

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,*

Court File No. 25-cv-04669
(KMM/DTS)

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,*

**DECLARATION OF
JACOB W. JESTER**

Defendants.

I, Jacob W. Jester, state as follows:

1. I am 22 years old, and I am a resident of Minneapolis, Minnesota.
2. On the evening of Friday, January 9th, I heard honking and whistling outside my house.
3. I stepped outside and spoke to my neighbor to see what was happening.

4. My neighbor and I walked around our neighborhood and observed an ICE officer in their vehicle, but since we were on foot, we did not follow the vehicle.

5. During my patrol of the neighborhood, my partner called to ask if I needed anything. I told them to meet us near the corner of Bloomington Ave. and 31st Street.

6. Once we got in the car with my partner, we observed two additional ICE vehicles.

7. We decided to follow the vehicles on the highway, honking to let others know that ICE is nearby.

8. We followed the vehicles until they pulled into the Whipple Federal Building.

9. We were not aware where the vehicles were heading until we pulled into the entrance.

10. When we got there, the ICE vehicles stopped at a checkpoint.

11. The officers got out of their vehicles and grabbed their weapons.

12. As we were sitting there, one of the officers walked up to my window and said “do you want to get shot in the face?”

13. Shortly after, another officer came and hit the back of our truck with his hand.

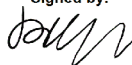
14. We were asked to leave and left immediately.

15. This situation left me feeling petrified. I was physically shaken up and incredibly terrified.

16. Since this situation was two days after the killing of Renee Good, I was incredibly fearful for my life.

**I declare under penalty of perjury under the laws of United States of America
that the foregoing is true and correct.**

Dated: 1/15/2026
County: Hennepin

Signed by:

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Jacob W. Jester