

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

Bernardo Gabriel Borbor Mera,

Petitioner,

v.

Pamela Bondi, Attorney General,

0:25-cv-4298

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,

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

and,

Ryan Shea, Sheriff of Freeborn County.

**SECOND DECLARATION
OF GABRIELA
ANDERSON IN SUPPORT
OF BERNARDO GABRIEL
BORBOR MERA'S
PETITION FOR WRIT OF
HABEAS CORPUS**

I, Gabriela Anderson, 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 0504395. My place of business is Wilson Law Group, 3019 Minnehaha Avenue, Minneapolis, MN 55406. My direct phone number is 612-436-8185.
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 L, a true and correct copy of the U.S. Immigration and Customs Enforcement, *Parole of Arriving Aliens Found to Have a Credible Fear of Persecution or Torture*, dated December 8, 2009.
5. I attach as Exhibit M, a true and correct copy of the U.S. Department of Homeland Security, *Fact Sheet: CBP One Facilitated Over 170,000 Appointments in Six Months, and Continues to be a Safe, Orderly, and Humane Tool for Border Management*, dated August 3, 2023.

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

Dated: November 24, 2025

/s/ Gabriela Anderson
Gabriela Anderson, Esq.
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