

FILED

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CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES

JB

8 UNITED STATES DISTRICT COURT  
9  
10 CENTRAL DISTRICT OF CALIFORNIA

11 John Doe and Jane Doe,  
12 Petitioners/Plaintiffs,

13 v.

14 U.S. Immigration and Customs  
15 Enforcement (ICE);  
16 Department of Homeland Security  
17 (DHS);  
18 Kristi Noem, Secretary of DHS;  
19 Field Office Director, Enforcement and  
20 Removal Operations (ERO), Los Angeles,  
21 in their official capacities; and  
22 John Doe ICE Officers 1-500, in their  
23 individual capacities,

24 Respondents/Defendants.

CASE NO: 2:25cv11902-HWC-Asx

Title: NOTICE REGARDING PUBLIC  
DOCKET, JUDICIAL SECURITY, AND  
CONDITIONAL SEALING

Date:

Time:

Dept:

(OR SOONEST AVAILABLE DATE)

1 **NOTICE REGARDING PUBLIC DOCKET, JUDICIAL SECURITY, AND**  
2 **CONDITIONAL SEALING**

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4 TO THE HONORABLE COURT:

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7 Petitioners respectfully submit this notice to clarify their intent regarding public docket status,  
8 pseudonymous filing, and concerns for judicial security and institutional oversight.

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11 **1. This Case Was Meant to Be Public**

12 Petitioners affirm that this lawsuit is not a private grievance, but a matter of public concern. It  
13 was filed with the specific intent that it be read not only by the Court, but by the public —  
14 including those who still see themselves as **auditors of the covenant between the free people**  
15 **and the government they have empowered.**

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18 The allegations in this case raise urgent and systemic questions:

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- Whether indefinite ICE supervision post-CAT protection is lawful;
- Whether Petitioners' ADA and First Amendment rights have been violated under  
color of law;
- Whether acts of retaliation, intimidation, and coercion have occurred with impunity.

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25 Petitioners have also launched a public platform, [www.iceterrorism.com](http://www.iceterrorism.com), to ensure transparency  
26 and public access to these proceedings.

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2 **2. Pseudonym Protection is for Safety, Not Secrecy**

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4 Petitioners request pseudonym status solely for safety — not to shield the truth. Petitioners and  
5 their family and associates have already suffered:

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- Potential arson and suspected retaliatory attacks, currently under investigation;
- Unlawful law enforcement contacts;
- Targeted surveillance and procedural harassment.

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10 This request mirrors the protections in Doe v. Stegall and other cases where disclosure would  
11 pose a real and imminent risk to safety and liberty.

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15 **3. If the Court Will Not Permit Pseudonymity, Petitioners Submit to Sealing**

16 Should the Court find pseudonym protection insufficient, Petitioners defer to its discretion and  
17 **do not object to sealing.** However, Petitioners ask that the record reflect:

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- This case was filed in truth and public spirit, not concealment;
- Petitioners explicitly wish for the American people to have access to these claims;
- Any sealing would not reflect an intent to litigate in secrecy, but rather a forced  
protective measure against real threats.

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26 **4. Judicial Security Awareness**

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1 Petitioners respectfully ask the Court to remain vigilant to the possibility of further retaliation or  
2 symbolic intimidation (including repeat suspected acts of arson, flag desecration, and harassment  
3 at the family's protected residence and the homes of associates). Petitioners welcome any  
4 coordination the Court deems appropriate, including optional notification to judicial security  
5 units, U.S. Marshals, or DHS-OIG.  
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9 **5. Oversight Requested: Potential Abuse of Government Immunity to Shield Pattern**

10 **Misconduct**

11 Petitioners further request that the Court be aware that the issues raised in this case are not  
12 isolated. The pattern of conduct described — including 14+ years of unlawful supervision,  
13 coercive reporting, contractor profiteering, false imprisonment, retaliation, and misappropriation  
14 of funds — may indicate that **ICE is functioning, in part, as a structural front for shielding**  
15 **RICO-style pattern activity behind the veil of governmental immunity.**

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17  
18 This Court's review could determine whether immunity has been transformed into impunity —  
19 and whether a legitimate agency has been compromised by private profit motives, civil rights  
20 violations, and organized administrative abuse.  
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23  
24 **CONCLUSION**  
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26 Petitioners respectfully request:  
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- That this case **remain public** for the benefit of the people;
- That pseudonym status be granted for protection, not concealment;
- And, if the Court finds pseudonymity inadequate, that sealing be allowed without prejudice to the truthfulness or public importance of the claims.

This is not simply a lawsuit. It is a message — that abuse of power will be challenged, not quietly endured.

Respectfully submitted,

December 18, 2025

**John Doe Pro Per:** Det

John Doe Pro Per: Det, Jane Doe Pro Per: V