

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Civil No. 26-01426

James Gbolahan OMOTOYINBO,

Plaintiff,

v.

Pamela Bondi, Attorney General, et al;

Respondents.

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)
) **DECLARATION OF**
) **DEPORTATION OFFICER**
) **ANGELA MINNER**
)
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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. James Gbolahan OMOTOYINBO (Hereinafter referred to as "OMOTOYINBO") is a citizen and national of Nigeria with no claim to U.S. Citizenship or Lawful Permanent Residence.

5. On August 7, 2021, U.S. Customs & Border Protection admitted OMOTOYINBO to the U.S. on an F-1 student visa for duration of status.

6. On December 8, 2025, the University of North Dakota terminated OMOTOYINBO from Optional Practical Training (OPT) employment, citing in its termination letter OMOTOYINBO's "verified threats against a colleague."

7. On December 30, 2025, the University of North Dakota Police arrested OMOTOYINBO for Violation of a Disorderly Conduct Restraining Order.

8. On December 31, 2025, the District Court at Grand Forks County, North Dakota convicted OMOTOYINBO of Violation of a Disorderly Conduct Restraining Order, and sentenced him to time served, or two days in jail with 360 days' probation. Attached as **Exhibit A** to this declaration is a true and correct copy of the conviction and sentencing order.

9. On December 31, 2025, ICE/ERO Grand Forks arrested OMOTOYINBO and

issued him Form I-862, Notice to Appear, alleging removability under Section 237(a)(1)(C)(i) of the Immigration & Nationality Act, for failure to maintain or comply with the conditions of the nonimmigrant status under which admitted. Attached as **Exhibit B** to this declaration are true and correct copies of Form I-862 and Form I-213 Record of Deportable/Inadmissible Alien from December 31, 2025.

10. On February 4, 2026, the Department of Homeland Security issued Form I-261, Additional Charges of Inadmissibility. Attached as **Exhibit C** to this declaration is a true and correct copy of Form I-261.

11. Since OMOTOYINBO's arrest by ICE/ERO on December 31, 2025, he has exhibited significant behavioral issues which necessitated his transfer to different detention facilities. On February 12, 2026, OMOTOYINBO was transferred from the Grand Forks County Correctional Facility to Kandiyohi County Jail in Willmar, MN. On February 13, 2026, OMOTOYINBO was transferred to the Freeborn County Jail in Albert Lea, MN. On February 14, 2026, OMOTOYINBO was transferred back to the Kandiyohi County Jail, where he is currently detained. ICE/ERO is currently seeking placement at another facility that can better accommodate OMOTOYINBO's behavioral management concerns. Due to the temporary restraining order in place, ICE/ERO has not been able to place OMOTOYINBO in an appropriate facility.

12. An Immigration Judge has already held two hearings in OMOTOYINBO's removal proceedings. These hearings were recorded, and the audio recordings are available to OMOTOYINBO's counsel of record (the same attorney who is representing him in this habeas action).

13. As the recording from the hearing held on January 21, 2026, confirms, the Immigration Judge noted OMOTOYINBO's request for a bond redetermination. However, OMOTOYINBO's counsel stated that she was "not prepared to argue bond." The Immigration Judge therefore scheduled a follow-up hearing, during which ICE anticipates OMOTOYINBO will be allowed and prepared to argue the issue of whether he should be released on bond. Critically, the Department of Homeland Security is not arguing in OMOTOYINBO's removal proceedings that he is subject to mandatory detention.

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: 2026.02.17 07:36:26 -06'00'

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

DATED: February 17, 2026