

EXHIBIT 10

(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 R.J.

(Redacted Version)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

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Protection*; U.S. BORDER PATROL;
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GREGORY BOVINO, *in his official capacity
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Defendants.

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

**DECLARATION OF
R.J.**

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

1. My name is R [REDACTED] J [REDACTED]. I am 33 years old. I am a U.S. citizen who was born in the United States. I live in Brooklyn Park, Minnesota with my wife and three kids. I am Hispanic.

2. I am a senior warehouse specialist at Second Harvest Heartland, a food bank and hunger-relief organization. I have worked there for about four years.

3. On January 10, 2026, at a little after noon, I was on my way to the Menards on 7800 Lakeland Avenue North in Brooklyn Park. I was driving my car, which is registered to me. The drivers license and registration are up to date. I never made it to Menards.

4. At around Brooklyn Boulevard and Zane Avenue North, I thought I noticed a car following me. At first, I thought I must be imagining it. But as I kept driving towards Menards, for almost two miles and for several minutes, I started to think that I was in fact being followed. I did not know who it was. The car was a Subaru. It didn't look like law enforcement. At a red light at Jolly Lane North and Brooklyn Boulevard, I was suddenly boxed in by two cars, the one behind me that had been following me, and one in front of my car.

5. I was trying to figure out what was happening. I guess my car was still in Drive for a moment and my music was still playing while I gathered myself. I was thinking that something bad must be about to happen to me, and that I needed to record what happened so that someone would know what happened to me. I turned on my

video on my phone and placed it on my dashboard. A true and correct copy of that video is attached as Exhibit A.

6. Immigration agents started knocking on my windows. I was trying to lower the volume on the music before I answered them. Before I could say anything, they started banging really hard, like they were going to break the window. I was asking them—"What are you doing? I'm not doing nothing!" One agent came over to the window next to me and pointed a gun at me. I put my hands up. There were three or four agents with vests and masks. Later I noticed the vests said Police and ICE on them.

7. The way the agents were banging on my window and car was so violent, so I was flustered and I wasn't moving as fast as they wanted me to. I realized that I hadn't put the car in Park, and when I did so, the doors automatically unlocked. When, the doors unlocked, the agents did not ask me anything, they did not identify themselves, and they did not present a warrant. They just opened my car door and started yanking me out of the car. I kept saying over and over that I was a U.S. citizen. I kept asking what they were doing.

8. They started saying I was resisting, but I wasn't resisting. My seatbelt was still on. The reason they could not yank me completely out of the car was that they did not unbuckle my seatbelt before trying to pull me out of the car. I kept telling them I wasn't resisting, but they didn't listen.

9. Once they did get my seatbelt off and finally pull me out of the car, they threw me to the ground and pinned me. They were pulling on my arms so tight to put on the handcuffs. They ripped my jacket and it was torn up. My wallet fell on the

ground. I was still repeating that I am a U.S. citizen. I repeated it over and over. They never asked for or looked at my identification.

10. The agents stood me up and walked me over to their car. They put me in the car with three agents. I told them that they shouldn't abandon my car in the middle of this busy, busy road. Then, one of the agents went over to my car, got in, and drove away. I watched him drive my car into a parking lot for a strip mall, near the Dragon Star Supermarket.

11. They drove me around in their car, handcuffed, for about 20 minutes. The only question they asked me was for my name. I said – don't you have it already? It seemed if they were going to violently arrest me before even looking at my identification, that they should have known who I was. They answered by asking me for my name again, and I told them my name.

12. One agent called or texted somebody, and then they verified it. Then, the agent said that I was clear and they could let me go. They told me that there is another person with the same name and birthdate who is illegal, so they thought I was that person. But that did not make any sense because they clearly did not know who I was when they arrested me.

13. Then, they drove me to another location behind some warehouses that are not far from where they had picked me up. It was a place where no one could see us. They dropped me off there and they told me someone would bring me my car.

14. After they had first left me there to wait for my car, one of the agents walked back over to me and told me something like "Next time, you need to comply with our

orders.” I responded, saying something like—“What do you mean? You didn’t give me no orders. You didn’t even figure out my legal status.” Then, an agent took out his phone. And even though they had already told me I could go, he put his phone camera in front of my face. I asked what he was doing. I said again that I had told them that I’m a US. citizen. He said, I still have to scan you. I told them that I just wanted my car. I asked them to please bring me my car. I just wanted this to be over.

15. Another agent did eventually bring me my car. I wondered what they did with my car while I was detained. They had it for a long time, and they could have done anything to it.

16. Once I got in my car, they stayed in the parking lot for a little bit. So, I drove away from them and parked on the side of the road a ways away. I checked to see if my car was okay. I checked whether anything was torn up or whether it looked like they had gone through or taken anything. I looked for evidence of an accident. It seemed okay.

17. I later saw on Facebook that moments later, they got another person just down the street from where they took me.

18. I never went to Menards. I drove straight home. I felt traumatized. My arm hurt. I had bruises from the handcuffs. They were so tight that half of my hand was numb for a few days. I guess it stopped the circulation to my hands while I was handcuffed. I had cuts on my face and hands.

19. I went to a doctor later that day to get checked out. They said that I just had to heal from what the agents had done to me. They told me to take ibuprofen for the

inflammation and pain. I was relieved that I was going to be okay. But I don't have insurance, so I have to pay out of pocket for that.

20. I am healing now. My thumb sometimes still feels numb. But it is better than it was. I try to stretch for more circulation.

21. Since this happened to me, I have to pass through that spot every time I drive to work. I keep going back to it and reliving it in my mind. I am dreaming about it. I can't get away from it. It is bothering me nonstop. I made an appointment to go talk to a counselor about it. I hope they can help me.

22. I am not going out on the weekend as much as I used to, because I am scared of being stopped and arrested again. My wife works at home, but once each week she has to go to the office and we worry about her getting stopped and arrested. When this happened to me, I had a second job making deliveries for Amazon, but quit that job after it happened. I know immigration agents target Amazon and other delivery drivers, so I don't think it is safe for me to do that anymore.

23. I can't stay home all the time, though. I have to go to work, out with family, run errands, and live my life. And I can only do so much to avoid the immigration agents, because they are everywhere in my community.

24. I believe the immigration agents stopped me because of the color of my skin and because I had Mexican flag and other Mexico stickers on my car. There were many other white people driving down that road that day, and none of them got stopped. It was clear that they did not know who I was when they stopped me and they had no warrant or paper with my name on it. They also did not try to figure out who I was

before they arrested me. They did not ask me anything about my job, my family, how long I had lived in Minnesota, or anything else about my ties to the community.

25. I received the video I am attaching as Exhibit B from someone else. I can see myself and the events I am describing in this declaration in Exhibit B.

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

Executed this Jan 31, 2026 in Hennepin County, Minnesota.

 (Jan 31, 2026 09:12:21 CST)

R  J 