

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

Sandra Elizabeth Chasipanta Llangari,

Petitioner,

v.

Pamela Bondi, Attorney General,

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

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

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

Respondents.

Case No. 0:26-cv-00283

**MOTION FOR SANCTIONS**

Petitioner incorporates by reference her previously filed motions to show cause and related filings and exhibits. (Doc. Nos. 8, 11, 19, 21, 22, and 24). On January 26, 2026, this Court issued an order to show cause why Respondents should not be sanctioned for their failure to comply with this Court's Orders by (1) failing to provide information to the Court about the location of Petitioner's release; (2) failure to return Petitioner's driver's license and \$114 in cash; and (3) failure to follow the Court's release order, which did not include conditions. (Doc. No. 20). The Court directed Respondents

to submit “a reasoned memorandum and any necessary supporting declarations or exhibits to support their positions on these three issues,” and provided Respondents well over a week to submit a response. *Id.*

Nine days later, Respondents filed a one-page “status update,” without any supporting declarations or exhibits, which vaguely asserts that Respondents “ha[ve] taken steps, and will continue to take steps, to mitigate the Court’s concerns.” (Doc. No. 23). The status update also generally represents that counsel “has communicated with Respondents about the need to return Petitioner’s belongings” and “is working with Respondent on ensuring that information is provided on release for detainees, to the fullest extent practicable, going forward,” without providing any further detail or explanation as to when such conversations have occurred, with whom, or why Respondents have no difficulty detaining people and whisking them out of the state in a matter of hours, but nonetheless require days or weeks to simply comply with this Court’s orders. *Id.*

On February 5, 2026, Petitioner filed a reply in support of her third motion for an order to show cause, asking the Court to deny Respondents’ request for a continuance and impose sanctions on Respondents, but not Respondents’ counsel. (Doc. No. 24).

Since that filing, Respondents have provided Petitioner with a Decision to Rescind Order of Release on Recognizance Conditions, but have not returned Petitioner’s property. Seventeen days after this Court issued an Order to Show Cause, Respondents still have not provided any explanation for Respondents’ misleading representations to the Court about the location of Ms. Chasipanta Llangari’s release.

Under these circumstances, Petitioner respectfully requests that this Court not allow Respondents' contempt to remain insulated and impose sanctions on Respondents.

Respectfully submitted,

Date: February 12, 2026

//s//Claire Nicole Glenn  
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*Attorney for Petitioner*