

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

NELSON ISAIAS RIVAS-ALONSO,

Petitioner,

v.

Case No. 25-cv-1660

SAM OLSON,


Respondent.

**DECLARATION OF SUPERVISORY DETENTION AND DEPORTATION OFFICER
JOSEPH CANELLA**

In accordance with 28 U.S.C. § 1746, I, Joseph Canella, make the following sworn declaration under penalty of perjury that the following is true and correct to the best of my knowledge and belief.

1. My name is Joseph Canella, and I am a Supervisory Detention and Deportation Officer assigned to the Chicago Filed Office of Enforcement and Removal Operations (ERO) of the United States Immigration and Customs Enforcement (ICE), United States Department of Homeland Security (DHS). I have been employed by DHS in my current position since February 09, 2025.
2. As a Supervisory Detention and Deportation Officer, my duties include: (1) supervising Deportation Officers, (2) arresting aliens who are removable from the United States; (3) processing aliens who will be removed from the United States or placed into removal proceedings before an immigration judge; (4) monitoring alien cases until removal; (5) responding to alien requests while in ICE custody; and (6) requesting travel documents and

coordinating travel for aliens ordered removed from the United States. My duties may, at times, include other responsibilities related to the apprehension, arrest, and removal of aliens, as needed.

3. At the request of Assistant United States Attorney Qortney McLeod, I make this declaration in my official capacity. The statements contained in this declaration are based upon my personal knowledge of NELSON ISAIAS RIVAS-ALONSO's immigration case; my review of available electronic databases and records kept by ICE in the ordinary course of business; and information provided to me by employees at the facility where he is held, as well as other ICE employees in the course of my official duties.
4. I make this declaration in support of Respondent's answer to the Petition for Writ of Habeas Corpus under 28 U.S.C. § 2241 filed by NELSON ISAIAS RIVAS-ALONSO and to place before the Court information relevant to this matter.
5. In DHS records, Petitioner RIVAS-ALONSO is assigned a unique Alien Number that ends in .
6. DHS records indicate that Petitioner RIVAS-ALONSO is a native and citizen of Honduras without legal status in the United States.
7. DHS records indicate that on August 12, 2025, Petitioner RIVAS-ALONSO was apprehended by personnel from ICE ERO. At the time, Petitioner RIVAS-ALONSO was subject to a removal order issued *in absentia*. Petitioner RIVAS-ALONSO subsequently moved to reopen his removal proceedings, and an immigration judge granted the motion on September 8, 2025. Petitioner RIVAS-ALONSO remains in ICE custody pending removal proceedings based on a Notice to Appear (NTA) issued on February 22, 2013.

8. DHS records indicate that U.S. Border Patrol apprehended Petitioner RIVAS-ALONSO on or about February 22, 2013, after his entry into the United States without inspection as an unaccompanied child. Between February 23, 2013, and May 22, 2013, Petitioner RIVAS-ALONSO was in custody of the Office of Refugee Resettlement.
9. DHS records indicate that Petitioner RIVAS-ALONSO has been detained at the Dodge County Jail, in Juneau, Wisconsin since August 18, 2025. Sheriff Dale Schmidt is the current Dodge County Sheriff and warden of Dodge County Jail.
10. DHS records indicate that on October 21, 2025, an immigration judge denied Petitioner RIVAS-ALONSO's request for release on bond.
11. DHS records indicate Petitioner RIVAS-ALONSO is seeking relief from removal in the form of an application for cancellation of removal for non-permanent residents. A hearing on this application is scheduled for December 15, 2025, before the Chicago, Illinois immigration court.
12. Copies of the NTA and immigration judge's bond order, that are included in the record of proceedings before the immigration court are attached to this declaration as exhibits.

I declare under penalty of perjury that foregoing is true and correct to the best of my knowledge and belief.

Executed on this 12th day of November 2025.

JOSEPH T
CANELLA JR

Digitally signed by JOSEPH T
CANELLA JR
Date: 2025.11.13 15:44:00 -0600

Joseph Canella
Supervisory Deportation and Detention Officer
ICE/ERO
Chicago, Illinois Field Office