

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SANDRO MANUEL ESPINOZA
LOPEZ,

Petitioner,

v.


LADEON FRANCIS, *et al.*,

Respondents.

Case No. 1:26-cv-345 (JHR)

**DECLARATION OF
DEPORTATION OFFICER
MICHAEL CHARLES**

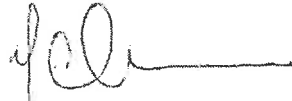
Pursuant to 28 U.S.C. § 1746, I, Michael Charles, hereby declare under penalty of perjury that the following is true and correct:

1. I am a Deportation Officer at U.S. Immigration and Customs Enforcement (“ICE”) within the U.S. Department of Homeland Security (“DHS”). I have served in this capacity since September 2015. As a Deportation Officer, I manage the cases of aliens who are in immigration proceedings. Once an alien is ordered removed from the United States, I facilitate the alien’s removal by coordinating with the government of that alien’s country of removal to obtain proper travel documents.
2. I have prepared this declaration in connection with a Verified Petition for a Writ of Habeas Corpus filed by the petitioner, Sandro Manuel Espinoza Lopez (“Petitioner”). Petitioner has been assigned the following Alien Number:  The following representations are based on my personal knowledge, review of Petitioner’s administrative file, consultation with my colleagues, and ICE electronic records and databases.
3. Petitioner is a native and citizen of Ecuador.
4. Petitioner unlawfully entered the United States at an unknown time and place.

5. On January 14, 2026, ICE Enforcement and Removal Operations (“ERO”) encountered Petitioner while conducting an enforcement action related to another individual in East Elmhurst, New York. During the voluntary encounter, Petitioner provided a photo of his Ecuadoran passport, his name, date and country of birth, and further admitted that he was illegally present in the United States. ICE ERO conducted a records check, which confirmed that Petitioner had no legal status in the US. Based on this information Petitioner was arrested by ICE ERO and served with a Form I-200, Warrant for Arrest of Alien. Petitioner was then transported for processing to 26 Federal Plaza in New York, New York, and booked into custody.
6. On January 14, 2026, Petitioner was personally served with a Notice to Appear (“NTA”), charging him as being inadmissible pursuant to Immigration and Nationality Act (“INA”) § 212(a)(6)(A)(i), 8 U.S.C. § 1182(a)(6)(A)(i), as an alien present in the United States without being admitted or paroled, or who arrived in the United States at a time or place other than as designated by the Attorney General. The NTA directed Petitioner to appear for a hearing before an Immigration Judge on January 26, 2026 at 201 Varick Street in New York, New York.
7. In the evening of January 14, 2026, Petitioner was transferred from 26 Federal Plaza to the Delaney Hall Detention Facility in Newark, New Jersey.
8. As of the date of this declaration, Petitioner remains detained at Delaney Hall Detention Facility pursuant to INA § 235(b)(2)(A), 8 U.S.C. § 1225(b)(2)(A).

I hereby declare under penalty of perjury that the above statements are true and correct.

Executed at New York, NY.
This 20th day of January, 2026.



Michael Charles
Deportation Officer
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security