

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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

Case No. 25-cv-04669

**DECLARATION OF EMILY BELTZ**

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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I, Emily Beltz, declare as follows:

1. My name is Emily Beltz. I am a resident of Edina, Minnesota, a suburb of Minneapolis. I was born and raised in Minnesota and have lived here for most of my life. I work as a Project Manager at a clinical research organization. I am 44 years old.
2. The Twin Cities area is my home. I love my community, how strong and resilient we are. I love the diversity of the area and have stayed here in part because I want to raise my five-year-old in an area where people are different, so that she knows that everyone matters.
3. After the Federal Government invaded my city, I began organizing with my neighbors to conduct legal observations of federal agent activity in my neighborhood. I joined a neighborhood group chat. I feel that I cannot be someone who stands by and lets another Anne Frank be taken. My husband was originally opposed to me going to protests or observing federal activity because he is scared, but I do not feel like I can stand by and let federal agents do illegal, inhumane things to my neighbors.
4. On the evening of Monday, January 26, 2026, I drove around my neighborhood to conduct legal observations of federal agent activity. I wanted to protest federal agent activity and bear witness to ICE's kidnapping of my neighbors. I was driving

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5. At approximately 6 PM that evening, while driving around, I received a notification that federal agents were sitting in a car parked outside an apartment building at 8915 Old Cedar Avenue South in Richfield, Minnesota.

6. I drove over to the apartment building, arriving at approximately 6:15 PM. I met other legal observers there. As I drove into the apartment parking lot, I saw a large SUV with no plates. The other observers and I began honking and whistling to let people in the apartment building know that federal agents were present and to protest agents' activities.

7. The unmarked SUV then left the parking lot. The other legal observers and I followed. I drove behind the federal agents at a safe distance. We drove through the neighborhood at the speed limit.

8. While following the unmarked SUV, a local police car came from behind me with its lights flashing. I pulled over to the shoulder, as did the other legal observers and the unmarked SUV. The police car then drove past. The unmarked SUV then continued driving. I followed it.

9. At approximately 6:30 PM, as I followed the unmarked SUV, I saw it pull into a parking lot. I followed from a distance. The unmarked SUV then stopped suddenly. I stopped as well and waited. Someone then leaned out of the SUV and took a photo of me.

10. I then decided to drive away and started to do so. The SUV then flipped around and sped at me. I thought the agents were going to deliberately T-bone my car. Right before it hit me, the unmarked SUV braked hard.

11. A woman wearing a gaiter-style mask then leaned out of the front passenger side window of the SUV. She yelled, "Emily, Emily, we're going to take you home." She then repeated my name again and repeated that they would take me home. She then said my address. She repeated, in a mocking tone, that they were going to escort me home.

12. I was freaked out. I did not care that they had my name, but I was scared for my family. The agents had told me, in effect, that they knew where I lived and could come and get me and my family at anytime.

13. The federal agents then left, driving around the block. The other legal observers then left as well. I followed the other legal observers. I drove in the opposite direction that the federal agents had gone. After driving approximately a block, I noticed that the federal agents were following me.

14. The federal agents followed me for a while and then followed one of the other legal observers. My fellow observers told me not to go home. One of them told me that they could meet me at a local restaurant instead. I drove to that restaurant. After spending some hours at the restaurant, I went home.

15. That night, I felt very scared. I did not feel safe observing federal agents again. I have seen on the news how federal agents have brutalized protesters and observers, and I did not want them to target my family.

16. The next morning, however, I decided that I could not let the federal agents intimidate me. They want to intimidate us to stop observing and protesting against them. I could not let them do that. Since then, I have continued to drive around my neighborhood during my commute to look for signs of federal agent activity.

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

30-Jan-2026

Dated and signed on \_\_\_\_\_ in Hennepin County, State of Minnesota.

Emily Boltz