UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Yurbelis SANGRONIS WANDET,
Jesus SANDOVAL SEQUERA;

Petitioners,

v.

LaDeon FRANCIS, in his official capacity as Acting Field Office Director of New York, Immigration and Customs Enforcement; Todd LYONS, in his official capacity as Acting Director U.S. Immigration and Customs Enforcement; Kristi NOEM in her official capacity as Secretary of Homeland Security; Pam BONDI, in her official capacity as Attorney General.

Respondents.

No. 25 Civ. 09011 (AKH)

DECLARATION OF SUPERVISORY DETENTION AND DEPORTATION OFFICER CHRISTOPHER FINNIE

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

1. I am a Supervisory Detention and 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 August 13, 2023. I joined ICE on May 07, 2018, and have served as a Deportation Officer previously. As a Supervisory Detention and Deportation Officer, I plan the work to be accomplished by subordinates, set and adjust short-term priorities, and prepare schedules for completion of the work and assign work to subordinates based on priorities, selective consideration of the difficulty and requirements of assignments, and the capabilities of employees and find ways to improve productivity or increase the quality of the work directed. I also assist in complex, difficult, or sensitive seizures. Furthermore, I coordinate travel plans with airlines; negotiate with receiving countries for receipt of deportee; and escorting deportees to their country

of citizenship. I work with other Federal law enforcement officials to identify, locate and/or apprehend noncitizens; prepare, present and defend deportation or exclusion proceedings; ensuring the physical removal of noncitizens from the United States at various stages of their deportation/exclusion proceedings, and conduct surveillance work. I evaluate work performance of subordinates; give advice, counsel, or instruction to employees on both work and administrative matters and develop performance standards and hear and resolve complaints from employees; effect minor disciplinary measures; identify developmental training needs of employees, providing or arranging for needed development and training.

2. I have prepared this declaration in connection with a Petition for a Writ of Habeas Corpus filed by the petitioners, Jesus Manuel Sandoval Sequera ("Sandoval Sequera") and Yurbelis Sangronis Wandet ("Sangronis Wandet"). Sandoval Sequera has been assigned the following Alien Number: [redacted] Sangronis Wandet has been assigned the following Alien Number: [redacted]. The following representations are based on my review of the petitioners administrative file, consultation with my colleagues, and ICE electronic records and databases.

3. Petitioners are natives and citizens of Venezuela.

4. On or about October 15, 2023, U.S. Border Patrol with U.S. Customs and Border Protection ("CBP") encountered petitioners at or near Eagle Pass, Texas, and determined that they had unlawfully entered the United States without inspection, admission, or parole by an immigration officer on October 13, 2023. After processing, the petitioners were released the same day on their own recognizance on conditional parole pursuant to 8 U.S.C. § 1226(a)(2)(B) due to lack of bed space, and personally served with Forms I-220A, Order of Release on Recognizance, as well as Forms I-286, Notice of Custody Determination. Prior to release, Sandoval Sequera was

enrolled in the Alternatives to Detention ("ATD") program and processed for SmartLink. He was given instructions to report to the nearest ICE Office on December 13, 2023.

5. On October 15, 2023, CBP personally served the petitioners with Notices to Appear ("NTA"), charging them as inadmissible under INA § 212(a)(6)(A)(i), 8 U.S.C. § 1182(a)(6)(A)(i), as aliens 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. On the same date, the NTAs were served on the Executive Office for Immigration Review, New York – Federal Plaza Immigration Court ("New York Immigration Court") in New York, New York, thereby commencing removal proceedings against the petitioners.

6. On March 20, 2024, Sandoval Sequera reported to the Queens, New York biometric office for tracking by the New York ICE Office. Sandoval Sequera was given the conditions of office visits every twelve weeks.

7. On September 2, 2024, Sandoval Sequera missed a biometrics check-in in violation of the ATD program. Biometric contractors notified ICE on September 4, 2024, of the missed check-in. On the same date, ICE contractors attempted to contact Sandoval Sequera via phone. Sandoval Sequera's phone rang, but no one answered. An ICE contractors left Sandoval Sequera a voicemail instructing him to take his picture in the SmartLink application. ICE contractors attempted to contact Sandoval Sequera's cousin, whose phone went to voicemail. ICE contractors then attempted to contact Sangronis Wandet, whose phone was disconnected. ICE contractors attempted to contact Sandoval Sequera's friend, whose phone rang but no answer was received. ICE staff attempted to make further contact via SmartLink messages, but Sandoval Sequera failed to log in.

8. On September 23, 2024, Sandoval Sequera filed with the Immigration Court an application for relief for himself and his family, Sangronis Wandet and a minor child.

9. On December 26, 2024, the petitioners appeared *pro se* for their first master calendar hearing before an Immigration Judge at the New York Immigration Court. The case was adjourned at the petitioners' request to allow time for them to find an attorney.

10. On July 7, 2025, Sandoval Sequera was arrested by the New York Police Department for Unauthorized Use of a Vehicle in the Second Degree, in violation of New York Penal Law ("NYPL") § 165.06, Grand Larceny in the Fourth Degree, to wit where the value of property exceeds one hundred dollars and the property consists of a motor vehicle, in violation of NYPL § 155.30(08), Reckless Endangerment in the Second Degree, in violation of NYPL § 120.20, Criminal Possession of Stolen Property in the Fourth Degree, in violation of NYPL § 165.40, and aggravated Unlicensed Operation of a Motor Vehicle in the Second Degree, in violation of Vehicle and Traffic § 0511. The charges were subsequently dismissed.

11. On October 30, 2025, the petitioners appeared *pro se* for their second master calendar hearing before an Immigration Judge at the New York Immigration Court. The allegations and the charge in their respective NTAs were sustained and the case was rescheduled to allow the petitioners time to find an attorney.

12. On October 30, 2025, immediately following the master calendar hearing, ICE revoked Sandoval Sequera's order of release on recognizance and took him into custody at 26 Federal Plaza, New York, pursuant to INA § 235(b)(2)(A), 8 U.S.C. § 1225(b)(2)(A), alternatively pursuant to INA § 236(c), 8 U.S.C. § 1226(c) based on his criminal history. During processing, ICE served Sandoval Sequera with a Form I-200, Warrant for Arrest.

13. On October 30, 2025, immediately after the master calendar hearing, Sangronis Wandet was enrolled in the ATD program and fitted with a GPS ankle monitor. She was given the condition of in-office reports every eight weeks.

14. Later on October 30, 2025, Sandoval Sequera was transported from 26 Federal Plaza to Delaney Hall Detention Facility in Newark, New Jersey, where he remained until November 6, 2025. Due to general paucity of available detention space in the Northeastern United States, Sandoval Sequera was scheduled for a transfer to ICE's Imperial Regional Detention Facility in Calexico, California on November 7, 2025.

15. At approximately 5:00 a.m. EST on November 7, 2025, ICE personnel began transferring Sandoval Sequera to Imperial Regional Detention Facility in Calexico, California. Sandoval Sequera was booked into Imperial Regional Detention Facility at approximately 3:30 a.m. PST on November 8, 2025.

16. On November 8, 2025, at approximately 4:00 p.m. EST ICE completed arrangements to return Sandoval Sequera to the New York City area. On November 10, 2025, Sandoval Sequera arrived back in New York City area at approximately 2:40 a.m. EST via a commercial flight and was transported to 26 Federal Plaza at 6:00 a.m. EST. ICE then transported Sandoval Sequera from 26 Federal Plaza to Orange County Jail, located in Goshen, New York, arriving at approximately 9:00 p.m. EST on the same date.

17. As of the date of this declaration, Sandoval Sequera remains detained at Orange County Jail pursuant to INA § 235(b)(2)(A), 8 U.S.C. § 1225(b)(2)(A), alternatively pursuant to INA § 236(c), 8 U.S.C. § 1226(c) pending removal proceedings.

Executed at New York, New York

this _14_th day of November 2025.

CHRISTOPHER C FINNIE

Digitally signed by CHRISTOPHER C FINNIE
DN: cn=CHRISTOPHER C FINNIE, o=U.S. Government, ou=People, email=Christopher.C.Finnie@ice.dhs.gov, c=US
Date: 2025-11-14T10:33:27-0500

Christopher Finnie
Supervisory Detention and Deportation Officer
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security