

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

STATE OF MINNESOTA, by and through its  
Attorney General Keith Ellison, CITY OF  
MINNEAPOLIS, and CITY OF SAINT  
PAUL,

Plaintiffs,

v.

Civ. No.: 0:26-cv-00190-KMM-DJF

KRISTI NOEM, in her official capacity as  
Secretary of the U.S. Department of  
Homeland Security; JOHN CONDON, in his  
official capacity as Acting Executive  
Associate Director of Homeland Security  
Investigations; U.S. Department of  
Homeland Security; TODD LYONS, in his  
official capacity as Acting Director of U.S.  
Immigration and Customs Enforcement;  
MARCOS CHARLES, in his official  
capacity as Acting Executive Associate  
Director, Enforcement and Removal  
Operations; U.S. Immigration and Customs  
Enforcement; RODNEY SCOTT, in his  
official capacity as Commissioner of U.S.  
Customs and Border Protection; U.S.  
Customs and Border Protection; GREGORY  
BOVINO, in his official capacity as  
Commander of the U.S. Border Patrol; U.S.  
Border Patrol; DAVID EASTERWOOD, in  
his official capacity as Acting Director, Saint  
Paul Field Office, U.S. Immigration and  
Customs Enforcement,

Defendants.

**DECLARATION OF  
KATHERINE BIES**

I, Katherine Bies, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am one of the attorneys of record appearing on behalf of the State of Minnesota in this matter. I submit this declaration in support of Plaintiffs' Motion for a Temporary Restraining Order based on my review of social media posts, communications by the Trump administration, and news reports.

2. Attached as Exhibit 1 is a true and correct copy of correspondence sent by U.S. Attorney General Pam Bondi to Governor Walz on January 24, 2026. In the letter, AG Bondi references Operation Metro Surge and calls on the Governor to "restore the rule of law, support ICE officers, and bring an end to the chaos in Minnesota" by: (1) sharing all Minnesota's records on Medicaid and Food and Nutrition Services programs, including Supplemental Nutrition Assistance Program data with the federal government; (2) repealing "sanctuary policies" and directing all detention facilities to "cooperate fully with ICE"; and (3) providing Minnesota's complete, unredacted voter rolls to the Department of Justice.

3. In addition to the correspondence referenced in Exhibit 1, the State of Minnesota submits the following statements by Trump administration officials as relevant to Plaintiffs' Motion for Temporary Restraining Order.

4. Exhibit 2 is a true and correct copy of an X post by President Donald Trump on the White House account (@WhiteHouse) (Jan. 24, 2026 at 1:37 p.m.), available at <https://perma.cc/SLR5-SKMY>.

5. Exhibit 3 is a true and correct copy of an X post by Vice President J.D. Vance (@JDVance) (Jan. 24, 2026 at 1:31 p.m.), available at <https://perma.cc/E89S-3Z2S>.

6. Exhibit 4 is a true and correct copy of an X post by AG Bondi (@AGPamBondi) (Jan. 24, 2026 at 3:09 p.m.), available at <https://perma.cc/725K-C5QL>.

7. Exhibit 5 is a true and correct copy of an X post by Rapid Response 47, the Official White House Rapid Response account (@RapidResponse47), sharing statements by Defendant Noem at a press conference (Jan. 24, 2026 at 4:53 p.m.), available at <https://perma.cc/MR4A-9ZYA>.

8. Exhibit 6 is a true and correct copy of an X post by Rapid Response 47 (@RapidResponse47), sharing statements by Defendant Bovino at a press conference (Jan. 24, 2026 at 1:23 p.m.), available at <https://perma.cc/QUW8-D32R>.

9. Plaintiffs further submit the following additional pieces of public reporting as relevant to Plaintiffs' Motion for Temporary Restraining Order.

10. Attached as Exhibit 7 is a true and correct copy of a Star Tribune article entitled "Agents detain and send 2-year-old girl and her father to Texas despite court order to release toddler" (Jan. 23, 2026), available at <https://www.startribune.com/agents-detain-and-send-2-year-old-girl-and-her-father-to-texas-despite-court-order-to-release-toddler/601569252> (last accessed Jan. 25, 2026).

11. Attached as Exhibit 8 is a true and correct copy of a Star Tribune article entitled "Witnesses dispute DHS claim that 5-year-old was 'abandoned' prior to ICE detainment" (Jan. 23, 2026), available at <https://www.startribune.com/witnesses-dispute->

[dhs-claim-that-5-year-old-was-abandoned-prior-to-ice-detainment/601569307](https://www.fox9.com/news/mn-sheriff-says-ice-was-too-busy-twin-cities-pick-up-child-predator) (last accessed Jan. 25, 2026).

12. Attached as Exhibit 9 is a true and correct copy of a Fox News article entitled “MN sheriff says ICE was too busy in Twin Cities to pick man accused of sex crime” (Jan. 21, 2026), available at <https://www.fox9.com/news/mn-sheriff-says-ice-was-too-busy-twin-cities-pick-up-child-predator> (last accessed Jan. 25, 2026).

Executed this January 25, 2026 in Washington D.C.,

/s/ Katherine Bies  
Katherine Bies (Attorney No. 0401675)