UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ABDOU TALL,

Petitioner,

-against-

William JOYCE, in his official capacity as District Director of New York 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. 9781 (AS)

SUPPLEMENTAL DECLARATION OF DEPORTATION OFFICER JORGE MALDONADO

Pursuant to 28 U.S.C. § 1746, I Jorge Maldonado, 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. I have served in this capacity since September 2017. 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. I have served in the ICE Enforcement and Removal Operations ("ERO") Fugitive Operations Unit since 2024. As part of my duties, I investigate referred cases from other agencies, final order cases, and aliens with criminal history in anticipation of conducting at-large enforcement actions in the field.

2. This supplements the declaration submitted on December 10, 2025, by Supervisory Detention and Deportation Officer Nelson Mercado in the above-captioned case filed by Petitioner Abdou Tall ("Tall"). I make this supplemental declaration in my official capacity based on my

personal involvement and recollection, as well as my review of Tall's administrative file, consultation with my colleagues, and ICE electronic records.

3. On October 7, 2025, Tall was arrested by the New York Police Department (NYPD) for Trademark Counterfeiting in the Second Degree, in violation of New York Penal Law § 165.72. Information about this arrest was provided to ICE ERO New York's Criminal Alien Program unit.

4. On October 7, 2025, ICE Supervisory Detention and Deportation Officer Naeem Williams issued a Warrant for Arrest of Alien (Form I-200) for Tall.

5. ICE ERO sent a detainer notice to NYPD for Tall, but NYPD did not honor the detainer and released Tall without providing ICE notice. The ERO Criminal Alien Program unit referred this matter to ERO Fugitive Operations.

6. On November 22, 2025, I and two other officers from ICE ERO New York's Fugitive Operations unit went out to execute the I-200 Warrant for Arrest of Alien issued for Tall. Tall had been observed earlier that day by one of the ERO officers outside of 488 Broadway in Lower Manhattan engaged in selling counterfeit merchandise. The officer recognized Tall from a photo, identified him as a target, and contacted me and another officer to prepare to arrest and detain Tall.

7. Prior to initiating the arrest, we conducted surveillance of Tall near 448 Broadway. We observed Tall selling what appeared to be counterfeit merchandise in front of that address. After we identified ourselves as ICE enforcement agents to Tall, he fled on foot and he was pursued by the two other officers present that day for approximately four blocks until he was apprehended at the intersection of Lafayette Street and Canal Street. Upon apprehension, Tall was asked if he required any medical attention but he declined.

8. We then took Tall into custody and transported him to ICE's hold space at 26 Federal Plaza.

9. A few days later, on November 25, 2025, ERO served a new arrest warrant, dated November 22, on Tall at 26 Federal Plaza.

Executed at New York, New York on this 16th day of December 2025.

Jorge Maldonado
Deportation Officer
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security