

1 ADAM GORDON
United States Attorney
2 DANIELLE L. BROWN
Special Assistant United States Attorney
3 Colorado State Bar No. 57814
Office of the U.S. Attorney
4 880 Front Street, Room 6293
San Diego, CA 92101-8893
5 Telephone: (619) 546-8592
Email: Danielle.Brown2@usdoj.gov
6

7 Attorneys for Respondents

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

11 WUILBER GARCIA-JUAREZ,
12

13 Petitioner,
14

15 v.
16

16 TODD BLANCHE,
17 *U.S. Attorney General, et al.,*

18 Respondents.
19

Case No. 26-cv-03007-LL-DEB

**SUPPLEMENTAL BRIEFING RE:
ORDER ECF NO. 12**

20 On June 5, 2026, the Court issued an order directing the parties to file
21 supplemental briefing by June 12, 2026 providing details of Petitioner's criminal
22 history. ECF No. 12. Respondents provide the following information pursuant to the
23 Court's June 5, 2026 order.

24 On May 16, 2022, Petitioner was convicted of Driving Under the Influence under
25 California Vehicle Code Section 23152(b) VC and sentenced to 4 years of probation
26 with the enhancing factor of involving a child causing injury or death. *See* Exhibit 1.
27 On September 28, 2022, Petitioner was convicted of Driving Under the Influence under
28 California Vehicle Code Section 23152(b) VC and sentenced to 15 days jail and his

1 prior probationary sentence was revoked and reinstated for 5 years of probation. *Id.* On
2 March 5, 2024, Petitioner was convicted of Driving Under the Influence under
3 California Vehicle Code Section 23152(b) VC with the enhancing factor of involving a
4 child causing injury or death and sentenced to 200 days jail and 5 years of probation.
5 *Id.* The government notes that in February 2024, arrest relief was granted. *Id.* According
6 to the RAP sheet the Petitioner was again arrested on July 22, 2025, for Driving Under
7 the Influence under California Vehicle Code Section 23152(b) VC. *Id.*

8
9 Dated: June 10, 2026

Respectfully submitted,

10 ADAM GORDON
11 United States Attorney

12 s/Danielle L. Brown
13 DANIELLE L. BROWN
14 Special Assistant United States Attorney

15 Attorney for Respondents
16
17
18
19
20
21
22
23
24
25
26
27
28