

EXHIBIT 8

(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.M.

(Redacted Version)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

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

DECLARATION OF M

M

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

1. My name is M [REDACTED] M [REDACTED]. I am 53 years old. I have lived in Minnesota since November 2016 and in the United States since 1999. I am a U.S. citizen, and I have been a citizen of the United States since 2008. I am Somali, I have six children, and currently live in New Hope, Minnesota.
2. On January 15, 2026, I dropped my sister-in-law off in Shakopee, Minnesota for a job interview. On my way back home, I stopped at a Speedway Gas Station in Shakopee to buy a coffee and a hotdog. I parked my car at a gas pump. My car is registered under my name and has current Minnesota license plates and registration.
3. After purchasing my coffee and hotdog, I walked back to my car. I opened the driver's door, placed the coffee in the cup holder, and put the hotdog on the passenger seat. As I was attempting to get into my car and close the door, two men suddenly held the door open and grabbed me. I recognized the men as immigration agents because they were wearing vests that read "Police" and "ICE." I then saw three additional men surrounding the car, also wearing vests that read "Police" and "ICE." All five men were wearing masks that covered their mouths.
4. The first two agents dragged me out of my car, twisted my arm and shoulder and pushed me against the car. One officer pressed his knee into my back. When I screamed out in pain, another officer put his elbow into my neck, and one of the officers yelled at me, "Shut the fuck up, son of a bitch!" Another Somali man saw what was happening and asked the officers why they were detaining me. One of the officers responded, "We're doing our job" and told the man to "back off."
5. As one agent was twisting my arm, I yelled to the agents, "I am a U.S. citizen. You are

violating my rights. You are detaining me illegally.” The agents handcuffed me anyway. Even after I was handcuffed, one officer kept his knee on my back, pressing me against my car. I never tried to resist or fight them.

6. While I was handcuffed, the officers repeatedly asked me, “What city were you born in?” and “What country are you from?” I told them, “My country is the USA.” One of the officers responded, “Why don’t you go back to your country?” I responded, “This is my country.”
7. The officers never asked me for my name. Instead, after they handcuffed me they reached into my pants pockets—first checking my right pocket, then my left pocket where they found my wallet. They looked through my wallet, found my Minnesota Driver License, and scanned it. They said some kind of numeric code to each other, then took off my handcuffs and turned to leave. As they were leaving I asked them, “Why did you treat me like that?” One officer responded, saying, “We are doing our job.” They then got in their car and drove away.
8. During this incident, I saw other customers recording the incident on their phones. I was later provided a copy of a video depicting the agents detaining me. A true and correct copy of that video is attached as Exhibit A.
9. None of the agents at any point ever identified themselves, presented a warrant, explained why they stopped me, or indicated that they knew my name prior to stopping me. None of them asked me anything about my ties to the community, how long I have lived in Minnesota, my family, or anything else about my circumstances.
10. Since coming to the United States in 1999, this is the first and only time I have been stopped or detained by law enforcement. I have never been convicted of any crime. I have never

had any interaction with law enforcement other than receiving a ticket for driving on my own in the carpool lane.

11. I believe I was stopped and detained solely because of the color of my skin and my appearance. It was clear the officers did not know who I was before they stopped me and handcuffed me. They did not present any warrant, and did not say why I was being detained. I am not aware of any other basis on which the officers might have decided to detain me. There were multiple white people at the gas station, and I did not see the officers stop any of them.

12. I live in Minnesota, work as a bus driver, and regularly drive in my community. I am very scared that I may be arrested or detained again. Every time I see someone wearing a beanie hat like the ones the immigration agents wore, I am afraid the person may be an agent and may try to detain or arrest me. The agents who detained me made no attempt to determine who I was before handcuffing me and pinning me against my car. Because of the number of immigration agents present in Minnesota I am afraid that other agents may similarly try to detain or arrest me in the future.

13. There is a Latino market near my house where I used to shop regularly. I have seen immigration agents in the parking lot of the market regularly in the last few weeks. I no longer shop at the market out of fear that I could be detained or arrested again.

14. This declaration was read to me in full in Somali on January 22, 2026 by Amran Farah. I completely understand the content of this declaration.

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

Executed on January 22, 2026


M  M 