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8 **UNITED STATES DISTRICT COURT**
9 **SOUTHERN DISTRICT OF CALIFORNIA**

10 **LEONARDO NELSON HUALLPA-**
11 **NISTAUS**

12 **Petitioner,**

13 **v.**

14 **PAMELA BONDI, U.S. Attorney General,**
15 **KRISTI NOEM, Secretary of DHS, TODD**
16 **LYONS, Director of ICE, CHRISTOPHER**
17 **LAROSE, Warden of Otay Mesa Detention**
Center

18 **Respondents.**
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Case No.: 3:26-cv-1426-JO-SBC

DECLARATION OF DAVID
TOWNSEND

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21 I, David Townsend, pursuant to 28 U.S.C. § 1746, hereby declare under penalty
22 of perjury that the following statements are true and correct, to the best of my
23 knowledge, information, and belief:

24 1. I am currently employed by the U.S. Department of Homeland Security
25 (DHS), U.S. Immigration and Customs Enforcement (ICE), Enforcement and Removal
26 Operations (ERO), as a Deportation Officer assigned to the Otay Mesa suboffice of the
27 ICE ERO San Diego Field Office.
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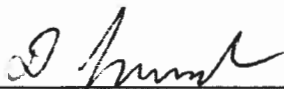
1 2. I have been employed by ICE as a law enforcement officer and serving as
2 a Deportation Officer since February 13, 2023. I currently remain serving in that
3 position. As a Deportation Officer, my responsibilities include case management of
4 individuals detained by ICE at the Otay Mesa Detention Center in Otay Mesa,
5 California.

6 3. This declaration is based upon my personal knowledge and experience as
7 a law enforcement officer and information provided to me in my official capacity as a
8 Deportation Officer in the Otay Mesa suboffice of the ICE ERO San Diego Field Office,
9 as well as my review of government databases and documentation relating to Petitioner
10 Leonardo Nelson Hualpa-Nistaus (Petitioner).

11 4. Petitioner was released from ICE custody on March 25, 2026 pursuant to
12 the conditions and re-detention restrictions of the District Court Order issued on March
13 25, 2026.

14 I declare under penalty of perjury of the laws of the United States of America that
15 the foregoing is true and correct.

16 Executed this 27th day of March, 2026.

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19 David Townsend
20 Deportation Officer
21 San Diego Field Office
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