

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

Joaquin Herrera Avila,

Petitioner,

v.

Pamela Bondi, Attorney General,

Kristi Noem, Secretary, U.S. Department of
Homeland Security,

Department of Homeland Security,

Todd M. Lyons, Acting Director of
Immigration and Customs Enforcement,

Immigration and Customs Enforcement,

Sirce Owen, Acting Director for Executive
Office for Immigration Review,

Executive Office for Immigration Review,

Samuel Olson, Director, St. Paul Field Office,
Immigration and Customs Enforcement,

and,

Ryan Shea, Sheriff of Freeborn County.

Respondents.

0:25-cv-3741

**DECLARATION OF LEE
ANNE MILLS IN SUPPORT
OF DANNY RUIZ
MENDOZA'S PETITION
FOR WRIT OF HABEAS
CORPUS**

I, Katherine L. Santamaria El Bayoumi, being first duly sworn upon oath, depose and state as follows:

1. I am an attorney licensed in Minnesota. My attorney's license number is 0504785. My place of business is Wilson Law Group, 3019 Minnehaha Avenue, Minneapolis, MN 55406. My direct phone number is 612-436-7102.
2. I am admitted to practice before the U.S. District Court of Minnesota. My admission is in good standing.
3. I am not subject to any pending disciplinary proceeding or any restriction on my capacity to practice law.
4. I attach as Exhibit A, a true and correct copy of the Notice to Appear filed in Petitioner's pending immigration matter.
5. I attach as Exhibit B, a true and correct copy of Form I-213 that Respondents prepared at the time of Petitioner's apprehension.
6. I attach as Exhibit C, a true and correct copy of the relevant sections of H.R. Rep. No. 101-469 Part 1 (1996).
7. I attach as Exhibit D, a true and correct copy of Inspection and Expedited Removal of Aliens; Detention and Removal of Aliens; Conduct of Removal Proceedings; Asylum Procedures, 62 FR 10312, 10323, 62 FR 10312-01, 10323 (March 6, 1997).
8. I attach as Exhibit E, a true and correct copy of Immigration and Customs Enforcement Policy No: 11088.1 Implementation of Migrant Protection Protocols (February 12, 2019).
9. I attach as Exhibit F, a true and correct copy of the INS Memorandum of Detention Guidelines, Effective October 9, 1998, AILA Doc No. 98100791.
10. I attach as Exhibit G, a true and correct copy of Immigration and Customs Enforcement ERO 11301.1 Bond Management Handbook (August 19, 2014).
11. I attach as Exhibit H, a true and correct copy of a blank draft form of the United States Department of Homeland Security, *Form I-205, Warrant of Removal/Deportation*.

I hereby declare under penalty of perjury that everything in this declaration is true and correct.

Dated: September 25, 2025

/s/ Katherine L. Santamaria El Bayoumi

Katherine L. Santamaria El Bayoumi, Esq.

MN Attorney #0504785

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