UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
CASE 26-CV-03300

Omar DERONJIC
Petitioner,

v.

RESPONDENTS, *et al.*,
Respondents.

Case No. 26-cv-03300

DECLARATION OF
IVAN SABIN
DEPORTATION OFFICER

I, Ivan Sabin, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a Deportation Officer ("DO") employed by the United States Department of Homeland Security ("DHS"), United States Immigration and Customs Enforcement ("ICE"), Office of Enforcement and Removal Operations ("ERO"). I am and have been employed with ICE since on or about October 16, 2016.
2. I have been tasked with reviewing and responding to a request for records regarding PETITIONER Omar Deronjic ("Petitioner").
3. I make this declaration based on my personal and professional knowledge, my review of records and systems maintained by ICE in the regular course of business, and information provided by other agents and officers.
4. On June 20, 2010, Petitioner and his parents were admitted to the United States on B2 (Temporary Visitor for Pleasure/Tourism) nonimmigrant visas. On February 4, 2011, USCIS initiated removal proceedings by issuing Petitioner a Notice to Appear, Form I-862, charging him under INA § 237(a)(1)(B). On June 13, 2019, an immigration judge granted Petitioner and his parents asylum. On June 25, 2019, DHS filed an appeal with the Board of Immigration Appeals (BIA).

5. On July 3, 2023, a court in North Dakota convicted Petitioner of Aggravated Assault (ND Statute 12.1-17-02(1)(b); C Felony), Reckless Endangerment (ND Statute 12.1-17-03; C Felony), and one count of Terrorizing (ND Statute 12.1-17-04(1); C Felony). Petitioner was sentenced to five years of confinement.
6. On August 21, 2023, a court in North Dakota convicted Petitioner of Terrorizing (ND Statute 12.1-17-04(1); C Felony) and sentenced to five years of confinement.
7. On January 8, 2026, the BIA granted Petitioner's motion to sever and motion for removal. The BIA further ordered Petitioner removed to Bosnia and Herzegovina.
8. To issue travel documents, the Government of Bosnia and Herzegovina requires a U.S. identification card for Petitioner. On July 14, 2026, ICE/ERO received an Employment Authorization Document for Petitioner from U.S. Citizenship and Immigration Services. On the same day, an ICE/ERO officer mailed the request and supporting documentation to the Government of Bosnia and Herzegovina for travel documents for Petitioner.
9. Based on previous requests to the Government of Bosnia and Herzegovina, ICE/ERO anticipates having Petitioner's travel documents by August 7, 2026. After ICE/ERO receives travel documents, it typically takes two to three weeks to execute removal.
10. Because Petitioner is subject to a final order of removal, and the Government of Bosnia and Herzegovina is issuing travel documents to their citizens with final orders of removal, there is a significant likelihood of Petitioner's removal to Bosnia and Herzegovina in the reasonably foreseeable future.
11. Petitioner remains detained at the Kanidyohi County Jail.
12. Attached is a true and correct copy of Forms I-862 and I-213.

13. The Forms I-862 and I-213 were kept in the course of regularly conducted activity of DHS/ICE.

14. The Forms Forms I-862 and I-213 were made by an employee of DHS/ICE who obtained information from immigration officers, Petitioner, and law enforcement information sources regularly maintained in the ordinary course of business by DHS/ICE.

15. Making the Forms I-862 and I-213 is a regular practice of DHS/ICE.

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

Ivan Sabin, Deportation Officer

U.S. Immigration and Customs Enforcement

DATED: July 29, 2026