

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
25-cv-3741-JRT-SGE

JOAQUIN HERRERA AVILA,

Petitioner,

v.

**DECLARATION OF  
JOHN D. LIGON**

PAMELA BONDI et. al.,

Respondents.

John D. Ligon, Deportation Officer, United States Immigration and Customs Enforcement (ICE), Department of Homeland Security (DHS), for his declaration under 28 U.S.C. § 1746, hereby states as follows:

1. The following declaration is based on a review of the Petitioner's alien file, statements, and e-mails.

2. I am and have been employed with ICE and the former Immigration and Naturalization Service (INS) since July 22, 2002. I began my career as a Border Patrol Agent, later promoted to a Supervisory Border Patrol Agent, transferred to ICE as an Immigration Enforcement Agent, and was then promoted to a Deportation Officer. I have been a Deportation Officer since October 11, 2009.

3. As a Deportation Officer, my assigned duties are to identify, locate, and arrest aliens illegally present in the United States. Additionally, I am charged with the responsibility of overseeing the cases of aliens in removal proceedings. These duties include reviewing alien files for sufficiency, reviewing the detention and release of aliens

in ICE custody, monitoring the progress of cases through the hearing process, and enforcing the immigration court's decision, including executing removal orders. I am also responsible for presenting criminal immigration cases to the United States Attorney's Office for possible criminal prosecution.

4. Joaquin Herrera Avila ("AVILA") is a native and citizen of Mexico. On or about October 10, 2016 AVILA entered the United States near Hidalgo, Texas without admission or parole. Attached hereto as Exhibit A is a true and accurate copy of the I-213 form for AVILA.

5. On August 29, 2025, ERO St. Paul encountered AVILA in Minneapolis, Minnesota via a traffic stop. AVILA identified himself and admitted to illegal entry and no legal status to reside in the United States. Ex. A at 2. AVILA was arrested and taken into custody.

6. He was charged the same day with being present in the United States without inspection, admission or parole and without any valid visa, permit, border crossing card, passport, or valid entry document under 8 U.S.C. §§ 1221(a)(6)(A)(i), 1221(a)(7)(A)(i)(I). Attached as Ex. B is a true and accurate copy of the Notice to Appear.

7. AVILA has a master calendar hearing in front of the Immigration Court on October 1, 2025.

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

JOHN D LIGON Digitally signed by JOHN D LIGON  
Date: 2025.10.01 07:08:00 -0500

John D. Ligon, Deportation Officer

U.S. Immigration and Customs Enforcement

October 1, 2025