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**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

JOSEPH D. KIRCHNER,
Plaintiff,

Case No. 0:26-cv-00726-JWB-ECW

vs.

KEITH ELLISON, in his official
capacity as Attorney General of the
State of Minnesota,
Defendants.

**DECLARATION OF JOSEPH D.
KIRCHNER IN SUPPORT OF
EMERGENCY MOTION FOR
TEMPORARY RESTRAINING
ORDER**

I. Personal Knowledge And Identity

1. I am the Plaintiff in this action. I am over 18 years of age and competent to testify to the matters stated herein. I make this declaration based on my personal knowledge and upon information and belief where so indicated.

2. I am a citizen of the United States and a resident of the State of Minnesota. I reside at 4440 Parklawn Avenue #203, Edina, Minnesota 55435.

3. I am a Minnesota taxpayer. My state tax dollars fund Minnesota law enforcement agencies, including the Bureau of Criminal Apprehension and local police departments throughout the state.

SCANNED

JAN 29 2026

U.S. DISTRICT COURT Mpls

II. INCORPORATION OF PETITION AND EXHIBITS

4. I incorporate by reference the Petition for Declaratory Judgment and Injunctive Relief filed in this action, including all exhibits and memoranda attached thereto.

5. The factual basis for emergency relief is fully documented in the Petition and its supporting materials, specifically:

(a) The killing of Renee Nicole Good on January 7, 2026 — *See* Petition ¶¶ 41-50;

(b) The killing of Alex Pretti on January 24, 2026 — *See* Petition ¶¶ 51-56;

(c) Vice President Vance's "absolute immunity" declaration — *See* Petition ¶¶ 44-46; Exhibit C;

(d) Attorney General Bondi's letter to Governor Walz — *See* Petition ¶¶ 79-84; Exhibit E;

(e) The shadow docket pattern — *See* Petition ¶¶ 93-109; Memorandum I;

(f) *Noem v. Vasquez Perdomo*, No. 25A169 (September 8, 2025) — *See* Petition ¶¶ 60, 210;

(g) Network forensic evidence of coordinated targeting — *See* Petition ¶¶ 15-24; Exhibit G.

6. The factual allegations set forth in the Petition for Declaratory Judgment and Injunctive Relief are true and correct. Where facts are stated upon information

1 and belief, I have a good faith basis for such belief based on the sources cited in
2 the Petition and its exhibits.

3 **III. STANDING AND PERSONAL STAKE**

4 7. I bring this action not as a stranger to the controversy, but as a Minnesota
5 citizen with a concrete and particularized stake in the outcome.

6 8. As a Minnesota resident, I face the same risk documented in *Noem v. Vasquez*
7 *Perdomo*: that federal agents conducting operations under claimed authority of
8 ultra vires Supreme Court stays may seize, detain, or harm me or members of
9 my community based on constitutionally impermissible factors.

10 9. As a Minnesota taxpayer, I have a direct financial interest in ensuring that my
11 tax dollars are not used to fund state law enforcement cooperation with federal
12 operations that lack valid constitutional and statutory authority.

13 10. As set forth in the Affidavit attached to the Petition (Exhibit F), I was
14 subjected to unlawful detention and forced psychiatric commitment by
15 Minneapolis police officers—conduct explicitly characterized as intended to
16 "teach [me] a lesson."

17 11. I am the subject of network attacks specifically targeting my
18 communications with Minnesota law enforcement while gathering evidence for
19 this Petition. Network forensic evidence documents TCP RST injection with a
20 1-microsecond FIN-to-RST gap—timing physically impossible for legitimate
21 traffic. *See* Petition ¶¶ 15-24; Exhibit G.

1 **12.** Two people have been killed by federal agents in my state in seventeen days.

2 I have a personal stake in ensuring that Minnesota officials take all lawful

3 measures to prevent further deaths.

4 **IV. URGENCY**

5 **13.** Two people are dead. Federal agents continue operating in Minnesota.

6 Without judicial intervention, another Minnesotan may be killed.

7 **14.** Federal officials have announced they will intensify operations despite

8 judicial orders. Secretary Noem called a federal judge an "idiot" and declared

9 operations would not change. CBP officials stated they would "go even harder."

10 **15.** Vice President Vance has declared "absolute immunity" for federal agents—

11 a doctrine that does not exist in American law.

12 **16.** Attorney General Bondi's January 24, 2026 letter to Governor Walz—

13 demanding voter rolls, welfare records, and policy concessions on the same day

14 Alex Pretti was killed—demonstrates that federal enforcement is being paired

15 with political coercion.

16 **17.** Every day without judicial clarity is a day Minnesota law enforcement

17 officers lack guidance on their constitutional obligations.

18 **18.** I respectfully request that this Court grant emergency relief at the earliest

19 possible date.

20 I declare under penalty of perjury under the laws of the United States that the

21 foregoing is true and correct.

1 Executed on January 29, 2026, at Edina, Minnesota.

2 

3 **JOSEPH D. KIRCHNER**

4 Plaintiff, Pro Se

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