

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

GUILLERMO MEDINA REYES,

Petitioner,

v.

POLLY KAISER, et al.,
Respondents.

) Case No. 25-cv-05436-RFL

) **DECLARATION OF**
) **DEPORTATION OFFICER MICHAEL**
) **CANNING**

I, Michael Canning, make the following statements under oath and subject to the penalty of perjury:

1. I am a Deportation Officer employed by the U.S. Department of Homeland Security (“DHS”), U.S. Immigration and Customs Enforcement (“ICE”). I have been assigned to ICE Enforcement and Removal Operations (“ERO”), in the San Francisco Field Office, since July 04, 2021. I am currently assigned to the Alternatives to Detention (“ATD”) / Non-Detained Unit, overseeing aliens who are not in ICE custody and live within the jurisdiction of the San Francisco Field Office.

2. My responsibilities include, but are not limited to, reviewing and monitoring cases involving aliens released from ICE custody while their immigration proceedings are pending. I am also responsible for identifying, locating, arresting, and removing aliens with final orders of removal from the United States.

3. I am familiar with ICE policy and procedures governing the detention and removal of aliens who come into ICE’s custody. The facts in this declaration are based on my personal knowledge, consultation with other ICE personnel, review of official documents and records contained in systems of records maintained by the agency and Department, and other relevant sources obtained during the regular course of business.

1 4. I am the ICE officer assigned to the case of Petitioner Guillermo Medina Reyes
2 (“Petitioner”). I provide this declaration based on the best of my knowledge, information, belief, and
3 reasonable inquiry for the above captioned case.
4

5 **IMMIGRATION AND CUSTODY HISTORY**

6 5. In March 2023, I began to supervise the Petitioner after he was released from ICE
7 custody.

8 6. The Petitioner was initially placed on GPS monitoring but was later changed to the
9 Intensive Supervision Appearance Program (“ISAP”) / ATD program. I cautioned the petitioner that if
10 he failed to comply with the terms of the monitoring program he would be returned to GPS monitoring.

11 7. On May 15, 2025, ERO learnt that the petitioner had been arrested and booked into the
12 Santa Clara County Jail through an information sharing database. However, at that time, ERO was not
13 aware of particular facts surrounding the arrest.

14 8. On May 21, 2025, I sent an email to the case specialist at the ISAP office to see if they
15 were aware of the Petitioner’s arrest.

16 9. Between May 2025 and June 2025, I was required to participate in a number high priority
17 taskings, forcing me to pause my investigation into the Petitioner’s most recent arrest. After these
18 taskings had been completed, I was able to resume my investigation into the Petitioner’s recent arrest.

19 10. On June 23, 2025, I requested a copy of the police report related to the Petitioner’s May
20 14, 2025 arrest. The Morgan Hill Police Department provided me with a copy of the said police report
21 on June 27, 2025.

22 11. On July 1, 2025, the Petitioner was placed back onto GPS monitoring; however, the
23 Petitioner refused to sign the GPS agreement and conditions form.

24 I declare, under penalty of perjury under 28 U.S.C. § 1746, that the foregoing is true and correct
25 to the best of my knowledge and based on information obtained from other individuals employed by
26 ICE.
27
28

MICHAEL J
CANNING

Digitally signed by
MICHAEL J CANNING
Date: 2025.07.02 16:04:57
-07'00'

DATED:

Michael Canning
Deportation Officer
Enforcement and Removal Operations
U.S. Immigration and Customs Enforcement