

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Civil No. 26-cv-00216 (JWB/SGE)

Estefany Johanna Sanchez,

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. Estefany Johanna Sanchez (Hereinafter referred to as "SANCHEZ") is a citizen and national of Colombia. SANCHEZ was first encountered by U.S. Border Patrol (USBP) on or about January 2, 2024, at or near Tecate, CA. SANCHEZ was issued a Notice to Appear, Form I-862 and released on her own recognizance.

5. On October 10, 2024, SANCHEZ filed an Application for Asylum and for Withholding of Removal, Form I-589.

6. On January 12, 2026, ICE encountered SANCHEZ in St. Paul, MN during Operation Metro Surge.

7. On January 13, 2026, SANCHEZ filed a Petition for Writ of Habeas Corpus.

8. On January 13, 2026, SANCHEZ was transferred to El Paso Camp East Montana in El Paso, TX for bed space decompression. At the time of the transfer, ICE/ERO was not aware of any habeas petition that was filed nor any requests for SANCHEZ not to be transferred.

9. SANCHEZ is currently at El Paso Camp East Montana in El Paso, TX and ICE is currently in the process of returning SANCHEZ to Minnesota.

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



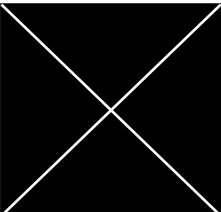

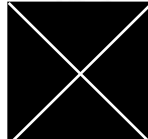
William J. Robinson, Deportation Officer
U.S. Immigration and Customs Enforcement


DATED: January 15, 2026

U.S. Department of Homeland Security

Subject ID: 390874989

Record of Deportable/Inadmissible Alien


Family Name (CAPS) SANCHEZ, ESTEFANY JOHANNA		First	Middle	Sex F	Hair [REDACTED]	Eyes [REDACTED]	Cmplxn [REDACTED]
Country of Citizenship COLOMBIA	Passport Number and Country of Issue [REDACTED] COLOMBIA	File Number [REDACTED]		Height [REDACTED]	Weight [REDACTED]	Occupation LABORER	
U.S. Address [REDACTED] MINNESOTA, 55119-4087				Sears and Marks See Narrative			
Date, Place, Time, and Manner of Last Entry 01/02/2024, 0300, 25.93 mile(s) E of TEC, PWA (Afoot)			Passenger Boarded at				
Number, Street, City, Province (State) and Country of Permanent Residence BOGOTA, COLOMBIA, COLOMBIA							
Date of Birth [REDACTED]	Age: 34	Date of Action 01/03/2024	Location Code SDC/BLV				
City, Province (State) and Country of Birth BOGOTA, COLOMBIA, COLOMBIA		AR <input checked="" type="checkbox"/>	Form : (Type and No.) Lifted <input type="checkbox"/> Not Lifted <input type="checkbox"/>				
NIV Issuing Post and NIV Number		Social Security Account Name					
Date Visa Issued		Social Security Number					
Immigration Record NEGATIVE				Criminal Record None Known			
Name, Address, and Nationality of Spouse (Maiden Name, if Appropriate)						Number and Nationality of Minor Children 2 - COLOMBIA	
Father's Name, Nationality, and Address, if Known See Narrative				Mother's Present and Maiden Names, Nationality, and Address, if Known See Narrative			
Monies Due/Property in U.S. Not in Immediate Possession None Claimed		Fingerprinted? <input type="checkbox"/> Yes <input type="checkbox"/> No	Systems Checks See Narrative		Charge Code Word(s) I6A		
Name and Address of (Last)(Current) U.S. Employer		Type of Employment	Salary	Employed from/to Hr			
Narrative (Outline particulars under which alien was located/apprehended. Include details not shown above regarding time, place and manner of last entry, attempted entry, or any other entry, and elements wh ative and/or criminal violation. Indicate means and route of travel to interior.) FINS # [REDACTED] I77 # [REDACTED] DNA Envelope # [REDACTED] #:FMU2401000807							
							
		Left Index Print			Right Index Print		
ARREST COORDINATES: ----- Latitude: 32.610537 Longitude: -116.20906							
CONSEQUENCE DELIVERY SYSTEM: ----- Classification: FMUA							
Alien has been advised of communication privileges		DAVID M HARRIS Date: 2024.01.04 00:45:50 -08:00 0403945610.CBP 01/03/2024 (Date/Initials)		DAVID M HARRIS Date: 2024.01.04 00:45:49 -08:00 0403945610.CBP D. C377 HARRIS Border Patrol Agent (Signature and Title of Immigration Officer)			
Distribution: FILE SDC		Received: (Subject and Documents) (Report of Interview) Officer: D. C377 HARRIS on: January 03, 2024 at 2244 (time) Disposition: Notice to Appear Released (I-862) Examining Officer: MIGUEL A. PEREZ <small>MIGUEL A. PEREZ SR. Date: 2024.01.04 01:48:24 -08:00 094375483.CBP</small>					

Alien's Name SANCHEZ, ESTEFANY JOHANNA		Date 01/04/2024
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SCARS, MARKS, AND TATTOOS:

TATTOO ARM, LEFT, NONSPECIFIC
TATTOO ARM, RIGHT, NONSPECIFIC


ADDRESS USED ON I-862:

Address
Address:  **MINNESOTA, 55119-4087**

FATHER NAME AND ADDRESS:

Nationality: COLOMBIA 
BOGOTA, COLOMBIA, COLOMBIA

MOTHER NAME AND ADDRESS:


Nationality: COLOMBIA 
BOGOTA, COLOMBIA, COLOMBIA



CUSTODY REDETERMINATION:


 ORFU

RECORDS CHECKED:


 CIS Negative
 ABIS Negative
 EARM Negative
 NCIC Negative
 NGI Negative
 TECS Negative

Subject's 

Son, 
Daugh 

Other Family/Associates Not in Event:


Signature D. C377 HARRIS	DAVID M HARRIS Date: 2024.01.04 00:45:53 -08:00 0403945610.CBP	Title Border Patrol Agent
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Alien's Name SANCHEZ, ESTEFANY JOHANNA		Date 01/04/2024
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NARRATIVE:

IMMIGRATION HISTORY: No Prior immigration history.

CRIMINAL HISTORY: No prior criminal history.

ENCOUNTER:
 A Border Patrol agent encountered this family unit, consisting of three subjects, in the San Diego Sector's area of responsibility (AOR). It was determined that these subjects had unlawfully entered the United States from Mexico, at a time and place other than as designated by the Secretary of the Department of Homeland Security of the United States.

After determining that the subjects illegally entered the United States, the subjects were arrested and transported to a nearby Border Patrol facility for further processing using the E3/IDENT and IAFIS Systems.

IMMIGRATION/CRIMINAL VIOLATION:
 The adult subject(s) claim they and their child/children are citizens and nationals of Colombia without the necessary legal documents to enter, pass through, or to remain in the United States. The adult subject(s) also admitted that they and their child/children illegally crossed the international boundary without being inspected by an immigration officer at a designated Port of Entry.

The adult subject(s) stated each of their parents are citizens of Colombia and no other country.

CONSULAR NOTIFICATION:
 The adult subject(s) was/were notified of their and their child's/children's right to communicate with a Consular Officer from their country as per Article 36(1) (b) of the Vienna convention on Consular Relations. The subject(s) indicated they understood this right but declined to speak with anyone at this time.

DISPOSITION:
 The adult subject provided a valid/verified U.S. address and phone number.

The family unit is being processed as NTA/OR due to lack of bed space.

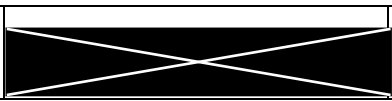
The adult subject(s) was/were served on their and their child's/children's behalf, with DHS forms I-220A, I-862, I-286, and given a copy of agency form G-56, a list of free legal services, and the "Notice to Appear Tear Sheet." The head of household was also served on behalf of their child/children, form I-770.

The adult subject was/were informed, per agency for I-220A, that they and their child/children must report for any hearing or interview as directed by the Department of Homeland Security or the Executive Office for Immigration Review and/or surrender for removal from the United States if so ordered.

Signature DAVID M HARRIS Date: 2024.01.04 00:45:55 -08:00 D. C377 HARRIS 0403945610.CBP	Title Border Patrol Agent
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U.S. Department of Homeland Security

Continuation Page for Form I213

Alien's Name SANCHEZ, ESTEFANY JOHANNA		Date 01/04/2024
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The adult subject was/were given a copy of this form and instructed that if their address and/or telephone number changes while awaiting or going through immigration proceedings, they are to file this form with the Department of Homeland Security within five (5) working days of that change.

The subjects do not appear to be a threat to national security, border security, or public safety. The subjects were released from the custody of the Department of Homeland Security (DHS) by "Order of Recognizance" (O.R.) pending their immigration hearing. This release was authorized through proper channels in accordance with San Diego Sector protocols.

The adult subject indicated that they understood Spanish, and the processing agent communicated with the subject in the Spanish language. No other interpreter was used.

The processing of this NTA/OR was conducted virtually by Border Patrol Agent Nicolas Garcia at the Murrieta Border Patrol Station. The subjects and witness Border Patrol agents were present at the San Diego Area Detention/ Transit Staging Area in San Diego, California.

Signature DAVID M HARRIS Date: 2024.01.04 00:45:56 -08:00 D. C377 HARRIS 0403945610.CBP	Title Border Patrol Agent
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DEPARTMENT OF HOMELAND SECURITY
NOTICE TO APPEAR

In removal proceedings under section 240 of the Immigration and Nationality Act:

Subject ID [REDACTED]

FINS [REDACTED]

File No: [REDACTED]

In the Matter of:

DOB: [REDACTED]

Event No: [REDACTED]

Respondent: ESTEFANY JOHANNA SANCHEZ

currently residing at:

[REDACTED] MINNESOTA, 55119-4087

[REDACTED]

(Number, street, city, state and ZIP code)

(Area code and phone number)

- You are an arriving alien.
- You are an alien present in the United States who has not been admitted or paroled.
- You have been admitted to the United States, but are removable for the reasons stated below.

The Department of Homeland Security alleges that you:

1. You are not a citizen or national of the United States;
2. You are a native of COLOMBIA and a citizen of COLOMBIA ;
3. You arrived in the United States at or near TECATE, CA , on or about January 2, 2024 ;
4. You were not then admitted or paroled after inspection by an Immigration Officer.

On the basis of the foregoing, it is charged that you are subject to removal from the United States pursuant to the following provision(s) of law:

212(a)(6)(A)(i) of the Immigration and Nationality Act, as amended, in that you are an alien present in the United States without being admitted or paroled, or who arrived in the United States at any time or place other than as designated by the Attorney General.

- This notice is being issued after an asylum officer has found that the respondent has demonstrated a credible fear of persecution or torture.
- Section 235(b)(1) order was vacated pursuant to: 8CFR 208.30 8CFR 235.3(b)(5)(iv)

YOU ARE ORDERED to appear before an immigration judge of the United States Department of Justice at:

1 FEDERAL DRIVE, SUITE 1850 FORT SNELLING MN 55111

(Complete Address of Immigration Court, including Room Number, if any)

on February 05, 2025 at 08:30 AM to show why you should not be removed from the United States based on the

(Date)

(Time)

charge(s) set forth above.

CHRISTIAN STONE
Acting/Patrol Agent in Charge



(Signature and Title of Issuing Officer)

Date: January 03, 2024

San Diego, California

(City and State)

Notice to Respondent

Warning: Any statement you make may be used against you in removal proceedings.

Alien Registration: This copy of the Notice to Appear served upon you is evidence of your alien registration while you are in removal proceedings. You are required to carry it with you at all times.

Representation: If you so choose, you may be represented in this proceeding, at no expense to the Government, by an attorney or other individual authorized and qualified to represent persons before the Executive Office for Immigration Review, pursuant to 8 CFR 1003.16. Unless you so request, no hearing will be scheduled earlier than ten days from the date of this notice, to allow you sufficient time to secure counsel. A list of qualified attorneys and organizations who may be available to represent you at no cost will be provided with this notice.

Conduct of the hearing: At the time of your hearing, you should bring with you any affidavits or other documents that you desire to have considered in connection with your case. If you wish to have the testimony of any witnesses considered, you should arrange to have such witnesses present at the hearing. At your hearing you will be given the opportunity to admit or deny any or all of the allegations in the Notice to Appear, including that you are inadmissible or removable. You will have an opportunity to present evidence on your own behalf, to examine any evidence presented by the Government, to object, on proper legal grounds, to the receipt of evidence and to cross examine any witnesses presented by the Government. At the conclusion of your hearing, you have a right to appeal an adverse decision by the immigration judge. You will be advised by the immigration judge before whom you appear of any relief from removal for which you may appear eligible including the privilege of voluntary departure. You will be given a reasonable opportunity to make any such application to the immigration judge.

One-Year Asylum Application Deadline: If you believe you may be eligible for asylum, you must file a Form I-589, Application for Asylum and for Withholding of Removal. The Form I-589, Instructions, and information on where to file the Form can be found at www.uscis.gov/i-589. Failure to file the Form I-589 within one year of arrival may bar you from eligibility to apply for asylum pursuant to section 208(a)(2)(B) of the Immigration and Nationality Act.

Failure to appear: You are required to provide the Department of Homeland Security (DHS), in writing, with your full mailing address and telephone number. You must notify the Immigration Court and the DHS immediately by using Form EOIR-33 whenever you change your address or telephone number during the course of this proceeding. You will be provided with a copy of this form. Notices of hearing will be mailed to this address. If you do not submit Form EOIR-33 and do not otherwise provide an address at which you may be reached during proceedings, then the Government shall not be required to provide you with written notice of your hearing. If you fail to attend the hearing at the time and place designated on this notice, or any date and time later directed by the Immigration Court, a removal order may be made by the immigration judge in your absence, and you may be arrested and detained by the DHS.

Mandatory Duty to Surrender for Removal: If you become subject to a final order of removal, you must surrender for removal to your local DHS office, listed on the internet at http://www.ice.gov/contact/ero, as directed by the DHS and required by statute and regulation. Immigration regulations at 8 CFR 1241.1 define when the removal order becomes administratively final. If you are granted voluntary departure and fail to depart the United States as required, fail to post a bond in connection with voluntary departure, or fail to comply with any other condition or term in connection with voluntary departure, you must surrender for removal on the next business day thereafter. If you do not surrender for removal as required, you will be ineligible for all forms of discretionary relief for as long as you remain in the United States and for ten years after your departure or removal. This means you will be ineligible for asylum, cancellation of removal, voluntary departure, adjustment of status, change of nonimmigrant status, registry, and related waivers for this period. If you do not surrender for removal as required, you may also be criminally prosecuted under section 243 of the Immigration and Nationality Act.

U.S. Citizenship Claims: If you believe you are a United States citizen, please advise the DHS by calling the ICE Law Enforcement Support Center toll free at (855) 448-6903.

Sensitive locations: To the extent that an enforcement action leading to a removal proceeding was taken against Respondent at a location described in 8 U.S.C. § 1229(e)(1), such action complied with 8 U.S.C. § 1367.

Request for Prompt Hearing

To expedite a determination in my case, I request this Notice to Appear be filed with the Executive Office for Immigration Review as soon as possible. I waive my right to a 10-day period prior to appearing before an immigration judge and request my hearing be scheduled.

Before:

(Signature of Respondent)

Date:

(Signature and Title of Immigration Officer)

Certificate of Service

This Notice To Appear was served on the respondent by me on January 03, 2024, in the following manner and in compliance with section 239(a)(1) of the Act.

- in person by certified mail, returned receipt # requested by regular mail
Attached is a credible fear worksheet.
Attached is a list of organization and attorneys which provide free legal services.

The alien was provided oral notice in the SPANISH language of the time and place of his or her hearing and of the conse on 240(b)(7) of the Act.



ed)

D. C377 HARRIS, Border Patrol Agent

(Signature and Title of officer)

Authority:

The Department of Homeland Security through U.S. Immigration and Customs Enforcement (ICE), U.S. Customs and Border Protection (CBP), and U.S. Citizenship and Immigration Services (USCIS) are authorized to collect the information requested on this form pursuant to Sections 103, 237, 239, 240, and 290 of the Immigration and Nationality Act (INA), as amended (8 U.S.C. 1103, 1229, 1229a, and 1360), and the regulations issued pursuant thereto.

Purpose:

You are being asked to sign and date this Notice to Appear (NTA) as an acknowledgement of personal receipt of this notice. This notice, when filed with the U.S. Department of Justice's (DOJ) Executive Office for Immigration Review (EOIR), initiates removal proceedings. The NTA contains information regarding the nature of the proceedings against you, the legal authority under which proceedings are conducted, the acts or conduct alleged against you to be in violation of law, the charges against you, and the statutory provisions alleged to have been violated. The NTA also includes information about the conduct of the removal hearing, your right to representation at no expense to the government, the requirement to inform EOIR of any change in address, the consequences for failing to appear, and that generally, if you wish to apply for asylum, you must do so within one year of your arrival in the United States. If you choose to sign and date the NTA, that information will be used to confirm that you received it, and for recordkeeping.

Routine Uses:

For United States Citizens, Lawful Permanent Residents, or individuals whose records are covered by the Judicial Redress Act of 2015 (5 U.S.C. § 552a note), your information may be disclosed in accordance with the Privacy Act of 1974, 5 U.S.C. § 552a(b), including pursuant to the routine uses published in the following DHS systems of records notices (SORN): DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, DHS/USCIS-007 Benefit Information System, DHS/ICE-011 Criminal Arrest Records and Immigration Enforcement Records (CARIER), and DHS/ICE-003 General Counsel Electronic Management System (GEMS), and DHS/CBP-023 Border Patrol Enforcement Records (BPER). These SORNs can be viewed at <https://www.dhs.gov/system-records-notices-sorn>. When disclosed to the DOJ's EOIR for immigration proceedings, this information that is maintained and used by DOJ is covered by the following DOJ SORN: EOIR-001, Records and Management Information System, or any updated or successor SORN, which can be viewed at <https://www.justice.gov/opcl/doj-systems-records>. Further, your information may be disclosed pursuant to routine uses described in the abovementioned DHS SORNs or DOJ EOIR SORN to federal, state, local, tribal, territorial, and foreign law enforcement agencies for enforcement, investigatory, litigation, or other similar purposes.

For all others, as appropriate under United States law and DHS policy, the information you provide may be shared internally within DHS, as well as with federal, state, local, tribal, territorial, and foreign law enforcement; other government agencies; and other parties for enforcement, investigatory, litigation, or other similar purposes.

Disclosure:

Providing your signature and the date of your signature is voluntary. There are no effects on you for not providing your signature and date; however, removal proceedings may continue notwithstanding the failure or refusal to provide this information.