

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA

JIDIER ANTONIO SAAVEDRA

DETAINED

A# 

Petitioner,

Civil Action No: _____

v.

PAM BONDI

Attorney General;

KRISTI NOEM

Secretary of Department of

Homeland Security;

HOMER BRYSON U.S.

ICE Field Office Director For

the Middle District of Georgia,

Field Office, and Warden DICKENSON

of Immigration Detention Facility,

Respondents.

**PETITION FOR A WRIT OF HABEAS CORPUS
PURSUANT TO 28 U.S.C. §2241, BY A PERSON
SUBJECT TO INDEFINITE IMMIGRATION
DETENTION.**

AND

**MOTION FOR APPOINTMENT OF COUNSEL
PURSUANT TO 18 U.S.C. §3006A**

Petitioner, JIDIER ANTONIO SAAVEDRA, hereby petitions this Court for a writ of Habeas Corpus to remedy Petitioner's unlawful detention by Respondents, and to enjoin Petitioner's continued unlawful detention by the Respondents. In support of this petition and complaint for injunctive relief, Petitioner alleges as follows:

BACKGROUND

Petitioner is a Citizen of Cuba. Detained and in the Custody of DHS/ICE in the United States, but has been ordered removed to Cuba by Daniel Pereira Immigration Judge at K.R.O.M.E S.P.C. in Miami Florida on January 9, 2020, with the ability to reopen his case from outside at anytime, as Cuba would not accept his removal as a P43 Political Refugee Cuban, which DHS/ICE in the Jurisdiction of Georgia is refusing to Honor!

Petitioner's removal order is Final, but Petitioner cannot be removed to Cuba, Thus Petitioner remains detained in DHS/ICE custody, and has been confined for a period far longer than the law mandates.

CUSTODY

1. Petitioner is in to physical custody of Respondents and U.S. Immigration and Customs Enforcement ("ICE"). Petitioner is Detained at Stewart Detention Center in Lumpkin Georgia where ICE has contracted the institution to house Immigration detainees such as petitioner. Petitioner is in the direct control of Respondents and their agents.

JURISDICTION

2. This action arises under the Constitution of the United States, 28 U.S.C. §2241(c)(1), and to Immigration and Nationality Act ("INA"), 8 U.S.C. §1101 et seq. This Court has subject matter Jurisdiction under 28 U.S.C. §2241, Art. I §9, cl. 2 of the United States Constitution ("Suspension Clause"); and 28 U.S.C. §1331, as Petitioner is Presently in custody under color of the authority of the United States., and such custody is in violation of the Constitution, laws, or treaties of the United States. See **Zadvydas v. Davis**, 533 U.S. 678, 688 (2001) (We conclude that §2241 habeas corpus proceedings remain available as a form for statutory and constitutional challenges to post-removal-period detention.") **INS V. St. Cyr**, 533 U.S. 289, 301 (2001) ("**at its historical core, the writ of habeas corpus has served as a means of reviewing the legality of executive detention, and it is in that context that its protections have been strongest.**")' **Clark v. Martinez**, 543 U.S. 371 (2005) (holding that **Zadvydas** applies to aliens found inadmissible as well as removable).

VENUE

3. Venue lies in the Middle District of Georgia, because Petitioner is currently detained in the territorial jurisdiction of this Court, at the Stewart Detention Center in Lumpkin, Georgia. Under 28 U.S.C. §1391.

EXHAUSTION OF REMEDIES

4. Petitioner has exhausted his administrative remedies to the extent required by law, and his only remedy is by way of this judicial action. After the Supreme Court decision in **Zadvydas**, the Department of Justice issued regulations governing the custody of aliens removed. See 8C.F.R. §241.4. Petitioner received a final order of removal in 2018, he then vacated his conviction and the BIA terminated his removal/Immigration proceedings. Petitioner then accepted new charges that brought him before another Immigration Judge that ordered him removed on paper **January 9 2020** but it was agreed that he would never be removed from the Country and allowed to re-open his case from outside at any time as he had been detained well over 1 year by DHS/ICE. While detained this time at His "**90-day**" custody review, on or about **June 11, 2025**. ICE never informed the Petitioner of anything or if it decided to continue His detention. Instead DHS/ICE has told the Petitioner that they recommended the Petitioner to be released on supervision and were awaiting a reply from the ERO Field office Director to release the Petitioner. Subsequently there has been no decision given to him on his case by anyone or any paperwork dated after his 90 day review date. **NO DATE GIVEN.**

ICE's Headquarters Post-order Detention Unit("HQPDU") "**HAS NOT**" informed Petitioner that it would release or continue to keep him in custody despite having been detained for over six months after a final order of removal. Petitioner was first detained by DHS/ICE from **April of 2018** until released on **February 2, 2020**. The custody review regulations do not provide for appeal from a HQPDU custody review decision. See 8 C..F.R.§241.4(d). **Especially when it has never been made or given to him.**

5. No statutory exhaustion requirements apply to Petitioner's claim of unlawful detention.

Petitioner remains detained without any indication from the United States Government or the Government of Cuba that the Petitioner's repatriation is reasonably foreseeable. A Habeas petition is proper in light of these facts.

PARTIES

6. Petitioner is a Citizen of Cuba. Detained and in the Custody of DHC/ICE in the United States, but has been ordered removed to Cuba by Daniel Pereira Immigration Judge at K.R.O.M.E S.P.C. In Miami Florida on January 9, 2020, with the ability to reopen his case from outside at anytime, as Cuba would not accept his removal as a P43 Political Refugee Cuban, which DHS/ICE in the Jurisdiction of Georgia is refusing to Honor! Petitioner was supposed to be taken to Palm Beach County for his Evidentiary Hearing in 2018 but was not allowed by DHS/ICE. Petitioner filed a Habeas Corpus Ad-testificandum after being ordered removed to Cuba by Daniel Lippman in Orlando Florida and was finally transferred to Palm Beach County where he prevailed and vacated his conviction in Criminal Court. The BIA then terminated his removal proceedings due to vacating his conviction.

Petitioner agreed to new non deport-able offenses and DHS/ICE once again took Petitioner into custody and sent him to K.R.O.M.E S.P.C where he again went through the 90day review process before he was released on supervision in February of 2020.

7. Respondent Pam Bondi is the Attorney General of The United States and is responsible for the administration of ICE and the implementation and enforcement of the Immigration & Naturalization Act (INA). As Such, Ms. Bondi has ultimate custodial authority over the petitioner.

8. Respondent Kristi Noem is the secretary of the Department of Homeland Security. She is responsible for the administration of ICE and the Implementation and enforcement of the INA. As such Ms. Noem is the legal custodian of the Petitioner.

9. Respondent Homer Bryson is the ICE field office director for the Middle District of Georgia

for the Stewart detention Center in Lumpkin, Georgia field office of ICE and is Petitioners immediate custodian. See Vasquez v. Reno, 233F.3d 688, 690 (1st Cir. 2000), cert. Denied, 122 S. Ct. 43 (2001).

10. Respondent Dickenson Warden at the Stewart Detention Center in Lumpkin, Ga where the petitioner is currently detained under the authority of ICE, alternatively may be considered to be petitioner's immediate custodian.

STATEMENT OF FACTS

11. Petitioner Jidier Antonio Saavedra was born in Cuba on [REDACTED] and fled the Country from Cuba to the United States stopping in Madrid Spain in 1979 when Petitioner was 2 years old, before his family arrived in New jersey on March of 1980, just before the Mariel Boat Lift took place. Petitioner was granted asylum as a P43 Political Refugee Cuban at age 3 as his family was very politically connected with the United States and considered an Enemy of the State and Country of Cuba! Petitioner was a Permanent Resident of the United States until he agreed to be removed on paper but not physically removed to Cuba on January 9, 2020. Petitioner lived in West Palm Beach, Florida until the day he came to visit his Mother who suffered a stroke at his sisters home in Georgia where he was detained on March 7, 2025 and brought to Stewart Detention Center in Lumpkin, Georgia. Petitioner lived with his Mother, Wife and 2 Daughters all of which are US Citizens until the day he was detained. All of petitioners family members and friends are United States Citizens and all of his education and knowledge has been obtained here in the united States as he has lived here for over 45.5 years so far!

12. Petitioner first arrived in the United States on March of 1980 as a child with his family as a P43 Political Refugee Cuban just before the Mariel boat lift.

13. Petitioner agreed to a global resolution plea where he accepted the charges of Possession of marijuana, Possession of Marijuana with intent to deliver, Possession of a controlled substance, fraudulent prescription and possession of an antique firearm all of which were Vacated and restructured for Immigration purposes.

14. Petitioner was released on Supervision with DHS/ICE on February 2, 2020 where he first reported on Supervision on his Birthday of February 4, 2020 and yearly ever since.

15. Petitioner was arrested and Detained this time by DHS/ICE on March 7, 2025 for a Civil Judgment belonging to his back then roommate Vasiliy Alekseyevv in 2012 that suspended his drivers license with-out his knowledge just days prior to him arriving in Georgia due to his Mother suffering a stroke .

16. Petitioner wrote the Clerk of Courts in Palm Beach County about the matter and the Clerk acknowledged and agreed that the said judgment did not belong to him and closed out the case with documentation sent to the petitioner as proof.

17. To date, however, ICE has not released Petitioner but instead claims they forwarded the information to their supervisors to release the Petitioner.

18. As of today ICE has been unable to remove the petitioner to Cuba. Petitioner knows for sure that Cuba will deny and has denied any and all requests for travel documents. (**Even stated by his Deportation officer C. Erickson that Cuba did not accept Petitioner**).

19. Petitioner is categorized as a rare and different class of Cuban Refugee. He is a P43 Political Refugee that Cuba will not accept back to Cuba and even mentioned to him by Immigration Judge Daniel Pereira in K.R.O.M.E. S.P.C in Miami, Florida where he agreed to be removed on paper but never sent to Cuba with the ability to reopen his case from outside at any time without any objection from DHS/ICE in January of 2020.

20. Petitioner has cooperated fully with all efforts of ICE to remove Petitioner from the United States, even though all parties acknowledge that Cuba will not accept him back to Cuba.

21. Petitioner was ordered removed on January 9, 2020 and the removal order became final.

22. Petitioner's most recent 90 day custody review under the Cuban review plan, 8C.F.R. §212.12 took place on June 11, 2025 at which Petitioner still remains detained. (**Allegedly Pending a reply to be released on Supervision**). **"This was stated to him by his Deportation officer C. Erickson."**

LEGAL FRAMEWORK FOR RELIEF SOUGHT

23. In Zadvydas v. Davis, 533 U.S. 678(2001), the U.S. Supreme Court held that 8.U.S.C. §1231(a)(6), when **"read in light of the Constitution's demands, limits an alien's post-order removal period detention to a period reasonably necessary to bring about the alien's removal from the United States."** 533 U.S. at 689. A **"Habeas Court must[first] ask whether the detention in question exceeds a period reasonably necessary to secure removal."** Id. At 699. If the individual's removal **"is not reasonably foreseeable, the Court should hold continued detention unreasonable and no longer authorized by the statute."** Id. at 699-700. In Clark v. Martinez, 543 U.S. 371(2005), the U.S. Supreme Court held that Zadvydas applies to aliens found inadmissible as well as removable.

24. In determining the length of a reasonable removal period, the Court adopted a “preemptively reasonable period of detention” After 90 days, the Government bears the Burden of disproving an alien's “good reason to believe that there is no significant likelihood of removal in the reasonably foreseeable future.” See Zhou v. Farquharson, 2001 U.S. Dist. LEXIS 18239, 2-3(D. Mass. Oct. 19, 2001) (quoting and summarizing Zadvydas). Moreover, “for detention to remain reasonable, as the period of prior post-order removal grows, what counts as the reasonably foreseeable future' conversely have to shrink.” Zadvydas, 533 U.S. At 701. ICE”s administration regulations also recognize that the HQPDU has a maximum six-month period for determining whether there is significant likelihood of a alien's removal in the reasonable foreseeable future. See 8 C.F.R. §241.4(k)(2)(ii).

25. An alien who has been detained beyond the presumptive period should be released where the government is unable to present documented confirmation that the foreign government at issue will agree to accept the particular individual in question. See Agbada v. John Ashcroft, 2002 U.S. Dist. LEXIS 15797(D. Mass. August 22, 2002) (court “will likely grant” after ICE is “unable to present document confirmation that the Nigerian government has agreed to[petitioner's] repatriation.”; Zhou, 2001 U.S. Dist. LEXIS 19050 at *7(W.D. Wash. February 28, 2002)(government's failure to offer specific information regarding how or when it expected to obtain the necessary documentation or cooperation from the foreign government indicated that there is no significant likelihood of petitioner's removal in the reasonably foreseeable future).

CLAIMS FOR RELIEF

COUNT ONE

STATUTORY VIOLATION

26. Petitioner re-alleges and incorporates by reference paragraphs 1 through 25 above.

27. Petitioner's continued detention by respondents is unlawful and contravenes 8 U.S.C. §1231(a)(6) as interpreted by the U.S. Supreme Court in Zadvydas. Petitioner's ninety-day statutory period of detention for continued removal efforts have passed as this is now his 4th time actually completing and exceeding a 90-day removal proceeding since 2018, one of which was actually well over 180 days, as the Petitioner was detained by DHS/ICE since April of 2018 and was not released on supervision until February 2, 2020. Respondent's are unable to remove petitioner to Cuba,

because there is no repatriation agreement between the United States and Cuba for P43 Political Refugees such as the Petitioner, and Cuba will not accept P43 Political Refugee Cubans who have been Ordered removed from the United States. In the instance of Martinez, the Supreme Court held that the continued indefinite detention of someone like petitioner under such circumstances is unreasonable and not authorized by 8 U.S.C. §1231(a)(6).

COUNT TWO

SUBSTANTIVE DUE PROCESS VIOLATION

28. Petitioner re-alleges and incorporates by reference paragraphs 1 through 27 above.

29. petitioner's continued detention violates Petitioner's right to substantive due process through a deprivation of the core liberty interest in freedom from bodily restraint. See e.g., **Tam v. INS**, 14 F. Supp. 2d. 1184(E.D. Cal 1998)(aliens retain substantive due process rights).

30. The due process clause of the Fifth Amendment require that the deprivation of Petitioner's liberty be narrowly tailored to serve a compelling government interest. While Respondents would have an interest in detaining Petitioner in order to effectuate removal, that interest does not justify the indefinite detention of Petitioner, who is not significantly likely to be removed in the reasonably foreseeable future. The U.S. Supreme Court in **Zadvydas** thus interpreted 8 U.S.C. §1231(a) to allow continued detention only for a period reasonably necessary to secure the alien's removal, because any other reading would go beyond the government's articulated interests to effect the alien's removal. See **Kay v. Reno**, 94 F. Supp. 2d. 546, 551 (M.D. Pa. 2000) (granting writ of habeas corpus, because petitioner's substantive due process rights were violated, and noting that "If deportation can never occur, the government's primary legitimate purpose in detention- executing removal- is nonsensical."). Because Petitioner' is unlikely to be removed to Cuba, his continued indefinite detention violates substantive due process.

COUNT THREE

PROCEDURAL DUE PROCESS VIOLATION

31. Petitioner re-alleges and incorporates by reference paragraphs 1 through 30 above.

32. Under the Due process clause of the Fifth Amendment, an alien is entitled to a timely and

meaningful opportunity to demonstrate that he/she should not be detained. Petitioner in this case has been denied that opportunity. **There is no administrative mechanism in place for the petitioner to obtain a decision from a neutral arbiter or appeal a custody decision that violates Martinez. See generally 8 C.F.R. §212.12 The custody review procedures for Cubans are Constitutionally insufficient both as written and as applied.** A number of Courts have identified a substantial bias within ICE toward the continued detention of aliens, raising the risk of erroneous deprivation to constitutionally high levels. See, e.g., Phan v. Reno, 56 F. Supp. 2d 1149, 1157 (W.D. Wash. 1999) (“**Ins does not meaningfully and impartially review the petitioner’s status.**”); St. John v. McElroy, 917 F. Supp. 243, 251 (S.D.N.Y. 1996) (“Due to political and community pressure, INS, an executive agency, has though they have served their sentences, on the suspicion that they may continue to pose a danger to the community.”); see also Rivera v. Demore, No. C99-3042 THE, 199WL521177, (N.D. Cal. Jul. 13, 1999) (procedural due process requires that aliens release determination be made by impartial adjudicator due to agency bias).

The question as to whether Petitioner's detention is in violation of the Laws of the United States is one for a Federal Habeas Court to hear. 28 U.S.C §2241. Accordingly, Petitioner files the accompanying petition for appointment of Counsel and request that this Court order his Immediate release from detention/confinement at Stewart Detention Center located at 146 C.C.A. Rd. Lumpkin, GA 31815.

Therefore, Petitioner request that this Court appoint Counsel to represent Petitioner in this Habeas action if he is not immediately released.

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA

JIDIER ANTONIO SAAVEDRA

DETAINED

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Petitioner,

Civil Action No: _____

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PAM BONDI

Attorney General;

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ICE Field Office Director For

the Middle District of Georgia,

Field Office, and Warden DICKENSON

of Immigration Detention Facility,

Respondents.

MOTION FOR APPOINTMENT OF COUNSEL

PURSUANT TO 18 U.S.C. §3006A

Petitioner, **JIDIER ANTONIO SAAVEDRA**, prose hereby petitions this Court for appointment of Counsel to assist him in his habeas corpus petition. In support of his habeas corpus petition and complaint for injunctive relief he is incorporating this Motion for appointment of counsel, Petitioner re-alleges everything stated in the habeas corpus submitted with this motion and also alleges as follows:

I. The Court Should Exercise It's Discretion to Appoint Counsel

assuming that a Petitioner has shown financial need, a district Court may appoint Counsel in a Habeas proceeding under 28 U.S.C. §3006A(a)(2)(B). Courts have often examined 3 elements when determining whether appoint of counsel is necessary, the likelihood of success on the merits, the complexity of the legal issues involved in the case, and the ability of the petitioner to present the case in light of its complexity. See, e.g., **Weygandt v. Look**, 718 F.2d 952, 954 (9th Cir. 1983); **Saldina v. Thornburgh** 775 F. Supp. 507, 511 (D. Conn. 1991).

Petitioner has been held in Custody more than 180 days since being ordered removed to Cuba, this time alone he has been detained well over 120 days and removal in the reasonable foreseeable future is unlikely because Cuba will not accept him as he is a P43 Political Refugee Cuban who has been in the United States since he is 3 years old and he is now 48 years old with no family in Cuba either. Under the Supreme Court's decision in Zadvydas, Petitioner's continued detention is preemptively unreasonable. Thus, Petitioner has a highly likelihood of success on the merits.

Moreover , Petitioner would encounter great difficulty in presenting this Habeas Corpus case alone. The house report on the predecessor to § 3006A(a)(2)(B) recognized that Habeas Corpus proceedings often present “**serious and complex issues of law and fact**” that would necessitate the assistance of counsel. H.R. Rep. No. 1546, 91st Cong. 2D Sess. (1970), reprinted in 1970 U.S.C.C.A.N. 3982, 3993. In addition the Congressional report on § 3006A(a)(B) stated that a Court should appoint counsel when “**necessary to ensure a fair hearing.**” Id The complexity of a Habeas case will pose an especially great obstacle for petitioner if he is not appointed Counsel to represent him as it is already unfair to be put against such educated and well versed individuals as the ones holding him in custody such as DHS/ICE.

In light of the complicated issues involved in habeas corpus proceedings and petitioner's inability to adequately present the case at bar, as well as Petitioner's likelihood of success on the merits, this Court should exercise its discretion to appoint counsel under 18 U.S.C. §3006A(a)(B).

II. Appointment of Counsel Is Necessary Because Discovery is Imperative

The rules governing habeas proceedings require that appointment of counsel in certain circumstances. Under rule 6(a), 28 U.S.C. Foll. §2254, a judge must appoint counsel for a petitioner if it is necessary for effective utilization of discovery procedures.” ICE has information and documentation relevant to petitioner's habeas petition, and without the assistance of counsel, Petitioner will not be able to effectively pursue discovery and , as a result, will not adequately present his claims. The aid of an Attorney is especially important in this case given the Petitioner's lack of familiarity with the legal procedures involved in requesting and obtaining discovery. Moreover, even if Petitioner were to obtain documents in discovery, without the assistance of counsel, Petitioner would not be capable of analyzing them properly to determine the likelihood of being removed in the foreseeable future.

III. An Evidentiary Hearing or Motions Hearing May Be Necessary

Under rule 6(c), 28 U.S.C. foll. § 2254, the court is required to appoint counsel in a habeas proceeding if an evidentiary hearing is needed. An evidentiary hearing will likely be necessary in this case. Regardless of any other issues, if an evidentiary hearing is scheduled, the court must appoint counsel for Petitioner.

For the above reasons, the court should appoint counsel to assist Petitioner in instant habeas proceedings challenging Petitioner's detention by ICE, pursuant to the Supreme Court decisions in Zadvydas and Martinez..

The rules cited in sections II and III typically govern those habeas corpus cases brought under § 2254.

However, these rules may be applied to habeas cases that do not fall under § 2254 – such as those cases arising under § 2241 – at the discretion of the court. Rule 1(b). U.S.C. Foll § 2254.

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**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA**

JIDIER ANTONIO SAAVEDRA

DETAINED

A# 

Petitioner/Plaintiff

Civil Action No: _____

v.

PAM BONDI

Attorney General;

KRISTI NOEM

Secretary of Department of

Homeland Security;

HOMER BRYSON U.S.

ICE Field Office Director For

the Middle District of Georgia,

Field Office, and Warden DICKENSON

of Immigration Detention Facility,

Respondents.

MOTION TO PROCEED INFORMA PAUPERIS

PURSUANT TO 18 U.S.C. §3006A and

PURSUANT TO 28 U.S.C. §2241

COMES NOW, the Defendant JIDIER ANTONIO SAAVEDRA pro se' and files this Motion in a timely manner.

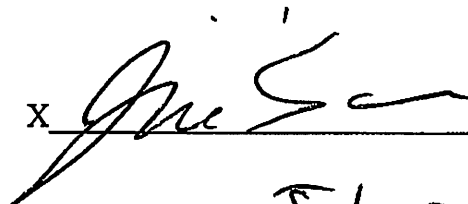
The Defendant files this Motion to proceed Informa Pauperis and states as follows:
The defendant is indigent and has no monies, employment or income as he was arrested on 3-07-2025 and has been in continued detention by DHS/ICE due to the present case and has been transferred to Stewart Detention Center at 146 CCA Rd, Lumpkin, GA 31815. Petitioner Humbly asks this Court to accept this motion and waive any Court Cost associated with the proceedings and appointment of Counsel in this case at Bar and allow him to proceed Informa Pauperis as he in Indigent.

(See fee waiver form attached)

PRAYER FOR RELIEF

WHEREFORE, Petitioner prays that this Court grant the following relief:

1. Assume jurisdiction over the matter;
2. Grant the Petitioner a habeas corpus directing the respondent to immediately release petitioner from custody, under reasonable conditions of supervision;
3. Order respondents to refrain from transferring the petitioner out of the jurisdiction of the ICE Director's Jurisdiction for the Middle district of Georgia while the petitioner remains in the Respondent's custody; and
4. Award Petitioner's Attorney fees and cost under the Equal Access to Justice Act("EAJA"), as amended, 5 U.S.C. §504 and 28 U.S.C. § 2412, and on other basis justified under law; and
5. Grant any other form of relief this court deems just and proper.

X 
July - 22 -2025

JIDIER ANTONIO SAAVEDRA

DETAINED

A#

Stewart Detention Center

146 CCA Rd

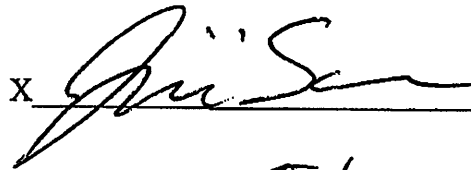
Lumpkin, GA 31815

CERTIFICATE OF OATH

I Swear under Penalty of Perjury from The United States of America if this Motion is found to be false, frivolous or made in bad faith. I also swear that this motion is true to the best of my knowledge.

I further state that this motion is not a copy of a Motion that has already been ruled on nor has it been deposed of by this Court.

I swear that this Motion has been prepared by me Jidier Saavedra and that I understand everything that is said in the following motion and everything is true.

X 

July. 22 -2025

JIDIER ANTONIO SAAVEDRA

DETAINED

A#



Stewart Detention Center

146 CCA Rd

Lumpkin, GA 31815

CERTIFICATE OF SERVICE

I Swear that a true and correct copy of the following Motion has been placed in the hands of an institution official or has been placed in the Mail-room official's hand at Stewart detention Center located at 146 CCA Rd. Lumpkin, Georgia 31815 to be mailed by first class mail to be furnished and forwarded to the following parties listed below.

on July - 22 -2025

1. United States District Court

For the Middle District of Georgia

Columbus Division

P.O. Box 124

Columbus, GA 31902

2. Department of Homeland Security/ICE

Stewart Detention Center

P.O. Box 248.

Lumpkin, GA 31815

3. H.Q.P.D.U.

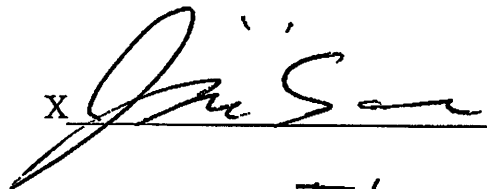
1050 Connecticut Ave. NW Suite 400

Washington, DC 20036

4. HOMER BRYSON

1208 Green Belt Drive

Griffin, GA 30224

X 
July - 22 -2025

JIDIER ANTONIO SAAVEDRA

DETAINED

A#



Stewart Detention Center

146 CCA Rd

Lumpkin, GA 31815

Fee Waiver Request

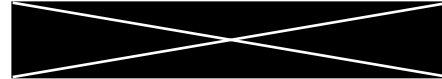
NAME AND ALIEN ("A") NUMBER

Answer all items in English. (Type or Print)

If more than one respondent is included in your application, motion, or appeal, only the lead respondent need file this form.

Saavedra, Jidier, Antonio

Name (Last, First, Middle)



Alien ("A") Number

AFFIDAVIT IN SUPPORT OF FEE WAIVER REQUEST.

(This affidavit is to be signed by the respondent, not the respondent's attorney or representative of record.)

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that I am the person above and that I am unable to pay the filing fee. I believe that my application/motion/appeal is valid and not frivolous, and I declare that the following information is true and correct to the best of my knowledge.

Jidier Antonio Saavedra

(Print name of respondent filing the form)

(Signature of respondent filing the form)

July 20, 2025

(Date signed)

The Immigration Judge may grant your fee waiver request for an EOIR application or motion filed with the Immigration Court if you show that you are unable to pay the filing fee. The Board of Immigration Appeals (BIA) may grant your fee waiver request for an appeal or motion filed with the BIA if you show that you are unable to pay the filing fee. If this fee waiver request does not establish your inability to pay the required fee, your application, motion, application, or appeal will not be deemed properly filed. 8 C.F.R. §§ 1003.8 and 1003.24(d). You must answer all questions on the form even if the answer is "\$0.00".

1. Estimate your average monthly amount of money received from each of the following sources. Adjust any amount that was received weekly, biweekly, quarterly, semiannually, or annually to show the average monthly rate. Use gross amounts, that is, amounts before any deductions for taxes and other state/federal payroll withholdings.

Income Sources	Monthly Average
Employment, including self-employment	\$ 0.00
Income from real property (such as rental income)	\$ 0.00
Interest from checking and/or saving account(s)	\$ 0.00
All other income, including but not limited to these and other sources: alimony, child support, interest, dividends, social security, annuities, unemployment, public assistance, etc.	\$ 0.00
1.A.: TOTAL AVERAGE MONTHLY INCOME	\$ 0.00

2. Estimate your average monthly expenses. Adjust any payments that are made weekly, biweekly, quarterly, semiannually, or annually to show the monthly rate.

Expense Sources	Monthly Average
Rent or home-mortgage payment(s) (include lot rented for mobile home)	\$ 0.00
Utilities (electricity, heating fuel, water, sewer, telephone, internet, etc.)	\$ 0.00
Installment payments or outstanding debits (credit card(s), store credit card(s), vehicle payment, personal loan(s), etc., but not including rent or home-mortgage payments)	\$ 0.00
Living expenses (food, clothing, transportation, child care, tuition, etc.)	\$ 0.00
All other expenses, including but not limited to these and other sources: alimony, child support, insurance, medical, health, any state or federal taxes, attorney fees, etc.	\$ 0.00
2.B: TOTAL AVERAGE MONTHLY EXPENSES	\$ 0.00

3. Calculate ability to pay filing fee (total income minus total expenses):

TOTAL AVERAGE MONTHLY INCOME (1.A):	\$ 0.00
TOTAL AVERAGE MONTHLY EXPENSES (2.B):	-\$ 0.00
TOTAL:	\$ 0.00

4. Provide any other information that will help explain why you cannot pay the filing fees for your appeal, motion, or application. Include your name and "A" number on all pages of any additional document(s) or additional pages.

I have Been Detained by DHS/ICE Since 3-5-2025
and I have no income.

Attorney or Representative (if any):

(If an attorney or representative is submitting this form, the attorney or representative must complete, sign, and date below.)

I hereby attest that I have reviewed the details provided herein and I am satisfied that this fee waiver request is made in good faith.

Signature of Attorney or Representative

Print Name

EOIR ID Number

Date

Paperwork Reduction Act Notice: Under the Paperwork Reduction Act, a person is not required to respond to a collection of information unless it displays a valid OMB control number. We try to create forms and instructions that are accurate, can be easily understood, and which impose the least possible burden on you to provide us with information. The estimated average time to complete this form is one (1) hour. If you have comments regarding the accuracy of this estimate, or suggestions for making this form simpler, you can write to the Executive Office for Immigration Review, Office of the General Counsel, 5107 Leesburg Pike, Suite 2600, Falls Church, Virginia 22041.

Privacy Act Notice: The information on this form is requested to determine if you have established eligibility for the fee waiver you are seeking. The legal right to ask for this information is located at 8 C.F.R. § 1003.8(a)(3). EOIR may provide this information to other Government agencies. Failure to provide this information may result in denial of your request.