

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Civil No. 25-cv-04615 (JMB/LIB)

Ali Cumar,

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. CUMAR stated he entered the U.S. in 2022 near San Ysidro, CA without inspection by U.S. Immigration Officers. CUMAR 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). The NTA was never filed and in 2024 an immigration judge dismissed the case. Attached hereto as Exhibit A is a true and accurate copy of the August 19, 2022, I-831 Form for CUMAR.


5. Ali Cumar (Hereinafter referred to as "CUMAR") is a citizen and national of Somalia. On December 1, 2025, CUMAR was encountered by Immigration and Customs Enforcement (ICE), Enforcement and Removal Operations (ERO) in Minneapolis, MN during Operation Metro Surge. ICE/ERO determined CUMAR was in the U.S. unlawfully, arrested and transported him to the Fort Snelling ICE office for processing. Attached hereto as Exhibit B is a true and accurate copy of the December 2, 2025, I-831 Form for CUMAR.

6. On December 1, 2025, after his arrest by ICE, CUMAR 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 INA. Attached hereto as Exhibit C is a true and accurate copy of the December 2, 2025, I-862 Form for CUMAR.

7. On December 12, 2025, CUMAR 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.

8. CUMAR is currently being housed at the Sherburne County jail in Elk River, MN where he is awaiting his next court hearing.

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



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

DATED: December 18, 2025