

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ROCIO GLADYS VILLARREAL OBREGÓN

and ,

Petitioners,

v.

LADEON FRANCIS, *et al.*,

Respondents.

No. 25-CV-9465 (KPF)

DECLARATION OF SUPERVISORY
DETENTION AND DEPORTATION OFFICER
KIM J. HAYNES

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

1. As of November 15, 2025, I serve in my current capacity as Supervisory Detention and Deportation Officer at U.S. Immigration and Customs Enforcement (“ICE”) within the U.S. Department of Homeland Security (“DHS”). I previously served as a Deportation Officer since May 2024 where I managed 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 that alien’s country of removal to obtain proper travel documents.
2. I have prepared this declaration in connection with a Petition for a Writ of Habeas Corpus filed by the petitioners, Rocio Gladys Villerreal-Obregon and  (“Petitioners”). Petitioners who are mother and daughter have been assigned the following Alien Numbers:  respectively. The following representations are based on

¹ The petition filed in this matter names the minor petitioner as  however, this petitioner’s initials are 

my personal knowledge, review of Petitioners' administrative files, consultation with my colleagues, and ICE electronic records and databases.

3. Petitioners are natives and citizens of Peru.
4. On or about October 7, 2022, a Border Patrol Officer with United States Customs and Border Protection ("CBP") encountered Petitioners near the Paso del Norte Bridge in the El Paso, Texas Border Patrol Sector Area and determined that Petitioners unlawfully entered the United States from Mexico and were not inspected by an Immigration Officer. Petitioners were arrested and transported to a nearby Border Patrol facility for processing. On October 14, 2022, due to space limitations at the facility and as a condition of their parole, Petitioners were released and assigned to the Alternatives to Detention Program. Petitioners were advised to report to the New York ICE office within 60 days of arriving at their destination.
5. On October 28, 2022, Petitioners reported to ICE officers at 26 Federal Plaza, New York, NY and were terminated from the Alternatives to Detention Program, but remained on parole. ICE officers scheduled the Petitioners to next report on November 12, 2025.
6. On July 14, 2023, Petitioners filed an asylum application, Form I-589, with the U.S. Citizenship and Immigration Services within DHS.
7. On November 12, 2025, the Petitioners reported to 26 Federal Plaza, 5th floor where ICE officers arrested the Petitioners pursuant to a Warrant for Arrest (Form I-200). See 

. Petitioners were taken into custody and escorted to the 5th floor at 26 Federal Plaza for processing.

8. On November 12, 2025, ICE officers served Petitioners with Notices to Appear (“NTAs”), charging them as inadmissible pursuant to Immigration and Nationality Act § 212(a)(6)(A)(i), 8 U.S.C. § 1182(a)(6)(A)(i), as aliens present in the United States without being admitted or paroled, or who arrived in the United State at a time or place other than as designated by the Attorney General. *See* Ex. B, NTA for Petitioner Rocio Gladys Villarreal-Obregon. The NTAs directed Petitioners to appear for a hearing before an Immigration Judge on May 20, 2026, at 26 Federal Plaza, New York, New York. On November 12, 2025, the NTA was filed with the Immigration Court in New York, New York, thereby commencing removal proceedings against Petitioners.
9. After ICE officers completed processing Petitioners on November 12, 2025, ICE transferred custody of the Petitioners to an ICE contractor for transportation to the South Texas Family Residential Center in Dilley, Texas (“Dilley FRC”). Petitioners were transported by the ICE contractor to LaGuardia Airport in Queens, New York, for a flight to Texas; however, they arrived too late to board their scheduled flight, and they were housed by the ICE contractor at a hotel at LaGuardia Airport on the night of November 12, 2025. On November 13, 2025, Petitioners were transported to Texas and arrived at the Dilley FRC where they are currently detained.
10. On November 14, 2025, ICE officers served Petitioner  with a Notice of Rights and Disposition, Form I-770, pursuant to 8 C.F.R. § 1236.3(h), which is a form used to inform juveniles of their rights while in DHS custody, and explained the contents of the NTA to her.

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

Executed at New York, New York
This 19th day of November, 2025.

KIM J HAYNES Digitally signed by KIM J HAYNES
Date: 2025.11.19 17:10:55 -05'00'

Kim J. Haynes
Supervisory Detention and Deportation Officer
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security