

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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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.

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Case No. 25-cv-04669-KMM-DTS

**DECLARATION OF  
DANIEL WOO**

I, Daniel Woo, declare as follows:

1. I am a resident of the City of Plymouth, County of Hennepin, Minnesota.
2. I am 29 years old.
3. I work as a sound designer.
4. I make the following declaration based on personal knowledge.

5. I have been concerned about the presence of U.S. Immigration and Customs Enforcement (“ICE”) agents in my community.

6. Because I am concerned, I have been participating in peaceful observation and documentation of ICE activities in my community. I have been doing observer work primarily in the Whittier neighborhood in Minneapolis.

7. At approximately 3:30 p.m. January 20, 2026, I drove to the Hmong Village, 1001 Johnson Pkwy, St Paul, MN 55106 in response to reports of ICE activity in the area. I was accompanied by another observer.

8. I went between the Hmong Village and Sun World Supermarket, 892 Arcade Street, St. Paul, MN 55106 to observe reported ICE agents in the area.

9. When I was at the Hmong Village, I observed one ICE vehicle parked and backed into a corner of the parking lot. Then another ICE vehicle drove by, in front of me, with two men inside. It was a dark gray, SUV Nissan Pathfinder. It had Washington plates: CKD7035.

10. I shared that license plate number with my observer group which confirmed it was an ICE vehicle, so I followed the vehicle as it traveled through neighborhoods in St. Paul.

11. At more than one four-way stop, the vehicle did a U-turn and stopped in the intersection to observe my vehicle. At other times, they made turns without signaling.

12. After travelling through neighborhoods, the ICE vehicle entered and exited several four-lane freeways and then drove back to the Hmong Village.

13. After the Hmong Village, the ICE vehicle got back on the freeway through Little Canada and New Brighton. I recognized they were heading west, and I became suspicious they were heading to my house in Plymouth. When we got to the split where we had to go towards Plymouth or Maple Grove, I knew they were going to my house.

14. The ICE vehicle first passed my cul-de-sac but then came back. It parked at the end of the cul-de-sac in front of my house with the front of the vehicle pointing out of cul-de-sac. The time was about 7:00 p.m.

15. I parked on my neighbor's property. I did not want the ICE officers to see me as a threat. Because they were parked in front of my house, I could not go home.

16. I saw one of my other neighbors in her garage and honked my horn to get her attention, but she closed her garage door.

17. After a few minutes, the ICE officers left and I followed them to Plymouth City Hall, 3400 Plymouth Blvd, Plymouth, Minnesota 55447, where the police station is located. I parked some distance from them to observe. The two officers went in and out of City Hall.

18. After the ICE officers got in their vehicle, I left the parking lot and drove up and down the street a few times before departing in case the Plymouth police wanted to talk to me. The ICE officers were wearing masks, badges, and ICE vests.

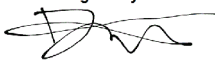
19. The next day I learned from the Plymouth Police Department that the ICE officers had filed a report of a suspicious vehicle following them.

20. I am now unable to help my neighbors by delivering food to those who are afraid because ICE knows my name and license plate. Since they have shown they will go to my house, I fear they will follow me to vulnerable people's homes.

21. I will continue to do observer work for as long as ICE is in my community.

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

Signed on 1/25/2026 in Hennepin County, Minnesota.

DocuSigned by:  
  
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Daniel Woo