


**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
WAYCROSS DIVISION**

ANGEL JOSE QUINTERO MORA,)	
)	
Petitioner,)	
)	
v.)	Case No. 5:25-cv-190
)	
Warden, FOLKSTON ICE PROCESSING)	
CENTER,)	
)	
Respondent.)	
)	

DECLARATION OF DEPORTATION OFFICER (DO) BIATRIS COBIAN

Pursuant to 28 U.S.C. § 1746, I, Biatris Cobian, do hereby declare:

1. I am employed by U.S. Department of Homeland Security (“DHS”), Immigration and Customs Enforcement (“ICE”), Enforcement and Removal Operations (“ERO”), and currently serve as a Deportation Officer. I have been employed by ICE since 2022.
2. In my current position, my responsibilities include handling detained cases at Folkston ICE Processing Center, via the Atlanta Field Office. I am the officer assigned to the case involving Angel Jose Quintero Mora (“Petitioner”), whose alien registration number is .
3. I provide this declaration based on my personal knowledge, belief, reasonable inquiry, and information obtained from various records, systems, databases, other DHS employees, employees of DHS contract facilities, and information portals maintained and relied upon by DHS in the regular course of business.
4. Petitioner is a native and citizen of Venezuela. On or about September 17, 2023, Petitioner was encountered by immigrations officers after unlawfully entering the United States near Rio Grande Valley, Texas. After a brief interview, Petitioner admitted to being a citizen and national of Venezuela without documentation to allow him to enter or remain in the United States. He further admitted he was not inspected or admitted at the time he entered. He was then served with a Notice to Appear (“NTA”) that charged him as being inadmissible pursuant to Immigration and Nationality Act (“INA”) § 212(a)(6)(A)(i) and released on his own recognizance. The NTA notified Petitioner that his initial master hearing was scheduled for March 24, 2025 at the Atlanta Immigration Court.
5. On April 26, 2024, Petitioner filed an application for relief from removal proceedings.

6. On March 24, 2025, Petitioner appeared, pro se, for his initial master hearing. The Immigration Judge gave advisals and Petitioner requested a continuance to seek counsel. The Immigration Judge granted the request and reset the master to February 5, 2026.
7. On September 4, 2025, immigration officers encountered Petitioner while at a worksite in Ellabell, Georgia. During this encounter, immigration officers determined Petitioner was unlawfully present in the United States. He was then detained by ICE and ultimately transported to Folkston ICE Processing Center in Folkston, Georgia. On October 23, 2025, the immigration court rescheduled Petitioner's next master hearing to November 20, 2025 as a result of his detention.
8. On or about October 17, 2025, Petitioner asked ICE/ERO to be considered for voluntary departure. On October 20, 2025, Petitioner and DHS entered into a joint motion for voluntary departure. The joint motion, however was misplaced and not filed until December 3, 2025.
9. On November 20, 2025, Petitioner appeared, pro se, for his master hearing. He admitted and conceded to the allegations and charge listed on the NTA. The NTA was sustained and Venezuela designated as the country of removal. The Immigration Judge set the case for a merits hearing on December 16, 2025.
10. On December 5, 2025, the Immigration Judge granted the joint motion for voluntary departure under safeguards. Pursuant to the terms of the order, Petitioner is required to voluntarily depart the United States by January 5, 2026 or the order for pre-conclusion voluntary departure becomes a removal order. Both Petitioner and DHS waived appeal.
11. To date, Petitioner remains detained at Folkston D. Ray ICE Processing Center pursuant to INA § 235(b)(2)(A).
12. ICE/ERO is presently removing Venezuelan nationals subject to final orders of removal to Venezuela.

Pursuant to Title 28, U.S. Code Section 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, this 8th day of December, 2025.

B. Cobian

Biatris Cobian, Deportation Officer
Department of Homeland Security
Immigration and Customs Enforcement

