

FILED

2025 DEC 18 PM 12:45

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

1 John Doe Pro Per  
2 Jane Doe Pro Per  
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10 UNITED STATES DISTRICT COURT  
11 CENTRAL DISTRICT OF CALIFORNIA

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

14 v.

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

20 Respondents/Defendants.  
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CASE NO: 2:25cv 11962-MWC-ASX

Title: John's declaration regarding the  
creation of www.ICETerrorism.com

Date:

Time:

Dept:

(OR SOONEST AVAILABLE DATE)

1 I, John Doe, hereby declare:

- 2 1. I am the Petitioner in this matter, proceeding pro se and under pseudonym  
3 protection granted by California Government Code §§ 6205–6211.
- 4 2. I created and published a public-facing website,  
5 <https://www.iceterrorism.com>, to document, explain, and disseminate the  
6 facts and legal issues surrounding this case.
- 7 3. The website was designed to preserve and present the factual allegations  
8 raised in this petition for writ of mandamus, injunction, and Bivens relief—  
9 including but not limited to the misuse of the Convention Against Torture  
10 protections, ADA violations, coercive supervision, ICE misconduct, and  
11 alleged retaliation.
- 12 4. I believe it is in the public interest to ensure these matters are available for  
13 inspection, analysis, and commentary by members of the public, the press,  
14 and civic oversight institutions.
- 15 5. This public disclosure is part of my effort to uphold what I view as the  
16 covenant between the free people of the United States and the government  
17 that exists only through their consent.
- 18 6. I respectfully request the Court take judicial notice of the existence of this  
19 public resource, and consider its relevance in evaluating both irreparable  
20 harm and public interest factors in the pending application for injunctive  
21 relief.

22 I declare under penalty of perjury under the laws of the United States that the foregoing  
23 is true and correct.

24 Executed on December 16, 2025, in Los Angeles, California

25 John Doe Pro Per: *JD*

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**EXHIBIT LIST**

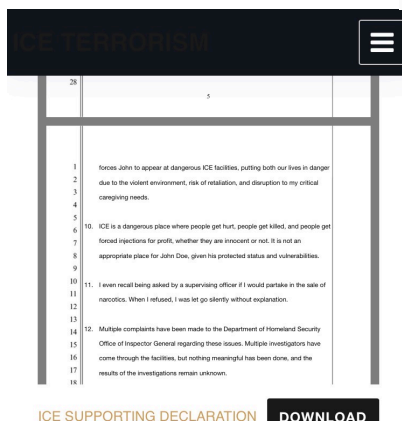
## EXHIBIT A

### Screenshots of the Website [www.ICETerrorism.com](http://www.ICETerrorism.com)



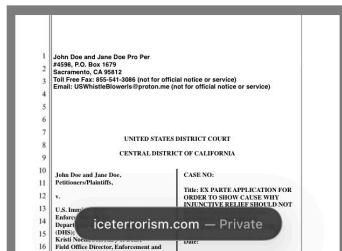
*How ICE has been flooding the "check-in" appointment system with frivolous requirements and checkins, how they abuse and manufacture inmates and how they use them as cash cows to recursively profit from! We are talking potential fraud in the billions!*

**The website articulates the issues in a practical manner nearly anyone can understand.**

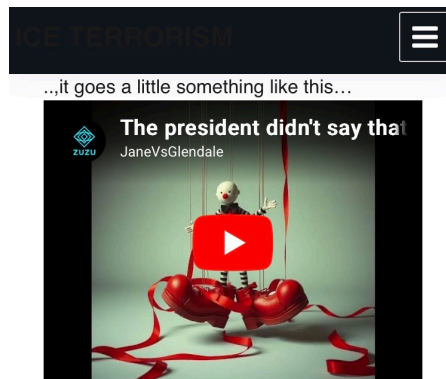


ICE SUPPORTING DECLARATION

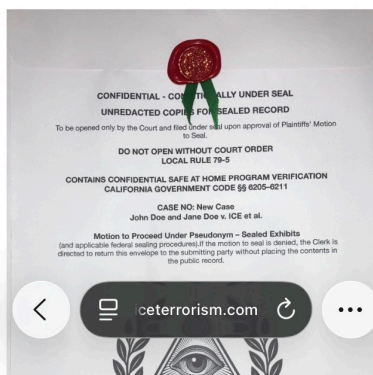
DOWNLOAD



**We have made our filings downloadable free of charge. No need for access to a paid legal platform or to purchase documents.**



...it goes a little something like this...



**We have everything from illustrations to professionally mastered music regarding the case.**