

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
25-cv-4296 (JRT/JFD)

Jose Mario Romero Santuario,

Petitioner,

v.

Pamela Bondi, *et al.*,

Respondents.

**DECLARATION OF
JOHN D. LIGON**

John D. Ligon, 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:

1. The following declaration is based on a review of the Petitioner's alien file, statements, and e-mails.

2. I am and have been employed with ICE and the former Immigration and Naturalization Service (INS) since July 22, 2002. I began my career as a Border Patrol Agent, later promoted to a Supervisory Border Patrol Agent, transferred to ICE as an Immigration Enforcement Agent, and was then promoted to a Deportation Officer. I have been a Deportation Officer since October 11, 2009.

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 reviewing alien files for sufficiency, reviewing the detention and release of aliens

in ICE custody, monitoring the progress of cases through the hearing process, and enforcing the immigration court's decision, including executing removal orders. I am also responsible for presenting criminal immigration cases to the United States Attorney's Office for possible criminal prosecution.

4. Jose ROMERO ("ROMERO") is a native and citizen of Mexico. On an unknown date, ROMERO entered the United States at an unknown location, without admission or parole. Attached hereto as Exhibit A is a true and accurate copy of the I-213 for Romero.

5. On October 18, 2025, ERO Officers arrested ROMERO in the Chicago Area of Operations.

6. On October 19, 2025, ERO Officers transported ROMERO to the ERO St. Paul office for processing.

7. He was charged the same day with being present in the United States without inspection, admission or parole under 8 U.S.C. §§ 1182(a)(6)(A)(i) and 1182(a)(7)(A)(i)(I). Attached hereto as Exhibit B is a true and accurate copy of the Notice to Appear.

8. On November 13, 2025, an immigration hearing was scheduled in EOIR St. Paul. Romero retained counsel and requested that the hearing be continued. It is now scheduled for December 3, 2025.

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

JOHN D LIGON Digitally signed by JOHN D LIGON
Date: 2025.11.25 11:22:20 -06'00'

John D. Ligon, Deportation Officer
U.S. Immigration and Customs Enforcement

November 25, 2025