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2025 DEC 18 PM 12:44

CLERK U.S. DISTRICT COURT
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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.
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26
27
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CASE NO: 2:25cv11902-MWC-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
5 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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12 **1. This Case Was Meant to Be Public**

13 Petitioners affirm that this lawsuit is not a private grievance, but a matter of public concern. It
14 was filed with the specific intent that it be read not only by the Court, but by the public —
15 including those who still see themselves as **auditors of the covenant between the free people**
16 **and the government they have empowered.**
17

18 The allegations in this case raise urgent and systemic questions:
19

- 20 • Whether indefinite ICE supervision post-CAT protection is lawful;
21 • Whether Petitioners' ADA and First Amendment rights have been violated under
22 color of law;
23 • Whether acts of retaliation, intimidation, and coercion have occurred with impunity.
24

25 Petitioners have also launched a public platform, www.iceterrorism.com, to ensure transparency
26 and public access to these proceedings.
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28

2. Pseudonym Protection is for Safety, Not Secrecy

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

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

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

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

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

- 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.

4. Judicial Security Awareness

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.
6

7 8 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.
21

22 23 24 **CONCLUSION**

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27 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: *JD* , Jane Doe Pro Per: *J.D.*