

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Civil No. 25-cv-3946

Jose Andres ROBLES-Encalada)

Plaintiff,)

v.)

Pamela Bondi, Attorney General; Kristi Noem,)
Secretary, U.S. Department of Homeland Security;)
The Department of Homeland Security; Todd M.)
Lyons, Acting Director of Immigration and Customs)
Enforcement; Immigration and Customs)
Enforcement; Sirce Owen, Acting Director for)
Executive Office for Immigration Review; Executive)
Office for Immigration Review; Samuel J. Olson,)
Field Office Director, St. Paul Field Office,)
Immigration and Customs Enforcement; and Ryan)
Shea, Sheriff of Freeborn County,)

**DECLARATION OF
DEPORTATION
OFFICER
ANGELA MINNER**

Respondents.)

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

1. The following declaration is based on a review of contents of the Plaintiff's alien file, official records checks, and information relayed to me by other officials.
2. I am and have been employed with DHS and the Department of Justice (DOJ) since October 20, 2002. I began my career as an Immigration Inspector with the former Immigration and Naturalization Service (INS). On March 1, 2003, INS reorganized into separate agencies under DHS and my title was renamed CBP Officer with Customs and

Border Protection (CBP). In August of 2007, I was promoted to the Enforcement CBP Officer position within CBP. In November of 2009, I was hired by ICE Enforcement and Removal Operations (ERO) as a Deportation Officer, my current position.

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 the review of alien files for sufficiency, the detention and release of aliens 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. Petitioner Jose Andres ROBLES-Encalada (Hereinafter referred to as "ROBLES") is a citizen and national of Ecuador. A true and correct copy of ROBLES's Record of Deportable/Admissible Alien Form I-213 detailing his personal history and summary of arrest last updated on October 14, 2025, is attached as Exhibit A. ROBLES entered the United States on an unknown date at an unknown place. ROBLES claimed to have entered the United States around September 2019, near Eagle Pass, Texas, without inspection.

5. On January 16, 2024, ROBLES filed an I-918 Application for Advance Permission to Enter as a Non-Immigrant, otherwise known as a "U Visa" application, with U.S. Citizenship & Immigration Services (USCIS).

6. On May 15, 2024, USCIS issued a "bona fide" determination notice on ROBLES' pending I-918 Non-Immigrant Visa application, which means the I-918 application is

considered complete and properly filed, and which allowed him to apply for employment authorization. A “bona fide” finding puts the U-visa application on a waiting list and does not mean the U-visa will be eventually approved after final adjudication. U-visa application adjudication can take six to eight years due to a high volume of applications. A USCIS deferred action grant does not prohibit ICE from taking enforcement action. Even if a U-visa petitioner is removed from the United States, they may await the adjudication of their application outside the United States and re-enter if USCIS grants the U visa and any applicable waivers.

7. On September 30, 2025, ICE officers conducting field operations encountered ROBLES in Minneapolis, MN pursuant to a traffic stop. ICE officers identified ROBLES as a citizen of Ecuador without authorization to remain in the United States, arrested ROBLES and issued him a Notice to Appear (“NTA”) in Removal Proceedings, Form I-862. A true and correct copy of the NTA dated September 30, 2015, is attached as **Exhibit B**.

8. On the same date, September 30, 2025, ICE issued a Warrant for Arrest of Alien for ROBLES, which is also referred to as a Form I-200. Attached as **Exhibit C** is a true and correct copy of the Form I-200 dated September 30, 2025.

9. On October 15, 2025, ROBLES first appeared before an immigration judge at Fort Snelling, MN. ROBLES’ next scheduled hearing in immigration court is October 29, 2025.

10. ICE agrees not to move Petitioner out of the District of Minnesota until after November 7, 2025, or the resolution of the pending habeas matter, whichever comes earlier, with one caveat: in the event of unforeseen circumstance or contingency consistent

with Petitioner's original request, ICE reserves the option, with 72 hours' notice, to apply to the Court for permission to withdraw from this commitment.

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



Angela Minner, Deportation Officer
U.S. Immigration and Customs Enforcement

DATED: October 22, 2025