

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Civil No. 25-cv-04753 (NEB/EMB)

Victor Perete-Benitez)

Plaintiff,)

v.)

Pamela Bondi, Attorney General; Kristi Noem,)
Secretary, U.S. Department of Homeland Security;)
The Department of Homeland Security; Samuel J.)
Olson, Field Office Director, St. Paul Field Office,)
Immigration and Customs Enforcement; and Eric)
Klang, Sheriff of Crow Wing County,)


Respondents.)

**DECLARATION OF
DEPORTATION OFFICER
CHRISTOPHER A.
CAMPBELL**

I, Christopher A. Campbell, 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. I am and have been employed with ICE since May 11, 2008. I began my career as an Immigration Enforcement Agent. On September 20, 2015, I was promoted to Deportation Officer.
2. As a Deportation Officer, my assigned duties are to identify, locate, and arrest aliens who are 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 noncitizen 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 decisions, 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.

3. I submit this Declaration in connection with a Petition for writ of habeas corpus by Petitioner Victor PERETE-Benitez (PERETE),  This Declaration is based on my personal and professional knowledge, information obtained from other individuals employed by ICE, and information obtained from records and systems maintained by DHS, as well as records of the immigration courts.
4. The documents attached to this declaration are true and accurate copies of documents from the immigration records on PERETE kept in the ordinary course of business by immigration officials at ICE/ERO.
5. Victor PERETE Benitez is a citizen and national of Mexico. PERETE makes no claim to U.S. citizenship or current lawful immigration status.
6. PERETE's first known entry to the United States was on some date prior to December 12, 2002. Records checks indicate he entered without inspection or parole.
7. On December 12, 2002, legacy Immigration and Naturalization Service (INS) encountered PERETE at the Hennepin County Adult Detention center in Minneapolis, MN after he had been arrested for traffic violations. INS served PERETE a Notice to Appear, Form I-862, charging removability under section 212(a)(6)(A)(i) of the Immigration and Nationality Act, as amended (INA), as an alien present in the United States without admission or parole.

8. On August 27, 2003, an immigration judge (IJ) ordered PERETE removed from the United States to Mexico.
9. On September 24, 2003, PERETE appealed the IJ's decision to the Board of Immigration Appeals (BIA).
10. On November 17, 2004, the BIA remanded PERETE's case back to the IJ.
11. On April 27, 2007, the IJ granted PERETE Voluntary Departure to Mexico.
12. On November 5, 2007, PERETE's Voluntary Departure was confirmed.
13. On an unknown date prior to December 13, 2025, PERETE entered the country without inspection or parole.
14. On December 13, 2025, ICE officers conducting targeted field operations encountered and arrested PERETE near Minneapolis, MN. ICE/ERO issued him a second 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 as an alien present in the United States without admission or parole and as an immigrant not in possession of a valid unexpired immigrant visa, reentry permit, border crossing card, or other valid entry document required by the INA.
15. PERETE is currently detained at Crow Wing County Jail in Brainerd, Minnesota.
16. PERETE's first immigration court appearance has not yet been scheduled.
17. PERETE has currently made no filings regarding bond or custody status with the immigration court.

I declare under penalty of perjury under the laws of the United States of America that the

foregoing is true and correct.

Dated: December 29, 2025

CHRISTOPHER A CAMPBELL Digitally signed by CHRISTOPHER A
CAMPBELL
Date: 2025.12.29 10:47:10 -06'00'

Christopher Campbell, Deportation Officer
U.S. Immigration and Customs Enforcement