

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Civil No. 25-CV-3939 (ECT/LIB)

Oumar Konate	)	
	)	
Petitioner,	)	
	)	<b>DECLARATION OF</b>
	)	<b>CHRISTOPHER A. CAMPBELL</b>
v.	)	
	)	
Pamela Bondi,	)	
U.S. Attorney General, et al.,	)	
	)	
Respondents	)	

1. Christopher A. Campbell, 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:
2. I am and have been employed with ICE since May 11, 2008. I began my career as an Immigration Enforcement Agent. On September 20, 2015, I was promoted to Deportation Officer.
3. As a Deportation Officer, my assigned duties are to identify, locate, and arrest noncitizens who are illegally present in the United States. Additionally, I am charged with the responsibility of overseeing the cases of noncitizens in removal proceedings. These duties include the review of noncitizen files for sufficiency, the detention and release of noncitizen in ICE custody, monitoring the progress of cases through the hearing process, and enforcement of the immigration court's decision, including the

execution of removal orders. I am also responsible for presenting criminal immigration cases to the United States Attorney's Office for possible criminal prosecution.

4. I submit this Declaration in connection with a Petition for writ of habeas corpus by Petitioner Oumar KONATE (KONATE). This Declaration is based on my personal and professional knowledge, information obtained from other individuals employed by ICE, and information obtained from records and systems maintained by DHS, as well as records of the immigration courts.
5. On June 10, 2002, the legacy U.S. Immigration and Naturalization Service admitted KONATE, a native and citizen of the Republic of the Congo, at New York JFK International Airport POE as a nonimmigrant visitor. KONATE admits he entered the country using fraudulent documents.
6. On July 1, 2003, Immigration and Customs Enforcement issued KONATE a Notice to Appear, form I-862, charging removability under sections 212(a)(7)(A)(i)(I) and 237(a)(1)(A) of the INA as an alien present in the United States without valid documents and an alien admitted to the United States without valid documents.
7. On April 6, 2005, an immigration judge ordered KONATE removed from the U.S. to Congo (Republic of the Congo). Attached as Exhibit 1 is a true and accurate copy of the Order of the Immigration Judge dated April 6, 2005.
8. On November 6, 2012, ICE arrested KONATE in order to effectuate the removal order against him.
9. On December 10, 2012, ICE requested a travel document from the Embassy of the

Republic of the Congo (the Embassy).

10. On March 12, 2013, the Embassy denied a travel document for this case.
11. On November 14, 2013, ICE released KONATE under an Order of Supervision. Attached as Exhibit 2 is a true and accurate copy of the Order of Supervision dated November 14, 2013.
12. On April 1, 2025, ERO St. Paul arrested KONATE and served him a Notice of Revocation of Release, citing a renewed likelihood of removal to the Republic of the Congo as a change in circumstances. Attached as Exhibit 3 is a true and accurate copy of the Notice of Revocation of Release dated April 1, 2025.
13. On April 9, 2025, ERO St. Paul contacted the Embassy to make a second request for a travel document.
14. On May 21, 2025, ERO St. Paul received a travel document from the Embassy.
15. On June 25, 2025, ERO St. Paul attempted to repatriate KONATE to the Republic of the Congo. KONATE refused to cooperate. Escorting officers advised KONATE that failing to comply with removal efforts would place him in Failure to Comply status, and that he would remain in custody until he complied with removal efforts. He continued to refuse to cooperate, forcing ERO St. Paul to cancel the removal.
16. On June 27, 2025, ERO St. Paul served KONATE Failure to Comply paperwork via certified mail.
17. On July 29, 2025, ERO St. Paul served KONATE an I-229(a) outlining his obligation to comply with removal efforts.
18. On August 18, 2025, KONATE's travel document expired.

19. On August 27, 2025, ERO St. Paul served KONATE an additional I-229(a).
20. On September 29, 2025, ERO St. Paul served KONATE an additional I-229(a).
21. On October 20, 2025, ERO St. Paul received a second travel document from the Embassy. ERO St. Paul plans to repatriate KONATE to the Republic of the Congo on November 20, 2025.
22. KONATE remains in custody because he is unwilling to comply with removal efforts.
23. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.
24. Further your affiant sayeth not.

CHRISTOPHER A CAMPBELL Digitally signed by CHRISTOPHER A CAMPBELL  
Date: 2025.11.13 11:11:55 -06'00'

Christopher Campbell, Deportation Officer  
U.S. Immigration and Customs Enforcement

November 12, 2025