

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Civil No. 0:26-cv-00778- JRT-LIB

Christian Alexander Sun Chajon,

Petitioner,

**SECOND
STATUS UPDATE**

v.

Pamela Bondi, *et al.*,

Respondents.

I write in response to this Court Order Dkt. No. 11 for a status update on Mr. Sun Chajon's property and conditions. The Agency records indicate Mr. Sun Chajon is still missing his Minnesota Drivers License, his Guatemalan Drivers ID, and his Guatemalan consular identification card. Here is timeline of events pertaining to the missing property:

At 11:17 A.M. on **6 February 2026**, this Court issued Dkt. No. 7 requiring Mr. Sun Chajon be released from detention.

At 11:24 A.M., the undersigned counsel transmitted the Order to the Agency.

At 11:41 A.M., the Agency confirmed it had notified the ERO team of the Court's Order.

At 12:00 P.M., Mr. Sun Chajon's counsel sent an email to the undersigned counsel notifying of the Court's Order for Mr. Sun Chajon's release.

At 12:32 P.M. on **7 February 2026**, the undersigned counsel requested an update from the Agency.

At 12:47 P.M., the Agency replied Mr. Sun Chajon was still in El Paso, but the Agency was working on his return.

At 12:50 P.M., the undersigned counsel requested confirmation on when Mr. Sun Chajon was scheduled for return.

At 12:55 P.M., the Agency's counsel replied it was working on getting the exact information.

At 4:45 P.M., Mr. Sun Chajon email again requesting and update on Mr. Sun Chajon's release.

At 6:19 P.M., the undersigned counsel requested an update from the Agency.

At 6:43 P.M., Mr. Sun Chajon requested another update.

At 6:47 P.M., The Agency's counsel replied to the undersigned counsel stating it would provide further information soon.

At 7:36 P.M., the undersigned counsel replied to Mr. Sun Chajon's counsel to confirm the Agency was aware of the requirements in the Oder.

At 6:01 A.M. on **8 February 2026**, the Agency counsel confirmed to Mr. Sun Chajon was scheduled to be returned to Minnesota that same day and released.

At 8:20 A.M., the undersigned counsel communicated this update to Mr. Sun Chajon's counsel.

At 9:09 A.M., Mr. Sun Chajon's counsel replied requesting a specific time of release.

At 9:12 A.M., the undersigned counsel replied with the estimate time of arrival for Mr. Sun Chajon.

At 9:18 A.M., Mr. Sun Chajon's counsel replied to request information on the planned location for Mr. Sun Chajon's release, and to emphasize Mr. Sun Chaon needed to be released with all his personal property, including documents.

At 9:21 A.M., the undersigned counsel requested more information on Mr. Sun Chajon's planned time of release.

At 9:23 A.M., the Agency replied release would occur later in the day.

At 2:59 P.M., the Agency provided the following information: "*Petitioners are being released into Whipple's lobby, which is indoors, heated, and well-lit, and where those being released can wait for pick up. I also understand public phones are made available for use.*"

At 7:39 P.M., the Agency represented to the undersigned counsel Mr. Sun Chajon was released at approximately 2:00 P.M. on that same day.

At 9:40 A.M. on **9 February 2026**, the undersigned counsel filed his status report with this Court. Dkt. No. 8.

At 4:53 P.M. on **11 February 2026**, Mr. Sun Chajon communicated to the undersigned counsel Mr. Sub Chajon was released without his Minnesota Drivers' License, his Guatemalan Drivers' License, and his consular ID.

At 5:09 P.M., the undersigned counsel communicated this issue to the Agency and inquired about returning the property to Mr. Sun Chajon.

At 5:11 P.M., the undersigned counsel provided to Mr. Sun Chajon's counsel the Agency's email address used to coordinate property returns.

At 9:44 A.M., on **12 February 2026**, Mr. Sun Chajon's counsel responded stating the email address had not been responsive in the past and requested a different point of contact.

At 11:34 A.M., on **13 February 2026**, Mr. Sun Chajon's counsel filed Dkt. No. 10 informing this Court about the issues with Mr. Sun Chajon's documents return.

At 11:43 A.M., the undersigned counsel reached out to the Agency again for assistance on this matter.

At 4:25 P.M. on **2 March 2026**, Mr. Sun Chajon's email the undersigned counsel to remind Mr. Sun Chajon had not yet received his property.

At 4:42 P.M., the undersigned counsel requested an update from the Agency.

At 6:52 P.M., the undersigned counsel requested another update from the Agency.

At 7:09 P.M., the Agency replied ICE/DHS El Paso had been asked to search for the documents.

At 10:04 A.M. on **3 March 2026**, the undersigned counsel requested another update from the Agency.

At 1:36 P.M., this Court scheduled a hearing on this matter at 2:00 P.M. on 5 March 2026.

At 1:44 P.M., the undersigned counsel requested another update from the agency.

At 2:02 P.M., the undersigned counsel email Mr. Sun Chajon's counsel to confirm the Agency was still searching for the property.

At 4:03 P.M., the Agency confirmed both facilities where Mr. Sun Chajon was housed had been searched for the Drivers' License, Guatemalan ID and Consular ID. The documents were not located in either facility.

At 12:01 P.M. on **4 March 2026**, the undersigned counsel communicated to Mr. Sun Chajon's counsel the Agency has deemed the property as lost. The undersigned counsel included the forms needed to file a claim against the Agency.

As shown by this timeline of the events, the Agency and undersigned counsel have done their best efforts to search for Mr. Sun Chajon's documents within minutes of being notified of the documents being missing. While the efforts have not been fruitful, this is not the result of neglect, disregard or an oversight on the part of the Agency nor the

undersigned counsel. As stated above, Mr. Sun Chajon is not without a remedy, a copy of Attachment B and Attachment C were emailed to his counsel.

March 4, 2026

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