

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

---

NELSON ISAIAS RIVAS ALONSO

Petitioner,

Case No. \_\_\_\_\_

v.

SAM OLSON, Field Office Director of Enforcement and Removal Operations, Chicago Field Office, Immigration and Customs Enforcement; KRISTI NOEM, Secretary, U.S. Department of Homeland Security; PAMELA BONDI, U.S. Attorney General; U.S. DEPARTMENT OF HOMELAND SECURITY; EXECUTIVE OFFICE FOR IMMIGRATION REVIEW; and SCOTT SMITH, Jail Administrator of Dodge County Jail,

Respondents.

---

DECLARATION OF ALLISON MIGNON

---

I, Allison Mignon, declare pursuant to 28 USC § 1746 and under the penalty of perjury, that the following is true and correct.

1. I am an attorney licensed to practice law in the State of Wisconsin.
2. I am an associate at Layde & Parra, S.C. My firm has been representing Nelson Isaias Rivas Alonso in his case before Executive Office for Immigration Review (EOIR).

3. I appeared before the EOIR on behalf of Mr. Rivas Alonso in his custody redetermination hearing on October 21, 2025.
4. In preparation for the hearing, I helped Mr. Rivas Alonso prepare and sign an affidavit, a copy of which is attached to this Declaration as **Exhibit A**. I also had a translator prepare and certify a translation of Mr. Rivas Alonso's affidavit. A copy of the certified translation is attached to this Declaration as **Exhibit B**.
5. Exhibits A and B are filed under seal because they contain the name of Mr. Rivas Alonso's minor child. Fed. R. Civ. P. 5.2(a). Pursuant to Gen. L.R. 79(d), I am also attaching public-facing versions of the same documents with the minor's name redacted. These documents are attached as **Exhibit C** and **Exhibit D**.
6. In addition, I helped Mr. Rivas Alonso's wife prepare and sign an affidavit, a copy of which is attached to this Declaration as **Exhibit E**.
7. Exhibit E is filed under seal because it contains the name of Mr. Rivas Alonso's minor child. Fed. R. Civ. P. 5.2(a). Pursuant to Gen. L.R. 79(d), I am also attaching a public-facing version of the same document with the minor's name redacted. This document is attached as **Exhibit F**.
8. During that hearing, the Immigration Judge made findings that Petitioner is not a flight risk and is not a threat to the community.
9. The Immigration Judge stated that he would ordinarily have granted Petitioner bond between \$3000 and \$5000, but that he lacked jurisdiction to

do so because the decision of the Board of Immigration Appeals (BIA) in *Matter of Yajure Hurtado* was binding on him.

10. I have requested a recording of the hearing via FOIA but have not yet received the results. The FOIA request was made on October 27, 2025, with a request for expedited processing given Mr. Rivas Alonso's upcoming hearing in December. A copy of the request is attached to this Declaration as **Exhibit G**. In my experience, these requests take about five months to process. Generally, transcripts of hearings are only prepared and issued in the case of an appeal to the Board of Immigration appeals pursuant to Chapter 4.10(b) of the Immigration Court Practice Manual.
11. Following the hearing, the Immigration Judge entered an order denying bond on the Immigration Court's electronic record system, and also sent me a copy by email. A copy of that order is attached to this Declaration as **Exhibit H**.

*Pursuant to 28 U.S.C. § 1746, I verify under penalty of perjury that the foregoing declaration is true and correct.*

Executed this 27<sup>th</sup> day of October, 2025.



Allison Mignon  
Attorney for Petitioner

LAYDE AND PARRA, S.C.  
PO Box 1226  
Milwaukee, WI 53201  
(414)488-1200  
allison@laydeimmigration.com