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January 30, 2026

Via Electronic Court Filing

The Hon. Jeffrey M. Bryan
U.S. District Judge, District of Minnesota
Courtroom – 3B
United States District Court
316 North Robert Street, Suite 100
St. Paul, Minnesota 55101

**Re: *Julio Cesar Valero v. Pamela Bondi, et al.*,
Civil Case No.: 26-cv-744 (JMB/DTS)**

Dear Judge Bryan

Petitioner opposes Respondent's request to effectively continue his wrongful detention.

While Respondent's claim they are "striving mightily to follow every single court order," the facts suggest otherwise. See *Juan T.R. v. Noem et al.*, 26-CV-0107 (PJS/DLM) (D. Minn. Jan. 28, 2026.) Respondents arrested Mr. Cesar Valero on Monday, January 26. By the following day, the Court had already enjoined Respondents from transferring Mr. Cesar Valero out-of-state or (if they had already) ordering him returned.

I communicated with the US Attorneys' Office on Wednesday afternoon seeking confirmation the order had been communicated to all relevant ICE/ERO personnel and asking after Mr. Cesar Valero's whereabouts. I was then redirected to several different AUSAs only to eventually be told yesterday (after Mr. Cesar Valero was ordered released) that:

The court has already imposed a follow-up reporting requirement related to this release. Separately responding to counsel in these cases is simply not possible.

Now, Respondents ask to continue Petitioner's detention because of a situation of their own making. Respondents are choosing to conduct unprecedented mass arrests in this district without warrants, are being sued for widespread racial profiling in arrests, and are then aggressively transferring these detainees out of state, in what appears to be an

attempt to avoid the jurisdiction of this Court. They should not expect detainees to bear the consequences, particularly given reports of the horrendous conditions in Respondent's detention facilities.

Which is to say that while Respondents emphasize the difficulty in following this Court's orders, the solution is simple: conduct lawful enforcement operations and stop transporting mass amounts of humans out-of-state without appropriate infrastructure.

Mr. Cesar Valero should not continue to suffer because Respondents have chosen the opposite course.

Respectfully,

/s/ m boulette

m boulette (0390962)

cc: David W. Fuller, AUSA