UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF LOUISIANA

MARIO CACHO and ANTONIO OCAMPO, Plaintiffs, v. SHERIFF MARLIN N. GUSMAN, Orleans Parish Sheriff, Defendant.	)	Case No. 2:11-cv-225-SS

DECLARATION OF SDDO SEAN BRAUD

I, Sean Braud, hereby declare that the following statements are true and correct to the best of my knowledge, information, and belief:

1. I am currently employed as a Supervisory Detention and Deportation Officer (SDDO) with the U.S. Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Enforcement and Removal Operations (ERO). I am assigned to the New Orleans Field Office in New Orleans, Louisiana. I joined ICE in April 2012. I have been an SDDO since November 2022. I am currently serving as the Deputy Chief of Staff for the New Orleans Field Office. I have held this position since February 2025.

2. Prior to joining ICE, I served with the United Stated Customs and Border Protection. I joined CBP in October 2002. I served with CBP until April 2012. From October 2002 to April of 2009, I served with CBP in the United States Border Patrol. In May 2009 to April 2012, I served with CBP in the Office of Field Operations.

3. The statements in this declaration are based on my personal knowledge or on information that other ICE employees have provided to me in my official capacity.

Orleans Parish Sheriff's Office (OPSO) Detainer Statistics

4. In fiscal years 2022 to 2025, ICE submitted the following numbers of detainers to the OPSO:

FY2022:	25
FY2023:	38
FY2024:	82
FY2025:	25
Total:	170

5. From FY2022 to FY2025, the OPSO honored 2 detainers and did not honor 168 detainers (a rate of just 1.2%).

Notable Cases in Which the OPSO Has Released Individuals Despite ICE Detainers

Darwin Gonzalez Muñoz

6. In March 2024, the OPSO arrested Muñoz for aggravated domestic abuse, domestic abuse with battery, and domestic abuse involving strangulation.

7. On March 18, 2024, ICE submitted a detainer for Muñoz. Despite the detainer, on an unknown date the OPSO released Muñoz without notifying ICE.

8. When the OPSO released Muñoz, it placed a GPS monitoring device on him. After he was released, Muñoz removed the device and absconded.

9. In May 2024, the U.S. Marshal's Service (USMS)'s Fugitive Taskforce arrested Muñoz in Texas.

Franklyn Orellano Velasquez

10. In January 27,2023, ICE/ERO arrested Velasquez and released him to the OSPO, pursuant to a writ of habeas corpus ad prosequendum, to face murder charges.

11. On March 1, 2023, ICE/ERO submitted a detainer for Velasquez. The State then reduced the murder charge to an obstruction charge and released Velasquez. Despite the detainer, the OPSO did not notify ICE that it intended to release Velasquez.

12. On June 29, 2023, ICE/ERO arrested Velasquez at-large, with assistance from the USMS. The United States then prosecuted Velasquez for illegal possession of a firearm. Velasquez pled guilty.

Juan Dubon Argueta

13. In August 2023, the U.S. Customs and Border Protection (CBP) arrested Argueta and placed him into ICE's custody. In November 2023, ICE released Argueta to the OPSO, pursuant to a writ of habeas corpus ad prosequendum, to face charges for Domestic Abuse Battery, Domestic Abuse Battery (Aggravated Assault), Aggravated Assault with a Firearm, Domestic Abuse Child Endangerment, Criminal Damage to Property. The writ required the OPSO to return Argueta to ICE at the completion of his criminal case.

14. In January 2024, the State dropped the charges against Argueta. In violation of the terms of the writ and criminal court's order, the OPSO released Argueta. The OPSO did not return Argueta to ICE custody, as the writ and court order required, or notify ICE that it intended to release Argueta.

Rafael Mendez

15. From 2008 to 2024, Mendez was arrested 10 times in Orleans Parish. The most recent arrest, in January 2024, was for aggravated assault with a firearm, criminal trespassing, and illegal carrying of weapons.

16. On January 6, 2024, ICE submitted a detainer for Mendez. The State then reduced the charges and released Mendez. Despite the detainer, the OPSO did not notify ICE that it was releasing Mendez.

Javier Martinez Amaya

17. In 2018, Amaya was arrested for driving under the influence.

18. On November 10, 2024, ICE submitted a detainer for Amaya. Despite the detainer, the OPSO released Amaya without notifying ICE.

19. In November 2024, Amaya was arrested for battery, aggravated assault with a firearm (two counts), obstruction, and illegal use of weapons/instrumentalities.

20. On November 11, 2024, ICE submitted a detainer for Amaya. Despite the detainer, the OPSO released Amaya without notifying ICE.

Arnold Molino Mendez

21. In October 2024, Mendez was arrested for simple battery and simple assault.

22. On October 27, 2024, ICE submitted a detainer for Mendez. Despite the detainer, the OPSO released Mendez without notifying ICE.

Executed on July 21, 2025.

SEAN M BRAUD Digitally signed by SEAN M BRAUD
Date: 2025.07.22 08:42:46 -05'00'

Sean Braud
Supervisory Detention and Deportation Officer
New Orleans Field Office
New Orleans, Louisiana