

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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SUSAN TINCHER, JOHN BIESTMAN,  
JANET LEE, LUCIA WEBB, ABDIKADIR  
NOOR, ALAN CRENSHAW, ABIGAIL  
SALM, RYAN DOXSEY, MARGARET  
WOOD, THE NEWSGUILD-  
COMMUNICATIONS WORKERS OF  
AMERICA, *on behalf of themselves and other  
similarly situated individuals,*

Case No. 25-cv-04669  
(KMM/DTS)

**DECLARATION OF STEVEN  
PAUL SAARI THE SECOND**

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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DECLARATION OF STEVEN PAUL SAARI THE SECOND

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I, Steven Paul Saari the Second, declare as follows:

1. My name is Steven Paul Saari. I am 40 years old. I am a resident of Minneapolis, Minnesota.
2. On January 24, 2026, I was at home hanging out with my girlfriend watching Family Guy on TV. I was scrolling through the news and saw another shooting with ICE, a little a mile away from where I was.
3. I bundled up and drove down there to see what happened.
4. I parked my car around noon, 2615 Stevens Avenue in Minneapolis is where I parked.
5. I walked up to the corner of an intersection to see what was going on.
6. Immigration and Customs Enforcement "ICE" was in the middle of the intersection. A few protesters were on the opposite side of the street of me; a few were on my side. Mostly it was people watching, not protesting.
7. Shortly after I arrived, as I was standing on the sidewalk, not recording with my phone, not protesting, not yelling, not blowing a whistle, just watching; I started to notice these heavily geared-up Border Patrol "BP" agents looking at me up and down and start communicating to their colleagues.
8. While staring down the barrel of an M4, I was roughly arrested, handcuffed and after a number of back and forth between themselves from the present agencies confirming I wasn't one of their undercover agents; I was put into an SUV and driven to the Whipple Building where I learned there is an entire jail.
9. I was shackled hands and feet, photos taken, my face scanned, and physically forced without my consent to do a DNA sample. My cell phone was cloned. I was not Mirandized. I was then thrown into a cell for 7-8 hours until I was released, without charges, with my disassembled, permitted and lawfully carried firearm.

10. This is why I believe I was targeted. Because I was legally carrying a firearm like Alex was.
11. During my time while being arrested on the sidewalk and through detention at the Whipple building, I was mocked, made fun of, and questioned, ironically, a number of times by BP and ICE and HS as to why I was “LARPing [live action role playing, a term used by gamers] and wearing MARPAT.”
12. MARPAT is the camouflage pattern of the pants I was wearing when I was arrested, which were issued to me when I volunteered to serve in the United States Marine Corp. infantry where I did two combat tours in Iraq and Afghanistan. I have an honorable discharge, good conduct medal, navy and marine corps achievement medal, and a combat action ribbon among other awards.
13. I was kept in a cell with a half dozen other individuals, some with significant injuries to their heads and faces and most, not all, were denied medical attention.
14. While I did not ask if anyone was a citizen or non-citizen, these detainees all appeared to be citizens as they were white men from Minneapolis, Minnesota for the most part. Everyone but one man was White, one was Native. We talked about this.
15. I had to ask a number of times for water and when they finally gave us some, they provided three bottles for all of us, seven or eight in total. I didn't drink as there were others who needed it much more than I, especially those who were tear-gassed and maced.
16. I was eventually released after 7-8 hours, out into the cold night without a jacket and had to take a train back downtown. I was released out of a side door. I had to have an attorney pick me up and drive me back to my car.
17. I could not fall asleep again until Thursday January 29, 2026, when I was able to get a full night's sleep.
18. Here I was, validly carrying a gun with my permit to carry. A block away from where a man was murdered for it. I was arrested for simply having that gun, which was returned to me:

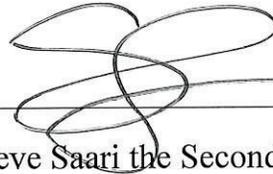


19. Something I hold close to myself is an ethos drilled into me from the Marines “Keep your honor clean.” Whether it’s serving my country abroad, my community as a medic at homeless camps or food drives, or as a loving boyfriend; I’ve kept and continue to keep my honor clean. This is why despite the fear of retaliatory consequences I am coming forward.
20. A video of my arrest supporting what I have said about it exists and has been provided to my attorney Shauna Kieffer.

21. No one has threatened me or forced me to give this statement. I received no compensation, money or otherwise for this statement. I am not suicidal.

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

Dated and signed on JAN 30, 2026 in Hennepin County, State of  
Minnesota.



Steve Saari the Second

NOTARY STAMP:



NOTARY SIGNATURE:

