

records, and/or communications with appropriately knowledgeable persons:

1. I have served as the Mayor of the City of Minneapolis since 2018.

2. Minneapolis is the largest city in Minnesota and one of its most diverse. And Minneapolis's immigrant neighbors are a vibrant and important part of the community we call home. As a Welcoming City, Minneapolis makes it clear that everyone — regardless of immigration status — deserves to feel safe, respected, and included.

3. Public trust in local law enforcement is paramount to effective community policing and the City, including the Minneapolis Police Department, is dedicated to community policing as a means of reducing crime while building community trust. If Minneapolis personnel were to enforce federal immigration laws for the federal government, it would squander limited municipal resources, have deleterious effects on public safety, and have a chilling effect on immigrant populations' willingness to report crime and cooperate with the City's public safety efforts. For that reason, the City has a formal Separation Ordinance that clarifies that the City's finite resources are to be used to advance the health and safety of all of the Minneapolis community, and not to enforce federal immigration law.

4. Since it commenced in December 2025, Defendants' so-called "Operation Metro Surge" has had a colossal negative impact on the City of Minneapolis and its resources, and the communities the City serves.

5. Defendants' tactics erode hard-earned community trust being rebuilt by Minneapolis police day by day-- particularly where the tactics being used by Defendants' agents are at odds with the carefully developed, trained, and enforced policies designed to increase that

trust, like impartial policing and de-escalation.

6. Since Operation Metro Surge began, we have been worried that the worst would happen -- that someone would be killed in Minneapolis during an encounter between the community and Defendants' agents. On January 7, 2026, that fear came true with the tragic fatal shooting of Renee Nicole Good.

7. I also fear for the safety of our police officers who are being called too often to respond to situations related to Defendants' immigration enforcement activities, where tensions are high between community members and federal immigration agents, and people on the scene, including federal agents, are armed.

8. Following Ms. Good's death, Minneapolis's communities are experiencing pain and anger toward the Trump Administration's immigration enforcement agenda, exacerbated by the continuing escalating, militarized and reckless actions of Defendants' agents in Minneapolis. This pain and anger have motivated community members to exercise their First Amendment rights of assembly and protest, including through several marches and vigils on and since January 7, 2026. The City is expending significant resources so that gatherings of community members exercising their First Amendment rights are safe and peaceful. The City's substantial efforts providing for public safety are having the effect of preventing Defendants from achieving their goal of creating chaos and engineering a pretext to deploy the military in Minneapolis.

9. Due to the need to be available to keep the peace at protests and to respond to the aftermath of Defendants' immigration enforcement incidents to protect public safety and

deescalate community tensions around those activities, Minneapolis Police Department (“MPD”) informed all sworn staff on January 7, 2026, that any scheduled days off would be cancelled through at least January 11, 2026. Approximately 983 scheduled days off were cancelled due in some way to Defendants’ immigration enforcement activities in Minneapolis. In addition, for the same reasons, officers are working longer shifts, extending past their 8- or 10-hour shifts. These changes have impacted MPD’s officers’ personal lives and leave them exhausted.

10. Another burden is the sheer cost of overtime for MPD officers in connection with Operation Metro Surge in Minneapolis. On January 7, 2026, the Minneapolis Police Department created a new overtime code for officers working overtime to provide public safety in response to Defendants’ immigration enforcement activities in Minneapolis. According to a report run early on January 9, 2026, since the code was created, more than 3000 hours of officer overtime was entered, at time-and-a-half. As of January 9, 2026, the estimated overtime amount MPD will pay for the date range of January 8 through January 11, 2026, was approximately \$2,477,859, but the final cost will depend on what response is required to handle the impact of how Defendants are carrying out immigration enforcement activities in Minneapolis.

11. MPD recently created a full-time position specifically dedicated to monitoring public safety needs due to Defendants’ immigration enforcement activities during the daytime hours. This has been in operation since December 18, 2025. This position is staffed by police lieutenants and is often augmented by one or two additional sergeants per day. Since the fatal

shooting on January 7, 2026, an additional lieutenant has been assigned during nighttime hours.

12. Minneapolis SWAT personnel and Strike Team personnel have been on paid on-call status since December 19, 2025, prepared to respond to public safety needs due to Defendants' immigration enforcement activities. The Unmanned Aerial Vehicle Team was also placed on paid on-call status on January 7, 2026.

13. Since January 7, 2026, MPD has observed a marked increase in the utilization of health and wellness resources, with MPD officers accessing contracted therapeutic services at rates significantly above baseline. Commonly reported responses include heightened hypervigilance and fear. For MPD officers who were present during the 2020 unrest, the January 7 incident has triggered re-traumatization as they resume operational duties amid concerns of potential instability. Officers who joined the department after 2020 have reported similar emotional impacts, having experienced prior unrest as community members. While comprehensive data is not yet available, there is a legitimate concern that the cumulative psychological impact of responding to Operation Metro Surge may contribute to increased attrition, as officers confront the destabilizing effects of actions by external actors on the community they are sworn to protect.

14. MPD has at least six officers who have been injured during responses to Defendants' immigration enforcement activity.

15. Another impact of Operation Metro Surge in Minneapolis is that MPD officers responding to public safety needs caused by Defendants' immigration enforcement activities prevents those officers from responding to other 911 calls from the communities MPD serves.

On January 7, shortly after 10:00 am, all priority-2 and priority-3 911 calls were put into “pending” status because MPD officers were responding to activities following the ICE fatal shooting of Ms. Good. Ultimately, close to 95 officers responded to the scene on January 7 to deal with the aftermath, and while they were doing so, they were not responding to 911 calls, investigating reports of crimes, or fulfilling other law enforcement duties for the communities MPD serves. Similarly, MPD administration has devoted considerable time to planning around the impacts of the manner in which Defendants are conducting immigration enforcement in Minneapolis, and that is time and attention that would otherwise be spent on making Minneapolis a safer place for people to live, work and visit.

16. Since the tragic January 7, 2026, ICE fatal shooting of Ms. Good, and due to Defendants’ continuing inflammatory tactics, the City has initiated and continues its emergency preparedness protocols, which means significant additional work for numerous City departments, from the Emergency Management Department, to Police and Fire, Public Works, Finance, Communications, my Cabinet, my staff and me, and many more, taking us all away from pressing City priorities.

17. President Trump and his messengers such as Defendant Noem and Defendant Department of Homeland Security have taken actions against Minneapolis, including through Operation Metro Surge, to punish it for its expressions of its values, its voters’ choices, its Separation Ordinance, and the First Amendment-protected activity of its elected officials.

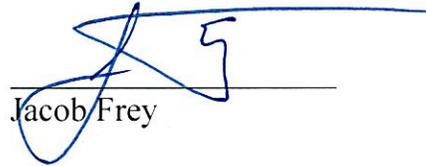
18. Minneapolis is widely considered a Democratic city. Although the position of Minneapolis Mayor is nonpartisan, I identify as a Democrat as do the vast majority of the

City's elected officials (the ballot for City elections is permitted to include a political party designation; mine has always included designation of my party affiliation, which is the Democratic Farmer Labor Party—Minnesota's Democratic party).

19. I have long been a vocal critic of the Trump Administration's agenda, as have many if not all of the other Minneapolis elected officials. I have vocally criticized the Trump Administration in the wake of the horrific fatal shooting of Ms. Good by an ICE agent, and my criticism has gotten national media attention. On the heels of that national attention, Defendant Noem announced an even larger deployment of DHS agents into Operation Metro Surge.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED this 12th day of January, 2026 in Minneapolis, Minnesota



Jacob Frey