July 27, 2026

Via ECF

The Honorable David T. Schultz
United States District Court Magistrate Judge
300 South Fourth Street
Minneapolis, Minnesota 5541

RE: Letter Providing Additional Legal Authority (Case No. 26-cv-3017 (KMM/DTS))

Dear Judge Schultz:

I write pursuant to the Court's July 21, 2026 order in the case of *Anthony N. v. Markwayne Mullin* (Case No. 26-cv-3017 (KMM/DTS)) [ECF 11] in which you permitted Anthony N. to file a letter containing citations to additional authority on the issues of whether "(1) the I-205 warrant 'was not validly issued because it was not issued by an official with the authority to issue it'; and (2) the Government has 'offered no legal authority supporting the assertion that an 11-year-old [possibly-already-executed] warrant can be used to justify Petitioner's arrest.'"

I would like to provide additional legal citations concerning the delegation of authority to issue I-205 warrants. A line of decisions from United States District Courts in New York have addressed delegation authority in the context of certain Immigration and Customs Enforcement (ICE) officers' authority to revoke orders of supervision. Those Courts have found that ICE can and does issue "delegation orders" that explicitly authorize certain officers to perform certain duties and that Respondents can produce such "delegation orders" should they exist. *See E.M.M. v. Almodovar*, No. 25-CV-08212 (MMG), 2025 WL 3077995 at *6 (S.D.N.Y. Nov. 4, 2025); *Ceesay v. Kurzdorfer*, 781 F. Supp. 3d 137, 162 (W.D.N.Y. 2025); *Roman-Cruz v. Lyons*, No. 25-CV-10522 (RA), 2026 WL 114936 at *2-3 (S.D.N.Y. Jan. 15, 2026); *Zhang v. Genalo*, 814 F. Supp. 3d 307, 321-22 (E.D.N.Y. 2025); *Lim v. Arteta*, No. 1:26-CV-00461 (JLR), 2026 WL 192490 at *3-5 (S.D.N.Y. Jan. 26, 2026).

I would also like to provide the legal citation for a recent decision concerning ICE's use of an old I-205 warrant that was issued by the Honorable Katherine M. Menendez during the course of this litigation on July 10, 2026: *Ahmed S. v. Blanche*, No. 26-CV-2265 (KMM/DLM), 2026 WL 1998718 at *4-6 (D. Minn. July 10, 2026) (finding that noncitizen was not validly arrested in December 2025 pursuant to a 2014 I-205 warrant and ordering release based on warrantless arrest of noncitizen on order of supervision following final order of removal).

Very truly yours,

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