

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

Plaintiffs,

**DECLARATION OF BRANDON
SIGUENZA**

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, Brandon Siguenza, declare as follows:

1. I am a resident of the Uptown area of Minneapolis, Minnesota. I've lived there with my wife for about 8 years. I'm a special education teacher at a middle school.
2. On Sunday, January 11, a fellow member of my community group picked me up to do some ICE watch. We connected with our community group and started driving. After about 40 minutes, we heard there was ICE activity at 42nd St. and 16th Ave. in South Minneapolis and headed over.
3. As soon as we got there, I started recording. I saw an SUV parked in the middle of the road, kind of sideways. Non-ICE cars were honking their horns. The ICE SUV swung around and headed south on 16th.
4. We followed that SUV and another one for about half a block down 16th. They stopped, and men in tactical gear got out. They were wearing masks so we couldn't see their faces. My partner kept saying that we weren't impeding and that they could pull forward. One agent said "this is your warning." The same agent went back to his car and got a can of pepper spray. He sprayed it into our car's vent. Another agent was recording us.
5. They went back to their cars and drove off. We followed. After maybe 20 more feet, they stopped again and got out of their cars.
6. The agents surrounded our car. One said "Sir, you're under arrest." Then, without warning, they smashed my window and Patty's almost simultaneously. The glass fell around me. I kept my hands up. One agent said, "Get out of the car. Get the fuck out of the car." I waited for them to tell me what to do. The agent knocked my phone out of my hand.
7. The masked agent opened the door and started trying to pull me out. But my seatbelt was on, so he couldn't pull me out. He clicked my seatbelt off and dragged me out. He put my arms down behind me and cuffed me. I said "Sir, I have my passport." He responded, "Shut the fuck up." Then they told me I was under arrest "for impeding operations." According to the agent, we "were warned, this is a U.S. government operation, and you guys then conceded to impede operations."
8. An agent took my whistle and said, "This is mine now, I'll be using this later."

9. They put me in one of the vehicles and drove me to the Whipple Building. It made me think about the Latin American dictatorships we studied in college to be put in an unmarked car like that with masked agents. It all felt so surreal—I even made small talk with them.
10. They didn't buckle me in and said they couldn't loosen my cuffs until we got to where we were going. The driver was on her phone most of the time she was driving. At one point, the male passenger agent reached into the backseat and retrieved what looked like a driver's license from a laptop that was on the seat next to me.
11. When we got to the Whipple, I saw people—only black and brown people—lined up in a garage for processing.
12. There was one table with a placard that said “obstruction.” I went into that line. The agents took my passport out of my coat, ran it, determined I was a citizen, put it in a bag, and gave me a coat check ticket. They brought me to a cell, told me to take off my boots and shoelaces, and put shackles on me.
13. I was being led around by two Special Agents, one name William something and another last name Garcia. I got the impression he was training her, but it was all very chaotic and unprofessional. They couldn't get into my cell, for example. No one seemed to be able to open doors they needed to.
14. They put me in a smaller room for an interrogation. This was the first time anyone showed me a badge of any kind or identified themselves as some sort of law enforcement officer. The agent read me my rights from a piece of paper and asked if I wanted to speak with them. I said, “No, thank you.” He gave me a piece of paper listing my property and told me I could make a phone call using his phone because they couldn't figure out how to dial out from the phone there. I called my wife.
15. The agents brought me back to my cell and I sat there for an hour or two. My throat was irritated from the pepper spray, so I hit the intercom and asked for a bathroom break and for water. I was told someone would come along. No one did.

I hit the intercom again. This repeated for several hours. I banged on the door to ask people passing by to help me. No one had a key.

16. Sometime later, a man in a black shirt came in and said he wasn't ICE, but HSI. He didn't give his name. He asked about my motivation and if I knew anyone that would place bombs or snipe ICE agents. I don't understand how they can believe that our motivation is to do anything but document their abuses peacefully. They are the ones beating people, they are the ones shooting people.
17. He took me to the bathroom, which was filthy. The TP was wet, there wasn't any soap. As I went past different cells, I saw a lot of really sad people. There was no room for people to lie down. People were screaming, crying, wailing. The Minnesotans I saw in the cells were Black and Brown. The only white people I saw were federal employees.
18. I saw and heard a lot of agents joking and laughing. One group of agents was watching a woman use the bathroom.
19. At one point they brought another man to my cell. He was hurt, clutching his ribs and wincing. He was never offered medical assistance that I could see. I later saw a video of his arrest—it was brutal. He was a legal resident, who'd lived in the U.S. for 23 years.
20. Three special agents came in to talk to him. After they'd spoken for about 20 minutes, they wanted to talk to me. They brought me to larger cell, sat me down on a concrete bench, and made small talk. One, a Latino man from Texas, was named Alphonso. The second, named Ari, had darker skin than me. The third was a white man whose name I don't remember.
21. Alphonso asked for the names of any protest organizers I knew. I said I didn't know any. He said he wanted to figure out my motivation. I told him "I want to protect my neighbors. "Oh your neighbors, where are they from?" he asked, as if trying to get me to name names of immigrants. I clarified that I meant my community. He wanted me to give them the names of undocumented people, and vaguely hinted that they could help me if I had family that needed the right documents or needed to get into the country. He could maybe even give me money.

22. I was stunned. It was hard to process what he was saying. I just told them again “No, thank you.” I was very polite. Alphonso said he was just sitting bored in his hotel room and said I could call him any time.
23. Then they brought me back to the cell for a while longer until they said that a lawyer was here to see me. They put us in a room together but said they couldn’t shut the door.
24. Finally, they decided to let me out. Agents brought me out through the building and walked me to where the protest was happening. They wouldn’t let me use a phone, and it was nighttime. My phone had been knocked out of my hand when they broke the windows and arrested us, so I didn’t know what exactly to do.
25. After they led me to where the protesters were, I thought “OK, I can see if someone will let me use their phone.” I was standing on the sidewalk as instructed by the agents. Then I heard someone say over a bullhorn “Stay on the other side” and I got hit by what I think was a pepper ball. The gas got into my lungs. I ran away, and found Patty.
26. It felt really unfair. I was standing where they said to be, where they took me when I was released, and then they punished me for it.
27. This doesn’t feel like law enforcement. It feels like terror. I’m a teacher of kids who are afraid to come to school and are missing days and weeks of class. My dad is a naturalized citizen who now has to carry his passport around wherever he goes.
28. I feel like it’s my job to tell this story so people will know what happened here, but I’m afraid. I had a nightmare the night it happened—I don’t remember the last time I had a nightmare. The other day I was at my mom’s house and heard a knock at the door. I thought it was them, coming back for me. They took pictures of me. They know where I live, and I’ve told the media about what happened.
29. But I can’t imagine what people who aren’t citizens are feeling, so I will continue to observe what they’re doing. I do it because I object to how they’re racially profiling people, how they’re hurting people. Observing both documents their

unlawful actions and lets them know we disagree, that we are watching what they do. Democracy dies in darkness.

30. I love my community. I love my city. I love Minneapolis. What we are doing to help one another during this time is beautiful. It gives me hope. The least we can do is try to keep federal agents from disappearing people without a trace—documenting where they take our neighbors helps their loved ones know what happened.
31. The other day, a woman messaged me on Facebook. There was a picture of a man, and she asked, “Did you see this man while you were in detention?” I cried.

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

Dated and signed on Jan 19, 2026 in Hennepin County, State of Minnesota.

Brandon Siguenza

Brandon Siguenza (Jan 19, 2026 18:27:52 CST)

Brandon Siguenza