

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

Doe/Podslurp,

Movant,

v.

UNITED STATES DEPARTMENT OF
HOMELAND SECURITY,

Respondent.

Misc. Case No.

1:26MC00861 RP

DECLARATION OF DOE/PODSLURP

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Application pro hac vice to be made forthwith

I, _____ [name redacted], declare as follows:

1. I am Movant Doe. I use the pseudonym “podslurp” on X (formerly Twitter).

Under that pseudonym I make numerous comments, including satirical or sarcastic comments, on various matters, including criticizing the Trump administration. I am not involved in importing or exporting merchandise in any way, nor do any of my posts on X suggest that I might be. I am a United States citizen and have never suggested in any post that I am illegally present in the United States.

2. Almost immediately after he killed Renee Good, I saw Agent Ross’s home address began to circulate widely on social media, where pro- and anti-ICE comments proliferated. I am certain that it was easy to learn his address given the wealth of identifying detail that was reported in the media, but I myself never did the work of figuring out his address, I simply saw it circulating on social media. I attach hereto as ***Exhibit A*** some examples of posts on X referring to his address that were posted immediately after ICE Agents swarmed Ross’s home.¹ I include these as samples of the sort of post that I was seeing at the time. I assume that many posts have subsequently been removed, just as I myself removed my post.

3. On January 16, a website reported that two online fundraisers had raised over one million dollars for Ross, and that he had “become a millionaire in the face of mounting pressure against him.” I attach hereto as ***Exhibit B*** a copy of that article, which can be found at the URL indicated thereon. The same day, Jack Posobiec, a pro-Trump activist and commentator, posted a link to the article on X. I attach hereto as ***Exhibit C*** a copy of that post.

¹ If one clicks on the URL indicated on each post, the web version of X will display the post that contained Ross’s address, without the surrounding context displayed in the exhibit. That context would be displayed if one viewed the post on an X account.

4. On January 23, I commented (“Comment”) in response: “@JackPosobiec Sending donations directly to 1120 francesca ct chaska mn 55318 to avoid fees and ensure he gets full amount! [saluting emoji].” I had learned Ross’s address from social media. The Comment was just a sarcastic reaction to the fact that online fundraisers had made Ross a millionaire. I did not intend, nor can I imagine, that my stray, sardonic comment would inspire anyone to take any action, let alone any violent action, at that address.

5. On February 25, X locked my ability to post on X and flagged the Comment. X required me to remove the Comment if I wanted to unlock my account, stating that it “Violated our Rules against Illegal and Regulated Behaviors.” I deleted the Comment and my X account was restored. I attach as *Exhibit D* a copy of the notice that I received from X, which includes a copy of the Comment, which, as I have explained, is no longer on X.

6. Late on Friday, March 20, X sent me an email that stated:

X has received the attached legal process, dated 2/27/2026, regarding your X account, @podslurp. This legal process obligates X to produce information related to your account. ... Please be advised that X is required to respond to this request by 3/27/2026. If we do not receive notice from you that a motion to quash the legal process will or has been filed ...we may produce some or all of the requested information.

The email attached a redacted copy of the DHS summons, which I attach hereto as *Exhibit E*.

7. I am well aware of multiple statements that Administration officials have made threatening to prosecute people who identify ICE agents or film their activities. I am aware that in other instances of DHS summons or subpoenas DHS has represented that it is conducting a criminal investigation. I do not believe that I have committed any crime and I believe the Comment was entirely protected by the First Amendment.

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8. I am also concerned that if I were identified, pro-ICE commenters would harass me, and that might have repercussions, for example, in my professional life.

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

_____ [signature redacted]

Executed on April 6, 2026 at _____ [place redacted].

I attest that I have on file a copy of the original signed version of this Declaration. I have redacted identifying information herein to avoid prejudice to the First Amendment right of the Declarant to anonymity.

Dated: April 6, 2026

_____\s_____

Joshua Koltun
Attorney for Movant Doe/Podslurp

EXHIBIT A

← Post



Homeland Security @DHS... · 08 Jan
THE WORK CONTINUES!

DHS investigations in Minneapolis are accelerating as more of our brave law enforcement enter the state.

We will not be impeded from ending the FRAUD that has ABUSED our nation's generosity. See you on the streets!



4.4K 6.8K 40.1K 731K



trade Marlon
@trashcanwilliam

Follow

Replying to @DHSgov

Hell yeah brothers see you at 1120 Francesca Ct, Chaska, MN 55318 <33

6:39 PM · 09 Jan 26 · **422** Views

6 Likes

<https://x.com/i/status/2009772124970406117>

← Post



The Green Dragon Tavern  ... · 10 Jan 

Arrest Jonathan Ross should be trending everywhere.

Put that ICE terrorist in a cell to die.

 144  1.8K  11.5K  87.4K  



Botty McBotterson @BottyM... · 10 Jan 

Replying to [@greendragonhq](#)
his home address should be trending

 3   1  157  



Rilety Raccoon

@RiletyR

Follow

Replying to [@BottyMcBotter69](#) and [@greendragonhq](#)

1120 Francesca Ct., Chaska, MN 55318

1:27 PM · 10 Jan 26 · **188** Views

Most relevant replies ▾



RedRiverGroyper @RedRiver... · 10 Jan 

Replying to [@RiletyR](#) [@BottyMcBotter69](#) and [@greendragonhq](#)

[@FBI](#) please this account to it's owner immediately [@DHSgov](#)

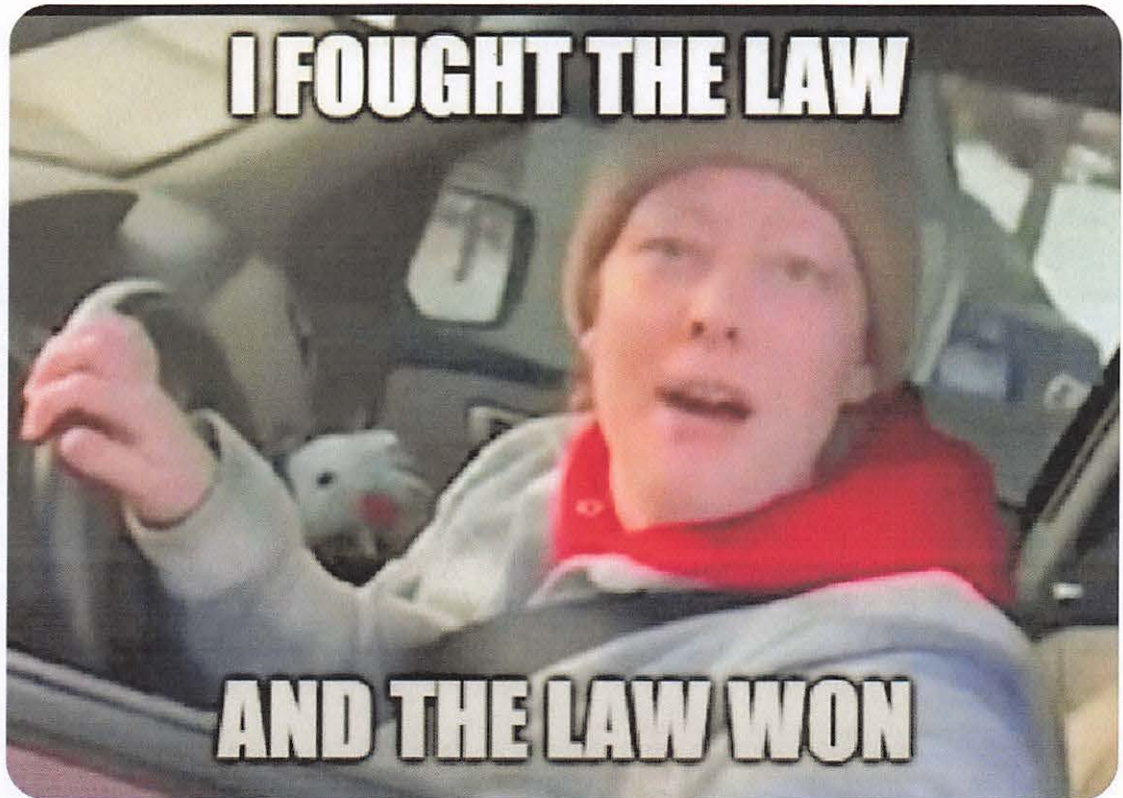
    16  



Z @insatiablevine · 10 Jan



The law won.



684

1K

10.9K

84.9K



SigmaBot

@SigmaBot123

Follow



Replying to [@insatiablevine](#)

1120 Francesca Ct, Chaska, MN 55318

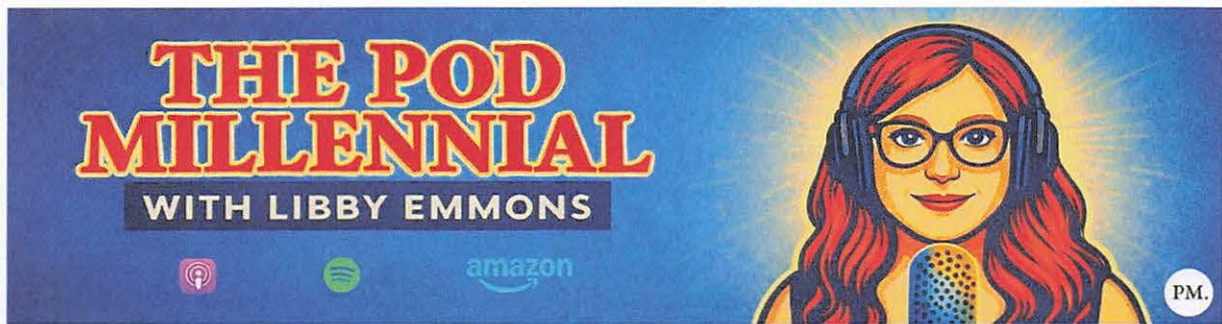
wont be winning for long :)

9:07 AM · 11 Jan 26 · **62** Views



EXHIBIT B

Search



SHARE



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DOWNLOAD ►

AMERICAN NEWS Jan 16, 2026

Fundraisers for ICE agent Jonathan Ross surpass \$1 million after leftist activist rammed him with car in Minneapolis

Online fundraisers for ICE agent Jon Ross have surpassed \$1 million in total funds.

ADVERTISEMENT

Find Results For Pool Enclosure Structure
Installation (Read More)




[Comment Below](#)


Online fundraisers for ICE agent Jon Ross have surpassed \$1 million in total funds.



Thomas Stevenson

Jan 16, 2026
2 Minute Read

SHARE



[Online fundraisers](#) for Jon Ross have surpassed \$1 million in total funds going to the ICE agent who shot Renee Good in Minneapolis after the left-wing activist rammed him with her car on the street. It is rumored that Ross, as well as his family, have gone into hiding since the incident and federal agents were recently seen taking items out of his home.

Two main online fundraising campaigns for Ross have crossed the \$1 million mark combined. One [GoFundMe](#) campaign organized by Clyde Emmons, which stated, "After seeing all the media bs about a domestic terrorist getting go fund me. I feel that the officer that was 1000 percent justified in the shooting deserves to have a go fund me." That has raised \$762,767.

Find Results For Pool Enclosure Structure
Installation (Read More)





Another fundraiser on GiveSendGo, put together by Tom Hennessey, titled, "Stand with our brave ICE hero," has also raised \$285,098. The two fundraisers mean that Ross has become a millionaire in the face of mounting pressure against him after the shooting of Good.

The top donation on the GoFundMe, totaling \$10,000, was from billionaire [Bill Ackman](#), who said that the shooting was a "tragedy."

WHICH SIDE OF THE INTELLIGENCE SPECTRUM ARE YOU ON?



The Civil Rights Division of the Department of Justice has yet to open a probe into the shooting of Good in the wake of her death but is usually the department to do so in law enforcement-involved shootings. Leading up to the shooting, Good, as well as her partner, Becca, had been blocking traffic with their car in an effort to obstruct ICE agents.

President Donald Trump has surged ICE as well as other DHS personnel into Minnesota in recent weeks, and radical to dox agents' location as well as interfere in operations.

Find Results For Pool Enclosure Structure Installation (Read More)

SHARE

EXHIBIT C



Post



Jack Posobiec

@JackPosobiec

...

BREAKING UPDATE: Over \$600,000 raised for ICE officer attacked by leftist agitator in Minneapolis



From thepostmillennial.com

12:44 PM · Jan 12, 2026 · 167.1K Views

<https://x.com/i/status/2010769829255319676>

EXHIBIT D

Remove Post

Post 1 of 1

Violating our Rules against [Illegal and Regulated Behaviors](#).

You may not use our service for any unlawful purpose or in furtherance of illegal behaviors.



The Andrew Formerly Known as Prince

@podslurp

@JackPosobiec Sending donations
directly to 1120 francesca ct chaska mn
55318 to avoid fees and ensure he gets
full amount! 😊

Jan 23, 2026, 7:32 AM

EXHIBIT E

1. To (Name, Address, City, State, Zip Code) X Corp. Safety - Legal Policy 865 FM 1209 Bldg. 2d Bastrop, Texas 78602	DEPARTMENT OF HOMELAND SECURITY SUMMONS To Appear and/or Produce Records 19 U.S.C. § 1509
Summons Number: OPR-DC-2026-034709-001	

By the service of this summons upon you, **YOU ARE HEREBY SUMMONED AND REQUIRED TO:**

(A)	☐	APPEAR before the U.S. Customs and Border Protection (CBP) Officer or U.S. Immigration and Customs Enforcement (ICE) Special Agent named in Block 2 at the place, date, and time indicated to testify and give information.
(B)	☒	PRODUCE the records (including statements, declarations, and other documents) indicated in Block 3 before the CBP Officer or ICE Special Agent named in Block 2 at the place, date, and time indicated.

Your testimony and/or production of the indicated records is required in connection with an investigation or inquiry to ascertain the correctness of entries, to determine the liability for duties, taxes, fines, penalties, or forfeitures, and/or to ensure compliance with the laws or regulations administered by CBP and ICE.

Failure to comply with this summons will render you liable to proceedings in a U.S. District Court to enforce compliance with this summons as well as other sanctions.

2. (A) CBP Officer or ICE Special Agent			(B) Date and Time
Name		Telephone	3/12/2026 8:00 AM
Title			
Address	12200 Sunrise Valley Dr Reston, VA 20191 United States		
3. Records required to be produced for inspection			
Please see attached continuation page.			

You are requested not to disclose the existence of this summons for an indefinite period of time. Any such disclosure will impede the investigation and thereby interfere with the enforcement of federal law.

Issued under authority of section 509, Tariff Act of 1930, as amended by Pub. L. No. 95-410 (19 U.S.C. § 1509); 44 F.R. 2217; Homeland Security Act of 2002.

4. Name of person authorized to service this summons or any other CBP Officer or ICE Special Agent	5. Date of issue - 2/27/2026 11:33 AM Eastern By:
	6. Name, title, address, and telephone number of person issuing this summons Name Title Address Homeland Security Investigations 11320 Random Hills Road Fairfax, VA 22030 United States Telephone
If you have any questions regarding this summons, contact the CBP Officer or ICE Special Agent identified in Block 2	

Digitally Signed by: 'E=Title-III\Support@ice.dhs.gov, CN=Homeland Security Investigations, O=Homeland Security Invest

Date: 2026.02.27 16:33:49 +00:00

1. To (Name, Address, City, State, Zip Code) X Corp. Safety - Legal Policy 865 FM 1209 Bldg. 2d Bastrop, Texas 78602	DEPARTMENT OF HOMELAND SECURITY SUMMONS (Continuation) To Appear and/or Produce Records 19 U.S.C. § 1509
Summons Number: OPR-DC-2026-034709-001	
3. Records required to be produced for inspection (continued)	
The following applies if checked:	
☐ Child Exploitation: This subpoena is in regard to an investigation involving Child Exploitation and/or transmission of Child Pornography via the internet. Please do not disclose/notify the user of the issuance of this subpoena. Disclosure to the user could impede an investigation or obstruct justice.	
All customer or subscriber account information for any and all accounts associated with the following identifiers listed below from August 26, 2025, to February 26, 2026: @podslurp - Queens of the Park Rangers In addition, for each such account, the information shall include the subscriber's: 1. Names (including subscriber names, usernames, and screen names); 2. Addresses (including mailing addresses, residential addresses, business addresses, and e-mail addresses); 3. Length of service (including start date) and types of service utilized; 4. Telephone or instrument numbers (including MAC addresses, Electronic Serial Numbers ("ESN"), Mobile Electronic Identity Numbers ("MEIN"), Mobile Equipment Identifier ("MEID"), Mobile Identification Numbers ("MIN"), Subscriber Identity Modules ("SIM"), MSISDN, International Mobile Subscriber Identifiers ("IMSI"), or International Mobile Station Equipment Identities ("IMEI")); 5. Other subscriber numbers or identities (including temporarily assigned network addresses, registration Internet Protocol ("IP") addresses with associated port numbers; and other login IP addresses); 6. Means and source of payment for such service (including any credit card or bank account number) and billing records. Please return all records to: Immigration and Customs Enforcement, Office of Professional Responsibility 11320 Random Hills Road, Fairfax, VA 22030	
<u>Method of Response:</u>	
Preferred:	
Return the requested records in an accessible data file format such as ".XLS", ".CSV", ".TXT", or ".PDF". The data file(s) should be delivered via e-mail to:	
NOTE: The ICE e-mail system limits incoming messages containing file attachments to 10 MB. For larger files send the summons response in multiple e-mail messages.	
Alternates:	
The records should be delivered to at U.S. Immigration and Customs Enforcement: 12200 Sunrise Valley Dr, Reston	
If you have questions, please contact	
<i>You are requested not to disclose the existence of this summons for an indefinite period of time. Any such disclosure will impede the investigation and thereby interfere with the enforcement of federal law.</i>	