

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

STATE OF MINNESOTA, MARY MORIARTY, and DREW EVANS, Plaintiffs,

v.

U.S. DEPARTMENT OF JUSTICE, et al., Defendants.

No. 26-cv-1007 (EGS)

INDEX OF EXHIBITS TO DECLARATION OF DREW EVANS

Submitted in Support of Plaintiffs' Motion for Summary Judgment

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Exhibit 1

MINNESOTA DEPARTMENT OF PUBLIC SAFETY



Alcohol &
Gambling
Enforcement

Bureau of
Criminal
Apprehension

Driver and
Vehicle Services

Emergency
Communication
Networks

Fiscal &
Administrative
Services

Homeland
Security and
Emergency
Management

Minnesota
State Patrol

Office of
Communications

Office of
Justice Programs

Office of Pipeline
Safety

Office of
Traffic Safety

State Fire
Marshal

Bureau of Criminal Apprehension

1430 Maryland Avenue East, St. Paul, Minnesota 55106

Phone: (651) 793-7000 FAX: (651) 793-7001

Website: bca.dps.mn.gov

James D. Reyerson

Special Agent in Charge

Minnesota Bureau of Criminal Apprehension

James.reyerson@state.mn.us

651-425-8388

January 29th, 2026

Assistant Special Agent in Charge Tonya Price,

On behalf of the Minnesota Bureau of Criminal Apprehension (BCA), this correspondence serves as a formal request for all available case information, reports, evidence summaries, and investigative materials related to the three (3) recent Immigration and Customs Enforcement (ICE)-related incidents that occurred in Minneapolis, Minnesota.

The BCA is seeking comprehensive information to ensure a complete understanding of the circumstances surrounding these incidents and to support any ongoing or future investigative efforts. This request includes, but is not limited to, incident reports, investigative notes, all evidence, timelines, forensic or analytical products, names and ranks of the agents directly and in-directly involved, operation briefing documents, and any other relevant documentation maintained by the Department of Homeland Security (DHS) Homeland Security Investigations (HSI).

As law enforcement partners, it is our shared responsibility to work collaboratively and transparently on matters of mutual jurisdiction and public safety. Coordinated, joint investigative efforts between federal and state agencies promote information sharing, reduce duplication of effort, and strengthen the integrity and effectiveness of the overall investigation. The Minnesota BCA remains committed to working alongside the DHS/HSI to ensure these cases are addressed thoroughly and professionally.

Please direct any questions or requests for additional clarification to me. We appreciate your partnership and cooperation. We look forward to working closely with the DHS HSI on these matters.

Sincerely,

James D. Reyerson

James D. Reyerson
Special Agent in Charge
Minnesota Bureau of Criminal Apprehension

Exhibit 2

MINNESOTA DEPARTMENT OF PUBLIC SAFETY



Alcohol &
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Bureau of
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Office of
Justice Programs

Office of Pipeline
Safety

Office of
Traffic Safety

State Fire
Marshal

Bureau of Criminal Apprehension

1430 Maryland Avenue E., St. Paul, Minnesota 55106

Phone: 651/793-7000 FAX: 651/793-7001

Website: bca.dps.mn.gov

June 3, 2026

Assistant U.S. Attorney David Steinkamp
Assistant U.S. Attorney Matthew Evans
United States Attorney's Office
600 U.S. Courthouse
300 South Fourth Street
Minneapolis, Minnesota 55415

Re: Reciprocal Evidence Sharing in Christian Castro Investigation

Dear AUSAs Steinkamp and Evans:

I received your request for access to the evidence that the Minnesota Bureau of Criminal Apprehension collected during its investigation into a January 14, 2026 shooting in Northeast Minneapolis involving Christian Castro. Your letter implies that the BCA is unwilling to cooperate with federal law enforcement in this investigation. That is inaccurate. As we have repeatedly communicated to federal law enforcement and the United States Attorney's Office, the BCA is prepared to share evidence reciprocally and to collaborate with federal authorities in the investigation as we have always done. To the extent there has been a breakdown in this longstanding collaboration, that breakdown is the result of an unwillingness to collaborate and share evidence with the BCA in return.

This case does not stand alone. The federal government has also refused to collaborate and share any evidence related to the shootings of Renee Good on January 7, 2026, and Alexander Pretti, on January 24, 2026, by federal officers. After our repeated efforts to re-establish cooperation failed, the BCA has had to sue to get access to the evidence in all three shootings, so it can fulfill its responsibility to investigate.¹

In this case, BCA agents were present at the scene after the January 14 shooting. From the beginning, BCA agents sought to cooperate with federal investigators. But after BCA agents and federal agents began conducting joint witness interviews on the scene, the federal agents' supervisors instructed them to stop cooperating with the BCA and to exclude BCA agents from further interviews.

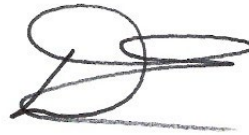
¹ See Compl., *State of Minnesota et al. v. U.S. Dep't of Justice*, Case No. 1:26-cv-01007 (D.D.C., filed Mar. 24, 2026), ECF No. 1.

Since that time, the BCA has made repeated efforts to re-establish our normal, cooperative working relationship with federal authorities on this case. My office has made both formal and informal requests of our counterparts at the FBI and HSI, along with the United States Attorney's Office, to re-establish collaboration. I understand that counsel at the Minnesota Attorney General's Office and Hennepin County Attorney's Office has repeatedly informed you that we are willing to share evidence with you if the exchange is reciprocal. Each of the federal agencies with whom we have discussed sharing evidence in this case has declined to do so thus far. None has provided any substantive reason for its refusal aside from relaying the perspective that these shootings are solely "federal" matters.

The BCA stands ready to restore the historic norm of two-way collaboration between our agency and federal law enforcement. We have so many partnerships and areas of common interest that we remain committed to these relationships. Minnesota has a sovereign responsibility to its residents to protect public safety and to investigate incidents that result of the death of those in our state, so it is necessary that any such exchange goes both ways. The best way to ensure a just outcome in both the state and federal investigations is for us to share evidence with each other, as we always have, so that both sovereigns have a complete picture of the facts. As noted in your letter, mutual sharing of information is necessary to achieve this common goal.

To the extent that you are prepared to share the evidence obtained in the federal investigation of this case, please reach out to the BCA's counsel at the Minnesota Attorney General's Office to arrange for a reciprocal exchange at your earliest convenience.

Sincerely,

A handwritten signature in dark ink, appearing to be 'Drew Evans', with a stylized, cursive-like script.

Drew Evans
Superintendent
Minnesota Bureau of Criminal Apprehension

cc: Deputy Solicitor General Peter Farrell (peter.farrell@ag.state.mn.us)
Special Counsel Kimberly Svendsen (kimberly.svendsen@ag.state.mn.us)
Special Counsel Joseph Richie (joseph.richie@ag.state.mn.us)

Exhibit 3



U.S. Department of Justice

United States Attorney
District of Minnesota

*600 United States Courthouse Telephone: (612) 664-5600
300 South Fourth Street Fax: (612) 664-5787
Minneapolis, MN 55415*

June 26, 2026

Dear Mr. Evans:

As we've discussed, the U.S. Attorney's Office is prepared to share evidence and collaborate as appropriate in the investigative matters relating to the federal officer-involved shootings that occurred in Minnesota during Operation Metro Surge. With the approval of the United States Attorney, the USAO and BCA will share evidence on these matters with the following understandings:

The USAO and BCA are independent from each other. Both the USAO and BCA enter into this understanding in good faith, with the goal of fairly and impartially bringing these investigations to their respective charging decisions in a thorough and appropriately expeditious manner. The USAO and BCA will consult with each other regarding the matters. The USAO and BCA may investigate these matters jointly but remain independent and neither will direct the investigation of the other.

BCA special agents may join the USAO prosecution teams as appropriate for the relevant matters under USAO investigation. As members of the USAO prosecution teams, assigned BCA agents will have full access to the USAO case file. BCA agents will have access to evidentiary materials from all investigative agencies that have participated in any of the federal officer-involved shootings, including the FBI, DHS and its subordinate agencies. Assigned agents will also be bound by federal rules of confidentiality and laws and regulations regarding secrecy of grand jury materials, which BCA has always upheld in past investigations with the USAO.

Independent of the USAO's investigations, the USAO and BCA will each share with the other all information and evidence relating to the matters. The USAO will make available all non-grand jury material, such as reports, interview memos, media, physical evidence, and search warrant evidence. Likewise, the USAO prosecution

team will have the same access to all evidence and information in the BCA's case file. The USAO will, within a reasonably prompt timeframe, move the federal court to disclose relevant grand jury material to the appropriate state prosecution office(s).

Any shared evidence may be used by a prosecutor's office (e.g., the USAO or the Hennepin County Attorney's Office) and in criminal court proceedings. Shared evidence will be treated by the USAO, BCA, HCAO, and any other prosecution office as criminal investigative data under state and federal law. As is often the case where the USAO and HCAO are investigating overlapping matters, each office will confer and share any appropriate information regarding charging decisions, timing, and other considerations.

Each party will make good faith efforts to ensure all government witnesses comply with any investigative or trial subpoenas.

This understanding does represent a change to this office's previous stance vis a vis the sharing of evidence and cooperation between our office and BCA in these investigations. We acknowledge that, ultimately, the best course for these investigations will be impartial and open sharing of information and evidence between the USAO and BCA. Please confirm these are your understandings too. We look forward to getting these investigations moving.

Sincerely,

s/Kristian Weir
Kristian Weir
Chief, Criminal Division
U.S. Attorney's Office
District of Minnesota

Exhibit 4



RE: Evidence Sharing in Metro Surge Matters

From Evans, Drew (DPS) <Drew.Evans@state.mn.us>

Date Mon 6/29/2026 4:45 PM

To Weir, Kristian (USAMN) <Kristian.Weir@usdoj.gov>

Cc Kimberly Svendsen <Kimberly.Svendsen@ag.state.mn.us>; morgan.kunz@hennepin.us <morgan.kunz@hennepin.us>; Forbes, Matthew (USAMN) <Matthew.Forbes@usdoj.gov>; Riverso, Mary (USAMN) <Mary.Riverso@usdoj.gov>; Green, David (USAMN) <David.Green3@usdoj.gov>; Steinkamp, David (USAMN) <David.Steinkamp@usdoj.gov>; Evans, Matthew (USAMN) <Matthew.Evans@usdoj.gov>; Mueller, Scott D (DPS) <scott.d.mueller@state.mn.us>; Reyerson, James (DPS) <james.reyerson@state.mn.us>

 1 attachment (10 KB)

image001.png;

Good Afternoon –

Thank you for your letter. I have reviewed it and the BCA agrees to share evidence in the manner you describe.

I understand we have already had productive conversations and our approach going forward with your office. We look forward to partnering with the USAO and federal law enforcement agencies on these investigations.

Sincerely,

DREW EVANS | SUPERINTENDENT

MINNESOTA HOMELAND SECURITY ADVISOR

 **MINNESOTA BUREAU OF CRIMINAL APPREHENSION**
1430 MARYLAND AVENUE EAST, ST. PAUL, MN 55106
651.793.7000 | Andrew.Evans@state.mn.us | [Follow BCA](#)

From: Weir, Kristian (USAMN) <Kristian.Weir@usdoj.gov>

Sent: Friday, June 26, 2026 10:13 AM

To: Evans, Drew (DPS) <Drew.Evans@state.mn.us>

Cc: kimberly.svendsen@ag.state.mn.us; morgan.kunz@hennepin.us; Forbes, Matthew (USAMN) <Matthew.Forbes@usdoj.gov>; Riverso, Mary (USAMN) <Mary.Riverso@usdoj.gov>; Green, David (USAMN) <David.Green3@usdoj.gov>; Steinkamp, David (USAMN) <David.Steinkamp@usdoj.gov>; Evans, Matthew (USAMN) <Matthew.Evans@usdoj.gov>

Subject: Evidence Sharing in Metro Surge Matters

Drew,

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

As we have discussed, please see the attached letter from our office regarding the sharing of evidence in officer-involved shooting incidents that occurred during Operation Metro Surge. I have copied the AUSAs from our office assigned to these matters, they will be reaching out shortly to the appropriate members of BCA to put this in motion. I'm very pleased to have reached this point and look forward to working with your office on these investigations.

Sincerely,

Kristian Weir | Chief, Criminal Division

U.S. Attorney's Office | District of Minnesota

300 South 4th Street | Suite 600 | Minneapolis, MN 55415

T: 612.253.0970 | C: 651.802.5830

Kristian.Weir@usdoj.gov