

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Civil No. 26-625

Luis Humberto PILATUNA-Gualoto,)	
)	
Plaintiff,)	
)	
v.)	DECLARATION OF
)	DEPORTATION OFFICER
Pamela Bondi, Attorney General, et al;)	ANGELA MINNER
)	
Respondents.)	
)	

Angela Minner, Deportation Officer, United States Immigration and Customs Enforcement (ICE), Department of Homeland Security (DHS), for her declaration under 28 U.S.C. § 1746 hereby states as follows:

1. The following declaration is based on a review of contents 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 and the Department of Justice (DOJ) since October 20, 2002. I began my career as an Immigration Inspector with the former Immigration and Naturalization Service (INS). The position and agency were later renamed to CBP Officer with Customs and Border Protection (CBP). Since November of 2009, I have served as a Deportation Officer (DO) with Immigration and Customs Enforcement (ICE) Enforcement and Removal Operations (ERO).
3. As a Deportation Officer, my duties include: (1) arresting illegal aliens who are removable from the United States; (2) processing illegal aliens who will be removed from the United States or placed into removal proceedings before an immigration judge; (3)

monitoring illegal aliens' cases until removal; (4) handling matters related to the detention and release of aliens in ICE custody; (5) requesting travel documents and coordinating travel for illegal aliens ordered removed from the United States; and (6) presenting cases to the United States Attorney's Office for possible criminal prosecution. My duties may, at times, include other responsibilities related to the apprehension, arrest, and removal of illegal aliens, as needed.

4. The information contained in this declaration is based on my review of the ICE records at my immediate disposal. ICE maintains those records in the regular course of its business.

5. Luis Humberto PILATUNA-Gualoto (Hereinafter referred to as "PILATUNA") is a citizen and national of Ecuador with no claim to U.S. Citizenship or Lawful Permanent Residence.

6. On or about July 24, 2023, PILATUNA entered the U.S. without inspection near Eagle Pass, TX. U.S Border Patrol (USBP) encountered PILATUNA shortly after his illegal entry and arrested him for removal proceedings.

7. On July 26, 2023, USBP issued PILATUNA Form I-862, Notice to Appear. Attached as Exhibit A of this declaration is a true and correct copy of the Notice to Appear. PILATUNA was released his own recognizance due to a lack of available bed space and overcrowding at the border facility.

8. On January 14, 2026, PILATUNA was arrested in St. Paul, MN during Operation Metro Surge.

9. On January 15, 2026, PILATUNA was transferred to El Paso Camp East Montana

facility in El Paso, TX, due to a lack of available bed space in MN.

10. On January 22, 2026, PILATUNA was transferred to South Texas ICE Processing Center in Pearsall, TX.

11. As of today, January 30, 2026, PILATUNA remains detained at the South Texas ICE Processing Center in Pearsall, TX.

12. PILATUNA's immigration court date is pending scheduling.

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

**ANGELA R
MINNER**

Digitally signed by ANGELA R
MINNER
Date: 2026.01.30 10:18:08
-06'00'

Angela Minner, Deportation Officer
U.S. Immigration and Customs Enforcement

DATED: January 30, 2026