

EXHIBIT 16

IN THE UNITED STATES DISTRICT COURT
FOR THE 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-00324-ECT-ECW

DECLARATION OF ANTONY DOE

I, ANTONY DOE, pursuant to 28 U.S.C. § 1746, declare as follows:

1. My name is Antony Doe. I am 26 years old and I am a delivery driver for DoorDash. I have lived in the United States since 2021 and in Minnesota since the same date. I am from Honduras, and I have a valid work permit, and a pending application for a U visa. My wife also has a pending U visa application. Our applications for our U visas were submitted around May 2023. I have two young daughters, ages four and six. We currently live in Brooklyn Center, Minnesota.
2. On the morning of January 10, 2026, I was doing food delivery through DoorDash, and I was parked in a parking lot outside of Pollo Campero in Brooklyn Center awaiting an order. I was in my car, which is registered in my name. That Pollo Campero location is about a five-to-seven-minute drive from the apartment complex where I live.
3. While I was waiting in the parking lot, my wife called me. She told me that immigration agents and vans had surrounded the apartment complex where I live. Agents were knocking on doors of the apartment complex. Agents had knocked on our door, and she was really scared – she was crying, and my daughters were scared and crying.
4. About two minutes after she called, about six or seven unmarked SUVs and vans pulled into the parking lot where I was parked. Four vans and SUVs surrounded my car and blocked me in. About three agents approached my car from my right side, and about five approached from the left side. They were all masked and were wearing unmarked clothing. I saw “ERO” written on two of their chests, and I noticed many had guns strapped to their waists or in their pockets.
5. They were yelling at me to open the doors, and two grabbed their weapons, pointing them toward the front part of my car. At that point, I opened both of my windows. I had seen that

federal agents had killed a white U.S. Citizen and I was scared they would try to do the same to me.

6. When my windows were open, one agent yelled at me, "Are you legal?" I told him that I have a valid work permit, and a U Visa in progress. They told me that wasn't legal status to stay in the United States, and I could be arrested.
7. They told me to turn the car off. I said, "Why?" The windows were open. Then they opened the right door, grabbed me, turned the car off, and pulled me out of the car.
8. I did not make any attempt to resist arrest or run away. My car was parked the entire time.
9. They asked me for identification, and I provided them with my drivers' license. I was going to give them my work permit, too, but I didn't because things were moving really quickly. They never gave me back my license. I still don't have it. They took a picture of my face and put handcuffs on me.
10. None of the agents at any point ever identified themselves, presented a warrant, indicated that they knew me or knew 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.
11. They put me inside one of the SUVs that was in front of me. Two agents were in front, and I was in the back, handcuffed. They drove me thirty minutes away; I asked where they were taking me, and they ignored me. They were speaking English and I couldn't entirely follow the conversation, but they said something about me entering illegally. The two agents in the car seemed really happy, and they were driving fast, distracted by their phones. The agent driving was accelerating really quickly, he almost hit a woman while we were driving. I was feeling really scared.

12. We arrived to a detention center in Bloomington, MN. At the detention center, they handcuffed my feet, and took me to a jail cell. There were probably 500 to 1,000 people held there; mostly Latino people.
13. At some point in the afternoon, they took me for processing. They took my photo. I could see that the screen on the computer they were using for processing flashed a red line, and it said “warning: victim of a crime,” on the screen.
14. The following day, they tied a group of us with a chain, connecting our waists to our feet. They took us to an airport and loaded us onto a plane. The person on the plane told us we were flying to El Paso, Texas. There were more than 200 people on the plane. In El Paso, we were taken to a detention center.
15. The first time I was allowed to make a phone call was that Tuesday, three days after I was first arrested. I called my wife; she was so worried and scared. I am the sole earner in our family.
16. No one gave me information about what was happening. One or two agents would occasionally come by and pull someone for deportation. Many people had been there for a month or longer.
17. One week later, agents came to collect between 40 and 60 people. They tied us up again with a chain, and took us back to the airport. They loaded us up on the plane. No one on the plane told us where we were going, and they didn’t let us open the window shades on the plane, either.
18. We arrived back in Minnesota on Tuesday, January 20, around midday. They called everyone on the plane to come off except about 10-15 people, who stayed on. I think the plane was making other stops after Minnesota. They loaded the people they took off the

plane onto a bus, which took us back to the detention center in Bloomington.

19. Once we arrived at the detention center, they called the names of 5 to 7 people, including me. They took the handcuffs off us, one-by-one, and told us we were going to be let go, without any explanation. I think most of the other 5 to 7 people had pending or finalized U visas, and I believe were two other people on special juvenile visas.
20. They told me I could make a call to have someone pick me up. I called my wife, and she had some friends from our church drive to pick me up. They are U.S. citizens. They arrived at the detention center around 8:30 or 9:00pm that night and took me home.
21. This experience has changed my life significantly. I am not working, and I have lost wages as a result. I am scared to leave the house. My wife doesn't want me to leave the house. We feel traumatized. We are really scared. It's really hard for me to sleep, thinking about how I can't open the doors of my home. The entire situation – it's been really difficult, and it's really hard to process. From the date they arrested me and deprived me of my liberty through today, I've never been told why I was arrested.
22. Since 2021, when I entered this country, this is the first and only time I have ever been arrested by law enforcement, and I have never been convicted of any crime or offense in this country.
23. I believe I was stopped and arrested solely because of the way that look; the color of my skin and being Latino. It was clear that the arresting officers did not know who I was, did not present any warrant, and did not say why I was stopped or why I was being arrested. I am very scared that I may be arrested and detained again.
24. I still see federal agents where I live. They're around every day near my apartment complex, waiting for people to exit their apartments so they can pick people up. My

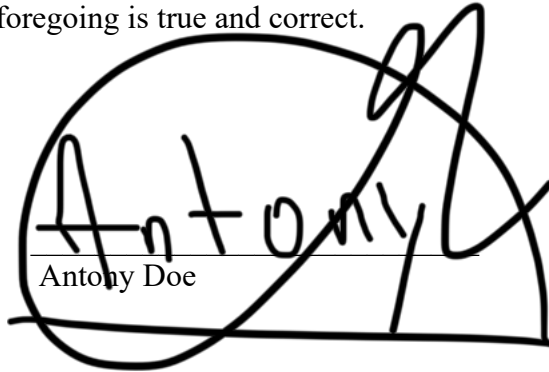
neighbors have had similar experiences; a lot of families around where I live have detained family members and relatives. My older daughter goes to school, and my younger daughter needs to start school, and we haven't brought either of them to school since this has happened. We're waiting for the federal agents to leave so that we can return them to school.

25. I am afraid of retaliation towards me and my family may face if my identity were to become public as a result of my participation in this lawsuit. I am afraid that my family members and I will be retaliated against and harassed by members of the public on social media given recent reports about people harassing noncitizens online.

26. This declaration was read to me in full in Spanish on January 30th, 2026 by Ana Sofia Barrios. I completely understand the content of this declaration.

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

Executed on January 30, 2026



Antony Doe

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, Ana Sofia Barrios, certify that I am fluent in both English and Spanish. On January 30th, 2026, I personally spoke with Antony Doe and read the foregoing information to him over the phone. Antony Doe affirmed that the information in the above declaration is true and accurate. I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Ana Sofia Barrios

Ana Sofia Barrios

Paralegal

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