

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

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 ABIGAIL SALM

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.

I, Abigail Salm, declare as follows:

1. I am a resident of the Elmwood neighborhood of St. Louis Park, Minnesota where I live with my partner. I've lived there for about five years. I work for a Fortune 500 company.
2. On January 9, 2026, at around 12:30 p.m., I learned there was ICE activity at Knollwood Mall. I decided to head over to observe. As I got close, I saw multiple ICE vehicles pulling out of the mall going west. The cars had Texas plates and I could see there were masked men inside through the front windshields. I decided to follow them so that when they made their next arrest or stop, I could film it and get the names of anyone arrested.
3. We were on Hwy 7 going west. The ICE cars got in the left turn lane at the intersection with Blake Rd., so I got in the left turn lane. Another car was between ICE and my car in the turn lane, I think they were also observing.
4. We all turned left when the light turned green and went south on Blake Rd. Right after the next intersection, the ICE car sped up and then slammed on its brakes quickly as if to cause the car between us to hit the back of the ICE vehicle.
5. I stopped, and because I thought I may have just witnessed an accident, put my car in park. I watched as agents got out of the ICE car and asked the driver and passenger of the observer car to get out.
6. I decided to film what they were doing. An agent walked over to me and I said, "Shame on you."
7. He looked at me and said, "Listen, have y'all not learned from the past couple of days?" I asked, "Learned what? What's the lesson you want us to learn?"
8. He said, "Following federal agents..." and grabbed my phone out of my hand. I told him to give me my phone back. He told me I needed to leave. I said I wasn't going to leave without my phone. He said, "You need to leave now or you're going to be arrested." I asked what I was being arrested for, and he told me that I was blocking traffic. When I told him to give me my phone back again, he said "Ok, you're under arrest" and grabbed me, slammed me down on the hood of my car, and handcuffed me.

9. He pushed me over to one of their trucks they had parked in front of the laundromat nearby and forced me up against it. He was behind me and said something like, “You don’t look like you could be more than 18 years old. Is this how you want to die? With a fucking bullet in your skull?”
10. I said, “Fuck you,” and he grabbed my collar behind my neck and tightened it against my throat. I felt like I was choking. I said, “I can’t breathe.” I said it again. He didn’t say anything.
11. Observers came over. I told them to call the police.
12. Agents told me to get on the ground. I saw that one had a gun, so I got down on the ground faster than I’d ever done anything before. I thought I was going to get shot. I learned later it was a rubber bullet gun, but I didn’t know, I thought it was a regular gun.
13. I started to hyperventilate, but didn’t have my inhaler. I couldn’t breathe.
14. The original agent who grabbed me and choked me came over and pulled me up by my collar. He said, “We’re gonna let you go. But first: have you learned your lesson?” I said, “What, that you’re domestic terrorists? Fuck you.”
15. The agent replied, “Oh, we were going to let you go. But not now” and I ended up back on the ground.
16. I don’t know how long I sat there, crying. Apparently while I was on the ground, they shot people who were videotaping with rubber bullets.
17. Eventually, an agent came over and yanked me up so forcefully and quickly that I fainted. I have Postural Orthostatic Tachycardia Syndrome (POTS), a blood circulation disorder where my autonomic nervous system fails to properly regulate heart rate and blood flow and causes me to faint if I get up too quickly.
18. I came to and heard them laughing. “See? She’s faking” one of them said.

19. Then two agents pulled me up and I fainted again. When I came to, I wasn't cuffed anymore. There was an ambulance, but they never came to talk to me. I don't know why. I guess the agents sent it away.
20. While I was still on the ground, I watched an agent walk over to my car and take my phone off the hood and put it in his pocket. Still dizzy, I got up and walked over to the agent and told him to give me my phone. He pointed at the one brown person in the crowd and said, "That guy took it."
21. I said, "No he didn't, you did" and pointed at the one I saw take it. We spent 10-15 minutes going back and forth until he finally went over to my car and pretended to "find it" there.
22. As soon as I got my phone, I walked over to the group of people observing and they gave me water and blankets.
23. The two men whose car had hit the ICE vehicle were off to the side, cuffed, but generally left alone by the agents. The agents focused on me the whole time, they kept asking if I had learned my lesson. I'm 5'5", 120 pounds, not much of a threat. But they had (someone told me) nine cars of agents there surrounding me.
24. I didn't sleep at all Friday night. I couldn't eat for more than 24 hours. I tried to go outside and had a panic attack. I've kept our blinds shut and checked the door locks a hundred times. I know they probably don't care about me anymore, but I can't help it. I keep seeing the agent's face.
25. Today I can't imagine going out to observe, but I know I'll be participating in observing and protesting again. I probably won't go observe alone.
26. Ever since more agents got here and Renee Good was killed, tensions have been high. When I went outside, I didn't feel safe today. That isn't normal. It feels bleak, like there's no end in sight, like ICE will always be here. The thing I keep thinking about is that I'm so lucky to be home right now with my cat and tea. At least I'm not at the detention center. At least I'm not dead or disappeared.

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

Dated and signed on 11/01/2026 in Hennepin County, State of Minnesota.



Abigail Salm (Jan 11, 2026 21:13:44 CST)

ABIGAIL SALM