

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

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Maria M. Guaman Pinguil.,

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.

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Case No. 26-CV-734 (SHL/SGE)

**FIRST DECLARATION OF  
SHERENE MOSTAGHIMI, ESQ.**

Pursuant to 28 U.S.C. § 1746, I, Sherene M. Mostaghimi, hereby declares as follows:

1. I am an attorney at the law firm of Guzior Armbrrecht Maher and am one of the attorneys representing the Petitioner in the above captioned matter. I respectfully submit this Declaration in support of Petitioner's request for Contempt of Court.
2. On February 6, 2026, I was informed by my paralegal, who spoke with Petitioner, that she was released as of 11:30pm on February 5, 2026, with only a check for the amount of \$60.

3. She was not given back her cell phone, keys, passport, work authorization card, social security card, wallet, and backpack.
4. Upon the recitation of these facts by Petitioner, undersigned counsel moves this Court to hold Respondents in contempt of court for not releasing Petitioner by 5pm yesterday and not releasing all of her personal items.
5. In addition to holding Respondents in contempt, undersigned counsel argues for the intervention of the U.S Marshall's Service, and if appropriate, the local sheriff's department, to obtain Ms. Guaman Pinguil's personal belongings at the local ICE ERO office in St. Paul, MN, or at the Crow Wing County Jail in Brainerd, MN. It is unknown to undersigned counsel where Petitioner's belongings are being held.

I declare under the penalty of perjury that the foregoing is true and correct.

Dated: February 6, 2026

By: /s/ Sherene Mostaghimi  
Sherene Mostaghimi (# 8394431)