

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Civil No. 0:25-cv-4758-ECT-ECW

LENG THAO,

Petitioner,

v.

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

DONALD J. TRUMP, *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. Leng Thao (Hereinafter referred to as "THAO") is a citizen and national of Laos. THAO entered the United States on March 31, 1992 at New York, NY as a refugee.

5. On January 13, 2006, THAO was convicted of Criminal Sexual Conduct-3rd Degree in Ramsey County District Court, St. Paul, Minnesota and sentenced to 18 months confinement and 15 years probation.

6. On September 13, 2006, THAO was released from prison in connection with his state court conviction. He was taken into custody by ICE and detained.

7. On September 14, 2006, ICE served THAO with a Notice to Appear, Form I-862, charging removability under section 237(a)(2)(A)(iii) of the Immigration and Nationality Act.

8. On September 19, 2006, an immigration judge in Bloomington, MN ordered THAO removed from the United States. Attached as **Exhibit A** is a true and correct copy of the removal order. THAO did not appeal this order to the Board of Immigration Appeals. As a result, the order became administratively final on September 19, 2006.

9. On January 16, 2007, ICE/ERO released THAO from custody on an Order of Supervision.

10. Homeland Security Investigations encountered THAO in St. Paul, MN during Operation Metro Surge on December 15, 2025.

11. On December 17, 2025, ICE/ERO revoked THAO's Order of Supervision, pursuant to a Notice of Revocation of Release signed by the Acting Deputy Field Office Director,

Michael Bottjen. I understand that the Acting Deputy Field Office Director was duly authorized to sign the notice and make the re-detention decision for THAO. Attached as **Exhibit B** is a true and correct copy of the Notice of Revocation served on THAO and revoking his supervision.

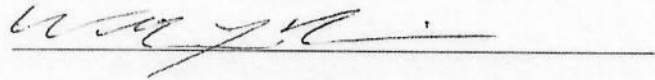
12. On December 15, 2025, ICE/ERO conducted an informal interview to give THAO an opportunity to respond to the reasons for revoking his release. Attached as **Exhibit C** is a true and correct copy of the notes from the informal interview.

13. THAO is currently in ICE custody and being housed at the Freeborn County jail in Albert Lea, MN pending removal from the United States to Laos.

14. Since the time of THAO's release on supervision, Laos has resumed issuing travel documents for removals and accepting individuals for repatriation. Since March 2025, ERO St. Paul has been able to remove more than 20 individuals to Laos. Laos is currently issuing travel documents, and charter removals are being conducted to the country regularly.

15. On December 19, 2025, ERO St. Paul submitted a request to ERO headquarters for a travel document for THAO. The request is pending as of today, although based on my experience the request should be approved soon. For example, a recent request for travel documents to effectuate a removal to Laos was submitted on June 17, 2025, the travel document was issued, and travel was scheduled to take place on August 25, 2025. Thus, I anticipate that Laos will issue travel documents in this case, and THAO will be able to travel to Laos in the reasonably foreseeable future.

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. J. Robinson", is written over a horizontal line.

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

DATED: January 6, 2026