

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

YANGCHUN WANG,

Petitioner,

v.

KENNETH GENALO, *et al.*,

Respondents.

No. 25-cv-9460 (JGK)

DECLARATION OF DEPORTATION
OFFICER MINCHEOL N. SO

Pursuant to 28 U.S.C. § 1746, I, Mincheol N. So, hereby declare under penalty of perjury that the following is true and correct:

1. I am a Deportation Officer at U.S. Immigration and Customs Enforcement (“ICE”) within the U.S. Department of Homeland Security (“DHS”). I have served in my current capacity as a Deportation Officer since September 30, 2015. As a Deportation Officer, I manage the cases of aliens who are in immigration proceedings. Once an alien is ordered removed from the United States, I facilitate the alien’s removal by coordinating with the government of the alien’s country of removal to obtain proper travel documents.
2. I have prepared this declaration in connection with the Petition for a Writ of Habeas Corpus filed by the petitioner Yangchun Wang (“Wang”). Wang has been assigned the following Alien Number [REDACTED] I am the Deportation Officer who has been assigned to Wang. The following representations are based on my review of Wang’s administrative file, consultation with my colleagues, and ICE electronic records and databases.
3. Wang is a native and citizen of China.
4. On November 12, 2025, ICE officers conducted a targeted enforcement action to locate and arrest another alien matching Wang’s description in the vicinity of [REDACTED]

[REDACTED] Wang refused to answer ICE officers’ questions but handed to them a Site Safety

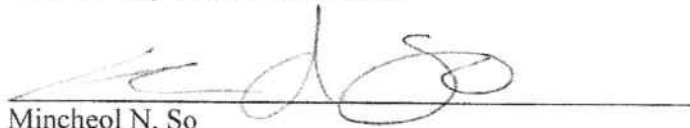
Training Identification document showing his name. ICE record checks revealed that Wang entered the United States illegally from the border of Mexico at the Brownsville (Gateway Bridge), Texas, Port of Entry on June 15, 2025. Therefore, officers arrested him without incident based on a Warrant for Arrest of Alien (Form I-200). After clearing the area, ICE officers transported Wang to 26 Federal Plaza, 10th Floor, New York, NY, 10278, for processing and a final disposition.

5. On the same date, while detained at 26 Federal Plaza, an ICE officer advised Wang of his administrative rights in removal proceedings. Wang acknowledged understanding his rights. Wang admitted that he is a citizen and national of China without any claim to United States citizenship. ICE issued and personally served Wang with a Form I-862, Notice to Appear (“NTA”), which charged him with removability pursuant to INA § 212(a)(6)(A)(i), 8 U.S.C. § 1182(a)(6)(A)(i), as an alien present in the United States without being admitted or paroled, or who arrived in the United States at any time or place other than as designated by the Attorney General and INA § 212(a)(6)(A)(i), 8 U.S.C. § 1182(a)(6)(A)(i). The NTA advised Wang that he was to appear before an immigration judge at 201 Varick Street, 5th Floor Room 507, New York, New York, for a hearing scheduled for January 14, 2026. ICE officers also served Wang with the I-200, I-862, I-826, FD-249, DHS-1815, Consulate Notification, provided him with both the Online Detainee Locator System (ODLS) Privacy Notice and a List of Pro Bono Legal Service Providers.
6. Subsequently, on the same date, Wang was transferred to the Delaney Hall Detention Facility, in Newark, New Jersey.
7. On November 21, 2025, Wang was transferred to the Metropolitan Detention Center, in Brooklyn, New York, where he will reside until during his habeas corpus proceedings in this Court.

8. On November 22, 2025, DHS filed a Form I-830 notifying the Executive Office of Immigration Review (EOIR) that on November 21, 2021, Wang was transferred to the Metropolitan Detention Center, 80 29th Street, Brooklyn, NY 11232. DHS also filed the NTA with the Immigration Court.
9. On the same date, the Immigration Court scheduled the case for a master calendar hearing on December 2, 2025, at 9.00A.M.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed at New York, New York
This 28th day of November 2025.

A handwritten signature in black ink, appearing to read 'Mincheol N. So', is written over a horizontal line.

Mincheol N. So
Deportation Officer
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security