

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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MINNESOTA BUREAU OF CRIMINAL  
APPREHENSION & HENNEPIN  
COUNTY ATTORNEY'S OFFICE

Plaintiffs,

v.

Case No. 0:26-cv-00628-ECT-DTS

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*; PAMELA BONDI, *in her official capacity as Attorney General of the United States*; KASHYAP PATEL, *in his official capacity as Director of the Federal Bureau of Investigation*.

Defendants.

**MOTION TO SEAL FBI  
DECLARATION**

Pursuant to Local Rule 5.6, Defendants hereby move to seal the unredacted declaration of an Federal Bureau of Investigation (FBI) Agent submitted in support of Defendants' opposition to Plaintiffs' motion for temporary restraining order. The declaration contains personally identifying information (PII) that, if publicly disclosed, could subject the agent and the agent's family to unwarranted attention, threats, harassment, or endanger their lives or physical safety. Public disclosure of an FBI agent's PII poses a real threat that third parties will access the information, engage in data mining, identity theft, and other crimes, and seek to inflict violence on the agent or the agent's family in retaliation for the agent's participation in a particular investigation.<sup>1</sup>

In recent days, FBI Agents working in Minnesota have been subjected to personal threats and doxxing attempts based on their work with the FBI. The Special Agent reasonably fears that public dissemination of the agent's PII through this well-publicized case could subject the agent and the agent's family to potential harm and further

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<sup>1</sup> See, e.g., Press Release, USAO, Central District of California, 10 Arrested on Federal Complaints Charging Them with Committing Violence Against Officers and Property During Anti-ICE Rioting (Oct. 29, 2025), <https://www.justice.gov/usao-cdca/pr/10-arrested-federal-complaints-charging-them-committing-violence-against-officers-and>; Press Release, DOJ, Office of Public Affairs, Tennessee Man Sentenced to Life in Prison for Conspiring to Murder Law Enforcement and Attack FBI Office (July 2, 2025), <https://www.justice.gov/opa/pr/tennessee-man-sentenced-life-prison-conspiring-murder-law-enforcement-and-attack-fbi-office>; Press Release, USAO, Eastern District of California, Vallejo Man Sentenced to 21 Months in Prison for Assaulting Federal Agents with a Firearm and Vehicle (Oct. 31, 2024), <https://www.justice.gov/usao-edca/pr/vallejo-man-sentenced-21-months-prison-assaulting-federal-agents-firearm-and-vehicle>; Press Release, USAO, Western District of Pennsylvania, Former Pitt Student Sentenced to 6 Years in Prison for Threatening Communications and Impeding and Obstructing FBI Investigation (Oct. 19, 2022), <https://www.justice.gov/usao-wdpa/pr/former-pitt-student-sentenced-6-years-prison-threatening-communications-and-impeding>; Press Release, USAO, Middle District of Florida, Neo-Nazi Convicted For Sending Gruesome Threats To Florida Officials And Their Families (Sept. 12, 2014), <https://www.justice.gov/usao-mdfl/pr/neo-nazi-convicted-sending-gruesome-threats-florida-officials-and-their-families>.

harassment. In such circumstances, sealing the Agent's identifying information is appropriate. *See, e.g., United States v. Rogers*, No. 13-CR-130 ADM/JJG, 2013 WL 5781610, at \*5 (D. Minn. Aug. 2, 2013) (finding that redaction of witness name was necessary to ensure safety).

For these reasons, the Court should seal the declaration of the FBI agent.

Dated: January 26, 2026

DANIEL N. ROSEN  
U.S. Attorney

Respectfully submitted,

BRETT A. SHUMATE  
Assistant Attorney General  
Civil Division

MICHAEL VELCHIK  
Senior Counsel to the Assistant  
Attorney General

/s/ Andrew Warden  
ANDREW WARDEN (IN #23840-49)  
Assistant Branch Director  
U.S. Department of Justice  
Civil Division, Federal Programs Branch  
1100 L Street, N.W.  
Washington, D.C. 20005  
Telephone: (202) 616-5084  
Fax: (202) 616-8470  
Andrew.Warden@usdoj.gov

*Counsel for Defendants*

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the sealed FBI declaration on the following counsel for Plaintiffs via email:

Joseph.Richie@ag.State.Mn.Us

Peter.Farrell@ag.State.Mn.Us

Clare.Diegel@hennepin.Us