

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

Juan Carlos Salgado Garcia,

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,

David Easterwood, Acting Director, St. Paul
Field Office Immigration and Customs
Enforcement,

and,

Ryan Shea,
Sheriff of Freeborn County.

Respondents.

Civil Case No. 25-4199

**DECLARATION OF DAVID
L. WILSON IN SUPPORT
OF JUAN CARLOS
SALGADO GARCIA'S
PETITION FOR WRIT OF
HABEAS CORPUS**

I, David L. Wilson, 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 0280239. My place of business is Wilson Law Group, 3019 Minnehaha Avenue, Minneapolis, MN 55406. My phone number is 612-436-7100.
2. I am admitted to practice before the U.S. District Court of Minnesota. My admission is in good standing.
3. I attach as Exhibit A, a true and correct copy of Petitioner's Notice to Appear in Immigration Court.
4. I attach as Exhibit B, a true and correct copy of Petitioner's I-213, Record of Deportable/Inadmissible Alien.
5. I attach as Exhibit C, a true and correct copy of the Immigration and Customs Enforcement, Interim Guidance Regarding Detention Authority for Applicants for Admission (July 8, 2025).
6. I attach as Exhibit D, a true and correct copy of the relevant sections of H.R. Rep. No. 101-469 Part 1 (1996).
7. I attach as Exhibit E, 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 F, 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 G, 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 H, a true and correct copy of Immigration and Customs Enforcement ERO 11301.1 Bond Management Handbook (August 19, 2014).

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

Respectfully submitted,

/s/ David L. Wilson

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November 3, 2025

Date