

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

Luis Humberto Pilatuna Gualoto,

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. 26-cv-625 (DMT/EMB)

SECOND AFFIDAVIT
OF KIRA KELLEY

I, Kira Aakre Kelley, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I received the following communication at 8:38 a.m. from the St Paul ICE/ERO field office, which was in response to the email I sent at 4:35 p.m. on January 31, 2026 asking for information regarding the whereabouts of my client.
2. This response contained only a hyperlink to the ICE Detainee Locator website and a screenshot of my client, who is showing up as being detained at the Kandiyohi County detention facility in Willmar, Minnesota.
3. The email was not signed, and no other information was provided. The exact email is reproduced on the following page.

St Paul.Outreach <StPaul.Outreach@ice.dhs.gov>
To: Kira Kelley <kira@climatedefenseproject.org>

Sun, Feb 1, 2026 at 8:38 AM

OnlineLocator

Search Results: 1

LUIS HUMBERTO PILATUNA-GUALOTO

Country of Birth : Ecuador

A-Number: 

Status : In ICE Custody

State: MN

Current Detention Facility: [KANDIYOHI CO. JAIL](#)

** Click on the Detention Facility name to obtain facility contact information*

[BACK TO SEARCH >](#)

Executed on February 1, 2026, in Hennepin County Minnesota.

/s/ Kira Aakre Kelley
Kira Aakre Kelley, Esq.