

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

SUSAN TINCHER, JOHN
BIESTMAN, JANET LEE, LUCIA
WEBB, ABDIKADIR NOOR, and
ALAN CRENSHAW, *on behalf of
themselves and other similarly situated
individuals,*

Plaintiffs,

v.

KRISTI NOEM, Secretary, U.S.
Department of Homeland Security
(DHS); TODD LYONS, Acting
Director, U.S. Immigration and
Customs Enforcement (ICE);
MARCOS CHARLES, Acting
Executive Associate Director,
Enforcement and Removal Operations
(ERO), ICE; DAVID EASTERWOOD,
Acting Field Office Director, ERO, ICE
Saint Paul Field Office; JOHN A.
CONDON, Acting Executive Associate
Director, Homeland Security
Investigations (HSI); The Department
of Homeland Security; Unidentified
Federal Agencies; and Unidentified
Federal Agents; *in their official
capacities,*

Defendants.

Case No. 25-cv-04669

DECLARATION OF [REDACTED]
[REDACTED], M.D.

I, [REDACTED], declare as follows:

1. I am a 29-year-old resident of the [REDACTED] in Minneapolis, Minnesota. I have lived in Minneapolis since 2024, when I moved to the city to begin my medical residency. I am a licensed pediatrician, and I have been practicing pediatric medicine in the city since I moved here.
2. On January 24, 2026, at approximately 9:00 am CST, I was awoken by the sound of cars honking and whistles blowing. Shortly after I awoke, I heard screaming from outside my window. I [REDACTED] saw several ICE agents and civilians yelling at each other.
3. One civilian was standing in front of a parked car on the side of the road. I saw him yelling at the ICE agents, but I did not see him attack the agents or brandish a weapon of any kind.
4. Suddenly, an ICE agent shoved him to the ground. My view of the altercation was partially obstructed, but after a few seconds, I saw at least four ICE agents point guns at the man. I then saw the agents shoot the man at least six or seven times.
5. Initially, I was stunned. From what I could see from my apartment, there was absolutely no need for any violence, let alone lethal force by multiple officers. I immediately put on my boots and coat, ran outside, and approached ICE agents who were near the victim.

6. The scene was chaotic. Many civilians were screaming and honking. Over the noise, I informed the ICE agents that I am a physician, and I asked to assess the victim.
7. At first, the ICE agents wouldn't let me through. They repeatedly asked me for my physician's license, which I obviously didn't have. But none of the ICE agents who were near the victim were performing CPR, and I could tell that the victim was in critical condition. I insisted that the agents let me assess him. Normally, I would not have been so persistent, but as a physician, I felt a professional and moral obligation to help this man, especially since none of the agents were helping him.
8. Finally, one agent agreed to let me assess the victim. He patted me down to "make sure I didn't have a weapon" and then let me approach the victim.
9. As I approached, I saw that the victim was lying on his side and was surrounded by several ICE agents. I was confused as to why the victim was on his side, because that is not standard practice when a victim has been shot. Checking for a pulse and administering CPR is standard practice. Instead of doing either of those things, the ICE agents appeared to be counting his bullet wounds.
10. I asked the ICE agents if the victim had a pulse, and they said they did not know. I then asked the agents to make space so I could assess the victim.

11. The victim had at least three bullet wounds in his back. I asked the ICE agents to turn the victim from his side to his back. From that position, I saw an additional gunshot wound on the victim's upper left chest and another possible gunshot wound on his neck.
12. I checked for a pulse, but I did not feel one. I immediately began CPR. Shortly after I started compressions, EMS personnel arrived and took over.
13. I remained at the scene for about five more minutes, but protesters began to gather and the situation seemed to be escalating, so I left and returned to my apartment.
14. When I returned to my apartment, I was extremely distraught. I was sobbing and shaking uncontrollably. Eventually, I called my sister, who lives in a nearby suburb. I called her for comfort and because I did not feel safe in my apartment; I wanted to see if I could stay with her for the day and maybe even a few days.
15. I also sought advice from a friend who works for the City of Minneapolis. He recommended that I shelter in place because the situation outside my apartment was so dangerous. I was going to follow his advice, but then ICE agents deployed tear gas on the crowd that had gathered below, and the tear gas began seeping into my apartment.

16. At that point, I did not feel like I could stay in my apartment any longer. I packed an overnight bag, took the elevator down to the parking garage, and drove about six blocks to a friend's house. I was still crying and shaking at this point, and I was barely able to speak. I drove to my friend's house because it was close, and I wanted time to collect myself before driving 30 minutes to my sister's house.

17. I am devastated by the killing of a Minnesotan by multiple federal immigration agents. From what I could tell, the victim was not actively threatening ICE agents or the public—he was just yelling at the agents because he objected to ICE's presence in our city. A person should not be shot and killed for lawfully expressing their opinions.

18. I am not sure when I will return to my apartment. I do not feel safe in my city. In less than one month, ICE agents have shot and killed two people for protesting and observing their actions. I worry that I or someone I love will be shot and killed for voicing their displeasure and being in the wrong place at the wrong time.

I declare under penalty of perjury that everything I have stated in this document is true and correct.

Dated and signed on 1/24/2026 in Hennepin County, State of Minnesota.

