

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Civil No. 25-cv-4601 (NEB/EMB)

Edison Vera Bermeo,

Petitioner,

v.

**DECLARATION OF
DEPORTATION OFFICER
WILLIAM J. ROBINSON**

Pamela Bondi, Attorney General, et al.,

Respondents.

William J. Robinson, 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 Plaintiff's alien file, official records checks, and information relayed to me by other officials.

2. I am and have been employed with DHS since September 8, 2008. I began my career as an Immigration Enforcement Agent. On September 20, 2015, I was promoted to Deportation Officer, my current position.

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 the review of alien files for sufficiency, the detention and release of aliens in ICE custody, monitoring the progress of cases through the hearing process, and enforcement of the immigration court's decision, including the execution of removal orders. I am also responsible for

presenting criminal immigration cases to the United States Attorney's Office for possible criminal prosecution.

4. Edison Vera Bermeo (Hereinafter referred to as "VERA") is a citizen and national of Ecuador. On December 10, 2025, VERA was encountered by Immigration and Customs Enforcement (ICE), Enforcement and Removal Operations (ERO) in Minneapolis, MN during Operation Metro Surge. ICE/ERO determined VERA was in the U.S. unlawfully, arrested and transported him to the Fort Snelling ICE office for processing. Attached hereto as Exhibit A is a true and accurate of VERA's form I-213.

5. VERA stated he entered the U.S. in 2023 near El Paso, TX without inspection by U.S. Immigration Officers. VERA was served a Notice to Appear, Form I-862, charging removability under sections 212(a)(6)(A)(i) and 212(a)(7)(A)(i)(I) of the Immigration and Nationality Act (INA). Attached hereto as Exhibit B is a true and accurate copy of the NTA.

6. On December 11, 2025, VERA filed a petition for writ of habeas corpus and complaint for declaratory and injunctive relief, and an emergency motion for temporary restraining order and preliminary injunction.

7. VERA is currently being housed at the Freeborn County jail in Albert Lea, MN where he is awaiting his next court hearing. The NTA (Exhibit B) lists a hearing date in 2027, but that is a typo. The immigration court has told ICE that it will set a date for VERA on its next available detained master calendar.

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

A handwritten signature in black ink, appearing to read "W. Robinson", is written over a solid horizontal line.

William J. Robinson, Deportation Officer
U.S. Immigration and Customs Enforcement

DATED: December 15, 2025