

# EXHIBIT B

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

**THIRD DECLARATION OF  
LUCIA WEBB**

I, Lucia Webb, declare as follows:


1. I am a 31-year-old resident of the Powderhorn neighborhood in Minneapolis, Minnesota. I've lived in Minneapolis since 2016. I'm the Operations Director at a local non-profit.
2. On January 24, 2026, I was at work when I received a message saying that an observer had been shot by ICE agents near Nicollet Avenue and 26th Street in Minneapolis. Shortly after that, I received more messages confirming the shooting, and that the victim was deceased.
3. When I read those messages, I was stunned and worried for my city and community. I did not think that my city could take another civilian shooting by an ICE agent. I was worried that the shooting would further inflame tensions between ICE agents and protesters and observers, and that ICE agents would use the escalating tensions to perpetrate further violence on civilians.
4. I then saw video footage of the shooting. It was incredibly upsetting. I have never seen violence like the violence I have witnessed these past few weeks. All of the violence I have witnessed has been committed by ICE agents against observers and protesters. I have not witnessed any protester or observer act violently toward any federal immigration agent. These

agents are acting as if the laws do not apply to them and as if observers and protesters do not have any rights.

5. When I got home from work, I felt the urge to help my community. I was worried that many observers and protesters would go to the site of the shooting, which would leave my neighborhood unprotected. So, I decided to contact a few friends to monitor our neighborhood and monitor ICE activity in the rest of South Minneapolis. I monitored for a few hours before going home.
6. The past few weeks have been very strange. I do not normally go toward violence and potential danger, and I am more scared than ever to observe and protest ICE activity.
7. But I care about my community, and I can't sit idly by while ICE targets, retaliates against, violently attacks, and even kills civilians for observing and protesting their conduct. I view it as my civic duty to continue observing, protesting, and telling others about ICE's unlawful actions. I will continue to show up for my community, even though I'm terrified that I or someone I love will be arrested, injured, or killed.

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.

  
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Lucia Webb