IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA

v.

ISAAC AUMAN SANT (1)
a.k.a. Isaac Dalto
a.k.a. Ike
EMMETT JAMES DOYLE (2)
a.k.a. Plotnikov
CAMERON KENNEDY (3)
a.k.a. Cam
a.k.a. Olive Knite
a.k.a. Knite
CALLUM ROBINET (4)
a.k.a. Juliet K
a.k.a. Juliet
a.k.a. Cal
ERIK DAVIS (5)
a.k.a. Errico
BRIAN STILLWELL APLAND (6)
a.k.a. Tiny
KYLE WAGNER (7)
a.k.a. Kaos
HANNAH MARGARET VAN DE WATER DAVIS (8)
a.k.a. Gabriel Van De Water
a.k.a. Nube
TREASURE CAY THORESON (9)
a.k.a. Schatzi
NATHAN JUNHO KIM (10)
a.k.a. Moon Bear
ALEC STEWART (11)
a.k.a. Mac
DOUGLAS MISTEREK (12)
a.k.a. Doug

No. CR 26-115 KMM/DTS

TO BE FILED UNDER SEAL

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U.S. DISTRICT COURT MPLS

a.k.a. D Munny Big Dog Orf Orf
DUSTIN SCOTT BEISELL (13)
a.k.a. Sparky
WILLIAM MORGAN (14)
a.k.a. Willow
a.k.a. Willow Tree
NATASHA RAKOTZ (15)
a.k.a. Anuran

Defendants.

INDICTMENT

The United States Grand Jury charges:

COUNT ONE
Conspiracy to Impede or Injure a Federal Officer
(Violation of 18 U.S.C. § 372)

The Conspiracy

1. From in and around January 2026, through in and around June 2026, in the District of Minnesota and elsewhere, the defendants, **Isaac Auman Sant, a.k.a. Isaac Dalto, a.k.a. Ike ("SANT"); Emmett James Doyle, a.k.a. Plotnikov ("DOYLE"); Cameron Kennedy, a.k.a. Cam, a.k.a. Olive Knite, a.k.a. Knite ("KENNEDY"); Callum Robinet, a.k.a. Juliet K, a.k.a. Juliet, a.k.a. Cal ("ROBINET"); Erik Davis, a.k.a. Errico ("DAVIS"); Brian Stillwell Apland, a.k.a. Tiny ("APLAND"); Kyle Wagner, a.k.a. Kaos ("WAGNER"); Hannah Margaret Van De Water Davis, a.k.a. Gabriel Van De Water, a.k.a. Nube ("VAN DE WATER DAVIS"); Treasure Cay**

Thoreson, a.k.a. Schatzi ("THORESON"); Nathan Junho Kim, a.k.a. Moon Bear ("KIM"); Alec Stewart, a.k.a. Mac ("STEWART"); Douglas Misterek, a.k.a. Doug, a.k.a. D Munny Big Dog Orf Orf ("MISTEREK"); Dustin Scott Beisell, a.k.a. Sparky ("BEISELL"), William Morgan, a.k.a. Willow, a.k.a. Willow Tree ("MORGAN"); and **Natasha Rakotz, a.k.a. Anuron ("RAKOTZ") ("the Defendants"),** did knowingly conspire, with other persons known and unknown to the Grand Jury, to prevent by force, intimidation, and threats, officers and employees of the United States Department of Homeland Security" ("DHS"), which includes United States Immigration and Customs Enforcement ("ICE"), from discharging the duties of their officers, in violation of Title 18, United States Code, Section 372.

2. The Defendants were members and associates of Twin Cities Direct Action ("TCDA"), which later changed its name to Direct Action Minnesota ("DAMN"), an organization dedicated and committed to direct action against federal law and immigration enforcement. Direct action refers to disruptive and obstructive tactics used by participants to forcibly challenge, block, or stop immigration raids, detentions, and deportations. DAMN describes itself as, "…as a decentralized coalition of working-class people engaged in various forms of community defense against the current Federal Occupation happening within the wider metro area, and against state and a far-right violence more broadly." DAMN also trains its members in the use of shields against law enforcement, surveillance, event planning, role differentiation, and rapid mass mobilization against ICE enforcement actions.

3. DAMN is comprised of members from several sub-groups, such as the Black Cat Worker's Collective ("BCWC"), Ray Rainbolt Memorial Shooting Club, and other organizations.

4. Many self-proclaimed "antifascist" or "Antifa" groups in the United States exist at the local level, in small units called affinity groups. Antifa groups frequently blend anarchist and communist views. BCWC is a Minneapolis-based Antifa affinity group committed to militant class struggle, community self-defense, and revolution. Militant class struggle includes disrupting rallies, digital campaigning, community organizing, and physical confrontation, often justified as collective self-defense. BCWC members advocate, promote, and utilize militant tactics and violence. BCWC members are intricately involved in the planning and execution of direct actions. The Ray Rainbolt Memorial Shooting Club is another Minneapolis-based Antifa affinity group dedicated to "community self-defense."

5. DAMN members worked closely with rapid response networks ("RRNs") to identify and harass federal immigration and law enforcement officers in order to harass and prevent officers from performing their official duties. RRNs are "inherently militant" with the "explicit aim of combating and stopping a federal agent with a gun." DAMN members utilize the Whipple Watch Signal group chat, which facilitates the identification of federal immigration and law enforcement vehicles and documents identifying information, such as license plate numbers, in databases. The databases include information like whether a vehicle has been identified as belonging to federal law enforcement, when it was last seen,

how many times it was seen, the kinds of activities it was engaged in, if it was in a caravan, and if someone saw federal agents with tactical gear inside, all to help determine how aggressive the response to that particular vehicle should be. DAMN members often rely on information and intelligence produced by the Whipple Watch and other Signal group chats to target, harass, and confront federal immigration and law enforcement officers. Once someone relays information about a federal immigration or law enforcement officer's location, "dispatchers" relay "verified" information to "commuters," who deploy to the identified area to interfere with, prevent, hinder, delay, impede, and directly confront federal immigration enforcement, including "de-arresting" people that federal law enforcement have arrested. "Commuters" follow federal immigration enforcement officers from locations, like the Bishop Henry Whipple Federal Building ("Whipple Building"), to the officers' residences and other locations. "Commuters" often work with "co-pilots," who communicate with "dispatchers" in real-time. "Dispatchers" relay identifying information about immigration and law enforcement vehicles to "commuters" and "co-pilots." DAMN members often engage in "commuting" tactics with other members.

6. DAMN worked closely with other direct action groups, Antifa affinity groups, RRNs, and other organizations to plan for and execute certain direct actions. DAMN infiltrated and exploited lawful protests to more efficiently carry out its direct actions targeting operations involving ICE as well as supporting federal and state law enforcement. DAMN relied upon otherwise lawful protesters and "strength in numbers"

to distract law enforcement and enable DAMN members to carry out its direct action operations.

Purposes of the Conspiracy

7. The purposes of the conspiracy include the following:

a. Preventing the enforcement of federal immigration law by force, intimidation, and threats;

b. Opposing the authority of the United States government;

c. Preventing, hindering, or delaying by force the execution of the laws governing the identification, detention, and removal of non-citizens, to include the Immigration and Nationality Act; and

d. Preventing, impeding, and interfering federal law enforcement from discharging their duties, including enforcement of federal immigration law by force, intimidation, and threats.

Manner and Means of the Conspiracy

8. **SANT, DOYLE, KENNEDY, ROBINET, DAVIS, APLAND, WAGNER, VAN DE WATER DAVIS, THORESON, KIM, STEWART, MISTEREK, BEISELL, MORGAN,** and **RAKOTZ,** with others whose identities are known and unknown to the Grand Jury, carried out the conspiracy through the following manner and means, among others, by:

a. Coordinating anti-law enforcement actions using RRNs, whose members and associates use social media, text messaging, and encrypted messaging

applications, such as Signal Messenger, to communicate with coconspirators and others;

b. Preparing, coordinating, and executing direct actions and blockades to forcibly obstruct federal immigration enforcement operations at the Whipple Building;

c. Advocating and promoting direct action against ICE and other law and immigration enforcement working in Minneapolis and the surrounding area;

d. Utilizing "hard blockades" at or around the Whipple Building and throughout the Minneapolis area to forcibly obstruct and impede federal law and immigration enforcement actions. Members of the "hard blockade" team use debris (wood, leaf blowers, etc.), vehicles, trailers, Czech hedgehogs (a static obstacle made of metal angle beams), and other items to obstruct the roads used by law enforcement near the Whipple Building to impede the movement of federal law enforcement and immigration officers;

e. Utilizing "soft blockades" at or around the Whipple Building and throughout the Minneapolis area to forcibly obstruct and impede federal immigration enforcement. Members of the "soft blockade" team wield homemade shields constructed from plastic, wood, and metal to physically resist the efforts of law enforcement, and to aggressively "wedge" or break through teams of officers on foot;

f. Employing "hard" and "soft" security to counter purported "fascists" or counter-demonstrators. "Hard security" includes members that are more confrontational and prone to physical violence. "Soft security" includes members utilizing de-escalation techniques;

g. Conducting after action reviews ("after actions" or "AARs") following planned direct actions to develop best practices;

h. Utilizing social media, text messaging, encrypted messaging application, and word of mouth to advertise and promote specific direct actions;

i. Coordinating with other groups and organizations—Melt the Ice, Week of Action, BCWC, Ray Rainbolt Memorial Shooting Club, and others—to plan and prepare for direct actions;

j. Operating working groups for specific direct actions where members of the conspiracy develop, plan, and rehearse roles and operations for specific direct actions targeting federal law and immigration enforcement;

k. Conducting targeted trainings and "dry runs" for participants to develop, plan, and rehearse roles, the use of shields, "de-arrest" tactics, and other strategies aimed at impeding federal law and immigration enforcement;

l. Utilizing counter-surveillance tactics to inform members about the activities of law enforcement at or around the Whipple Building;

m. Engaging in "community self-defense," which is a decentralized, militant approach to opposing groups it perceives as fascist as well as local and federal law enforcement;

n. Utilizing and practicing "operational security" or "OPSEC," such as collecting members cell phones during meetings to prevent recordings;

o. Utilizing "commuting" tactics, which include identifying, following, surveilling, harassing, and confronting federal immigration enforcement with the goal of preventing, hindering, delaying, and impeding the enforcement of federal immigration law; and

p. Training other direct action and Antifa affinity groups throughout the country about how to forcibly obstruct, prevent, delay, hinder, and impede federal immigration enforcement operations;

Overt Acts

9. In furtherance of the conspiracy, and to affect the object and purposes thereof, the defendants, **SANT, DOYLE, KENNEDY, ROBINET, DAVIS, APLAND, WAGNER, VAN DE WATER DAVIS, THORESON, KIM, STEWART, MISTEREK, BEISELL, MORGAN,** and **RAKOTZ,** and others known and unknown to the Grand Jury, committed various overt acts, including, but not limited to, the following:

1) On or about January 11, 2026, **DAVIS** moderated an event called "Emergency Meeting on Resistance to ICE Operation" on Central Avenue Southeast in Minneapolis. During the meeting, attendees broke out into the

following groups based on their assigned roles for a January 23, 2026 direct action at the Whipple building: hard/blockade, soft blockade, mass commuting, civil disobedience, and march groups.

2) At the meeting, **SANT** introduced **DAVIS,** stating he was part of the Black Cat Workers Collective ("BCWC").

3) Before the meeting ended, an unindicted coconspirator created a Signal chat group called "TCDA" where individuals from the meeting joined to coordinate actions for the January 23, 2026 direct action at Whipple.

4) On or about January 13, 2026, **KENNEDY** posted on Facebook, "It's going to get much worse and non-violent ideology and our politicians aren't going to save us. We need to become ungovernable. We need to actively resist anyway (sic) we can to materially stop the Nazi occupation forces."

5) On or about January 14, 2026, at 10:03 p.m., **SANT** was present when rioters broke into Federal Bureau of Investigation ("FBI") vehicles and stole several items, including a firearm, on the northside of Minneapolis.

6) On or about January 14, 2026, at 10:09 p.m., **SANT** sent a message in the "TC DA" Signal group message, stating, "ICE is gone. Standoff here with MPD ("Minneapolis Metropolitan Police Department") in riot gear."

7) On or about January 14, 2026, **SANT** sent a message in the "TC DA" Signal group message, stating, "Some folks raided an ICE vehicle for paperwork…"

8) On or about January 15, 2026, **SANT** wrote an article for "Crimethinc", an anarchist blog that styles itself as "an international network of aspiring revolutionaries." **SANT's** article, "North Minneapolis Chases Out ICE: A Firsthand Account of the Response to Another ICE Shooting" discussed law enforcement's response to an officer-involved shooting in north Minneapolis. In the aftermath, **SANT** wrote, "…the officers lost control of the area and retreated, ceding the streets to those who had defied them." **SANT** continued, "…ICE agents abandoned several vehicles in the area. Demonstrators opened up the vehicles and found identity cards, paperwork, license plates, operational plans, tactical gear, and other items."

9) In the article, **SANT** discussed individuals breaking into an ICE vehicle. **SANT** described hearing someone yell, "This is one! This is ICE!" while pointing at a silver SUV parked on 24th Avenue North. **SANT** said he then "checked the plates against the database of ICE vehicles that activists keep, saw that she was correct, and instantly felt silly for doing clerical work in the middle of a riot." **SANT** explained that, "someone started whacking one of the side windows with the ice scraper that had been in the previous vehicle, striking it as hard as possible. After a few swings, there was a satisfying crunch as the window gave in. People around me began kicking in these windows, too. Somebody got the driver's side door open and threw a firecracker inside."

10) From on or about January 16 to on or about January 17, 2026, **APLAND** and **WAGNER** had a conversation in Signal chat. **APLAND** messaged **WAGNER,** stating, "Hey! Are you still in the cities? My comrades may be able to use your help. Do you still have that space in north…Kind of high security thing, so I want to be extremely careful if we decide to use the space, if indeed it is open. Building things. need production space. Fuck ICE." **WAGNER** responded, "Let's have a face to face conversation soon – we have resources." **APLAND** replied, "10am my place" and provided his address.

11) On or about January 17, 2026, at approximately 11:46 a.m., **DAVIS** sent a message in the "TC DA" Signal group message, stating, "ANNOUNCEMENT – PLEASE READ ** working group delegates: please post links to your groups in reply to this message after reading to the bottom** The spokes coordinating group has been meeting and we're making good progress. This message is to communicate some information, and to ask y'all to re-sort yourselves into the final action groups for Friday 1/23. UPDATE: We're all in for 1/23. We have some initial plans, but also a few challenges. So, especially if you have connections to AFL-CIO leadership or decision-makers, PLEASE ASK THEM TO FOCUS ON WHIPPLE AND NOT DOWNTOWN…"

12) On or about January 18, 2026, **WAGNER** posted a video on his Instagram account "kaos.follows," which was captioned, "I'm fundraising for other mutual aid networks and spending my resources fighting back and organizing the direct action that's getting us results…If you can't be here and want to see us take the fight to them - give me your support and help us Stop ICE now. My link is in my bio - fund community protection and anti-ICE direct action. #vivalaresistance."

13) On or about January 18, 2026, at approximately 10:15 a.m., **APLAND** sent a text message to **WAGNER,** stating "Hey Kyle! (**WAGNER**) Are you still planning on coming by this morning? Ike (**SANT**) and I are hanging out here waiting for you."

14) On or about January 18, 2026, at approximately 11:17 a.m., **WAGNER** sent a text message to **APLAND**, stating, "Here." **APLAND** also sent a text message to **WAGNER**, called him, and left a voicemail.

15) On or about January 18, 2026, at approximately 12:23 p.m., **APLAND** introduced **WAGNER** to **SANT** in the "January DIY" Signal group message. **APLAND** messaged, "Kyle (**WAGNER**), Isaac (**SANT**)."

16) On or about January 18, 2026, **SANT** posted a white flyer advertising the January 23 blockade at the Whipple Building in the "January DIY" Signal group message. The same flyer was later posted on the BCWC's Facebook page.

17) On or about January 18, 2026, at approximately 4:56 p.m., **SANT** messaged **WAGNER** in the "January DIY" Signal chat group, "Good talking today – let me know when the earliest date & time we could use that warehouse is." **SANT, WAGNER,** and **APLAND** met earlier that day.

18) On or about January 18, 2026, at approximately 4:59 a.m., **APLAND** messaged **WAGNER** on Signal, "Would it be alright/useful if I connect you with a comrade of a comrade from Chicago who has carpenter friends who want to help with shield building.

19) On or about January 18, 2026, at approximately 5:39 p.m., **APLAND** created a new Signal chat group called "New Friends" and added **WAGNER** and "Sam." **APLAND** messaged in the group, "Kyle, meet Sam. Sam is coming up from Chicago tonight to support us, also has some friend here who want to help with shield building. I learned this morning that Kyle was planning a shield build as well. Learned about Sam from my longtime California comrade, Forrest, who also happens to be on this chat."

20) On or about January 19, 2026, the BCWC's public Facebook page advertised "DIRECT ACTION TO SHUT DOWN ICE" and listed the date as January 23, 2026. The post also stated "The Whipple Building is ICE headquarters for the entire Upper Midwest. If we shut them down here, we halt the deportation machine everywhere. ALL OUT TO WHIPPLE THIS FRIDAY

(January 23, 2026)." **SANT** later posted an image of the "DIRECT ACTION TO SHUT DOWN ICE" image in the "TCDA" Signal group chat.

21) On or about January 19, 2026, at approximately 6:15 p.m., **SANT** sent a message in the "TC DA" Signal group message, stating, "I just circled around Whipple and a car and scoped it out…There were 15 Hennepin sheriff cars there, with 2 by the light rail and 2 in south lot, and all the rest near Gate 3 on Federal Dr and in the tennis building lot…We should expect and plan for at least that many sheriff vehicles to be there on Friday. Their main goal is going to be to keep us out of the street and on the sidewalk. If we have the numbers, this may be difficult for them. Every spoke should adjust their plans accordingly."

22) On or about January 20, 2026, **KENNEDY** purchased a trailer from Capital Car on Facebook Marketplace. **KENNEDY** messaged that he was borrowing a truck and could pick the trailer up the following day.

23) On or about January 21, 2026, at approximately 1:15 p.m., **SANT** received a text from U-Haul.

24) On or about January 21, 2026, at approximately 7:01 p.m., **WAGNER** sent a Signal message to **APLAND**, stating, "Did you guys want me to share the flyer for Friday." **APLAND** responded "Yes, that's public."

25) On or about January 21, 2026, at approximately 3:15 p.m., **SANT** texted an individual about "neighborhood rapid response groups," describing them as,

"extremely well-organized and have very good communication practices. Signal groups with 1000 people in them form every day, and are deleted and re-created every night. We benefit a lot from a counter-surveillance program called Whipple Watch, which is mostly what I did for the first 5 weeks of the invasion. That's people posted up at the big federal building taking pictures of ICE license plates and adding them to a publicly accessible database in real time." **SANT** continued, "There is also a lot of frustrating peace-policing, and a level of opsec that can be paralyzing. Probably 8000-10k people are volunteering to patrol their neighborhoods. When they find a kidnapping in progress, there is not a strong culture of physically resisting. Although that may be changing since Renee's murder. The most frustrating thing is when you show up at a kidnapping, and the person running dispatch tell you to stay 30ft away and take pictures. Or even worse, when they say 'Stay away from there, we have enough observers.' An ad hoc liberal coalition called Defend612 plays an outsized role. After the murder, my crew called for a mass spokescouncil about planning direct action resistance to ICE. We encountered a ton of pushback from libs in every rapid response group…"

26) On or about January 22, 2026, at approximately 8:34 a.m., **APLAND** sent a message to **WAGNER** on Signal, stating, "We do need one or two of your trucks if you can make them available. This is an essential moment, the plan

may not go forward if someone does not volunteer a truck. The trucks may not be lost, they just might be marked, plates might be compromised."

27) On or about January 22, 2026, at approximately 11:05 a.m., **APLAND** sent a message in the "Construction Invoice #7" Signal chat group, stating, "Cam (**KENNEDY**) meet Kyle (**WAGNER**). Kyle is very generously offering a truck. **WAGNER** responded "What's up – happy to help." **KENNEDY** replied, "Hey Kyle. You are a hero! We need this bad to pull off our action tomorrow." **KENNEDY** messaged, "Well, if you are willing to face possible arrest, it would be to use your truck to drive a trailer and deploy it with a small team of vetted folk to block a roadway. Time permitting-using chains to flip it. If you aren't comfortable with that, letting us borrow your truck will ensure we can make this action happen." **WAGNER** responded, "For sure can empty the truck and let it go missing…I've been urged by the community not to engage and to stay free – so I cannot get arrested…but this truck is already been stolen twice out of uptown and we're going to let that happen again today yeah?" **KENNEDY** replied, "Love it. WE have another driver lined up so that works grand…When can we pick it up…and do you have a 2 inch hitch for a trailer?" **WAGNER** messaged, "It has hitches and balls for 2 or 2 5/16….I will have it cleaned out and ready this afternoon – you can take it after I have my shit cleared out."

28) Between on or about January 22, 2026, and January 23, 2026, **APLAND** and **WAGNER** exchanged approximately 20 connected Signal calls.

29) On or about January 23, 2026, at approximately 7:01 a.m., **KENNEDY** rented a 10-foot moving van from a U-Haul location in Saint Paul, Minnesota.

30) On or about January 23, 2026, at approximately 7:09 a.m., **THORESON** was near the Jake the Plumber business in her white Subaru ("Subaru") with a black trailer.

31) On or about January 23, 2026, at approximately 7:16 a.m. **SANT** walked from the Jake the Plumber business and entered the U-Haul Moving and Storage at Hiawatha ("Hiawatha U-Haul"), which is located on Hiawatha Avenue in Minneapolis.

32) At approximately 7:21 a.m. and 7:27 a.m., **SANT** received short code text messages from U-Haul.

33) At approximately 7:30 a.m., **SANT** drove a U-Haul cargo trailer from Hiawatha U-Haul to Jake the Plumber business. Multiple individuals loaded shields into the U-Haul cargo trailer in the Jake the Plumber parking lot. During this time, **THORESON** was near the Jake the Plumber business in her Subaru.

34) At approximately 7:39 a.m, **DAVIS** sent a message in the "TC DA" Signal group message, stating, "People who are on the ground today should leave and delete this group."

35) At approximately 8:39 a.m., **THORESON** drove the Subaru with a black trailer to a parking lot in and around the northwest corner of the Whipple Building and parked.

36) At approximately 8:44 a.m., **SANT** dove the U-Haul cargo trailer to the North Park and Ride parking lot at or around the Whipple Building. **SANT** exited the U-Haul cargo trailer and walked to the Fort Snelling Light Rail station. **DOYLE** was a passenger in the U-Haul cargo carrier.

37) At approximately 8:47 a.m., a crowd gathered across from the main gate of the Whipple Building. Several of the individuals later met with **SANT** and took part in the "soft blockade" at the Light Rail Station on Minnehaha Avenue.

38) At approximately 8:48 a.m., **SANT** entered the Fort Snelling Light Rail station.

39) At approximately 8:53 a.m., seven individuals left the main gate at or around the Whipple Building and met **SANT** at the Fort Snelling Light Rail station. The group was carrying walkie talkies and wearing neon vests. **SANT** appeared to give instructions while holding a walkie talkie in his hand.

40) At approximately 8:54 a.m., **KIM** and **STEWART** were at the Fort Snelling Light Rail station. **KIM** received a radio.

41) At approximately 8:59 a.m., **DOYLE** unloaded large "ICE OUT" and Palestine flag shields from the back of the U-Haul cargo carrier in and around the North Park and Ride Parking lot to a crowd of approximately 30-40 people. **DOYLE** also passed out pieces of white 55-gallon drums and wooden items to the crowd.

42) Between approximately 9:01 a.m. and 9:03 a.m., **SANT** met with a group of individuals at the Fort Snelling Light Rail station and appears to give them directions. The group then started walking towards the North Park and Ride.

43) At approximately 9:05 a.m., **SANT** left the Fort Snelling Light Rail station and walked towards the North Park and Ride parking lot at or around the Whipple Building.

44) Between approximately 9:22 a.m. and 9:25 a.m., **SANT** provided a radio to an individual and a group wearing neon vests and holding shields and barriers from the North Park and Ride parking lot towards the soft blockade at or around the Light Rail Station on Minnehaha Avenue.

45) At or around 9:27 a.m., **DOYLE** drove the U-Haul cargo carrier away from the area of the North Park and Ride parking lot.

46) At or around 9:38 a.m., **DOYLE** drove the U-Haul cargo carrier to the area at or around **DOYLE's** residence on Snelling Avenue in Minneapolis.

47) At approximately 9:46 a.m., the group holding the shields and barriers stood side-by-side, shoulder-to-shoulder, blocking road and vehicular traffic, forming a soft blockade in the road.

48) At or around 10:01 a.m., **SANT** told individuals participating in the soft blockade that he was going to see if the other blockade was deployed. **SANT** then walked from the soft blockade towards the Whipple Building's main gate.

49) At or around 10:11 a.m., **SANT** directed individuals towards the soft blockade.

50) At or around 10:17 a.m., **ROBINET** was seen participating in the "soft blockade."

51) At or around 10:22 a.m., **SANT** spoke with a group across the Whipple Building main gate. Several individuals from the group threw large ice blocks at law enforcement vehicles and into the road at or around this time.

52) At or around 10:29 a.m., **SANT** spoke with an RRN member and then walked back to the "soft blockade."

53) At approximately 10:29 a.m., **THORESON** was participating in the "soft blockade."

54) At or around 10:32 a.m., a U-Haul cargo carrier towed a trailer that flipped over at Bloomington Road and Minnehaha Avenue North.

55) At or around 10:58 a.m., a truck, with the identifiable features of **WAGNER's** vehicle, towed the trailer that was purchased by **KENNEDY.** The trailer later crashed near the intersection of 7th Street West and South Davern Street.

56) From approximately 10:39 a.m. to 11:11 a.m., individuals near the main gate of the Whipple Building threw large ice blocks at law enforcement vehicles.

57) At or around 10:47 a.m., individuals formed a second "soft blockade' east of the Whipple Building main entrance

58) At or around 11:05 a.m., **WAGNER** posted a video to his "Kyle Wagner" Facebook account, stating, "I'm Kyle. I'm Antifa…I'm on my way to Whipple with a bunch of gas masks with filters, get in my DMs, give me a salute. And let me know how to best to get you taken care of. There's more. I have everything I can fit in the car at the moment…"

59) At or around 11:14 a.m., **SANT** left the "soft blockade" site, walked towards another individual, and then walked back to the "soft blockade" site.

60) At or around 11:18 a.m., **WAGNER** took a video of a trailer flipped over at Bloomington Road and Minnehaha Avenue North.

61) At or around 11:24 a.m., the "soft blockade" moved to the area at or around the North Park and Ride parking lot and set up in the street.

62) At or around 11:32 a.m., **WAGNER** was in the North Park and Ride parking lot in a white Chevy Blazer.

63) At or around 11:35 a.m., an unindicted coconspirator texted **WAGNER,** "Where you at? **WAGNER** responded, "I'm gonna roll down here where do you guys think you wanna park over at 10:10 or what?" The unindicted coconspirator replied, "We are figuring it out."

64) At approximately 11:37 a.m., **THORESON** drove the Subaru with a black trailer away from the parking lot in and around the northwest corner of the Whipple Building. **SANT** was a passenger in the Subaru.

65) At or around 11:42 a.m., **WAGNER** posted a video to his "Kyle Wagner" Facebook account, stating, "…I am at the North Fort Snelling Park and Ride, and we have a blockade of protesters across the street with shields prepared to stand guard here."

66) At or around 11:55 a.m., an unindicted coconspirator texted **WAGNER,** "I'm gonna b in a million pictures and I'm kinda not ready." **WAGNER** responded, "That's ok – your voice carries – be proud bb. I'm proud of you – and others will find strength in what you do." The unindicted coconspirator replied, "Did you hear me big? I got big with a guy in a plow lol." **WAGNER** texted, "…I saw you front and center with your shield yelling and heard you when I was walking up."

67) At or around 11:58 a.m., **WAGNER** sent a video to an unindicted coconspirator, which showed him driving the trailer that was tipped over at Minnehaha Avenue North and Bloomington Road. **WAGNER** texted, "We

sh*t down both the back entrances and have them trapped one way in and one way out from that north entrance." The unindicted coconspirator texted, "I wasn't even scared. I was ready to tell them to f**k off…And I did."

68) At or around 2:52 p.m., **SANT** drove the U-Haul cargo carrier from residence on Cheatham Avenue in Minneapolis and parked in front of **DOYLE's** residence on Snelling Avenue in Minneapolis. **DOYLE** entered the passenger side of the U-Haul cargo carrier and the U-Haul cargo carrier departed the area. **SANT** drove the U-Haul cargo carrier, with **DOYLE** as a passenger, to the Hiawatha U-Haul, to return it.

69) At or around 3:05 p.m., **SANT** drove the U-Haul cargo carrier to the Hiawatha U-Haul. **DOYLE** was in the front passenger seat of the U-Haul cargo carrier.

70) On or about January 23, 2026, at approximately 12:20 p.m., **SANT** sent a message in the "TC DA" Signal group message, stating, "I got out and I'm home safe. We held the intersection at Minnehaha and Federal for 2 and a half hours…ICE was totally boxed in for half an hour, and inconvenienced all morning…"

71) On or about January 24, 2026, **WAGNER** posted a video on his Instagram account "kaos.follows," where he stated, "I am Kyle. I am Antifa. And they just shot another f****** peaceful observer literally five f****** blocks away from here. In my neighborhood, just like they shot Renee fourteen

blocks away over there....it needs to be said. You can't march and bang drums and sing songs when they're shooting people in the f****** head. Go and f****** fight them..."

72) On or about January 24, 2026, **WAGNER** posted a video on his Instagram account "kaos.follows" while wearing a bullet-proof vest. In the caption, **WAGNER** directed "anarchist" kids to "every armed American that's within a reasonable distance of 26th and Nicollet in uptown Minneapolis need to come and stand." During the video, **WAGNER** explained, "I have my truck on standby. I have gas masks on the ground there, as much as I could deliver. I have people in en route. If you're seeing this video, we're done with peaceful protests now. The gloves come off and ICE needs to get out. Run for the hills, boys." **WAGNER** stated, "I have repeated myself ad nauseum to a (sic) deaf ears of cowards and b**** made little f*** boys that was to f***** talk about their f****** feelings instead of putting hands on these murderers."

73) On or about January 24, 2026, **WAGNER** posted a video on his Instagram account "kaos.follows," while wearing a bullet-proof vest. **WAGNER** admitted to being Antifa. **WAGNER** stated, "[I]f you are [caught up], it's time to suit up. Boots on the ground. Nicollet and f*****g 26th. My house is four blocks away. Anywhere between Franklin and Nicollet, and 26th and Nicollet, show up ready to go. Okay, no, not talking about peaceful protests

anymore. We're not talking about having polite conversations anymore…This is exactly what I said was going to f****** come when we didn't f****** go march on f****** Whipple with guns. Sorry but welcome to America 2026 where the Second Amendment is the only thing that's going to keep you f****** protected from literal f****** Nazi gun men that are killing innocent people in the street with impunity. This is not a f****** joke. There's nothing fun to chant about it. Get your f****** guns and stop these f****** people."

74) On or about January 24, 2026, **KENNEDY** posted on Facebook, "The massive amount of support for physical resistance in the streets against ICE today made everyone who resists safer…By supporting the resistance you are helping create a smokescreen of discontent that makes us all safer and harder to track. More over, when Frontline feel supported, they act far more boldly because they know if they fight ICE in the street, folks actually harbor them and help and them instead of lecturing them on 'non-violence'…"

75) On or about January 25, 2026, **SANT** wrote an article for "Crimethinc," which is an anarchist blog that styles itself as "an international network of aspiring revolutionaries." In the article, titled "Minneapolis Responds to the Murder of Alex Pretti," **SANT** wrote that it was "an eyewitness account from an anarchist in Minneapolis." **SANT** discussed receiving a Signal message about individuals manning a barricade and "facing off against ICE" on

Nicollet Avenue. **SANT** stated "my friend and I decided to join them." He described a large crowd behind wooden barricades on Nicolett Avenue with ICE and Customs and Border Protection ("CBP") officers on the opposite side. **SANT** stated "We could see fear in their eyes." **SANT** stated that law enforcement fired tear gas at him and the crowd and then ICE SUVs and an armored vehicle attempted to leave the scene towards the highway. **SANT** wrote "We ran down 1st street, where I'd started out, to try to catch the agents as they retreated. We turned and ran north back up to 26th. People were peppering their cars with rocks and ice chunks as they drove off toward the 35W on-ramp.

76) On or about January 26, 2026, **WAGNER** posted a video on his Instagram account "antifa.kaos," where he stated, "My name's Kyle. I'm Antifa. And I'm back…The fight is well and alive. We have pushed ICE to leave this city in droves. We have made our voices heard. Viva la resistance."

77) On or about January 26, 2026, **WAGNER** posted a video on his Instagram account "antifa.kaos," that showed a pickup truck pulling up to a crowd. **WAGNER** got out of the truck and asked, "Who needs a gas mask?" and then pulled out a bag of gas masks and passed them out. **WAGNER** also passed out shields, stating, "the shields and shit in the truck is free to grab." The video is captioned "Power to the people…#minneapolis # antifa # iykyk # f***ice #f***trump #iron front."

78) On or about January 27, 2026, **WAGNER** sent a direct Signal message to "Bear," explaining he was about to go on a "mission" to Wisconsin to obtain fireworks and then he will be in the "streets" for the rest of the day. **WAGNER** continued, "Welcome homan (White House Border Czar Tom Homan) properly…I need some black block kids to give homan a proper welcome - just picked up some party favors – looking for some real ones – same people we need to start targeting ice convoys with more direct interventions.." The Signal user "Bear" stated, "What exactly do you think your part is?" **WAGNER** replied, "Easy target – draw attention and distract and occupy them so they don't target the mutual Aid or community of watchers…give them a face to hate so they aren't focused on the real movement behind the scenes. I'm a spectacle – a punch able face and loud mouth – and everything they hate…"

79) On or about January 27, 2026, **WAGNER** posted a video on his Instagram account "antifa.kaos," where he applauded the success of the efforts to impede federal immigration enforcement, stating "I'm Kyle. I'm Antifa. Welcome to Minneapolis. Got rid of Bovino yesterday. Also sent a lot of ICE agents packing. It's working people. The pressure is getting results."

80) On or about January 27, 2026, **SANT, KENNEDY, VAN DE WATER DAVIS, APLAND, THORESON, KIM, ROBINET, MISTEREK, DAVIS, BEISELL,** and others attended an "after action" meeting held at the

Democratic Socialists of America office about the January 23, 2026 blockade at the Whipple Building. Members of BCWC, TCDA, and the Democratic Socialists of America attended the meeting. **SANT** and **DAVIS** led the meeting. **SANT** collected participants cell phones, smart watches, and other electronic devices and placed them in a plastic bin.

81) During the meeting, participants broke into six groups—marshals, medics, hard blockade, soft blockade, jail support, and propaganda/communications.

82) At the meeting, **SANT** and **ROBINET** admitted to taking part in the soft blockade at the Whipple Building on January 23, 2026. **KENNEDY** and **MISTEREK** discussed their involvement in the "hard blockade" around the Whipple Building on January 23, 2026. **DAVIS** and **SANT** identified themselves as members of BCWC. During the meeting, **DAVIS** said "We're anarchists." **SANT** stated "One thing we in Black Cat are going to be doing in the next two or three weeks is calling for some sort of re-groupment meeting for revolutionary anarchists in the Twin Cities."

83) **SANT** discussed participants in the meeting breaking into six groups—marshals, medics, hard blockades, soft blockades, propaganda group, and communications, and jail support. **DAVIS** said "in order to learn from our direct action, we absolutely must analyze them and learn from them afterwards."

84) On or about January 30, 2026, **KENNEDY** posted on Facebook, "It's really encouraging to see tens of thousands still in the streets to protest in Minneapolis. I want y'all to realize though that if we had those numbers down at the Whipple Building today, we could shut down most of ICE's operations in the state and actually have protected our people for at least a day, today. We need to focus our energy strategically to maximize disruption of ICE and minimize our own losses in people and materials. It takes a lot less to block 3 entrances into the federal building then a 75k march…We need to physically shut them the f**k down. I encourage you all to think about how to physically stop ICE, disrupt their logistics or otherwise directly impede them in your own life and find the courage to escalate your tactics to something more confrontational. We need to fight to win, not just for show."

85) On or about February 1, 2026, at approximately 3:00 p.m., **KENNEDY, VAN DE WATER DAVIS,** and other coconspirators attended a group meeting sponsored by TCDA's Propaganda and Communications Team. **KENNEDY** discussed TCDA's finances. **KENNEDY** stated that TCDA raised approximately $5,000 in preparation for the January 23, 2026 action at the Whipple Building. **KENNEDY** wanted to use funds to stockpile materials to assist with other organizations, but he wanted the focus of the meeting to be about aiding TCDA. **KENNEDY** explained, "…these people who are taking, you know, the high risks to shut down ICE operations and

make everything safer for everybody. And they don't, they're not getting funded. And so the purpose in my head for this funding is to give it to these front liners and not just this group. The idea of also being that we stockpile materials for other groups and can provide training."

86) **KENNEDY** stated, "...Hi, my name's Cam. I'm now Olive Knight in the chat. I'm a revolutionary anarchist...I've more or less traveled around the country doing various types of struggles, um, since I was 15...I've got fairly extensive experience with how to specifically coordinate propaganda with effective direct action to help supply materially."

87) At the meeting, **KENNEDY** discussed, "we are on the precipices of real political power that is completely goes over both political parties." **KENNEDY** discussed living in Minneapolis's Cedar neighborhood. He stated that they are operating a blockade on his street that stops ICE vehicles.

88) On or about February 5, 2026, **WAGNER** wore a sweatshirt that had "I'm Antifa!" on the front. **WAGNER** possessed multiple Antifa patches at his residence.

89) On or about February 5, 2026, **KENNEDY** posted on Facebook, "I swear I'm going to lose my f*****g mind if I see that 'if 3.5% of the population is committed to peaceful revolution, they win' bulls**t...It's given far to (sic) many well meaning people, a fake a** idea of what it takes to win. It has folks attacking militant elements of the resistance and aiding the state against

them because they think violence or even property destruction is counter revolutionary. They could not be more wrong. I want to make this as clear as I can: YOU WILL NEVER WIN WITH NON-VIOLENCE ALONE. Ever. No one has. No one will. You absolutely need militants to win. I'm sorry the world is so cruel but this is the real world, not a f*****g fairytale…"

90) On or about February 5, 2026, **KENNEDY** posted on Facebook about recent property destruction at the Eugene Federal Building in Oregon, stating, "Huge props to Eugene for breaking enough s**t to actually shut down the fed building…Property destruction clearly won the day here and we should all take notice. F**k these dumb f**k pacifists. They aren't comrades, they are allies of the state."

91) On or about February 6, 2026, federal immigration officers were engaged in an arrest operation on or around Cedar Avenue South in Minneapolis. **SANT** drove a red Subaru and followed vehicles that were driven by federal immigration officers. Federal immigration officers stopped the Subaru and warned **SANT** that they were engaged in official duties and that any interference would constitute a violation of federal law. Despite the warning, **SANT** continued to followed the immigration officers' vehicle and impeded the transport of the detained individual.

92) On or about February 7, 2026, at approximately 10:12 a.m., **DOYLE** loaded shields into the back of his Dodge Ram at or around **DOYLE's** residence on Snelling Avenue in Minneapolis.

93) On or about February 7, 2026, at approximately 11:30 a.m., **DAVIS** and others attended a rally, "Defend our Community From ICE and Fascists," which was hosted by BCWC and another Antifa organization. Numerous attendees wore "Antifa" branded sweatshirts. A BCWC member stated that their security was armed and ready to deal with any armed counter-protesters that showed up.

94) On or about February 11, 2026, at approximately 3:04 p.m., **SANT** sent a message in the "TC DA" Signal chat group, stating, "Black Cat is part of the coalition putting on this week of action. I want to make a proposal for TC DA to get involved, too. Specifically, I'd like us to take responsibility for an action at a certain corporate target something during that week. Will say more at the meeting."

95) On or about February 12, 2026, at approximately 11:16 a.m., **SANT** sent a message in the "TC DA" Signal chat group, stating, "Even a huge drawdown to 300 agents would still leave us in the same shoes we were in in December. There were 40 ICE/ERO field agents doing raids before the invasion. Anything more than that is bullshit. We have to keep going."

96) On or about February 12, 2026, at or around 2:23 p.m., **DAVIS** sent a message in the "TC DA" Signal chat group, stating, "Hey all, I'm really excited that we're gonna have our next TC-DA meeting tomorrow night…The discussed drawdown will likely have a diminishing effect on many of those who have become active in the last couple of months. That would be a tragedy; the amount of self organization we have seen is impressive, it should not be lost, but preserved. The revolutionary potential of our organizations if continued and allowed to grow in experience and militancy should not be underestimated…"

97) On or about February 12, 2026, **ROBINET** and other unindicted coconspirators attended a virtual meeting sponsored by TCDA. At the meeting, **ROBINET** discussed having, "…sharp shooters of the roof the parking ramp across the street" from a prior TCDA meeting. **ROBINET** noted, "I don't think that's relevant. We don't need to do that this time. We just had no idea what to expect…and that's awesome because that was the most boring job I've ever had in my entire f*****g life."

98) On or about February 13, 2026, at approximately 7:00 p.m., **SANT, APLAND, KENNEDY, DOYLE, VAN DE WATER DAVIS, KIM, ROBINET, DAVIS, BEISELL** and others attended a meeting sponsored by TCDA for "vetted" members only. The purpose of the meeting was to discuss TCDA organization and structure. **DAVIS** moderated the meeting.

DAVIS said they are anarchists. The group discussed whether TCDA would be narrowly focused on anti-ICE activities or would have a broader focus on being "anti-regime" function. **DAVIS** concluded, "we will be broadly anti-authoritarian. We're going to be broadly anti-capitalist."

99) At the meeting, **KIM** collected cell phones and walked them to a room in the back. **KENNEDY** discussed the need for trucks that could be used in a future blockade.

100) At the meeting, **SANT** stated that he had just come from a meeting with organizers from Minnesota 50501 and Sunrise. He stated those groups wanted to do a march from Fort Snelling to the Whipple Building on March 1, 2026, and requested the assistance of TCDA in organizing a blockade at the eastern entrance at Gate 3.

101) On or about February 13, 2026, at approximately 9:11 p.m., **VAN DE WATER DAVIS** sent a message in the "TC DA" Signal chat group, stating, "@Errico (**DAVIS**) or @Ike (**SANT**) please add this to the group discussion for convenience? Our next is Tuesday 02/16 @ 7 PM…Host: @Sparky (**BEISELL**) Facilitator: @Schatzi (**THORESON**) Notes: smokahontas (unindicted coconspirator) (pending addition, in materials crew)…"

102) On or about February 13, 2026, at approximately 9:18 p.m., **DOYLE** sent an attachment titled, "Working group structure draft" in the "TC DA" Signal chat group.

103) On or about February 13, 2026, at approximately 10:06 p.m., **VAN DE WATER DAVIS** sent a message in the "TC DA" Signal chat group, stating, "People who would like to be part of the March 1st Whipple project group please flag/react to this message. Thank you."

104) On or about February 14, 2026, at approximately 5:03 p.m., **APLAND** sent a message in the "TC DA" Signal chat group, stating, "Hey y'all, I just met/hung out with an anarchist visiting from the Bay Area who is here with a comrade to help/learn from us if she can. Doing a lot of anti ICE stuff out there and very knowledgeable. I just met her but a close comrade from CA Black Rose (Black Rose Anarchist Federation) introduced her as highly trusted. She's here for like 10 days or something, staying in Whittier, and wants to help with whatever she can. She mentioned a particular interest in patrolling ICE with cars…Anyway, please DM me if you want to meet/plug her into anything. She said to share her name, Marie." **DOYLE** responded, "Get her to the workers' assembly tomorrow for sure" and posted a flyer titled "Workers' Assembly: To Defeat ICE and Plan the Next Mass Strike."

105) On or about February 15, 2026, at approximately 11:35 a.m., **SANT** posted screenshots of notes from a TCDA meeting held on February 13, 2026 in the "TC DA" Signal chat group. One screenshot was titled, "Draft Working Group Structure" and listed the following roles: Vetting/Oversight, Medic, Shield, Logistics/Resources, Information Security, and Security.

106) On or about February 15, 2026, at approximately 3:00 p.m., **ROBINET** and others attended a meeting held at the United Labor Center building in Minneapolis and sponsored by TCDA, BCWC, Ray Rainbolt Memorial Shooting Club, Socialists Alternative, and other organizations. **ROBINET** wore a "Ray Rainbolt" hat and served on the "special security" team for the event. The group discussed medical, firearms, and "hard security" training. Participants began planning a March 1, 2026 direct action at the Whipple Building. **SANT** proposed organizing another blockade at the east entrance of the Whipple Building.

107) On or about February 16, 2026, at 11:32 a.m., **VAN DE WATER DAVIS** sent a message in the "TC DA" Signal chat group, stating, "This chat (TC DA Signal Group) is being closed in the next 24 hours…We have concluded the initial vetting process and will be creating a new group chat with all vetted members. If you did not respond to a member of the vetting team by this time, you will not be added to the new group. You can still be added, you just need to complete the process…If you have questions, please DM the vetting team member you have been working with. Once the new chat is up, this chat will be renamed Leave and Delete. Please leave the group promptly an delete it from your message history. Don't forget to request to be added to the new chat before leaving this one!" **VAN DE WATER DAVIS** sent the link to the new chat group, which was renamed "TC DA (2)."

108) On or about February 16, 2026, at approximately 11:38 a.m., an unindicted coconspirator sent a message in the "Whip 03/01" Signal chat group, stating "From @nube (**VAN DE WATER** DAVIS) Hey, everyone, here's the link to the week of action site for everyone's reference: melttheice.com. @Ike (**SANT**) proposed at the meeting yesterday support the upcoming 03/01 protest st (sic) Whipple with a hard blockade element and we decided to strike this project group to make that happen! One thing I think will be important to start is getting additional delegates into the next general week of action meeting…Ike (**SANT**) was at the most recent one which was also yesterday but it will be beneficial to have a couple of people who can coordinate..."

109) On or about February 16, 2026, at approximately 12:55 p.m. **VAN DE WATER DAVIS** sent a message in the "Whip 03/01" Signal chat group, stating, "There is a meeting with folks from Week of Action coalition organizing on Tuesday at 5pm. Would anyone else like to join Ike [**SANT**] and myself at the meeting?" **MISTEREK** responded at approximately 8:14 p.m., "I will try to be there."

110) On or about February 17, 2026, **SANT, APLAND, KENNEDY, VAN DE WATER DAVIS, THORESON, BEISELL,** and others attended a TCDA meeting on Pleasant Avenue in St. Paul. **BEISELL** organized the meeting. During the meeting, **SANT** and another male walked around the room and

collected all attendees' cell phones and placed them in a tote bag. The group discussed "de-arrest" and swarm training.

111) **THORESON** moderated the meeting. **THORESON** identified herself as a BCWC member and discussed "old" and "new" business. "Old" business topics included TCDA structure, organization, vetting process, and new members. "New business" topics included the March 1, 2026 direct action at the Whipple Building where the group planned to utilize a "soft blockade" and "hard blockade."

112) During the meeting, **APLAND** presented the vetting process for TCDA.

113) At the February 17, 2026 meeting, **KENNEDY** recommended that a TCDA member open a bank account at Trustone Financial because it allows its customers to have multiple debit cards on one account.

114) At the meeting, **SANT** discussed blocking Minnehaha Avenue as they had during the January 23, 2026 direct action at the Whipple Building. **STEWART** suggested organizing a soft blockade with shields. **VAN DE WATER DAVIS** and **SANT** discussed the Red Pine Collective as overseeing direct action at the Whipple Building on March 1, 2026. Individuals associated with the Red Pine Collective requested that TCDA coordinate a hard blockade.

115) On or about February 17, 2026, at approximately 9:12 p.m, **VAN DE WATER DAVIS** sent a message in the "Whip 03/01" Signal chat group,

stating, "…the basic plan for 03/01 is as follows: Rally point will be at 9AM at the Whiskey the Horse Gravesite at fort Snelling. They rally will then take the street and walk under the freeway to whipple…There will be a more focused meeting to hash out further details on Friday at 4:30 PM, no location yet."

116) On or about February 17, 2026, at approximately 9:08 p.m., **SANT** sent a message in the "Renegade" Signal chat group, asking, "who else wants to be added to the 3/1 Whipple action planning chat? I know there are more people who didn't get added yet." **THORESON** responded,9 "Please add me."

117) On or about February 17, 2026, at approximately 9:18 p.m., **SANT** sent a message in the "Whip 03/01" Signal chat group, stating, "Melt the Ice organizers are asking us to do the same thing we did the 23rd, block Minnehaha…While their march takes the street on the other side by 62E." **STEWART** responded, "So soft blockade with shields?" **MISTEREK** replied, "I say if we can figure it out we go further than just that."

118) On or about February 17, 2026, at approximately 9:55 p.m., **SANT** posted a screenshot of a map showing the Melt the Ice organization's proposed march route for the March 1, 2026 direct action at the Whipple Building in "Whip 3/1" Signal chat group. **SANT** posted another screenshot of the map and messaged the group, "Green is where they'll be at at 10am, red is where

they're suggesting for us (TCDA) to be. We don't have to do exactly that, if we're feeling creative."

119) From approximately February 18, 2026 to approximately March 30, 2026, **SANT** sent numerous messages in the "Whipple Plates" and "Whipple Watch (Refresh)" Signal group chats, in which **SANT** provided detailed descriptions of government-issued vehicles and their license plates.

120) On or about February 18, 2026, at approximately 9:25 a.m., **KENNEDY** sent a message in the "TC DA (2)" Signal chat group, stating, "I want to get a proposal on public fundraising set up for the next meeting…we are going to need at least 1 person to volunteer to open a bank account or use an existing one, ideally one that will issue multiple cards (TruStone was recommended). that will connect to a payment service that connects to open collective…the person opening/using their bank account is kinda a de facto treasurer…this role will have some level of risk."

121) On or about February 18, 2026, at approximately 10:31 a.m., **SANT** sent a message in the "Whip 03/01" Signal chat group, stating, "I'm watching Whipple this morning. Looks like Natl guard is in 2 humvees near Base Camp on airport service rd, but not in the south lot. 2 sheriff cars near light rail, 1 posted up VERY close to 62E on ramp."

122) On or about February 18, 2026, at approximately 10:39 a.m., **APLAND** sent a message in the "TC DA (2)" Signal chat group, summarizing the "vetting"

process discussed at the February 17, 2026 TCDA meeting. **APLAND** wrote, "...TCDA will draft a code of conduct to send to prospective members. TCDA will also author a set of organizing principles to serve as a metric for who to recruit/admit to the organization...Vetting team will be sized accordingly to workload. Members of the vetting team will volunteer but their service on the vetting team must be approved by TCDA. Members must have been active in TCDA for a minimum of 3 months..." **APLAND** continued, "Vetting structure committee also came up with some suggestions for future structural work including: Decide on definition of direct action – Write organizing principles – Draft an ejection structure – Draft a "call list" for structure." **APLAND** noted that, "Ike [**SANT**] raised the opinion that we cannot actually avoid infiltration, especially by the federal government, but we should either do a 'real' vetting procedure (i.e. ask candidates their 'legal' name and do an internet background check accessing public knowledge (addresses, legal history, work history – any info available publicly) which would actually catch/deter some spooks/infiltrators, or alternatively should not pretend to vet at all, but simply have a loose vouching system. Anything in between Ike [**SANT**] characterized as 'security theater'...Please thumbs up to this message if you would be comfortable undergoing vetting via an internet background check of your legal name, as above. This would be done to all members, not just you, and those who refuse would be excluded from

tcda." **KENNEDY** replied, "I oppose enforcing the legal name search for the broader group. I propose a combination with subgroups like 'materials' having a legal name vetting structure…" **KENNEDY** opposed the described level of vetting for subgroups, such as "art and propaganda." **APLAND** responded, "agreed, I didn't say all working groups, just the sensitive ones."

123) On or about February 18, 2026, at approximately 12:39 p.m., **VAN DE WATER DAVIS** sent a message in the "Whip 03/01" Signal chat group, stating, "Meeting info for Friday: 4:30 on friday it is then! I can host at my house, xxx W franklin. See yall then." **STEWART** responded, "Could you edit to clarify which meeting you are referring to." **VAN DE WATER DAVIS** replied "03/01 specific planning meeting. This is the meeting we are having a meeting to prepare for." **SANT** messaged, "To be totally clear – we are meeting tomorrow at 6:30…to come up with our own plan…Then Friday, Melt the ICE is doing a planning meeting for the whole Whipple march. That's 4:30pm at XXX W Franklin." **KENNEDY** responded, "Thx. Needed that."

124) On or about February 18, 2026, at approximately 5:14 p.m., **DOYLE** sent a message in the "Whip 03/01" Signal chat group, stating, "I've been delayed on the shield building as I'm battle a bad cold. I'll get back on it and pump out the remainder when I recover."

125) On or about February 19, 2026, at approximately 9:31 p.m., **SANT** sent a message in the TC DA (2)" Signal chat group, stating, "Just want to give some updates from the working group meetings tonight…For the Whipple action – we looked at some maps; we came up with a specific plan for the 1st (March 1); we flagged roles we need to fill like drivers, deployment, marshals and medics…and we verified that we can use Melt the ICE's jail support we don't need to set up our own version."

126) On or about February 19, 2026, at approximately 9:10 p.m., **VAN DE WATER DAVIS** sent a message in the "Whip 03/01" Signal chat group, requesting information about the meeting that occurred that day. **SANT** replied, "It was good – we looked at some maps; we came up with a specific plan for the 1st, we flagged some roles we need to fill like drivers, deployment, marshals, and medics; we decided on a big purchase and an ask for the fundraising team; and we verified that we can use Melt the ICE's jail support…"

127) On or about February 20, 2026, at approximately 8:22 a.m., an unindicted coconspirator sent a message in the "Art/Money/Comms Club" Signal chat group, stating "For the Whipple 3/1 action, we're looking to raise about $10k. Maybe we can make a graphic or coordinate a last minute raffle?" **KENNEDY** responded, "Yeah the Whipple project group has formally requested that we set a goal of 10k and asked this group to help get it. I

recommend we call on members of our group to individually fundraise and give the money to someone in this group, most of which would be given to the action project group and the materials group. I think we should also consider a temporary GoFundMe or something similar to the action to raise public funds…"

128) On or about February 20, 2026, at approximately 10:58 a.m., **VAN DE WATER DAVIS** sent a message in the "Art/Money/Comms Club" Signal chat group, stating, "I just am gonna need guidance on what we're asking for." **KENNEDY** responded, "The GoFundMe you are talking about right? Based on last night's meeting, we set 10k as a fundraising goal for the WoA (Week of Action). I imagine the GoFundMe will have a brief description of the group, stating the purpose which is for TC DA to logistically and materially support the WoA…I will announce the fundraising push in the general chat and mention we plan to make a temporary GoFundMe."

129) On or about February 20, 2026, at approximately 2:09 p.m., **VAN DE WATER DAVIS** sent a message in the "art/money/comms club" Signal chat group, describing what was written for the GoFundMe account: "Hi, I'm Gabe [**VAN DE WATER DAVIS**], and I'm representing Twin Cities Direct Action. We are a decentralized coalition of working class people engaged in various forms of community defense against the current Federal Occupation

happening within the wider metro area, and against state and a far right violence more broadly…" **KENNEDY** responded, "Looks great to me."

130) On or about February 20, 2026, at approximately 2:46 p.m., **VAN DE WATER DAVIS** posted a link for the TCDA GoFundMe account in "TC DA (2)" Signal chat group. The link had a TCDA logo and read "Donate to Support Twin Cities Direct Action Against ICE…Hi, I'm Gabe (**VAN DE WATER DAVIS**), and I'm representing Twin Cities Direct Action…Gabriel Van de Water needs your support for Support Twin Cities Direct Action Against ICE."

131) On or about February 20, 2026, at approximately 3:45 p.m., **VAN DE WATER DAVIS** posted a screenshot of the TCDA GoFundMe page that listed the name "Gabe" in the "Art/Money/Comms Club" Signal chat group. **VAN DE WATER DAVIS** wrote "My name is on this so I'm a lil nervous but we'll see how it goes." **KENNEDY** responded "Really appreciate the risk you are taking and of possible support as much obfuscation of your identity as you want/is possible. Hopefully we can reach our goal and pull it before anything really connect with you or us."

132) On or about February 20, 2026, at approximately 4:24 p.m.., **MISTEREK** sent a message in the "Whip 3/1" Signal chat group, stating that he would be at Week of Action meeting held that day "for the materials group." **MISTEREK** continued, "If anyone has an idea of where some 4'' or wider

square tubing/ I Beams are hit me up. Scrap just need scrap." **KIM** responded, "None at coremark? How long? Could maybe get some tmw. Train rail?"

133) On or about February 20, 2026, at approximately 6:57 p.m., **THORESON** sent a message in the "Whip 03/01" Signal chat group, asking, "Is there a formal marshals group set up?" **STEWART** responded, "There is not." **THORESON** replied, "Who else wants to marshal? I could make a group and we can start planning. Unless there is already a plan from dsa/rp? I'm not sure how large a hand they're having in planning the minutae of this stuff."

134) On or about February 20, 2026, at approximately 7:01 p.m., **KIM** sent a message in the "TC DA (2)" Signal chat group, asking, "Any tips on how to share the gfm with extended networks? How public do we wanna share it?" **KENNEDY** responded, "Spread it! I threw it up on my FB and others are doing the same."

135) On or about February 21, 2026, at approximately 12:20 a.m., **DOYLE** sent a message in the "TC DA (2)" Signal chat group, stating, "I have shared the fundraiser to From a Comrade," which is an anarchist Facebook page.

136) On or about February 21, 2026, at approximately 9:44 a.m., an unindicted coconspirator posted a news article that discussed the decreased use of the Whipple Building by ICE in the "TC DA (2)" Signal chat group.

MISTEREK responded, "I am under the belief is was for show for when Ilhan walked through…But that's my uneducated speculation." **KENNEDY** replied, "I wouldn't call it uneducated...it's likely. Folks been tracking them closely and while there are rumors of secondary facilities in Edina/Minnetonka, I haven't seen any confirmation…There is a private airport in Eden Prairie it sounds like they do some deportations out of as well. I think Whipple still very much remains a target but we should definitely investigate potential other sites."

137) On or about February 21, 2026, at approximately 10:50 a.m., an unindicted coconspirator sent a message in the "Art/Money/Comms Club" Signal chat group, stating, "Holy s**t @ nube **(VAN DE WATER DAVIS)** It's already raised over $1,200," in reference to the GoFundMe page. **VAN DE WATER DAVIS** responded, "I'm seeing 1,150 on gfm (Go Fund Me)!"

138) On or about February 21, 2026, at approximately 2:52 p.m., **THORESON** sent a message in the "Whip 03/01" Signal chat group, stating, "DM me to be added to a marshals planning chat."

139) On or about February 21, 2026, at approximately 2:58 p.m., **STEWART** sent a message in the "Whip 03/01" Signal chat group, which provided an overview of a meeting with other groups involved in the March 1, 2026 action at the Whipple Building. **STEWART** messaged, "we're gonna be somewhat autonomous from the main march. They'll be on federal coming

down from Whiskey horse and we'll be holding Minehaha (sic). We designated a couple commons people and we'll coordinate scouts between both sides. We decided two scouts on bikes with burners and radios on our side to watch for kettling from the north side of Minehaha (sic). We'll deploy shields and some other stuff on Minehaha (sic)….we'll be more of a soft blockade hybrid…Start time is looking like 10:00 and we're going to check in every hour to determine holding the following hour." **THORESON** asked, "Are you gonna marshal again?" **STEWART** responded, "Not really sure where I'm fitting in yet lol…"

140) On or about February 22, 2026, at approximately 10:19 a.m., **STEWART** sent a message in the "Whip 03/01" Signal chat group, asking, "Anybody down to bike scout for our side? We'd like two." **THORESON** responded, "We have bike marshals maybe they know someone who would like to scout?" **THORESON** messaged, "Reviewing – We are a week out from this action…I'm coordinating with someone from WoA (Week of Action) for OTG (off the grid) phones…Mac (**STEWART**) is coordinating walkies as a plan B…Our GFM (GoFundMe) is at 2k…additional material procurement is underway…is there a shield training coming up? @Plotnikov (**DOYLE**) we weren't sure at the Friday meeting."

141) On or about February 22, 2026, at approximately 12:17 p.m., **SANT** posted a flyer titled "ICE OUT No Collaboration with Occupation: March Against

ICE Collaborators," in the TC DA (2)" Signal chat group. The flyer contained emblems for the Black Cat Workers Collective, Democratic Socialists of America, Workers Solidarity Circle, and Ray Rainbolt Memorial Shooting Club.

142) On or about February 22, 2026, at approximately 12:30 p.m., **KENNEDY** and others took part in "de-arrest" training at Loring Park in Minneapolis.

143) On or about February 22, 2026, at approximately 5:13 p.m.., **VAN DE WATER DAVIS** sent a message in the "Whip 3/1" Signal chat group, stating, "Just got off the phone with Rod, he is gonna reach out to the Jail Support loop and ensure that someone is taking point on receiving and checking jail support forms for OTG (off the grid) people on the first. Once that is lined up, Rod will share a rise up pad with jail support info needs and the email to send it to to close the date of action."

144) On or about February 23, 2026, at approximately 12:10 p.m., **STEWART** sent a message in the "Whip 03/01" Signal chat group, stating, "Please start brainstorming spots to meet…" **VAN DE WATER DAVIS** responded, "Library meeting rooms are not the worst spot for this kind of thing unless people have security concerns." **KIM** replied, "I can also look into the warehouse spot I booked in Seward if needed. Will be talking with a friend who manages it today."

145) On or about February 23, 2026, at approximately 2:58 p.m., **SANT** sent a message in the "Whip 03/01" Signal chat group, stating, "Apparently there is $9000 unaccounted for in the Week of Action budget…Do we want to ask them to fund any part of our thing on Sunday?" "M" replied "Hell yeah."

146) On or about February 23, 2026, at approximately 11:26 a.m., **ROBINET** posted an "ICE OUT: March Against Ice Collaborators" for an event scheduled for February 27, 2026 in the "TC DA (2)" Signal chat group. The flyer contained logos for the BCWC, Rainbolt Memorial Shooting Club, and other groups. **ROBINET** messaged, "Looking for help with marshals for this. It's a broader coalitional thing, so it won't be exactly the same as we've been doing for the assemblies. Hoping to get at least 10 volunteers between here (TCDA) and Rainbolt (Ray Rainbolt Memorial Shooting Club)."

147) On or about February 23, 2026, at approximately 12:18 p.m., **THORESON** sent a message in the "TC DA (2)" Signal chat group, stating, "I'm looking for marshals for the Whipple action. Please dm if you're interested."

148) On or about February 23, 2026, at approximately 5:48 p.m., **VAN DE WATER DAVIS** sent a message in the "Whip 03/01" Signal chat group, which discussed communications available for March 1, 2026 action at the Whipple Building. **VAN DE WATER DAVIS** messaged, "9 phones are going to be purchased. Someone on the WoA (Week of Action) team who is good with radios and tactical comms and offered to act as a liaison between

our crews to ensure we have a working system." **VAN DE WATER DAVIS** described her discussions with the Week of Action team, stating, "an offer was made to direct people who had signed up for the WoA and might be interested in a more confrontational vibe to us (TCDA) and have one of us meet with them as a rep of TC DA on Wednesday…They also shared a map of what their planned routes are and where they are expecting to have scouts and marshals…" **STEWART** responded, "Thanks, Nube (**VAN DE WATER DAVIS**). That sounds fine to me and if we can get a few folks to meet up with them Wednesday, hell yeah. My understanding was that we were a hard blockade with soft backup, so as long as those folks are aware and down to hold ground, the more the merrier. I'm guessing Materials and Marshals have thoughts though."

149) On or about February 23, 2026, at approximately 11:22 a.m., **ROBINET** sent a message in the "SecuritAs" Signal chat group, stating, "now that we have everyone in here we need to start pulling people together for this one on Friday (ICE OUT: March Against Ice Collaborators" event). It's going to be a 'make it work' type situation with some other groups that don't entirely share our ideology, but I'm hoping we can get at least 10 from here. Who is interested in volunteering?" **KENNEDY** replied, "I want to request to add Big Vic to this loop. They are a left jabber and personal friend of many years who is a long time anti fascist with an impressive background in security…"

150) On or about February 23, 2026, at approximately 1:00 p.m., an unindicted coconspirator sent a message in the "SecuritAs" Signal chat group, asking, "Is there a length of time that someone should be a member in attendance before vouching for someone new? To be clear, not for the security team, but just to show up to a dry dire." **ROBINET** responded, "Oh for Rainbolt (Ray Rainbolt Memorial Shooting Club)? No if you're in the loop you're good to propose people in the announcements chat. Put their name and where people might know them from, and then 1 week waiting period before coming to a dry fire. The relationship between this group (TCDA) and Rainbolt (and left jab for that matter) needs to be talked about at whatever meeting we have next."

151) On or about February 23, 2026, at approximately 1:13 p.m., **STEWART** sent a message in the "SecuritAs" Signal group chat, stating, "Sorry to make another ask, but we're looking for a couple hard and soft security to help with a march at Whipple on Sunday 3/1. This is just a precaution in case actual fash (fascist)…not soft handed Jake (reference to right-wing influencer Jake Lang, who was assaulted by left-wing rioters in downtown Minneapolis on January 17, 2026) show up. Also, anybody willing to loan 5-10 radios for that march? DM me for more details….It will be a march/blockade hybrid with anywhere from 200-800 people…"

152) On or about February 23, 2026, at approximately 9:55 p.m., **SANT** sent a message in the "Whip 03/01" Signal chat group, stating, "I'm asking Melt the ICE organizers which welcome center is the most inoffensive one for us to have a shield training at…I don't know if a particular one is better for finding people who might participate on Sunday, but I think we should plan to use them to recruit some people. People will be coming from out of town looking to get involved in stuff like what we're doing."

153) On or about February 24, 2026, at approximately 8:56 p.m., **ROBINET** sent a message in the "SecuritAs" Signal chat group, stating, "Alright, 20 radios are in – with bodyguard earpieces, programmed, and a printed copy of the radio book. If you want one, thumbs up this message and come pick one up…Oh and there's a chance these might get covered by week of action funds so if that's the case I will use any funds to buy more for Rainbolt (Ray Rainbolt Memorial Shooting Club) and other people who we like but aren't here yet."

154) On or about February 24, 2026, at approximately 12:48 p.m., **SANT** added **ROBINET** as a participant in the "Whip 03/01" Signal chat group.

155) On or about February 24, 2026, at approximately 2:57 p.m., **VAN DE WATER DAVIS** sent a message in the "Whip 03/01" Signal chat group, stating, "I am inviting Cleo, the otg (off the grid) comms point person from Red Pine/for this action to join us at this meeting. They are providing the

phones and are self described as very into and well versed in radio comms as well."

156) On or about February 24, 2026, at approximately 3:18 p.m., **VAN DE WATER DAVIS** sent a message in the "Whip 03/01" Signal chat group, stating, "Another important need to get squared away is exfil vehicles. We need folks with cars that are willing to post up in the north lot and come down Minnehaha towards the light rail station to pick people up if we need to leave in a hurry. I did exhfil at the Daunte Wright protests in 2021 and can chat with you about it if you are not sure." **SANT** replied, "Leyden and Tiny (**APLAND**) and I are calling the whole TC DA chat one by one to get an idea of headcount…So we can plan for exfil drivers accordingly."

157) On or about February 24, 2026, at approximately 4:51 p.m., **VAN DE WATER DAVIS** sent a message in the "Whip 03/01" Signal chat group, asking, "I have one person so far who can scout, can we get one more person to volunteer?" An unindicted coconspirator responded "The scout is a biking position, correct? I have a potential volunteer, not a member though."

158) On or about February 25, 2026, at approximately 2:59 p.m., **DOYLE** removed approximately five shields from the backyard at his residence on Snelling Avenue in Minneapolis and placed them in the back of his Dodge Ram under a green tarp. **DOYLE** again walked to his backyard and returned

carrying two half-barrel shields. **DOYLE** placed the shields under the green tarp in the back of his Dodge Ram.

159) On or about February 25, 2026, at approximately 10:02 a.m., **SANT** sent a message in the "Whip 3/1" Signal chat group, stating, "We need numbers. I'm already going to the week of action welcome centers and recruiting out-of-towners for it by word of mouth. I think vetted rapid responders are welcome…Having big numbers is going to make this action safer. If we're too cagey about inviting people, and we have small numbers, it'll be more dangerous. I hope everyone here invites a friend. Especially cause we can't put this one on social media." **VAN DE WATER DAVIS** responded, "They can def come attendants of the action (sic)…Anyone who supports what we are doing can attend, there are boundaries around who is planning and coordinating and know strategic details."

160) On or about February 25, 2026, at approximately 10:11 a.m., **VAN DE WATER DAVIS** posted a flyer for "Autonomous Action Against ICE" in the "TC DA (2)" Signal chat group. **VAN DE WATER DAVIS** messaged, "This is not for social media. We need numbers on our end of the 03/01 action at whipple we are coordinating with Melt the Ice! Please share this directly with friends and comrades. Even inviting one person will potentially help us out a lot! Hope to see you there!" **KENNEDY** responded, "In the future, I think we really need to post these kind of events, where numbers

matter, on social media. It's more dangerous to avoid it and use word of mouth for large actions. It isolates us, makes us more of a target and is a lot less effective."

161) On or about February 25, 2026, at approximately 11:16 a.m., **STEWART** sent a message in the "Whip 03/01" Signal chat group, stating, "I forgot to mention last night, but I think we could use 5-10 traffic cones, 5 gal palls with lids, or big water jugs, and a couple of hand held blowers. I think I can get one blower."

162) On or about February 25, 2026, at approximately 12:35 p.m.., **SANT, VAN DE WATER DAVIS,** and others discussed the planned March 1, 2026 action at the Whipple Building in the "TC DA (2)" Signal chat group. **VAN DE WATER DAVIS** messaged, "At this time we are primarily looking for people to come be part of the crow with the understanding that this particular crowd will have a more confrontational character than the main March that will be coming out to whipple that day…the best way to get plugged into a supportive role is to join the project group…People who want to Marshal on Sunday please get in touch with @Schatzi (**THORESON**)." **SANT** replied, "The main roles we're trying to fill right now are A) people to be in the blockade B) drivers to relay people back and forth from their cars to Whipple C) marshalls."

163) On or about February 25, 2026, at approximately 2:41 p.m., **VAN DE WATER DAVIS** sent a message in the "Whip 03/01" Signal chat group, stating, "…One of the reasons we want to recruit more exfil drivers is so that we can help people get out if things get blocked." An unindicted coconspirator asked "How arrestable do we think the exfil role is?" **VAN DE WATER DAVIS** responded, "In my experience exfil is a lower risk role." The unindicted coconspirator replied "OK I've got two more for exfil then…"

164) On or about February 25, 2026, at approximately 4:16 p.m., **VAN DE WATER DAVIS** sent a message in the "TC DA (2)" Signal chat group, stating, "We have the ok to share this (Autonomous Action on ICE flyer) on socials…This shouldn't be directly associated in your post with the Melt the ICE March on whipple."

165) On or about February 25, 2026, at approximately 8:41 p.m., **SANT** sent a message in the "Whip 03/01" Signal chat group, stating, "The three biggest updates from the meeting with Melt the ICE people: Indigenous march is now planning on staying until 2pm (not noon!). Do we follow suit? They can only give us 3 burner phones, we will have to provide our own for the other 2. I have one, we'll need one more. The march has on-site jail support person, they asked if we could have one too."

166) On or about February 25, 2026, at approximately 10:59 p.m., **KIM** sent a message in the "Whip 03/01" Signal chat group, stating, "The walking trail (between light rails at or around the Whipple Building) is really chill and you can go pretty for up it. 30 mins north takes you out a dog park by light rail if you're feeling paranoid. Good spots to change and ditch clothes along the way if needed."

167) On or about February 27, 2026, at approximately 2:21 p.m., **DOYLE** drove his Dodge Ram to **SANT's** residence in St. Paul.

168) At approximately 2:30 p.m., **DOYLE** and **SANT** departed **SANT's** residence in the Dodge Ram and drove in or around Peavey Plaza in Minneapolis.

169) At approximately 3:07 p.m., **DOYLE, SANT,** and others removed signs from **DOYLE's** Dodge Ram.

170) At approximately 6:44 p.m., **DOYLE** and another individual loaded shields into the back of **DOYLE's** Dodge Ram at the rear of his residence.

171) At approximately 7:10 p.m., **DOYLE** drove his Dodge Ram to the area at or around Hamline Park in St. Paul. **DOYLE** parked and several individuals walked towards his truck. **DOYLE** unloaded shields from underneath a green tarp out of the back of his Dodge Ram and handed them out to the group.

172) On or about February 27, 2026, at approximately 7:15 p.m., **DOYLE** led shield training at Zion Community Commons in St. Paul. **DOYLE, SANT, KENNEDY,** and others took part in the training.

173) At shield training, **DOYLE** stated that the shield provides an advantage in situations where you are close to the enemy. **DOYLE** continued, "…fighting with the fascists rather than just going at them just chest to chest with no shields, if you have a shield wall, you are going to be more effective and much more safe than they are…Take your strongest, heaviest, fastest most aggressive people and put them at the point of that wedge…have your strongest people pushing through…" **SANT** stated, "Find two scrawny looking cops and get between…and in that case, somebody just used an umbrella as a wedge…and just parted the two cops."

174) On or about February 28, 2026, at approximately 8:53 a.m., **APLAND** sent a message in the "TC DA (2)" Signal chat group, stating, "IF the plastic really is better for repelling projectiles…we should look into getting a bunch of flat plastic that we can cut flat shields out of." **KENNEDY** responded, "Part of what makes the barrel shells Id a lot better for protecting against projectiles is the curved shape, it deflects impact where as flat surfaces just eat the impact, you can feel the vibration a lot more and flat surfaces splinter easier. Frankly I think we will be doing 98% protecting against projectiles and maybe 2% fending off snitch squads with shields on Sunday. In this recent

iteration of struggle, the cops have almost never brought shields of their own and heavily favor projectiles."

175) On or about February 28, 2026, at approximately 9:02 p.m., **VAN DE WATER DAVIS** sent a message in the "Whip 03/01" Signal group chat, stating, "Hey folks. My buddy for my vehicle dipped on me. I need a backup, anyone who can act in that role dm me ASAP." **VAN DE WATER DAVIS** responded, "Problem solved." Two coconspirators replied with heart emojis.

176) On or about March 1, 2026, at approximately 7:22 a.m., **VAN DE WATER DAVIS** sent a message in the "Leave and Delete" Signal group chat, stating, "Sparky (**BEISELL**) and I are en route to Whipple for first scout…1 sheriff at North Lot…2 sheriffs parked by train tracks at light rail station…4 sheriffs at 6000 minnehaha…5-6 Sheriffs at gate 3…2 sheriffs at the freeway exit…2 sheriffs at fort snelling park And ride south lot." **STEWART** and an unindicted coconspirator sent "thumbs up" emojis.

177) On March 1, 2026, from on or about 8:45 a.m. to on or about 8:55 a.m., **THORESON** and several other individuals arrived at the Fort Snelling Light Rail station.

178) At approximately 8:56 a.m., **THORESON** provided a radio to an individual with a black hat and grey jacket.

179) At approximately 8:59 a.m., **THORESON** provided a radio to an individual wearing a blue jacket on a bike.

180) At approximately 9:01 a.m., **SANT** and numerous other individuals arrived at the Fort Snelling Rail station.

181) At approximately 9:02 a.m., **SANT** attempted to get the attention of **THORESON**.

182) At approximately 9:05 a.m., **SANT** handed out goggles from his backpack while at the Fort Snelling Rail station. **THORESON** was near **SANT** with a bullhorn.

183) At approximately 9:06 a.m., **SANT** and **THORESON** directed coconspirators at the Fort Snelling Rail station.

184) At approximately 9:11 a.m., **SANT** and approximately seven other coconspirators left the Fort Snelling Rail station and walked eastbound.

185) At approximately 9:15 a.m., **THORESON** was at the Fort Snelling Rail station with an unindicted coconspirator and possessed a radio. **THORESON** put an earpiece in her ear.

186) At approximately 9:22 a.m., **THORESON** left the Snelling Light Rail station and walked to the North Park and Ride parking lot in the vicinity of the Whipple Building.

187) At approximately 9:25 a.m., approximately 10 individuals with gas masks and umbrellas walked to the North Park and Ride parking lot.

188) At approximately 9:29 a.m., **VAN DE WATER DAVIS** drove a white Dodge Ram Wagon ("white van"), which was registered to **STEWART,** to the North Park and Ride parking lot. **BEISELL** was a passenger in the white van. **VAN DE WATER DAVIS** and **BEISELL** distributed shields to coconspirators.

189) At approximately 9:32 a.m., **VAN DE WATER DAVIS,** with **BEISELL** as a passenger, drove the white van and was pulled over by Hennepin County Sheriffs Office deputies near the Whipple Building.

190) At approximately, 9:33 a.m., coconspirators with shields walked southbound on Minnehaha Avenue.

191) At approximately 9:41 a.m., **THORESON** was with two unindicted coconspirators in the area of the North Park and Ride parking lot. **THORESON** possessed a bullhorn.

192) At approximately 9:44 a.m., **THORESON** possessed a radio and was with a group of coconspirators. **THORESON** was detained by Hennepin County deputies.

193) At approximately 9:56 a.m., coconspirators with shields blocked access to and from Minnehaha Avenue North in the vicinity of the Whipple Building.

194) At approximately 9:58 a.m., **DOYLE** and other coconspirators holding shields blocked a road near the North Park and Ride parking lot, which prevented vehicle access to and from the Whipple Building.

195) At approximately 10:00 a.m., **DOYLE** and other coconspirators placed debris in Minnehaha Avenue at or around the North Park and Ride parking lot, which blocked vehicle access to and from the Whipple Building.

196) At or around 10:02 a.m., **VAN DE WATER DAVIS** drove the white van to the area at or around the U-Haul cargo carrier and RV.

197) At approximately 10:04 a.m., **DOYLE** and other coconspirators used shields and placed debris in the roadway at or around the North Park and Ride parking lot, which blocked access to and from the Whipple Building.

198) At approximately 10:06 a.m., individuals began to form a blockade on Minnehaha Avenue North. **MISTEREK** drove his blue Ford F-150 ("blue truck") to Minnehaha Avenue North. **STEWART** and **KIM** exited the passenger side of the blue truck. **SANT** approached the rear of the blue truck.

199) At approximately 10:07 a.m., **SANT, DOYLE, KIM, STEWART,** and an unindicted coconspirator began to remove debris, including multiple "Czech hedgehogs," which are static obstacles made of metal angle beams, from the blue truck. **MISTEREK** then drove the blue truck, with **STEWART** and **KIM** as passengers, away from the area of Minnehaha Avenue North.

200) Beginning at approximately 10:08 a.m., **SANT,** an unindicted coconspirator, and others participated in the hard blockade on Minnehaha Avenue North, which prevented vehicles from going to or from the Whipple Building.

201) At approximately 10:15 a.m., Hennepin County deputies performed disbursement notifications to individuals at the blockade at Minnehaha Avenue North.

202) At approximately 10:23 a.m., an unindicted coconspirator was parked near the blockade on Minnehaha Avenue North. An unidentified individual approached the unindicted coconspirator and asked if the unindicted coconspirator could be "evac driver." The unindicted coconspirator agreed to be an "evac driver." The unindicted coconspirator drove a white Toyota Corolla.

203) At approximately 10:23 a.m., an unindicted coconspirator parked a Honda Fit near the blockade on Minnehaha Avenue North.

204) From approximately 10:50 a.m. to 10:56 a.m., Hennepin County Sheriffs deputies gave multiple dispersal orders to individuals blocking traffic at or around the Whipple Building.

205) At approximately 11:00 a.m., individuals threw projectiles at Hennepin County Sheriffs near the Whipple building main gate.

206) On or about March 2, 2026, at approximately 12:34 p.m.., an unindicted coconspirator sent a message in the "3_1 Marshals" Signal chat group, stating, "Hello all. I am still missing two radios one with white tape on the back and one with green tape. @Schatzi (**THORESON**) so glad you made it out! I have four of your radios in their packages. Where can I drop these?"

207) On or about March 2, 2026, at approximately 12:52 p.m., **THORESON** sent a message in the "3_1 Marshals" Signal chat group, requesting to set up a debrief pertaining to the March 1, 2026 direct action at the Whipple Building.

208) On or about March 3, 2026, at approximately 6:40 p.m., **THORESON** led a "virtual debrief" in the "3_1 Marshals" Signal group chat. The group noted that law enforcement's response to the March 1, 2026 Whipple Building action was quick. The group stated that shield deployment took too long and that dropping shields closer to the "hard blockade" could yield better results. The group also agreed that rental cars and U-Haul cargo carriers could be used as distractions for future actions. **THORESON** encouraged people to join TCDA and get vetted.

209) On or about March 3, 2026, at approximately 7:25 p.m., **BEISELL** sent a message in the "Whipple Watch (Refresh)" Signal group chat, stating, "A note about trade contractor vehicles in MN: Minnesota law…requires electrical contractor vehicles to display the company name and license number on both sides. These marking must be in a contrasting color, with characteristics at least 3 inches high and 0.5 inches wide. This could help in distinguishing legit vehicles from bogus ones." A unindicted coconspirator responded, "I'm sorry how did they possibly think that log wasn't just the most obvious…"

210) On or about March 4, 2026, at approximately 11:58 a.m., an unindicted coconspirator sent a message in the "Renegades" Signal chat group, stating, "INFO FROM @MOONBEAR (**KIM**) about moving barricades/walls: Heavy duty cutters https://www.grainger.come/product/5MK42 Ppl use these sometimes to cut exhaust pipes cleanly. It's also very quiet and only needs a fraction of a turn at a time."

211) On or about March 7, 2026, at approximately 5:23 p.m., **KENNEDY** posted a link to a GoFundMe page to support a martial arts class hosted by Left Jab in the "DAMN" Signal chat group.

212) From approximately March 11, 2026 to approximately May 21, 2026, **RAKOTZ** sent numerous messages in the "Whipple Plates," "Whipple Watch (Refresh)," and other Signal group chats, which included detailed descriptions of government-issued vehicles and their license plates as well as physical descriptions of suspected immigration and law enforcement officers.

213) On or about March 11, 2026, at approximately 8:20 a.m., **RAKOTZ** sent a message in the "Whipple Watch (Refresh)" Signal group chat, stating, "I signed up for 3:00 to 5:00 as well as shadowing if possible. If not I have recorded plates before just not the same way that you guys do it. But either way I'll be there from 3:00 to 5:00."

214) On or about March 15, 2026, at approximately 7:42 p.m., **ROBINET** sent a message in the "SecuritAs" Signal chat group, stating, "Okay, we've voted this is going to be a group, and we are going to solicit names from the loop for a week before making a decision. Securitas is the name of a major corporation and we should not have a joke name that might get us legal threats." Several participants had suggestions for the security group's name. **ROBINET** messaged, "I've been trying so f****** hard to turn a group into the provisional something or other…" **DOYLE** responded, "Oh, the anarcho syndicalists in Weimar Germany had security forces called the Shwarze Scharen, or Black Herds, or Black Flock. To keep the alliteration it would be the Black Band, or…well, the Black Bloc. They actually used Black Bloc tactics, too-wearing all black clothing and masks when they fought fascists."

215) On or about March 15, 2026, at approximately 9:34 p.m., an unindicted coconspirator sent a message in the SecuritAs Signal chat group, asking, "Is anyone opposed to me sharing the notes with Ray Rainbolt (Ray Rainbolt Memorial Shooting Club)?"

216) On or about March 18, 2026, at approximately 3:33 p.m., **RAKOTZ** sent a message in the "Whipple Plates" Signal group chat, stating, "Out g3 (gate 3). Shades and hood up. Florida plates blacked out windows."

217) On or about March 20, 2026, at approximately 11:58 a.m., **KENNEDY** sent a message in the "DAMN" Signal chat group, stating, "…Being able to drag

forces away from Whipple with a feint opens up other opportunities along with the idea of driving vehicles through to get them to follow us. We can use their (law enforcement) predictable aggressiveness to our advantage, goad them into the city away from Whipple and maybe another attempt at Whipple itself thereafter."

218) On or about March 21, 2026, at approximately 9:20 a.m., **RAKOTZ** sent a message in the "Whipple Plates" Signal group chat, stating, "Out g3 (gate 3). Female driver. Passenger hiding face."

219) On or about March 24, 2026, at approximately 12:18 p.m., **SANT** sent a message in the "Whipple Watch (Refresh)" Signal chat group, stating, "I'm flying solo at Whipple right now. Does anybody feel like copiloting?" **SANT** later messaged that, "Sugar Glider (unindicted coconspirator) is copiloting with me. They should be added to this chat so they can post."

220) On or about March 25, 2026, at approximately 9:39 a.m., **RAKOTZ** described how to obtain good photographs of license plates at Gate 3 of the Whipple Building in the "Whipple Watch (Refresh)" Signal group chat. **RAKOTZ** stated, "If they have a front plate I try to get it at the stop sign. Otherwise I zoom in more and just take a bunch of pictures as they drive up if possible and usually at least one of them is clear enough."

221) On or about March 27, 2026, at approximately at 1:25 p.m., an unindicted coconspirator sent a message in the "DAMN" Signal group chat, stating,

"Doob was arrested while commuting. Talking to Tony S on Signal now-he was not arrested." **APLAND** responded with a thumbs up emoji.

222) On or about March 27, 2026, at approximately 1:54 p.m., **SANT** sent a message in the "DAMN" Signal group message, stating, "Hey fyi: I have a separate burner phone for commuting. I will NEVER have the Tony Success phone on me for ICE-watching. Even if I do get arrested, there is no need to remove this account. Only my burner account."

223) On or about March 29, 2026, at approximately 11:02 a.m., **SANT** sent a message in the "Whipple Watch (Refresh)" Signal group message, stating, "No commuters yet at Whip. I'm doing a ground observer shift today. If you can do some Whipple commuting please come." An unindicted coconspirator responded, "Can't today, have plans at 1230 otherwise I would." Another unindicted coconspirator replied, "I will be there soon, but would love to not be the only car."

224) On or about March 29, 2026, at approximately at 2:14 p.m., **SANT** sent a message in the "Whipple Watch (Refresh)" Signal group chat, stating, "Hennepin sheriffs are posted upon the median strip on 62E on-ramp, many departing ICE agents are stopping to talk to them. More observers down at Whipple would be much appreciated right now."

225) On or about March 31, 2026, at approximately 11:37 p.m., **ROBINET** posted a flyer titled "Ray Rainbolt Memorial Shooting Club 10th

Anniversary Party" in the "SecuritAs" Signal chat group. The flyer noted there would be live music by Emmett Doyle (**DOYLE**). **ROBINET** noted, "…Please do not share this to other loops or on social media…"

226) On or about March 31, 2026, at approximately 6:38 p.m., **RAKOTZ** sent a message in the "WW Chatter!" Signal group chat, stating, "Hey y'all. Please DM me about what you have noticed as far as HCSO's (Hennepin County Sheriff's Office) behavior regarding ICE. So they think they are showing up during commuting because they are on to our hours or are being called once we start following? What have you seen that makes you think they are working together? Thanks! Gathering data!"

227) On or about April 2, 2026, **ROBINET** and other unindicted coconspirators took part in the "Anarchist Speaking Tour" in Chicago, Illinois. **ROBINET** explained, "We made this group called Workers Solidarity Circle coalition between local DSA (Democratic Socialists of America) branch, Black Cat Workers Collective, which is the descendant of people familiar with the Ray Rainbolt Shooting Club and Red Pine Revolutionary Collective. So we've been working towards building these workers assemblies to get inter-union conversation going. But when all of this stuff went down, we threw together this emergency kind of mass meeting about the incident at hand here. And not only did we put it out to all of the union people, we put it out to all of the rapid response chats in the cities." **ROBINET** discussed expanding the

rapid response structure beyond anti-immigration enforcement activities, stating, "There's a lot more potential in these structures than they're even being used for, you know, as things are kind of slowing in some ways in Minneapolis and they're setting their sights elsewhere…you know in these neighborhood group chats, people ask questions like what is mutual aid? Is that just kind of like charity? Not really. But you know, kind of here's what here's what we're trying to do. You know, people have questions about anti fascism…you know, can we organize against regular law enforcement…like during the George Floyd situations in 2020, there were neighborhoods that had, you know, groups like this that tried out some of this stuff into big success." **ROBINET** continued, "A lot of people elike to think about this as just community defense kind of a thing, which I think it's true in some ways, you know, but community defense also means attack, right? Some people are purely here for creating safe….there's also like an inherent militancy into this project and it's all part of like a chain of insurgency." **ROBINET** stated, "All three of us are anarchists," referring to himself and the other two speakers.

228) On or about April 8, 2026, **ROBINET, MORGAN,** and other DAMN coconspirators took part in the "Anarchist Speaking Tour" in Ann Arbor, Michigan. During the event, they discussed "commuting" tactics directed towards immigration enforcement officers. **MORGAN** stated, "another part

of our rapid response infrastructure that's rather critical is relays. Just for context, like ICE is an entirely car-based operation. They're driving from one place to another and they're driving fast. So they rarely stay in one place for very long. And it's important that when they leave one area and enter another, the area they're entering is alerting so that place's rapid responders and patrollers can address the situation. This is known through relays in each hyper local chat." **ROBINET** discussed "rapid response," stating it "is an inherently militant project…this is something with the explicit aim of combating and stopping a federal agent with a gun."

229) During the event, **ROBINET** told the crowd, "So this is an anarchist speaking tour. We're all anarchists. This is something that we believe in principle, but you know, the whole movement in the Twin Cities…they didn't believe these things first…They did them. Because they worked, right? We found that time and time again that the centralized model is a model of telling other people what to do…and what does work is that we stand out together where we see each other as only human beings, and we adopt this horizontal power structure, right? We all contribute in the way that we can. When we don't stop the people who are trying something different or something new, even if we don't agree with it, you know, this may be an opportunity for discussion, but we're not going to try and tear each

other down because that's not helpful, right? This is the kind of everyday anarchism that made this resistance function right."

230) On or about April 17, 2026, at approximately 10:18 a.m., an unindicted coconspirator sent a message in the "Whipple Watch (Refresh)" Signal group chat, stating, "Can vouch for Juliet K (**ROBINET**)! They will be my copilot today."

231) On or about April 17, 2026, at approximately 11:19 a.m., **ROBINET** sent a message in the "Whipple Watch" Signal group chat, stating, "Cora (unindicted coconspirator) and I are on lrj105, west on 62." **ROBINET** then sent out a license plate, which he noted, "was a decoy for the white charger." **ROBINET** later messaged, "Van convoy headed up post road…van convoy headed to checkpoint gate 222." **ROBINET** continued that, "That convoy was 3 large vans full of detainees from Whipple to gate 222" and he sent out four vehicle and three license plate descriptions. At 2:34 p.m., **ROBINET** messaged that, "Cora (coconspirator) and I followed that (license plate number for a government-issued vehicle) black Dodge charger up Hiawatha. then he turned his lights on and floored it after Franklin -nearly caused an accident heading towards 7th st exit and last minute cut to 35w. Lost him around 35w bridge. We're calling it for today. Stay safe and chill, f**k ice."

232) On or about April 18, 2026, **SANT, KENNEDY,** and **MORGAN** took part in the "Anarchist Speaking Tour" in Seattle, Washington. During the event,

SANT said, "We're here from Minneapolis. We're on tour to talk about our experiences resisting the ICE occupation. **KENNEDY** discussed the history of violent resistance in Minneapolis. **KENNEDY** described the looting and burning of the Minneapolis Police Department's Third Precinct as "the happiest moment of my life." **KENNEDY** explained, "A lot of mutual aid networks that were later characterized…this resistance to ICE came from the George Floyd uprising."

233) During the event, **SANT** described taking part in the January 14, 2026 theft of materials from law enforcement vehicles near Lyndale Avenue North and 23rd Avenue North. **SANT** explained he saw three black vehicles being looted and observed individuals break into the vehicle. **SANT** stated that individuals "pry open a gun safe" in the back of one of the vehicles. **SANT** explained, "some kids like like rip open the glove box and start live streaming on Instagram the sensitive documents that were inside. And we got the full names of like 10 ICE agents and some operational details from Whipple from that. I remember getting out my phone and being like yeah these look like ICE…and like checking their license plates against a database that we maintain and feeling really stupid for doing clerical work in the middle of a riot." He continued "Right after this happened, MPD tear gassed us…we were expecting them to come like, you know, come through the gas cloud and arrest people. But that didn't happen…So I and one of my friends went

and scouted the perimeter and we saw that they were actually gone and they had ceded the streets to the people."

234) At the event, **KENNEDY** discussed the January 23, 2026 direct action at the Whipple Building. He discussed utilizing a "soft blockade with shields at one entrance." **KENNEDY** said there were "two other deployment teams…those deployment teams had trailers that they had bought off of Facebook Marketplace for really cheap and they essentially tried to blockade the other entrances simultaneously with this blockade (pointed to soft blockade on the projector). One of those trailers was deployed and flipped and successfully shut access. The other was about 30 seconds away from successful deployment before the team was actually pepper sprayed. They managed to avoid arrest…and they managed to drive away, albeit losing the trailer in the process."

235) During the event, **SANT** discussed the logistics of "commuters," who follow, harass, and confront federal immigration enforcement vehicles. **SANT** described, "…commuters were on a phone call in real time with a dispatcher who was somewhere with a dispatcher who was somewhere in the privacy of her own room reporting on like that convoys movements. That dispatcher was in a relay chat that allowed for communication between the Elliott Park and the adjacent Loring Park neighborhood…" **SANT** further explained, "We don't recommend that anybody ever commute or control by yourself

because it's an inherently dangerous thing. So you always want to do that with a buddy who's your copilot. So like you're driving and looking for ice, your co-pilots on the phone talking to dispatch and however many other commuters on a Signal call…you might ask that dispatcher for plate checks, like they're looking at a database of license plates and you're not. And you might be like, so a lot of like your day and you're like, hey I wonder if that's ICE…And like you see a suspicious looking white Jeep Wagoneer, your copilot like reports a dispatch…and then you follow that car until you can't anymore." **SANT** then described Whipple Watch as a "counter surveillance project," stating, "This is a very like boring and unglamorous and unsexy side of our work, but basically what I and my comrades do is we go down to Whipple building and hang out there all day and photograph every ICE vehicle that's coming in and out of the vehicle." **SANT** continued that, "Now in April and we have it down to a science and it's more or less instantaneous. We maintain a searchable database in conjunction with data collection group called Defrost that's publicly searchable on a website…Defrost is the list of every vehicle that we've ever seen ICE in make and model plates and like where and how many times it's been spotted…So what we've started to experiment with now is we maintain a second database that's only current plates. We erase it at the end of every night and we refresh it the next morning…and hot dishes is just a database of like all the active plates that

left Whipple that day. So commuters can know like what we're, we have confirmed on the road at the moment....What we do is, I mean we have a two fold motive of like getting their plates and blasting those out to all the neighborhoods and also just like wasting their time and resources."

236) During the event, **KENNEDY** described different ways to blockade the Whipple Building, including "intentional shut them down blockades." **KENNEDY** pointed to the projector screen and said, "the one you see over here is another shield wall on March 1st." He continued, "this demonstration had four components to it. There was a above ground march that was led by indigenous sundancers that would take up gate one of the Whipple Building and the others were designed to essentially shut down the other two points of egress...there was 3 deployment teams. The first deployment team brought in shields." The second deployment team "was sent in and they had something to be like tank busters..." **KENNEDY** described these items as similar to "images of like D-Day, they're like the metal X structures that you see and actually when the vehicles hit them, it digs back into the road and will stop the vehicle." **KENNEDY** explained, "I was on deploy 2 or deploy 3 and I had a 10-foot U-Haul box truck and a 30-foot trailer that I was going to use to block one of the entrances." **KENNEDY** stated he learned that the other two deployment teams were arrested and that ICE was "tailing" him.

KENNEDY described taking law enforcement on "a tour of the Twin Cities" and that it "was one of the dumbest police chases I've been in my life. "

237) During the event, **MORGAN** explained, "there is an inherent militancy to this project" and stated "this is something that comes with the explicit aim of stopping and combating an armed federal agent trying to violently abduct your neighbor…" **KENNEDY** stated he is a "revolutionary anarchist." He continued, "the anarchist movement will achieve the ability to have fluid communication between independent groups without stateany centralized leadership…I believe that's exactly what we're seeing in Minneapolis…"

238) During the event, **SANT** stated, "I think that Twin Cities real contribution to the field of revolutionary organization, of insurrectionary organization is these rapid response networks…" **SANT** later stated, "I am in an anarchist, revolutionary organization. It's called Blackcat."

239) During the event, **MORGAN** stated "Now we've talked about patrolling rapid responding and Whipple Watch, we want to give you a glimpse into the rest of the breadth of tactics that we've used in our insurgency against the occupation of our state."

240) On or about April 20, 2026, at approximately 12:49 p.m., **RAKOTZ** sent a message in the "Whipple Watch (Refresh)" Signal group chat, stating, "I am here to commute but waiting on copilot."

241) On or about April 21, 2026, at approximately 10:28 a.m., **RAKOTZ** sent a message in the "Whipple Watch (Refresh)" Signal group chat, stating, "Will be at whip (Whipple Building) to commute around 12."

242) On or about April 24, 2026, **KENNEDY** posted on Facebook about taking part in an interview with Seattle NPR who were covering the "Breaking the ICE" tour. **KENNEDY** discussed the anti-ICE operations in Minneapolis, writing, "...We make a very strong and compelling case that militant confrontations with ICE are what made our movement explode in numbers, drastically reduce deportation numbers and ultimately get the feds to retreat from operation Metro Surge (we even used graphs depicting the change in deportation rates before and after militant confrontations) in addition to the vast network of mutual aid and decentralized community rapid response networks." **KENNEDY** criticized a non-violent approach to opposing immigration enforcement, referring to pacificism as "an anti intellectual blight."

243) On or about April 28, 2026, at approximately 1:24 p.m., **SANT** sent a message in the "DAMN" Signal group chat, stating, "There's an effort tomorrow morning to commute around ICE's hotels by Mall of America. 7am-10am. Anybody interested in joining me to copilot?" An unindicted coconspirator responded, "I haven't copiloted since Dec/Jan but I could see if you need someone." Another unindicted coconspirator messaged, "My

commuting buddy and I could join this effort, is there somewhere I can be added for more info?"

244) On or about May 1, 2026, at approximately 5:17 p.m., an unindicted coconspirator sent a message in the "Renegades" Signal group chat, stating, "I wish there was an in-person career fair where you could go from booth to booth, and listen to all the anarchist, Rebellion, and protest plans being made, and sign up to the ones you thought were interesting. Now, it's like an Amway pyramid selling scheme. I understand that the security of a one hour self destruct message chat. How does that allow us to plan, train, and recruit for anything 'spicy'? PM, since I don't understand it." **RAKOTZ** responded, "I would love to find out more direct action/civil disobedience stuff when re the goal is to be arrested for the optics."

245) On or about May 4, 2026, a federal immigration officer left the Whipple Building in his government-issued vehicle. **SANT** drove a Hyundai Sonata and followed the federal immigration officer from the Whipple Building to Hudson, Wisconsin. St. Croix County deputies stopped the Hyundai Sonata in Hudson, Wisconsin and identified **SANT** as the driver.

246) On or about May 4, 2026, at approximately 2:08 p.m., **SANT** sent a message in the "Whipple Watch (Refresh)" Signal group chat, stating, "494 E approaching concord st s…Just getting to woodbury…Nb on 494…Do we have any rr (rapid response) calls in hudson? We're looking to handoff if

possible…We're in WI. we're going to keep following. We won't get back to Whipple for another one…Carmichael rd nb…" At 2:29 p.m., **SANT** messaged, "Cop pulling us over…stopped by police in Hudson WI…They let us go with a warning. Threatened us with criminal charges."

247) On or about May 7, 2026, at approximately 5:59 p.m., an unindicted coconspirator shared a link to the "The White House Counterterrorism Strategy," in the "DAMN" Signal group message, which discussed several national security threats, including from "anarchists and Anti-Fascists." The unindicted coconspirator messaged "The White house just declared us terrorists…" **APLAND** responded, "Terrorism is direct action." **KIM** noted that, "My new bio: anti-American, radically pro-transgender, and anarchist." **KENNEDY** messaged, "Unless we can organize large numbers and direct them to swarm Whipple, losing the gates provides almost as much challenge as having them there. It did make blocking the entrances easier with smaller numbers. It will be a lot easier for a large group to overwhelm them now and challenge the actual building but without the numbers, it seems difficult to use it to our advantage at least in the short term."

248) On or about May 7, 2026, at approximately 12:39 p.m., participants in the "DAMN" Signal group message discussed the Hennepin County Sheriff's Office removing the barriers and fencing around the Whipple Building. **SANT** messaged, "Never interrupt your enemy while they are making a

mistake...This is an opportunity we can't afford to ignore, imo (in my opinion)."

249) On or about May 9, 2026, at approximately 10:27 a.m., **MORGAN** sent a message in the "Whipple Watch (Refresh)" Signal group message, stating, "Is anyone available to copilot today? Baul plart (an unindicted coconspirator) is unavailable."

250) On or about May 11, 2026, at approximately 11:15 p.m., **MORGAN** sent a message in the "Whipple Watch 3.0" Signal group chat, stating, "Baul plart (an unindicted coconspirator) has been copiloting with me the last several times I was commuting at whipple and would like to be added to this chat, what is the process to get him added?"

251) On or about May 12, 2026, **SANT, APLAND, BEISELL**, and other coconspirators attended a DAMN meeting in St. Paul. At the meeting, participants distributed a document titled, "Direct Action Minnesota: Missions and Values." The document listed the mission statement, which read, "Direct Action Minnesota (DAMN) is a decentralized, anti-capitalist, and anti-authoritarian organization of working class people committed to defending our community against the violence committed by the state and the far right. We employ an intersectional approach of resisting oppression in all of its forms, and seek to foster a greater capacity within our group, and within the working class more generally, to meet this end. We also look to

the future. We realize that tearing down oppressive systems is only the beginning and we work towards building upon existing interdependent community to rectify the many failing of the current system." The document also explained DAMN's vetting process, stating, "Candidates that come to us on their own accord are assigned a point person from the vetting team and given a list of questions/instructions to reply, including…orgs you've been involved in the past 5 years, how you found DAMN, why you want to be part of this group, and how you define 'direct action'. Describe a direct action you participated in or you have detailed knowledge of (without naming names or admitting to illegal acts)…Members of vetting team will volunteer but their service on the vetting team must be approved by DAMN. Members must have been active in DAMN for a minimum of 3 months…before they can volunteer…Candidates that are being recommended by a current DAMN member will be asked for a character review from this member, including how they know the candidate, how long, any traits that will be helpful to DAMN, any concerns. They will also be asked about past participation in direct action that they have witnessed from the candidate (without any illegal acts identified to anyone as above)…an initial vote on each prospective member shall be conducted over a period not to exceed 7 days…All new members have the option to be assigned a 'supportive comrade'…"

252) At the meeting, **SANT** discussed a group called Rebel Loon Alliance that does both "cop watch" and "ICE watch." **SANT** stated there were "changes in the rapid response landscape that happened starting yesterday." **SANT, APLAND,** and other coconspirators discussed holding shield training on May 30, 2026. **APLAND** asked how many shields were left and **SANT** replied, "it's more than 100, less than 200, we should count."

253) At the meeting, **SANT** said, "I really feel like that we need to engineer some sort of clash with ICE…I think the fact that like that happened on a daily basis in January is why the movement swelled to the numbers it did…the propaganda value of that happening and that being like filmed and publicized is very important."

254) At the meeting, **APLAND** described a weakness of the direct actions thus far is that "we are challenging them on their turf where they have all that Whipple, right, where they have all their concentrated force…the part of the impetus of the experimentation was the sort of impromptu improvised fashion, luring them to our turf and then overwhelming them." **APLAND** continued, "I was just going to say we could arrange a sort of decoy maneuver with the federal courthouse in order to lure them…they have encountered us before…we've encountered them before. They know what to look for. And so we could easily bake them."

255) On May 12, 2026, a federal immigration officer left the Whipple Building in his government-issued vehicle. **MORGAN** drove a Honda Civic and followed the federal immigration officer from the Whipple Building to the area around the officer's residence in Hudson, Wisconsin. Hudson police officers stopped the Honda Civic in Hudson, Wisconsin and identified **MORGAN** as the driver and an unindicted coconspirator as the passenger.

256) On or about May 15, 2026, at approximately 8:48 a.m., an unindicted coconspirator sent a message describing a Homeland Security Investigation ("HSI") agent's government-issued vehicle (Government Vehicle 1) as well as his license plate number in the "Whipple 3.0" Signal group chat. The unindicted coconspirator described Government Vehicle 1 as having a "reflective hat & vest on dash." At approximately 11:24 a.m., an unindicted coconspirator referred a different government-issued vehicle in the area (Government Vehicle 2) and stated, "This vehicle was confirmed at whip and hasn't been added to the DB (database) – currently near the 28th and Bloom situation."

257) On or about May 15, 2026, at approximately 11:25 a.m., **SANT** sent a message in the "DAMN" Signal group chat, stating, "Alerta alerta: There's an ICE raid in progress RIGHT NOW at 28th and Bloomington. Ford F150…" **SANT** provided the license plate number for Government Issue

Vehicle 1 and continued, "three agents out of vehicle. I am not on scene. Get over there if you can!" **APLAND** responded, "Omw (on my way)."

258) On or about May 15, 2026, at approximately 10:20 a.m. to 11:26 a.m., HSI agents were performing their duties and conducting interviews. During this time, HSI agents noticed sandbags placed under the driver's side front tire and passenger's side rear tire of a government-issued vehicle (Government Vehicle 1). Government Vehicle 2 was also on scene. **MORGAN** then approached one of the agents and knocked the agent's notes out of his hand. **MORGAN** also kicked Government Vehicle 2 twice, causing dents. **SANT** was also present.

259) On or about May 15, 2026, at approximately 1:17 p.m., **SANT** sent a message in the "DAMN" Signal group chat, stating, "ICE situation in south mpls is resolved for now – one vehicle left, the other one got a flat tire somehow and pulled into the police station lot on Nicollet." An unindicted coconspirator responded, "Somehow? Like 'somehow' somehow?" and included a smiley face and devil emoji. **APLAND** replied, "Couldn't drive within the law, couldn't change a flat without the law."

260) On or about May 18, 2026, a federal immigration officer left the Whipple Building in his government-issued vehicle. **RAKOTZ** drove a Honda Civic and followed the federal immigration officer from the Whipple Building to the area of Minnesota State Highway 55 and Minnesota State Highway 5.

RAKOTZ "brake checked" the officer and "side swiped" the officer's vehicle, causing a collision.

261) On or about May 18, 2026, at approximately 2:14 p.m., an unindicted coconspirator sent a message in the "DAMN" Signal group chat, stating, "Remove anuran (**RAKOTZ**)" Another unindicted coconspirator tagged **VAN DE WATER DAVIS** and other unindicted coconspirators. An unindicted coconspirator, who was the chat administrator, messaged "On it" and removed **RAKOTZ** from the "DAMN" Signal group chat at approximately 2:17 p.m.

262) On or about May 18, 2026, at approximately 4:43 p.m., **RAKOTZ** sent a message in the "Whipple Watch 3.0" Signal group chat, stating, "I was never in custody to be clear but good job y'all I'm being so quick to boot me just in case…Oh hell yeah group safety is way more important than my admission to a group! Like I said I was hella impressed."

263) On or about May 18, 2026, at approximately 7:12 p.m., an unindicted coconspirator added **RAKOTZ** back to the "DAMN" Signal group chat." **RAKOTZ** responded, "Thanks for the re-add!"

264) On or about May 19, 2026, at approximately 8:34 a.m., an unindicted coconspirator sent a message in the "DAMN" Signal group chat asking when ICE activity is the highest at the Whipple Bhilding. **RAKOTZ** responded, "It seems to vary. Late afternoon you see the most exists in a shorter period

of time as it's 'end of business'. Midday is when there is a dispatched commuting so a fair level of in and outs. Definitely not weekend."

265) On or about May 21, 2026, at approximately 2:23 p.m., **SANT** sent a message in the "DAMN" Signal group chat, stating, "NEED OBSERVERS. STAGING." **SANT** then sent a description and license plate number for a government-issued vehicle and continued, "parked in front of Cayuga Park. Attempted abduction here earlier today. Still in cars but at least 4 occupants. If able to respond please join RLA." **SANT** again described government-issued vehicles as well as license plate numbers. **SANT** explained, "Confirmed ICE by East Metro Garage…They're still there, mostly in their cars. I'm circling." **SANT** later texted, "Great work today. everyone. DAMN showed up strong and moved the need on this Cuyhoga Park situation. I'm proud of us."

266) On or about May 26, 2026, **APLAND, VAN DE WATER DAVIS, BEISELL,** and others attended a DAMN meeting in St. Paul. **VAN DE WATER DAVIS** discussed a planned direct action at Federal Ammunition on July 11, 2026. The group discussed upcoming shield training and a shield building day.

267) On or about May 31, 2026, **SANT** and several unindicted coconpsirators discussed supplying and assisting a direct action at the Delaney Hall immigration facility in New Jersey in the "DAMN" Signal group chat. An

unindicted coconspirator messaged, "Through sheer coincidence, I did an infosec training for a New Jersey anarchist mutual aid and community self defense group on Monday – I've reached out to them to ask whether there's any support folks from MN can provide." **SANT** responded, "[URGENT CALL FOR SUPPLIES] MN > NJ] Vehicles are heading to the Delaney detention center protests between now and Tuesday. PRIORITY NEEDS: gas masks, especially MIRA…goggles…" **SANT** posted "Delaney Hall last night" and shared a youtube link titled, "BREAKING: COPS CLASH With ICE Protests at Delaney Hall." **SANT** provided a drop-off location for supplies.

268) On or about June 6, 2026, at approximately 8:52 a.m., participants in the "DAMN" Signal group chat discussed the direct action occurring at the Delaney Hall ICE facility in the "DAMN" Signal group chat. **KENNEDY** stated that it was "intense" and "those cars (leaving the Delaney Hall facility) need to be stopped by any means necessary…blockades, tire spikes, bashing windows and disabling. Anything. When cars are used as a weapon, all bets are off."

269) On or about June 6, 2026, at approximately 11:00 a.m., **KENNEDY** sent a message in the "Left Jab" Signal group chat, stating, "Hey all. I think I'm going to cancel Swarm training for Thursday the 18th in an effort to make sure enough folks come to the one on Sunday the 21st…I'm thinking of

holding in in (sic) Powderhorn park Sunday June 21st 12:30-2:30...We should print out more fliers to hand out there."

all in violation of Title 18, United States Code, Section 372.

COUNT TWO
Solicitation to Commit a Crime of Violence
(Violation of 18 U.S.C. § 373)

270) On or about January 24, 2026, in the District of Minnesota and elsewhere, the defendant, **KYLE WAGNER,** with the intent that another person would engage in conduct constituting a felony that has an element the use, attempted use, or threatened use of physical force against property or against the person of another in violation of the laws of the United States, and under circumstances strongly corroborative of that intent, solicited, commanded, induced, or otherwise endeavored to persuade another to engage in such conduct, that is assault with a dangerous or deadly weapon against an officer or employee of the United States, in violation of Title 18 United States Code, Section 111(b), in violation of Title 18, United States Code, Section 373.

COUNT THREE
Interstate Threats
(Violation of 18 U.S.C. § 115(a)(1)(B))

271) On or about January 24, 2026, in the District of Minnesota and elsewhere, the defendant, **KYLE WAGNER,** did threaten to assault, kidnap, and murder a federal law enforcement officer, with intent to impede, intimidate, and interfere with the officer while

he or she was engaged in the performance of his or her official duties or with intent to retaliate against such officer on account of the performance of official duties, in violation of Title 18, United States Code, Section 115(a)(1)(B).

COUNT FOUR
Interstate Stalking
(Violation of 18 U.S.C. § 2261A(1)(B))

272) On or about May 4, 2026, in the District of Minnesota and elsewhere, the defendant, **ISAAC AUMAN SANT,** traveled in interstate or foreign commerce, with the intent to kill, injure, harass, intimidate, or place under surveillance another person, and in the course of, or as a result of, such travel or presence, engaged in conduct that caused, attempted to cause, or would be reasonably expected to cause substantial emotional distress to a person, in violation of Title 18, United States Code, Section 2261A(1)(B).

COUNT FIVE
Interstate Stalking
(Violation of 18 U.S.C. § 2261A(1)(B))

273) On or about May 12, 2026, in the District of Minnesota and elsewhere, the defendant, **WILLIAM MORGAN,** traveled in interstate or foreign commerce, with the intent to kill, injure, harass, intimidate, or place under surveillance another person, and in the course of, or as a result of, such travel or presence, engaged in conduct that caused, attempted to cause, or would be reasonably expected to cause substantial emotional distress to a person, in violation of Title 18, United States Code, Section 2261A(1)(B).

COUNT SIX

Assault on a Federal Officer
(Violation of 18 U.S.C. § 111(a)(1))

274) On or about May 15, 2026, in the District of Minnesota and elsewhere, the defendant, **WILLIAM MORGAN,** forcibly assaulted, resisted, opposed, impeded, intimidated, and interfered with an officer or employee of the United States or an agency in a branch of the United States Government, designated in 18 U.S.C. § 1114, who was engaged in the performance of official duties, in violation of Title 18, United States Code, Section 111(a)(1)).

COUNT SEVEN
Destruction of Government Property
(Violation of 18 U.S.C. § 1361)

275) On or about May 15, 2026, in the District of Minnesota and elsewhere, the defendant, **WILLIAM MORGAN,** willfully and by means of kicking a Government-issued vehicle, injured and committed a depredation against property of the United States and of any department or agency thereof, specifically, a Government-issued vehicle, and the resulting damage exceeded $1,000, in violation of Title 18, United States Code, Section 1361.

COUNT EIGHT
Assault on a Federal Officer
(Violation of 18 U.S.C. § 111(a)(1))

276) On or about May 18, 2026, in the District of Minnesota and elsewhere, the defendant, **NATASHA RAKOTZ,** forcibly assaulted, resisted, opposed, impeded, intimidated, and interfered with an officer or employee of the United States or of an agency in a branch of the United States Government, designated in 18 U.S.C. § 1114, who was engaged in the performance of official duties, and caused physical contact and inflicted bodily injury, and used a dangerous weapon, specifically, a vehicle, in violation of Title 18, United States Code, Section 111(a)(1) and (b).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON