

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LILIANA DEL CISNE RUEDA TORRES,

Petitioner,

v.

LADÉON FRANCIS, *et al.*,

Respondents.

No 25-CV-8408 (DEH)

DECLARATION OF
DEPORTATION OFFICER
YI JIANG

Pursuant to 28 U.S.C. § 1746, I, Yi Jiang, hereby declare as follows:

1. I am a Deportation Officer at U.S. Immigration and Customs Enforcement (“ICE”) within the U.S. Department of Homeland Security (“DHS”). I have served in my current capacity as a Deportation Officer since June 2, 2024. As a Deportation Officer, I manage the cases of aliens who are in immigration proceedings. Once an alien is ordered removed from the United States, I facilitate the alien’s removal by coordinating with the government of the alien’s country of removal to obtain proper travel documents.
2. I have prepared this declaration in connection with a Petition for a Writ of Habeas Corpus filed by the petitioner, Liliana Del Cisnes Rueda Torres (“Rueda Torres”), on October 9, 2025. I make this declaration in my official capacity, and the following representations are based on my review of Rueda Torres’s administrative file, consultation with my colleagues, and ICE electronic records and databases.
3. Rueda Torres is a native and citizen of Ecuador.
4. On or about September 28, 2022, a Border Patrol Agent with U.S. Customs and Border Protection (“CBP”) encountered Rueda Torres and her family at or near Paso Del Norte, Texas, and determined that she had entered the United States without inspection, admission, or parole

from an immigration officer. After processing, Rueda Torres was released that same day on humanitarian parole valid through November 30, 2022, in the discretion of CBP pursuant to Immigration and Nationality Act (“INA”) § 212(d)(5), 8 U.S.C. § 1182(d)(5), and given instructions to report to the nearest ICE office within 60 days for continued processing.


5. On October 31, 2022, Rueda Torres appeared at the ICE office in Newark, New Jersey for processing, at which time she was served an arrest warrant and a Notice to Appear (“NTA”), which charged her as removable pursuant to INA § 212(a)(6)(A)(i), 8 U.S.C. § 1182(a)(6)(A)(i), as an alien present in the United States without being admitted or paroled, or who arrived in the United States at any time or place other than as designated by the Attorney General. The NTA directed Rueda Torres to appear for a hearing before an Immigration Judge on December 29, 2022, at 970 Broad Street in Newark, New Jersey.
6. Also on October 31, 2022, ICE personally served Rueda Torres with a Form I-220A, Order of Release on Recognizance, as well as a Form I-286, Notice of Custody Determination, which confirmed her release on recognizance.
7. Rueda Torres’s humanitarian parole was terminated on October 31, 2022, with service of the NTA. It was not subsequently renewed by DHS.
8. On November 21, 2022, ICE filed the NTA with the Executive Office for Immigration Review, thereby commencing removal proceedings against Rueda Torres.
9. On December 29, 2022, Rueda Torres appeared *pro se* at her first master calendar hearing in Newark, New Jersey, where she was informed of her rights by the Immigration Judge, and at Rueda Torres’s request, the case was adjourned to July 6, 2023, to permit her an opportunity to secure counsel. The July 6, 2023, hearing date was subsequently rescheduled to October 19, 2023, due to the Immigration Judge’s unavailability on the originally scheduled date.

10. On August 21, 2023, Rueda Torres filed with the immigration court a defensive application for asylum on behalf of herself and her two minor children, as well as a motion to change venue from Newark, New Jersey, to New York, New York as she had moved to Manhattan. The motion to change venue was granted on August 24, 2023, changing venue to the New York City Immigration Court. On August 30, 2023, a master calendar hearing was scheduled for April 4, 2024.
11. On April 4, 2024, Rueda Torres appeared *pro se* for a second master calendar hearing in New York City, and at Rueda Torres's request, the case was adjourned to December 5, 2024, to permit her another opportunity to secure counsel.
12. On December 5, 2024, Rueda Torres appeared *pro se* for a third master calendar hearing in New York City. The case was adjourned to October 9, 2025, when pleadings were scheduled to be taken.
13. On February 21, 2025, Rueda Torres was arrested by the New York Police Department for Attempted Petit Larceny, in violation of New York Penal Law § 155.25, and Attempted Criminal Possession of Stolen Property, in violation of New York Penal Law § 165.40.
14. On February 22, 2025, ICE lodged an immigration detainer with Central Booking of New York County Criminal Court, located at 100 Centre Street in New York, New York.
15. On October 9, 2025, Rueda Torres appeared *pro se* for a fourth master calendar hearing at 26 Federal Plaza in New York, New York. The Immigration Judge adjourned the case until September 23, 2026. Immediately following the hearing, ICE revoked Rueda Torres's order of release on recognizance and took Rueda Torres into custody in the premises of the immigration court. ICE transported Rueda Torres to the processing space within 26 Federal Plaza and personally served Rueda Torres with a Form I-200, Warrant for Arrest.

16. ICE's only detention facility within the Southern District of New York, the Orange County Jail, does not house female ICE detainees.
17. Rueda Torres remained at 26 Federal Plaza until the following day, October 10, 2025, when long-term bedspace was secured for her at South Louisiana ICE Processing Center, 3843 Stagg Avenue, Basile, Louisiana, 70515. Rueda Torres left 26 Federal Plaza at approximately 10:12 a.m. on October 10 and took a 12:50 p.m. flight from Newark Liberty International Airport in New Jersey to Alexandria International Airport in Louisiana. Following a delay, the flight landed in Alexandria at approximately 4:07 p.m., at which time Rueda Torres was transferred to South Louisiana ICE Processing Center, where she remains detained at this time. ICE has no current intention of moving Rueda Torres during the pendency of her habeas proceedings.

I hereby declare under the penalty of perjury that the above statements are true and correct.

Executed at New York, New York
this 17th day of October 2025.



Yi Jiang
Deportation Officer
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security