name badges on their uniforms. They asked me if I was a citizen, and I responded that I am a citizen.

6. They told me to put off my car first and asked for my ID. I gave them my driver's license. After checking my driver's license, one of the agents returned it back to me and told me that I can now go.

7. Then, I got out of my car and started walking towards the store. All of a sudden, the agent came walking back to me and said that the agents needed to see my passport. I told them that my passport was at home.

8. I called my husband, H [REDACTED] and told him that I had been stopped, and that I needed my passport. He said that he would send me a photo of my passport by text. The agent responded, insisting that I only had three seconds to provide them a picture of my passport. Then, he counted down, three seconds, two seconds, one second. I was begging the agent for time for the text from H [REDACTED] to go through. I could hear H [REDACTED] frantically searching his phone to send the photo in three seconds. I checked and checked, but it did not come through in time.

9. An agent put my hands behind my back, handcuffed them together, and pushed me towards their car. H [REDACTED] was still on the line, but as soon as I got handcuffed, they took my phone by force, and they turned it off. They treated me roughly and violently. I was begging them not to do this. I kept telling them I could show them the picture, that I was a citizen. I asked them to just wait, to give me time. But they pulled, and pushed, and forced me into their car, and they did not listen to me. I told them they were hurting me but they did not listen, and I cried for help but no one could help me. When they put me in the car, they left me handcuffed, and did not put my seatbelt over me.

10. In the time period before they handcuffed me and put me in the car, they did not ask me how long I had lived in Minnesota, who I lived with, about my children, whether and where I worked, or anything else about my connection to St. Cloud.

11. Once we were in the car, they asked me where I was born. I told them I was born in Somalia. I don't know why they wanted to know this since they didn't let me show them my passport and I had told them that I am a United States citizen.

12. We drove around for about an hour. I will still begging them to give me a chance to prove that I am a U.S. citizen. I was so worried about my baby at home without me. I didn't know what these agents were going to do with me, and whether I would ever see my husband and my baby again. At some point, they yelled at me to stay quiet.

13. While we were driving around, they searched my bag, and they found my health insurance card. My driver's license had been damaged because I was holding it when they handcuffed me. But they made a phone call with the information from my insurance card and the driver's license, and apparently confirmed that I was a U.S. citizen, something I could have confirmed without being handcuffed and arrested.

14. They drove me to a Walgreens store, and left me in the parking lot, about half a mile away from where they had taken me and left my car. I asked them why they couldn't bring me back to where they had picked me up. They didn't care. I turned on my phone, called Hassan, and told him where I was. He arranged for someone to pick me up while I stood under the shelter at the Walgreens store. I got a ride back to my car.

15. I was in pain in my wrists and hands from the handcuffs and from how they had been cutting off my circulation. My hands were swollen. I had significant pain in my shoulders. And I was just so overwhelmed. My body is still healing from having my baby. This was so hard on me physically.

16. H[REDACTED] later took me to the hospital. I went through a medical exam, the doctor witnessed physical harm, and they documented it. They took pictures.

17. H[REDACTED] and I also made a police report, but they told us there was nothing they could do.

18. I feel differently since this happened to me. I don't feel safe in my community. When H[REDACTED] leaves to do his job, I worry that my baby and I are not safe, and that we might be separated from one another. I am having trouble sleeping. My body hurts.

19. In addition to the physical and emotional harm, videos of the arrest of me circulated widely on local news outlets and social media platforms. Knowing that this has been seen by many people has made me fear for my personal safety and for harm to my reputation. A true and correct copy of a video of the arrest that was posted on social media is attached as Exhibit A.

20. I feel that I was stopped simply because I am a Somali woman, who speaks Somali, and wears a Hijab. The ICE officers came directly towards me that day, even though they would have no reason to think I was not a citizen. When they stopped me, they did not know my name or have a warrant with my name on it. I did not see them stop any of the white people in the area.

21. ICE agents continue to patrol in St. Cloud. I have seen their cars on the street since this happened. Somali people are getting stopped and detained for no more than walking or driving down the street. It is impossible to avoid for people trying to live a normal life in this community.

22. This declaration was read to me in Somali translation by H [REDACTED] H [REDACTED]. I completely understand the content of this declaration.

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

Executed this January 30, 2026 in Stearns County, Minnesota.



[REDACTED] (Jan 30, 2026 20:43:35 CST)

H [REDACTED] S [REDACTED]