

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

Julio Cesar Valero,

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,

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

Respondents.

Case No. 0:26-cv-744

**DECLARATION OF m boulette  
IN SUPPORT OF PETITIONER'S  
MOTION TO SHOW CAUSE**

I, m boulette, declare under penalty of perjury under the laws of the United States of America that the following is true and correct:








1. I am an attorney and counsel of record for Petitioner in this action.
2. On January 29, 2026, this Court ordered Respondents to release Petitioner from detention no later than 4:00 p.m. on Friday, January 30. The Court further directed Respondents to file a declaration "stat[ing] when and where the Petitioner was released, attach[ing] any and all relevant documentation concerning the Petitioner's release, and affirm[ing] that all property of Petitioner was returned to Petitioner upon release (or, if property is retained, state which property and the legal basis for retention)."

3. Respondents did not release Petitioner on January 30. The following day, January 31, counsel made or received no less than seven phone calls to or from three different ICE officials and Respondents' counsel; sent multiple emails to both AUSA Fuller (whose efforts over the weekend are appreciated) and Detention and Deportation Officer Michael A. Velasco; and personally drove to the Whipple Building in an attempt to facilitate Petitioner's release. Amid counsel's efforts, ICE communicated to the undersigned that they apparently transported Petitioner from the Whipple to the Freeborn County Jail, only to return him later that evening.

4. Respondents eventually released Petitioner on or around 6:00 p.m. on February 1, 2026.

5. Following Petitioner's release, the undersigned learned that Respondents had retained his identity documents (a work permit and driver's license) and forced him to sign an "Order of Release on Recognizance" imposing specific conditions on Petitioner's release from detention, none of which this Court authorized. The undersigned has seen pictures of this "Order" but has, as of the time of filing, been unable to obtain a copy.

6. The undersigned attempted to confer with Respondents' counsel in an email dated Sunday, February 1, 2026, as follows:

 M Boulette   Reply  Reply all  Forward   ...  
To: Fuller, David (USAMN) <David.Fuller@usdoj.gov>; Isihara, Matthew (USAMN) <Matthew.Isihara@usdoj.gov> Sun 2/1/2026 4:57 PM  
Cc: Voss, Ana (USAMN) <Ana.Voss@usdoj.gov>

David,








Mr. Cesar Valero was released yesterday evening. However his personal documents were not returned, and he was required to sign a number of conditions of release in the form of an "Order of Release on Recognizance" before agents would allow him to leave. I believe both those actions are contrary to the Court's order.


Can you see what we can do about this? I'd prefer not to raise it in a motion if we can resolve it.

Thank you,

m

7. Respondents counsel responded later that evening as follows:

 Fuller, David (USAMN) <David.Fuller@usdoj.gov>      ...  
To:  M Boulette; Isihara, Matthew (USAMN) <Matthew.Isihara@usdoj.gov> Sun 2/1/2026 6:30 PM  
Cc: Voss, Ana (USAMN) <Ana.Voss@usdoj.gov>

 You replied on Sun 2/1/2026 6:32 PM

Thanks for taking this approach. I'll look into it and see what I can learn. Please check back if you don't hear from me tomorrow.

David W. Fuller  
Assistant U.S. Attorney  
612/664-5600

8. The undersigned replied a few minutes later simply saying, "thank you," but did not receive any further response from Respondents' counsel until the "status report" filed earlier today.

9. As of the filing of this declaration, the undersigned understands Petitioner's documents have still not been returned to him and that the conditions Respondents have purported to impose on his release remain in place.

Date: February 2, 2026

/s/ m boulette

m boulette  
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(612) 229-1159

*Attorney for Petitioner*