

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. _____

1. Pedro BELLO-RUBIO
2. Denis LOPEZ-PEREZ
3. Miguel Alejandro GARCIA-MORA
4. Lismary LOPEZ-QUINTERO
5. L-G-L- (a minor child)
6. S-G-L- (a minor child)
7. L-G-L- (a minor child)
8. C-C-R- (a minor child)
9. Alejandro HERNANDEZ-GOMEZ
10. Zoila Maria AVILES-GONZALEZ
11. Daniel Alejandro PEREZ-PUPO
12. Delys DURAN-PERO
13. Alejandro FUNDORA-HIDALGO
14. Maria QUINTERO-MILIAN
15. Rafael MENDEZ-RODRIGUEZ
16. Evelio BAEZ-ARZA
17. Yoany REYNALDO-OJEDA
18. Yadleidy DIAZ-CORDERO
19. Yanet VALDES-PEREZ
20. Yanelys DARZON-SILVA
21. Nestor Yasmani VALLE-RABELO
22. N-V-D- (a minor child)
23. H-V-D- (a minor child)
24. Henry BENITEZ-RUIZ
25. Sarai GARCIA-PONS

**FIRST AMENDED
CLASS ACTION
PETITION FOR WRIT OF HABEAS
CORPUS AND
COMPLAINT FOR DECLARATORY
AND INJUNCTIVE RELIEF**

26. Yunior Miguel SOLER-OLIVA
27. Andy RANGEL-RODRIGUEZ
28. Luisel PEREZ-GRAVERAN
29. Edgar AVILA-MARTINEZ
30. Daniel INFANTE-BATISTA
31. Maria Caridad DIAZ-PACHECO
32. Rolando Enrique GIL-GARCIA
33. Rosche BERNET-DENIA
34. Cecilia LOPEZ-CEPERO
35. Maria del Carmen TAMAYO-ASEF
36. Carlos Guillermo LLOGA-SANZ
37. Pedro MARTIN-HERNANDEZ
38. Frank GONZALEZ-HERNANDEZ
39. Rosa BARRIOS-RODRIGUEZ
40. Osvaldo ACOSTA-CORVO
41. E-A-B- (a minor child)
42. C-E-A-B- (a minor child)
43. Iselis GUTIERREZ-PEREZ
44. Ignacio CARCAJAL-COELLO
45. Dailen GOMEZ-MENDEZ
46. Cristobal VALLES-GONZALEZ
47. Larisa CRUZ-TORRES
48. Camila CRUZ-GONZALEZ
49. Mayelin CARCAJAL-COELLO
50. Carlos David PADRON-MARIN
51. Jorge Jassan LEYVA-GARAY
52. Marisleidis PERDOMO-OSORIO
53. Ayamey ALBA-ARIAS

54. Yaniel GARCIA-RUSIEL
55. Danilo PEREZ-FERNANDEZ
56. Yanilia MARTINEZ-LEYVA
57. Yenny HERNANDEZ-CID
58. Camilo Sergio ALBERNA-BALSA
59. H-C-S-H- (a minor child)
60. Claudia ALONSO-PAUSADA
61. Luis Carlos BUITRAGO-PAVON
62. Lisandra GUERRA-VERGEL
63. Brian JO-REAL
64. Yoany ARAGON-BALMASEDA
65. Meilyn FONSECA-TORANZO
66. Adrian CABEZAS-DE-LA-NUEZ
67. Roselin NUNEZ-ORTEGA
68. Yasser CESAR-MEDINA
69. A-C-N- (a minor child)
70. Ana Paula DEL-PINO-NUNEZ
71. Janis Beatriz REYES-CALA
72. Yoandy TORRES-ROJAS
73. Pedro Jose VILLAFANA-CAMEJO
74. Michel REYES-REYES
75. Sonia RODRIGUEZ-VALDES
76. Rafael CANCINO-CARBALLO
77. Katherine MACHADO-GARCIA
78. Yoannys Gustavo DUENAS-PEREZ
79. Abraam SUAREZ-GUERRA
80. Diandy ALEMAN-DANIEL
81. Ernesto RAMIREZ-LEYVA

82. Elsa ZAMON-RIVERA
83. Iraldo SOCARRAS-MOZA
84. Luz CASTANEDA-MARTINEZ
85. Yainet YERA-CABOVERDE
86. Adrian HERNANDEZ-PEREZ
87. A-S-H-Y- (a minor child)
88. A-M-A-Y- (a minor child)
89. M-F-A-Y- (a minor child)
90. Miraida CABOVERDE-FUENTES
91. Jorge Elias YEAR-RODRIGUEZ
92. Adalberto SILVEIRA-NAPOLES
93. Yilian MONIER-LEYVA
94. Victoria SILVEIRA-MONIER
95. Amanda SILVEIRA-MONIER
96. Yusniel ALVAREZ-LORENZO
97. Rosbel PALMERO-GOMEZ
98. Neivys MONTESDEOCA
99. J-E-P-M- (a minor child)
100. Ariel GARCIA-GARATEIX
101. Alexei SILVA-POZO
102. Carlos Sandys SUAREZ-ALVAREZ
103. Danier ESPINOSA-CARRAZANA
104. Daylin MENA-HERNANDEZ
105. Rafael HERNANDEZ-BENITEZ
106. Cindy Rita FONTES-LEDESMA
107. Yanet ALVAREZ-URQUIZA
108. Adrian CHAO-SOSA
109. A-P-C-A- (a minor child)

110. Angel GUERRA-GONZALEZ
111. Adrian Jesus GUERRA-MORA
112. Yoelsi JEREZ-PEREZ
113. Pedro Rafael NIEVES-GAMBOA
114. Meybis KESSEL-PAEZ
115. D-N-K- (a minor child)
116. Ana MARQUEZ-DELGADO
117. Rafael Roger PEREZ-PUPO
118. Alexander HERNANDEZ
119. Yadiel GUTIERREZ-PRIETO
120. Frank David TIRADO-RODRIGEZ
121. Julio RICARDO-LARDOEYT
122. Manuel LOPEZ-GOTERA
123. Celeste SENABRE-GARCIA
124. C-A-L-S- (a minor child)
125. Sergio Luis CABRERA-MORALES
126. Leandro HERRERA-LOPEZ
127. Judith LOPEZ-LOPEZ
128. Leandro Jr. HERRERA-LOPEZ
129. Pedro Ignacio LEON-HIDALGO
130. Carlos QUESADA-GORRIN
131. Frank Ernesto CASTELLANOS
132. Sibelys Akela PAZ-GONZALEZ
133. Lianny MARTINEZ-ACOSTA
134. Javier Raul HERRERA-CARPIO
135. Noelia DOMINGUEZ
136. Raul DANGER-LAPINELL
137. Ivan PUENTES-CARRERA

138. Yaquelin SOSA-GONZALEZ
139. Eduar CHARLES-RAMOS
140. Robert CHARLES-SOSA
141. Rayden Luis LEYVA-PADILLA
142. Jorge Luis RODRIGUEZ-LLANES
143. Neysi ALFONSO-CONTE
144. Eliezer CUESTA-LAFERCE
145. Dayan GONZALEZ-GARCIA
146. Ania CASTELLANOS-AVILA
147. Damian Armando RADA-RAZA
148. Daylen GARCES-BATLLE
149. Karel Barbaro FUENTES-RABELO
150. Ricardo ALONSO-MIRABAL
151. Marilin HEREDIA-REYES
152. Sandra Mabel MARTINEZ-PENAS
153. Blanca Susel FERRAN-PANTOJA
154. Rene CABRERA-RODRIGUEZ
155. Raynara TORRES-GALLO
156. Yeinier HERNANDEZ-DELGADO
157. Leandro javier ACOSTA-LUIS
158. Elizabeth LUIS-MORENO
159. Francisco ACOSTA-PEREZ
160. Eduardo LEYVA-VALLADARES
161. Mayle SANTOS-MENDEZ
162. C-L-S- (a minor child)
163. Yamisleidis MORA-SERRANO
164. A-D-T-M- (a minor child)
165. Arielis TEJEDA-MORA

166. Jorge GONZALEZ-MENENDEZ
167. Yoan VILLALON-RODRIGUEZ
168. Roberto Carlos GARCIA-ANDINO
169. Karla RICHARD-FONSECA
170. Adrian JIMENEZ-MEDEROS
171. Dailyn SUAREZ-RAMOS
172. Darlenys LORENZO-CUETO
173. Jorge Antonio SOTO-MILIAN
174. Jorge Lazaro DIAZ-SUAREZ
175. Luis LISSABET-ALVAREZ
176. Nancy BRING-PALOMINO
177. Daniela Elianet PINA-BRING
178. Tania RICANO-MONTEAGUDO
179. Victoria CARMENATE-FON
180. Manuel VIAMONTE
181. Yariel PEREZ-DIAZ-VELIZ
182. Karen POLO-NAVARRO
183. Diosvany HERNANDEZ-PARET
184. Luis QUINTERO-RODRIGUEZ
185. Elizabeth Lianet PEREZ-JIMENEZ
186. Luis Javier VALLEJO-MURSULI
187. Arianna RODRIGUEZ-PUPO
188. A-L-V-R- (a minor child)
189. Melisa RODRIGUEZ-BORRELL
190. Carlos CRESPO-FIGUEROA
191. Claudia ESPINO-CRESPO
192. C-C-E- (a minor child)
193. Marlon Luis MARTINEZ-MILLAN

194. Barbara FERNANDEZ-PRIETO
195. Jose Jorge MORENO-VILLAFANA
196. Dayana AYARDE-RODRIGUEZ
197. Norge ANGUERA-MARTIN
198. Manuel Ruben MARTINEZ-VILA
199. Alain BERMUDEZ-GARCIA
200. Yudenia HERNANDEZ
201. Ihosvanny ORDOVAS
202. Yan Carlos PEREZ-MARINO
203. Liesbert GARCIA-MORENO
204. Oscar REYES-LESCANO
205. Lazaro PEREZ-ESTRADA
206. Handy MARQUETTI-GONZALEZ
207. Sandy AVILA-SUAREZ
208. Kendry GONZALEZ-DUARDO
209. Carlos Miguel PIREZ-RIBOT
210. Lazaro MORALES-GARCIA
211. Yonniss VELIZ-VARGAS
212. Reydel SOTOLONGO-CHINIQUE
213. Tony HOYS-HERNANDEZ
214. Emilde GONZALEZ-BATISTA
215. Eirol LORIE-MARTINEZ
216. Liuba FUENTES-CASTILLO
217. Aresky MONZON-HERNANDEZ
218. Daymit GARCIA-LINARES
219. Jorge Luis FERNANDEZ-DE-DIOS
220. Kenier RODRIGUEZ-GARCIA
221. Raico OCONOR-RIVERON

- 222. Mayoli ORTIZ-MARIN
- 223. Diosney SARMIENTO-HERRERA
- 224. Orlando SUAREZ-LEON
- 225. Marnie REINA-CISNEROS
- 226. M-S-R- (a minor child)
- 227. E-S-R- (a minor child)
- 228. Mirian Diogracia BELLO-TONJEN
- 229. Yoel RIVERA-SUAREZ
- 230. Hilda RODRIGUEZ-GOMEZ
- 231. E-D-R-R- (a minor child)
- 232. Lazara FERRER-SARDINAS
- 233. Tahimi FUENTES-CRUZ
- 234. Yohander ROMERO-TORRES
- 235. Niurka SALCEDA-RIVERO
- 236. Yunier TORRES-RAMIREZ
- 237. Yenisleydis SIXTO-CABANA
- 238. Linet AGUIAR-PEREZ
- 239. Yandy HERNANDEZ-MONTERO
- 240. Mairelys ASECIO-BOROT
- 241. Reinol SANCHEZ-TEJEDA
- 242. Dairys GARCIA-QUIAN
- 243. G-A-G-G- (a minor child)
- 244. Oscar ESTRABAO-SOLER
- 245. Yaneidi GOMEZ-HERNANDEZ
- 246. Gleidys BORROTO-DELGADO
- 247. Reydel PADRON-MARTINEZ
- 248. Omar Junior LEAL-NIEBLA
- 249. Nestor ESTEVEZ-FERNANDEZ

250. Antonio GONZALEZ-PORTALES
251. Abel CRUZ-CASTELLON
252. Pedro Arnays BARZAGA-FAVIER
253. Adalberto ALONSO-LOPEZ
254. Angel AMAYA-BLANCO
255. Alfredo LUSSEN-LOPEZ
256. Nelson ALVAREZ-REGUEIRA
257. Yannia RODRIGUEZ
258. Anabel ROQUE-GUERRA
259. A-P-R- (a minor child)
260. Lianet BARRANCO-AGUILAR
261. Adrian AMORES-CABREJA
262. B-A-B- (a minor child)
263. Roberto SOSA-MACHADO
264. Yaksel DURAN-RIVAS
265. Dariel TABOADA-HONG
266. Enrique LORENZO-GONZALEZ
267. Jose Rafael LOPEZ-SANCHEZ
268. Rolando JUSTIZ-CAMPOS
269. Miguel Angel PINO-BAUTA
270. Claudia ADAY-PADRON
271. Francisco NAVARRO-GUILARTE
272. Ernesto CARRION-MELENDEZ
273. Ever CHAVIANO-CASTANEDA
274. Dennys MARIN-TRUJILLO
275. Giovanni RODRIGUEZ-MORA
276. Gisselle CHAVEZ-RODRIGUEZ
277. Omar FERNANDEZ-PEREZ

278. Xafiye LORENZO-FEE
279. Carlos HERNANDEZ-TORRES
280. Pedro PLACERES-PEREZ
281. Yeiny QUESADA-PEREZ
282. E-V-M-Q- (a minor child)
283. Joaquina HORMILLA-TAMAYO
284. Dailier MORENO-RODRIGUEZ
285. Mabel Beatriz VALDES-MOLINA
286. Yaimarelys TAPANES-LOPEZ
287. Jesse COBAS-CHARCHABAL
288. Yosdel CARTAYA-LABRADOR
289. Henry IGLESIAS-HERNANDEZ
290. Maydelin CASTRO-GONZALEZ
291. H-I-C- (a minor child)
292. H-I-C- (a minor child)
293. Demetrio VAZQUEZ-AMARO
294. Ronald MORALES-PAREDES
295. Alexeis CHAVEZ-CABRERA
296. Yoannde FERNANDEZ
297. Roberto DE-LA-TORRE-GUERRA
298. Milenys TORRES-LARA
299. Ernesto LORENZO-GONZALEZ
300. Amanda MARTINEZ-CHAVEZ
301. Elizabeth ALFONSO-CORREA
302. Beatriz ROMERO-SUAREZ
303. Albert SANCHEZ-MACHADO
304. Frank HERNANDEZ-MUNOZ
305. Ever Yoandry SANTANA-BLANCO

- 306. Rigoberto HERNANDEZ
- 307. Marcos ALFONSO-LOPEZ
- 308. Livia Adelaida CORREA-GIL
- 309. Osmany MARTINEZ-BAEZ
- 310. Ernesto MENENDEZ-MARTINEZ
- 311. Tania PARRADO-VALDES
- 312. Eduardo AVILA-VELEZ
- 313. Arlyn REYNALDO-FERRERA
- 314. Jesus BARRIOS-SANCHEZ
- 315. S-B-R- (a minor child)
- 316. Adis REYES-SUZ
- 317. Alejandro AVILA-GARCES
- 318. Caridad PARDO-FERNANDEZ
- 319. B-A-Z-P- (a minor child)
- 320. Yurquivis CASTINEIRA-MARTIN
- 321. Adriana FALCON-PEREZ
- 322. Lisbey GARCIA-PAZ
- 323. Roberto Yosvany GARCIA-UEVAS
- 324. Gerardo LOPEZ-RODRIGUEZ
- 325. Adriana VALDES-AVILES
- 326. Andy ORTIZ-CARO
- 327. Ander FROMETA-SALAZAR
- 328. Adianet CALDERIO-LEON
- 329. Luis Daniel CALVO-CARO
- 330. Isel Elena ACOSTA-GALINDO
- 331. Arlen ALORDA-BUSTAMANTE
- 332. Laura Yisel HERRERA-FUENTES
- 333. Alina NIEBLA-PEREZ

- 334. Nelvis FRAGA-RODRIGUEZ
- 335. Armando SEIJAS-CASTILLO
- 336. Andres ULLOA-CABRERA
- 337. Andy DEL-REY-HEREDIA
- 338. Adrian ULLOA-CABRERA
- 339. Aida CABRERA-MENDEZ
- 340. Andres ULLOA-CARCASES
- 341. Andy MONTTOYA-PALACIO
- 342. Wilfreis QUINTERO-LEYVA
- 343. Lianet SOSA-GARCIA
- 344. Adrian PEREZ-ALVAREZ
- 345. Enmanuel FLEITAS-LLERENA
- 346. Jahicha MUSTELIER-BIGNOTTE
- 347. Roberto BORRETO-MUSTELIER
- 348. Juan Robert MESA-MUSTELIER
- 349. Leosvany MESTRE-APODACA
- 350. Kevin FERNANDEZ-AGUILAR
- 351. Mario Olec MUNOZ-ROMERO
- 352. Yiranaicy ALONSO-GONZALEZ
- 353. J-A-M-A- (a minor child)
- 354. Daimi FERNANDEZ-PACHECO
- 355. Adrian Dario GONZALEZ-MENA
- 356. Felix Esteban LOGAT-DUVERGER
- 357. Miguel MEDINA-BERNAL
- 358. Anali MARTINEZ-GARCIA
- 359. Alexis POMPA-VIRELLES
- 360. Maryleidi MAURINO-PIOVERT
- 361. Jose SANCHEZ-BRIZUELA

362. Lazaro NAVARRO-MENDEZ
363. Armando QUINTANA-SILVA
364. Manuel ESCALONA-PARDO
365. Anyel GONZALEZ-PELAEZ
366. Didiet PADRON-AGUIAR
367. Nayelin Daniela ARIAS-DOTRES
368. Melkys SANCHEZ-ABRINES
369. Celia SANCHEZ-ESTRADAIA
370. Abel PEREZ-FALCON
371. Elaine MARTINEZ-PORTALES
372. Orlando VENTO-BLANCO
373. Diego VENTO-MARTINEZ
374. Roxana ORTIZ-TELLEZ
375. Yara SALGUEIRO-DIAZ
376. A-M-S- (a minor child)
377. R-I-S- (a minor child)
378. S-I-S- (a minor child)
379. Nays HERNANDEZ-CUETO
380. Ortelio DENIS-CASTILLO
381. Yudisnay DIAZ-HERNANDEZ
382. Dayana VENEGAS-ISADA
383. Yaliana FIFFE-GOMERO
384. Victor GRECESQUI-BRIOSO
385. Ibrahim TAMAYO-NARANJO
386. Ana D'AGOSTINI
387. Manuel GIL-DE-MONTES-CASO
388. Hector RAMIS-SALGADO
389. Marta AROCHE-RAMOS

390. Dunieski ORIAS-ROJAS
391. Norberto MARIN-DIAZ
392. Alejandro MARIN-ORIAS
393. Yuniesky RAMIREZ-OUTERINO
394. Lourdes CONTRERAS-MORALES
395. Jose Gabriel MARIN-CASTILLO
396. Lazaro Yansiel GARCIA-ROJAS
397. Bettssy NIEVES-AGRAMONTE
398. Liset REYES-ALDEREGUIA
399. Manuel MARTIN-HERNANDEZ
400. Marcos Ernesto DEL-RISCO-PUPO
401. Reysmael BORGES-BOUZA
402. Jose Antonio GAMEZ-COMPTES
403. Kirenia SANCHEZ-PEREZ
404. Jesus Aurelio CALUNGA-GOMEZ
405. Nayalie Beatriz LEON-FAGUNDO
406. Gisel PEREZ-RODRIGUEZ
407. Daniel ACOSTA-ACOSTA
408. Daniel FERNANDEZ-COCA
409. Cynthia SURIS-LEON
410. A-F-S- (a minor child)
411. Orlando PAYROL-BARRETO
412. Daikelyn REINOSO-CARDENAS
413. S-C-P-R- (a minor child)
414. Dasina MOURE-DELGADO
415. Alvaro Alejandro CUE-ALFONSO
416. Amanda ALONSO-VALLE
417. Hussein GIL-GOMEZ

418. Nelson RODRIGUEZ-MARTINEZ
419. Zulma FIGUEROA-RODRIGUEZ
420. Isis Leydis CARDENAS-ADAMES
421. Eliani BURGOS-BORGES
422. Javier MOLINOS-MORALES
423. Danilo VAZQUEZ-PORTAL
424. Ingrid MOMBLAN-SANCHEZ
425. Heizel BASULTO-ORTIZ
426. Rachel TAMAYO-RODRIGUEZ
427. Liset GUIZADO-CASTILLO
428. Yudaris CARBOT-RAMOS
429. Sarah Flavia COALLA-PEREZ
430. Yosbel SARDINA-MENA
431. Julio Antonio MAIZA-VARELA
432. Yanet FERRER-PHIPPS
433. Pedro JEREZ-ORTIZ
434. Yuliesky VAZQUEZ-PALOMINO
435. Osmaly RODRIGUEZ-SANABRIA
436. Luis Santiago DAGER-GUERRA
437. Camila ESPINOSA-MARTY
438. Alejandro ROMAGOSA-PERERA
439. Alejandro DIAZ-MOSQUERA
440. Geydis VAZQUEZ-MESA
441. Yuliet BERROA-MESA
442. Alian TAPANES-MACHADO
443. Daily RAMIREZ-CORDOVES
444. Amy TAPANES-RAMIREZ
445. Andy Asael GUEDES-RAMIREZ

- 446. Beatriz MACHADO-LA-O
- 447. Oscar GUILLON-MONDUI
- 448. Banessa CARDENTY-BORROTO
- 449. Anailis CASTILLO-ACOSTA
- 450. Yuslendy ROMERO-DAVILA
- 451. A-C-A-C- (a minor child)
- 452. Daniela MARTINEZ-RAMOS
- 453. Victor Manuel LOPEZ-GARCIA
- 454. Yania ACOSTA-MARTINEZ
- 455. Aris Landi DELGADO-LOPEZ
- 456. A-J-D-A- (a minor child)
- 457. Yanet CABRERA-CACHEIRO
- 458. V-G-C- (a minor child)
- 459. Yoelkys HERNANDEZ-ARACIL
- 460. Yamila IBARRA-GUTIERREZ
- 461. S-H-I- (a minor child)
- 462. Yamile CAMPOS-GONZALEZ
- 463. Alexei GOMEZ-PEREZ
- 464. Rachel DOMINGUEZ-PERAZA
- 465. Aylen PEREZ-INTERIAN
- 466. Dionez GONZALEZ-TORRES
- 467. Danilo MORERA-GARCIA
- 468. Luis Frank MORERA-GARCIA
- 469. Claudia MACHADO-SANCHEZ
- 470. Deivis RIVERO-MARTINEZ
- 471. Lazaro PEREZ-CONTRERA
- 472. Mario Sergio BETANCOURT
- 473. Milenys MORENO-GONZALEZ

474. Elio PEREZ-RODRIGUEZ
475. Leonardo PEREZ-DUARTE
476. Mariayde VALDES-PEREZ
477. Carlos Miguel PLASENCIA-PEREZ
478. M-C-P-V- (a minor child)
479. M-C-P-V- (a minor child)
480. Raidel GUERRA-GARCIA
481. Maikel SOTO-MARTINEZ
482. Yordys MARTINEZ-AGUILERA
483. Rosmeris SABLON-LEZCANO
484. Ramon MARTINEZ-PEREZ
485. Dailen CARMENATE-TELLEZ
486. C-R-M-C- (a minor child)
487. William Javier RUIZ-QUEVEDO
488. Ernesto MENDEZ-MARTINEZ
489. Teresa TORRES-HERNANDEZ
490. Geider REYES-VILLAVICENCIO
491. Yosvani GONZALEZ-PEREZ
492. Alberto Antonio CALERO-LAY
493. Barbara Beatriz PEREZ-FLORES
494. Geilys SANCHEZ-CONCEPCION
495. Duniel DELGADO-BRESLER
496. Leticia PEREZ-ANDRES
497. Jose Ramon AMARO-SANCHEZ
498. Maikel MIRANDA-FERRER
499. Eleany VERDECIA-GONZALEZ
500. Melanie MARTIN-GONZALEZ
501. Ilem SALAN-ESCASENA

- 502. Daisel GONZALEZ-RODRIGUEZ
- 503. Yordan BANGO-PORRO
- 504. Olivia NIEBLA-PEREZ
- 505. Rosalia RIVERO-CEPERO
- 506. Alberto ALDAS-MONTOYA
- 507. A-A-R- (a minor child)
- 508. Julian MARTINEZ-LOPEZ
- 509. Nelida SUAREZ-ALFONSO
- 510. Alfredo Ramon REYES-RAMIREZ
- 511. Yudisbel SANFIEL-SUBIT
- 512. Rolando RAMIREZ-FALCON
- 513. Yanelis CARRETERO-SEOANES
- 514. Onidia PUENTE-LANDESTOY
- 515. Raul HERNANDEZ-LA-ROSA
- 516. Lidice SANCHEZ-ESTRADA
- 517. Yudisan VAZQUEZ-CAMACHO
- 518. Flavio ROMERO-GONZALEZ
- 519. Juan Miguel FONSECA-DEL-REY
- 520. Ernesto MOJARRIETA
- 521. Dariel MACIAS-AMADOR
- 522. Zulaidy GIL-FRAGA
- 523. Duniesky MEDEROS-GARCIA
- 524. D-M-G- (a minor child)
- 525. Amaury SANCHEZ-BRAVO
- 526. Ernesto CASTANEDA-OBREGON
- 527. Elian ROSETE-NAVARRO
- 528. Yanier COBA-SANCHEZ
- 529. Yanet RODRIGUEZ

- 530. N-G-R- (a minor child)
- 531. Adiala GALVEZ-JAULAR
- 532. Alfredo RODRIGUEZ
- 533. Dayneris ZAYAS-OSORIO
- 534. Yosvany RAMIREZ-RAMIREZ
- 535. Sunay AGUILA-CAMACHO
- 536. Reybel MOYA-PINERO
- 537. C-M-A- (a minor child)
- 538. C-M-A- (a minor child)
- 539. Yanary MUNOZ-PEREZ
- 540. Marlen CORDERO-FERNANDEZ
- 541. Lander SANCHEZ-MARTINEZ
- 542. Fidel RIVERO-NARANJO
- 543. Maritza PLANOS-TABLADA
- 544. S-F-R-P- (a minor child)
- 545. F-A-R-P- (a minor child)
- 546. Yanquiel QUEVEDO-MARTINEZ
- 547. Ismael CALZADA-VALDES
- 548. Alejandro MECIAS-QUIRIELLO
- 549. Adrian MORALES-BRETO
- 550. Lazaro Miguel BORROTO-CRUZ
- 551. Luis Ernesto GUERRA-MACHADO
- 552. Gildamar CAMONA-DE-ARMAS
- 553. Daylin SANZ-MANTILLA
- 554. Liusep MARTINEZ-PEREZ
- 555. A-M-S- (a minor child)
- 556. Susel GIMON-RODRIGUEZ
- 557. Belkys Mariela AMADOR-ROJAS

- 558. Adrian DURAN-MATOS
- 559. Marcos Antonio PEREZ-MENDEZ
- 560. Rafael DUENAS-HERNANDEZ
- 561. Myriam SAMPER-DIAZ
- 562. Dayana PADIERNE-GONZALEZ
- 563. Nelson MENDEZ-LLANES
- 564. Glenda ACOSTA-SOTOLONGO
- 565. Elvis VILLAMIL-SANABRIA
- 566. Diana LANZA-MONLONGO
- 567. Arelis GUERRA-ACUNA
- 568. Osniel LOPEZ-LUJAN
- 569. Jorge LOPEZ-ESPINOSA
- 570. Jose Antonio SURIS-MARTINEZ
- 571. Samantha LAMAR-MESA
- 572. Yordanis GONZALEZ-ALMEIDA
- 573. Monica LORFFE-RUISANCHEZ
- 574. Alexis TORRES-DE-LA-CRUZ
- 575. Mayrele RIVERA-VERDECIA
- 576. Osvaldo MESA-CURBELO
- 577. Lilianys Barbara MELGAREJO
- 578. Alain MARTINEZ-CHAVEZ
- 579. Marcia VALDES-BAZAN
- 580. Yuniel ALVAREZ-PULIDO
- 581. Yanisleik ACUNA-ALVAREZ
- 582. L-L-A-A- (a minor child)
- 583. A-L-A-A- (a minor child)
- 584. Ana CABALLERO-HERNANDEZ
- 585. Nathaly HURTADO-APARICIO

- 586. Yander EDIE-QUINTERO
- 587. Merly ALFARO-HERNANDEZ
- 588. Ibrahim ROJAS-BLANCO
- 589. Ibrahim ROJAS-ALFARO
- 590. Osvel DELGADO-CASTRO
- 591. Sandra ARMENTEROS-ABREU
- 592. Alejandro BRETO-SEGUI
- 593. Carlos NAVARRO-FONT
- 594. Cinthia RODRIGUEZ-CRESPO
- 595. Claudia ESPINOSA-CARDOSO
- 596. T-A-C-E- (a minor child)
- 597. J-N-C-E- (a minor child)
- 598. Rogennis PEREZ-VELAZQUEZ
- 599. Evelyn Virgen ORTIZ-PLA
- 600. Rigoberto MIR-RODRIGUEZ
- 601. Yaime RODRIGUEZ-RODRIGUEZ
- 602. Tomas Enrique BARRERA-VELIZ
- 603. Lisbani ALVAREZ-JAIME
- 604. Raymon TAPIA-CASTELLANOS
- 605. Lissette MEDEROS-CAMERO
- 606. A-T-M- (a minor child)
- 607. Osmel SUAREZ-CASTELLANOS
- 608. Jairo MARTINEZ-HERNANDEZ
- 609. Jiannis MORALES-GARCIA
- 610. Shekina CABALLERO-MORALES
- 611. Reinaldo ARIAS-SERRANO
- 612. Nora Bernanrdina PEREZ-ABREU
- 613. Deibbys TORRES-LEAL

- 614. Rolando PEREZ-LLANES
- 615. Danis Ely ROMERO-HERNANDEZ
- 616. Liovel HERNANDEZ-MORENO
- 617. Yohandro SANCHEZ-REYTOR
- 618. Saily HERNANDEZ-PESCOZO
- 619. Loraysis DIAZ-GONZALEZ
- 620. Yadira CARRERAS-JIMENEZ
- 621. Solanh ESTRADA-RODRIGUEZ
- 622. Indira BANOS-CARRERA
- 623. Dariel VALDES-CARDENTY
- 624. Eliany WONG-DE-LARA
- 625. Yanet GONZALEZ-HIDALGO
- 626. Ebert OJEA-TAMAYO
- 627. Lazara Maria OJEA-GONZALEZ
- 628. Elimay FALCON-ESQUIVEL
- 629. Kenia ROMAN-CHAVEZ
- 630. Katia ROMAN-CHAVEZ
- 631. Marileisy FONSECA-LUGO
- 632. Pedro MIRABAL-GONZALEZ
- 633. Angel HERNANDEZ-
- 634. Carlos RODRIGUEZ-ABREU
- 635. Alejandro ALVAREZ-MARTINEZ
- 636. Flavia ALVAREZ-CESAR
- 637. Arleis GONZALEZ-PEREZ
- 638. Boris Luis GARCIA-LAVIN
- 639. Leydis TARTERA
- 640. Claudia CRUZ-CECILIO
- 641. Dainier DELGADO-SANCHEZ

- 642. Jennifer GALINDO-ROBAINA
- 643. Yuliana ACOSTA-LOPEZ
- 644. N-J-C-A- (a minor child)
- 645. Lidersy CABALLERO-ESPINOSA
- 646. Alberto PINEIRO-BERTOT
- 647. Julianne CORDOVA-AGUDO
- 648. Arletty GONZALEZ-BELLO
- 649. Yaneisy VALDIVIA-RODRIGUEZ
- 650. Violeta COLON-CABRERA
- 651. Boris RUBIO-CORONA
- 652. Ramdy RAMIREZ-LEAL
- 653. Reina RODRIGUEZ-GONZALEZ
- 654. Samuel HERNANDEZ-
- 655. Neivys ALVAREZ-CABEZOLA
- 656. Dahilee RODRIGUEZ-PEREZ
- 657. Eugenio ALVAREZ-CABRERA
- 658. Edelys BARNAT-SANTIAGO
- 659. E-A-A-B- (a minor child)
- 660. Jorge Isac MORE-AGUILA
- 661. Gitzy Sayuri BOLLY-SALAZAR
- 662. B-A-T-B- (a minor child)
- 663. S-A-T-B- (a minor child)
- 664. Alejandro MOJENA-PINERA
- 665. Normando FERRO-LA-PAZ
- 666. Maria Elena DIAZ-CASTILLO
- 667. Raul SOLORZANO-RENTE
- 668. Maylen ARAUJO-JORGE
- 669. I-S-A- (a minor child)

- 670. Eloina MARTIN-LORENZO
- 671. Alexi ROMERO- RAMIREZ
- 672. Ronald ROMERO-MARTIN
- 673. Ariel ACOSTA-DIAZ
- 674. Yenely DEL-ROSARIO-ANDERE
- 675. Johana CASTANO-VALDES
- 676. Joaquin FALCON-CUADRA
- 677. E-F-C- (a minor child)
- 678. E-F-C- (a minor child)
- 679. Jenniffer Maria VIERA-OLMO
- 680. Adier HERRERA-GUERRA
- 681. Gisela NOVOA-CASTINEIRA
- 682. Leonald Gustavo PEREZ-RUIZ
- 683. Rosa PEREZ-GONZALEZ
- 684. Juan RODRIGUEZ-ESTRADA
- 685. Yandi GOMEZ-AGUILERA
- 686. Marisol LEON-CABRERA
- 687. Jose Enrique PASCUAL-RAMIREZ
- 688. Isilya LIMA-GONZALEZ
- 689. Yuraicys HERNANDEZ DE MESA
- 690. Samantha RAMOS-HERNANDEZ
- 691. Idonis DIAZ-DIAZ
- 692. Yadira SANTIESTEBAN
- 693. Daniela DIAZ-SANTIESTEBAN
- 694. N-D-D-S- (a minor child)
- 695. Rubiel PORTELLES-LEON
- 696. Jariel DE-LA-NUEZ-SANCHEZ
- 697. Jorge VALLINA-NEPOMUCENO

- 698. Yoandry LAZO-NODARSE
- 699. Marelis RUIZ-LAUREIRO
- 700. G-M-L-R- (a minor child)
- 701. Alfredo MOREJON-ORTEGA
- 702. Yohara CUBAS-SARIOL
- 703. Jierse Francisco DIAZ-QUESADA
- 704. I-D-C- (a minor child)
- 705. P-D-C- (a minor child)
- 706. A-D-C- (a minor child)
- 707. Julio Cesar VASQUEZ-SOBREDO
- 708. Dayana ECHENIQUE-HERRERA
- 709. C-A-V-E- (a minor child)
- 710. Jose FLECHOSO-GONZALEZ
- 711. Diamela BARCELO-RIVERON
- 712. E-F-B- (a minor child)
- 713. Vicente CASTILLO-PEREZ
- 714. Beatriz VALDES-SOSA
- 715. Yanai RIVERO-LOPEZ
- 716. Felipe LEY-FRANCISCO
- 717. B-L-R- (a minor child)
- 718. V-L-R- (a minor child)
- 719. Leonardo RIVERA-HERNANDEZ
- 720. Addiel CASTILLO-MESA
- 721. Leticia Natalia REZA-BURON
- 722. Beatriz DUMPIERRES-OTERO
- 723. Osvaldo RODRIGUEZ-GOMEZ
- 724. Pedro Javier ORBEA-GUADA
- 725. Tania MORELL-MESA

- 726. Wilky MARIN-RODRIGUEZ
- 727. Yanila ALVAREZ-HERNANDEZ
- 728. Yulianis GOMEZ-SUAREZ
- 729. Yasmani GOMEZ-GUTIERREZ
- 730. Drunayle LAUGART-GUERRA
- 731. Yusniel RUIZ-REYES
- 732. Yailen SANCHEZ-JIMENEZ
- 733. I-R-S- (a minor child)
- 734. Gisela SANTANA-LASSERRA
- 735. Patricio FERRAZ-SANTANA
- 736. Eleani LINARES-ALVAREZ
- 737. Zaida GARCIA-MARI
- 738. Isabel Camila LINARES-BELTRAN
- 739. Yunier LOPEZ-ARCIA
- 740. Amarilis RAMIREZ-AMBRIOSO
- 741. M-A-L-R- (a minor child)
- 742. Hernan RODRIGUEZ-RAMIREZ
- 743. Heilin CASTRO-HERRERA
- 744. Alejandro MOREJON-ORTEGA
- 745. K-M-C- (a minor child)
- 746. K-A-M-C- (a minor child)
- 747. Norberto QUESADA-REYES
- 748. Dafne RIVERA-ROSS
- 749. Angela SALAZAR-CASTRO
- 750. Miriela MARTIN-CECILIA
- 751. Andy VIERA-DELGADO
- 752. Alejandro DOMENECH
- 753. Beatriz GONZALEZ-PEREZ

- 754. Elena PEREZ-GONZALEZ
- 755. Dario GONZALEZ-HERNANDEZ
- 756. Oscar Marcial REYES-CASERES
- 757. Lien REMEDIOS-CARRION
- 758. Maria Teresa MIRANDA-GARCIA
- 759. Vladimir PENA-FIGUEREDO
- 760. Mario Miguel PENA-MIRANDA
- 761. Alejandro GONZALEZ-SANCHEZ
- 762. Ariel ARTEAGA-CASTELLON
- 763. Arianna BENITEZ-CUENCA
- 764. Lyan LAO-SANTANA
- 765. Fernando Ranses ANON-GUERRA
- 766. G-A-L- (a minor child)
- 767. Leonardo LUIS-SIPRIAN
- 768. Ricardo Felipe LOPEZ-ESPINOSA
- 769. Ramses CECILIA-SANTA-CRUZ
- 770. Julio VELIZ-MARIN
- 771. Juan CASTANEDA-MIRANDA
- 772. Duniesky GARCIA-MARTINEZ
- 773. Yunet CAMPOS-MARTIN
- 774. Dianeyis GARCIA-TORRES
- 775. Juan Carlos PALOMINO-BOADA
- 776. Alejandro CANCIO-MESA
- 777. Jessica ACOSTA-CANDELARIO
- 778. Dayanis CARO-RAMIREZ
- 779. Laritza NAVARRO-RAMOS
- 780. Rafael DOMINGUEZ-BAUTA
- 781. Adalberto SEGURA-ZALDIVAR

- 782. Antonio GARCIA-CASTRO
- 783. Yaima HERNANDEZ-AGUILA
- 784. Cindy RUIZ-VALLADARES
- 785. Diana Rosa CAMPOS-RAMIREZ
- 786. Idania BRINGUIER-GONZALEZ
- 787. Darian FLEITA-BRINGUIER
- 788. Andres Alfredo FLEITA-ALMEIDA
- 789. Luis REYNALDO-JORDAN
- 790. Mayda LORENZO-DIAZ
- 791. Alberto SOSA-FERNANDEZ
- 792. Eleanis DE-FRANCISCO-UZNEGO
- 793. D-D-D-F-B- (a minor child)
- 794. Gabriel MAYOL-CABRERA
- 795. Yalice PELEGRIN-VELAZQUEZ
- 796. Geordanys INVIERNO-MARTIN
- 797. Yuniel TORRES-RUIZ
- 798. Jorge Carlos LINARES-PELEGRIN
- 799. Yunior LEYVA-GONZALEZ
- 800. Asbel DATRE-MUNOZ
- 801. Hades TALLET-MARTINEZ
- 802. Raisel DEL-POZO-ALCORTA
- 803. Daily DIAZ-DIAZ
- 804. Elmy Iraldo LOPEZ-RODRIGUEZ
- 805. Guillermo GUERRA-MESA
- 806. Lorena VAZQUEZ-INGUANZA
- 807. Arley RODRIGUEZ-ALFONSO
- 808. Yanet LABRADA-ZEQUEIRA
- 809. Claire PENA-DIAZ

- 810. Javier ORSAS-PEREZ
- 811. Lauren FABELO-RECALDE
- 812. Haymee RECALDE NARANJO
- 813. Oscar VARGAS-ZAYAS
- 814. Marly Sujei PEREZ-RODRIGUEZ
- 815. D-V-P- (a minor child)
- 816. Jorge BATISTA-CISNEROS
- 817. Lisbet MORFFE-RODRIGUEZ
- 818. Jose Manuel GARCES-MUNIZ
- 819. Lianet ESTRADA-PADRON
- 820. Pedro TAMAYO-SIMON
- 821. Sheley LABRADOR-GONZALEZ
- 822. Alfredo HERNANDEZ-VIERA
- 823. Maria GONZALEZ-GONZALEZ
- 824. Alessandra VILLAR-AVILA
- 825. Alexis GRANDAL-MENDEZ
- 826. Manuel MORALES-GARCIA
- 827. Yurisleidy Francia HERNANDEZ
- 828. Yunieski PROHENZA
- 829. Jeidis PEREZ
- 830. Yadia HECHAVARRIA-FAJARDO
- 831. Yasel GUTIERREZ
- 832. Royma ALARCON
- 833. Pablo HERRERA-MENDILUZA
- 834. Aimee HERNANDEZ-VALDES
- 835. Yazmin MUNOZ-SANCHEZ
- 836. Elena Aurora SANCHEZ-ROJAS
- 837. Hildemar IZADA-SANTANA

- 838. Yaimari MOLIER-BAEZA
- 839. Merardo CHACON-TORRES
- 840. Yareimys GONZALEZ
- 841. Esther SOTOLONG-MARTINEZ
- 842. Sahily RAMOS-GARCIA
- 843. Eduardo Aguedo ORO-TALLET
- 844. Jeidy ARIAS-DARIAS
- 845. Layra SANTOS-VEGA
- 846. Monica DOMINGUEZ-MARTINEZ
- 847. Damian RAMIREZ-SOTO
- 848. Yines RECIO-VILLA
- 849. Yocelyn HASTIE-RECIO
- 850. Ronaldy CRUZ-SUAREZ
- 851. Yoel OQUENDO-ERMUS
- 852. N-O-V- (a minor child)
- 853. Rebeca PEREZ-BARRIENTOS
- 854. Loida COTO-ORUNA
- 855. Alejandro GONZALEZ
- 856. Julio Cesar DAPENA-REYTOR
- 857. Miriam RODRIGUEZ GOMEZ
- 858. Bryam ROJAS-RODRIGUEZ
- 859. Daylin BLANCO-GUEVARA
- 860. Lorna HERNANDEZ-FUENTES
- 861. Yoandry GUANES-ALFARO
- 862. K-G-H- (a minor child)
- 863. Livan VEGA-GONZALEZ
- 864. Heidy GARCIA-ARAFET
- 865. Herline ORAMAS-ZAMORA

- 866. Marilyn GONZALEZ-RAMIREZ
- 867. Liz M. VIGO-GONZALEZ
- 868. Adria RODRIGUEZ-RIVERO
- 869. Carlos Eduardo GARCIA-ALCALA
- 870. Dariel MORALES-ARMAS
- 871. Sergio SANCHEZ-DOMINGUEZ
- 872. Tania RODRIGUEZ-HERRERA
- 873. Dayli EXPOSITO-ESCALONA
- 874. Alvaro Andres PEREZ-LEYVA
- 875. Roldan RODRIGUEZ-ALCORTA
- 876. Dora ESQUIJARROSA-ARCIA
- 877. Amalia PESTANA-HERNANDEZ
- 878. Yoan CARMENATE-MARTINEZ
- 879. Daniel DIAZ-RUIZ
- 880. Carlos Rasiel TEJEDA-BARNETT
- 881. Denis CASTRO-FERNANDEZ
- 882. Erlan Rene CARDOSO-LINARES
- 883. Addiel LABRADA-SANCHEZ
- 884. Osiery GARCIA-RAMIREZ
- 885. Jorge RODRIGUEZ-MUNOZ
- 886. Ricardo GARCIA-GUTIERREZ
- 887. Lidismary LOPEZ-GUEDES
- 888. Frank Ernesto SANTANA-CRUZ
- 889. Ledisney HURTADO-ESPINOSA
- 890. Cristian SACERIO-HURTADO
- 891. Daniel IZQUIERDO-
- 892. Jenny RODRIGUEZ-CABRERA
- 893. Lorena GOVIN-ALONSO

894. Katia Rachel PANIZO-TORRES
895. Eileen GRAVERAN-REYES
896. Reinney FERNANDEZ-ESTRADA
897. Rolando CAMEJO-JIMENEZ
898. Mariela SUAREZ-MARTINEZ
899. Fher FERNANDEZ-SUAREZ
900. Roxana RODRIGUEZ-PEREZ
901. Jorge Alberto GARCIA-NUNEZ
902. Frank MONTERO-SOTOLONGO
903. Felix SUAREZ-ALEGRIA
904. Dailin PENA-ESCALONA
905. Yairene GARCIA-FORBES
906. Rigel MENDEZ-MARTINEZ
907. E-M-G- (a minor child)
908. Yoan CABRERA-PEREZ
909. Franklin FERNANDEZ-SANCHEZ
910. Amanda ALVAREZ-GUERRA
911. Yunia MARTINEZ-CRUZ
912. Adriana RAMIREZ-AMBROSIO
913. Karel VAZQUEZ-VILLAREAL
914. Karolina VAZQUEZ-RAMIREZ
915. Dilian MOLINA-ALVAREZ
916. Melany PROENZA-MOLINA
917. Sandra RANGEL-BLANCO
918. Daniel SMITH-MIRANDA
919. Haydee OLIVERA-VILLALON
920. Alejandro PUIG-PENA
921. Ailyn VEJO-MARTINEZ

- 922. Lisdanys CHAVIANO-ROQUE
- 923. Pedro Pablo AMIN-PEREZ
- 924. Jorge Gabriel MARIN-BALLOQUI
- 925. Ovianyelis Caridad PEREZ-PEREZ
- 926. Pilar LEDESMA-BELTRAN
- 927. Lazaro TELLEZ-CABRERA
- 928. Idael BERMUDEZ-OSORIO
- 929. Loraine VILLAVICENCIO
- 930. Idael BERMUDEZ
- 931. Daniel BERMUDEZ
- 932. Tania ZALDIVAR-RONDA
- 933. Gustavo NOY-SOUTO
- 934. Diamela GARCIA-MARTINEZ
- 935. Roberto GARCIA-MACHADO
- 936. T-M-G- (a minor child)
- 937. M-M-G- (a minor child)
- 938. Lisset LLOMBART-SANCHEZ
- 939. Jorge Luis SANTOS-ACOSTA
- 940. Thalia ROMERO-TIJERA
- 941. Jose Carlos BARBOSA-LOPEZ
- 942. Michel ARTILES-EGUE
- 943. Alely OLIVA-MARTINEZ
- 944. Jose Carlos CERVERA-ARIAS
- 945. Yoeslen ERRASTI-TORRES
- 946. Yamilet Zucel DIAZ-ACOSTA
- 947. Damian SMITH-OLIVERA
- 948. Daniela CARVAJAL-FUENTES
- 949. Alejandro MARICHAL

- 950. Lazara DE-ARMAS-HERNANDEZ
- 951. Sheila MARTINEZ-GOMEZ
- 952. Roger HERNANDEZ-DIAZ
- 953. Alain GARCIA-GARCIA
- 954. Yoan FIGUEREDO-LLANES
- 955. Yaniel ARIAS-TOLEDANO
- 956. Mirna GONZALEZ-PARDO
- 957. Yerandi CHAGIME-REYES
- 958. Mileidy MORALES-GONZALEZ
- 959. Luis VITORES-PENA
- 960. Jorge LANDEIRO-HERNANDEZ
- 961. Alfredo ARRIERA-PEREZ
- 962. Damarys VILAU-VALDES
- 963. Irene PEREZ-VILAU
- 964. Homero ARMENTERO DEL RIO
- 965. Ana Idis PINO-CABRERA
- 966. Idael GARCIA-RODRIGUEZ
- 967. Alther HERNANDEZ-MARTINEZ
- 968. Sandra MUNOZ-HERNANDEZ
- 969. Amaury ROBAUL-FIGUERAS
- 970. A-R-M- (a minor child)
- 971. Maylen CRUZ-GONZALEZ
- 972. Javier SAMPEDRO-SERRANO
- 973. F-E-S-C- (a minor child)
- 974. Sandra Dayana SOLIS-MARTINEZ
- 975. Maria Victoria BELLO-PEREZ
- 976. Emilio VALCARCEL-SANCHEZ
- 977. Xiulem SING-RODRIGUEZ

- 978. Lester FEBLES
- 979. Anelis TORRES-MARTINEZ
- 980. Retsel FEBLES-TORRES
- 981. Rentel FEBLES-TORRES
- 982. Mairela RODRIGUEZ-VALDES
- 983. Naibelys GARCIA-VEGA
- 984. Maykel LOPEZ-RODRIGUEZ
- 985. Leidys PRADO-MARTINEZ
- 986. A-M-D-D- (a minor child)
- 987. V-E-D-D- (a minor child)
- 988. Eduardo GARCIA-PEREZ
- 989. Thalia COSTA-HERNANDEZ
- 990. Leidys CANIZARES-CABALLERO
- 991. Aleagna CABRERA-MILANES
- 992. R-G-C- (a minor child)

v.

KRISTI NOEM, *in her official capacity as the Secretary of Homeland Security,*

TODD M. LYONS, *in his official capacity as the Acting Director of U. S. Immigration and Customs Enforcement (ICE),*

MARCOS CHARLES, *in his official capacity as the Acting Executive Associate Director Enforcement and Removal Operations (ERO),*

TOM GILES, *in his official capacity as the Assistant Director for ERO Field Operations,*

PAMELA JO BONDI, *in her official capacity as the United States Attorney General,*

Defendants.

**FIRST AMENDED CLASS ACTION
PETITION FOR WRIT OF HABEAS CORPUS AND
COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF**

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**FIRST AMENDED CLASS ACTION
PETITION FOR WRIT OF HABEAS CORPUS AND
COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF**

The plaintiffs, by and through the undersigned, allege as follows:

SUMMARY OF CLAIM

Following the conclusion of the special parole program for Cuban nationals that was implemented in conformance with 8 U. S. C. § 1225(b)(1)(F) — colloquially referred to as the “wet-foot/dry-foot policy” — the Department of Homeland Security continued to release Cuban nationals into the United States without keeping them in mandatory detention under either §§ 1225(b)(1) or (b)(2). But rather than document their parole into the United States under § 1182(d)(5)(A), the Department purported to “conditionally parole” these Cuban nationals into the United States under § 1226(a), in order to preclude them from obtaining the benefits that Congress has historically offered under the Cuban Refugee Adjustment Act of 1966 (CAA), Pub. L. No. 89-732, 80 Stat. 1161 (as amended). Hundreds of thousands of Cuban nationals in this situation are stuck in immigration limbo, without access to the CAA’s benefits, often still awaiting the commencement of removal proceedings for years after having entered the United States. In fact, many will not even be subject to physical removal to Cuba under the current Migration Accords.

This complaint is brought on behalf of Cuban nationals who sought refuge in this country after the termination of the wet-foot/dry-foot policy. They were apprehended by the Department while arriving in the United States by land between designated ports of arrival, and were thereafter released from custody after the direct commencement of removal proceedings under 8 U. S. C. § 1229a without documentation of their parole from custody. Instead, they were released and are being subjected to unlawful custody under an “order of release on recognizance” pursuant to the purported auspices of § 1226(a). They bring this action on their own behalf, and on behalf of all

other Cuban nationals similarly situated, seeking: (1) habeas relief from their ongoing unlawful custody; (2) declaratory relief under the Administrative Procedure Act (APA) ruling that they were paroled out of custody pursuant to § 1182(d)(5)(A) without the proper documentation; and (3) related injunctive relief under the APA to effectuate the Court's declaration of law; in their pursuit of permanent residence under the Cuban Refugee Adjustment Act.

Importantly, a new urgency has emerged as a consequence of the Department's unlawful practice of mis-papering parole releases under § 1182(d)(5)(A) as purported releases on recognition. Earlier this year, the Department announced new policies whereby it would pursue expedited removal in a new, broadened fashion. *Coalition for Humane Immigrant Rights v. Noem* (*CHIR*), No. 25-CV-872 (JMC), 2025 WL 2192986, at *9–*10 (D.D.C. Aug. 1, 2025), appeal filed, No. 25-5289 (CADDC). Cuban nationals, who would qualify as class members under this case, have sought individualized habeas relief from unlawful applications of expedited removal against them, but have faced difficult jurisdictional issues in those challenges. See, e.g., *Chaviano v. Bondi*, No. 25-22451-CIV, 2025 WL 1744349, at *1 (S.D. Fla. June 23, 2025), appeal pending, No. 25-12153 (CA11); and *Quintero v. Field Off. Dir. of Miami ICE Field Off.*, No. 25-cv-22428-CMA, ECF No. 25 (S.D. Fla. June 23, 2025), voluntary dismissal of appeal pending, No. 25-12147 (CA11). However, the relief requested here (recognition of having been paroled) would have the additional benefit of providing an arguable defense to unlawful expedited removal because people who have been paroled into the United States cannot be subjected to expedited removal. *CHIR*, 2025 WL 2192986, at *21–*30; *id.*, at *22 (“the Designation Provision forbids the expedited removal of noncitizens who have been, at any point in time, paroled”); *Doe v. Noem*, 778 F. Supp. 3d 311, 336–37 (D. Mass. 2025), appeal filed, No. 25-1384 (CA1); *Al Otro Lado, Inc. v. McAleenan*, 394 F. Supp. 3d 1168, 1200 (S.D. Cal. 2019).

JURISDICTION

1. This action is brought against the defendant, and those acting under her, for failure to comply with their federally mandated duties under the Cuban Refugee Adjustment Act of 1966 (CAA), Pub. L. No. 89-732, 80 Stat. 1161 (as amended), the Immigration and Nationality Act of 1952 (INA), Pub. L. No. 82-414, 66 Stat. 163 (codified as amended at 8 U. S. C. §§ 1101 et seq.), Title 8 of the Code of Federal Regulations, and the Administrative Procedure Act (APA), 5 U. S. C. §§ 701, et seq.

2. The Court has jurisdiction over this case and may grant relief pursuant to 28 U. S. C. § 2241, et seq. (habeas corpus). See *Clements v. Fla.*, 59 F. 4th 1204, 1213 (CA11 2023) (“non-citizens released on supervision while awaiting a final decision in their immigration proceedings are deemed to be ‘in custody’ for purposes of habeas corpus”) (citing *Romero v. Sec’y, DHS*, 20 F. 4th 1374, 1379 (CA11 2021); and *United States ex rel. Marcello v. Dist. Dir. of INS, New Orleans*, 634 F. 2d 964, 971 & n. 11 (5th Cir. 1981) (precedential under *Bonner v. City of Prichard, Ala.*, 661 F. 2d 1206, 1207 (CA11 1981) (en banc))).

3. The Court also has jurisdiction over this case under 28 U. S. C. § 1331 (federal question), and may grant relief pursuant to the Administrative Procedure Act (APA), 5 U. S. C. §§ 701, et seq., the All Writs Act, 28 U. S. C. § 1651, and the Declaratory Judgment Act, 28 U. S. C. §§ 2201–02.

4. The INA’s jurisdictional bar regarding discretionary judgments made under the general adjustment of status statute, 8 U. S. C. § 1252(a)(2)(B)(i), does not apply to applications for adjustment of status made under the Cuban Refugee Adjustment Act. *Perez v. USCIS*, 774 F. 3d 960, 967–68 (CA11 2014).

VENUE

5. Venue is proper in this district because:
 - (a) “a substantial part of the events or omissions giving rise to the claim occurred” in this district, 28 U. S. C. § 1391(e)(1)(A);
 - (b) the defendant “resides” in this district, § 1391(e)(1)(B), see *Bartman v. Cheney*, 827 F. Supp. 1, 2 (D.D.C. 1993) (“Officers and agencies of the United States can have more than one residence, and venue can properly lie in more than one jurisdiction.”); and
 - (c) several of the plaintiffs reside in this district, § 1391(e)(1)(C), see *A.J. Taft Coal Co. v. Barnhart*, 291 F. Supp. 2d 1290, 1301–02 (N.D. Ala. 2003) (collecting cases demonstrating that “residency of ‘the plaintiff’ should be interpreted to mean *any* plaintiff rather than *all* plaintiffs”) (emphasis in original).
6. Venue is proper in this district also because “a district court acts within its respective jurisdiction within the meaning of § 2241 as long as the custodian can be reached by service of process.” *Rasul v. Bush*, 542 U. S. 466, 479 (2004) (cleaned up); accord *Braden v. 30th Jud. Cir. Ct. of Kentucky*, 410 U. S. 484, 495 (1973) (“So long as the custodian can be reached by service of process, the court can issue a writ ‘within its jurisdiction’ requiring that the prisoner be . . . released outright from custody, even if the prisoner himself is confined outside the court’s territorial jurisdiction.”).
7. “[A] habeas petitioner who challenges a form of ‘custody’ other than present physical confinement may name as respondent the entity or person who exercises legal control with respect to the challenged ‘custody.’ ” *Rumsfeld v. Padilla*, 542 U. S. 426, 438 (2004); accord *Strait v. Laird*, 406 U. S. 341, 344 (1972) (discussing the “nominal custodian”).

EXHAUSTION OF REMEDIES

8. As to the plaintiffs' claims under the Administrative Procedure Act, there are no administrative remedies available that the plaintiffs are required to exhaust under *Darby v. Cisneros*, 509 U.S. 137 (1993), and an agency's failure to take action is reviewable agency action, *Norton v. S. Utah Wilderness Alliance*, 542 U.S. 55, 61–62 (2004).

9. As to the plaintiffs' habeas claims, no exhaustion is statutorily required because "Section 2241 itself does not impose an exhaustion requirement." *Santiago-Lugo v. Warden*, 785 F.3d 467, 474 (CA11 2015). Further, prudential exhaustion is inapplicable because there are no available "administrative remedies [that can] provide relief commensurate with the [plaintiffs'] claim." *Boz v. United States*, 248 F.3d 1299, 1300 (CA11 2001).

PARTIES AND PARTY-SPECIFIC FACTUAL ALLEGATIONS

10. Defendant **KRISTI NOEM** is sued in her official capacity as the United States Secretary of Homeland Security. In this capacity, she has supervisory authority over all operations of the Department of Homeland Security (DHS) and its component agencies. 6 U.S.C. § 112, 8 U.S.C. § 1101(a)(1). This includes authority over: United States Border Patrol (USBP) which is responsible for conducting inspections and determining the admissibility of persons arriving at the border between ports of entry; U.S. Citizenship and Immigration Services (USCIS) which is responsible for the adjudication of affirmative immigration benefits, including applications for permanent residence under the Cuban Adjustment Act; and U.S. Immigration and Customs Enforcement (ICE) which is responsible for interior enforcement of the immigration laws. In this capacity, she is responsible for the legal injuries against the plaintiffs and the members of the class, and she is a legal custodian of the plaintiffs and the members of the class.

11. Defendant **TODD M. LYONS** is sued in his official capacity as the Acting Director

of U. S. Immigration and Customs Enforcement (ICE). In this capacity, he is responsible for the legal injuries against the plaintiffs and the members of the class, and he is a legal custodian of the plaintiffs and the members of the class.

12. Defendant **MARCOS CHARLES** is sued in his official capacity as the Acting Executive Associate Director of Enforcement and Removal Operations (ERO) within ICE. In this capacity, he is responsible for the legal injuries against the plaintiffs and the members of the class, and he is a legal custodian of the plaintiffs and the members of the class.

13. Defendant **TOM GILES** is sued in his official capacity as the Assistant Director for ERO Field Operations within ICE. In this capacity, he is responsible for the legal injuries against the plaintiffs and the members of the class, and he is a legal custodian of the plaintiffs and the members of the class.

14. Defendant **PAMELA JO BONDI** is sued in her official capacity as the United States Attorney General. In this capacity, her “determination[s] and ruling[s]” “with respect to all questions of [immigration] law shall be controlling,” 8 U. S. C. § 1103(a)(1), and has the authorities and functions specified in § 1103(g). In this capacity, she is responsible for the legal injuries against the plaintiffs and the members of the class, and she is a legal custodian of the plaintiffs and the members of the class.

15. Given the large number of plaintiffs discussed below, a table of their names, alien numbers, and location is attached for ease of reference (**Ex. A**), and said information is also alleged with specificity in the chart below at paragraph 25.

16. Every plaintiff in this case is a native and citizen of Cuba who resides in the city and state noted in the chart below at paragraph 25.

17. Every plaintiff in this case was assigned their respective alien number as noted in

the chart below at paragraph 25.

18. Every plaintiff in this case arrived in the United States by land between ports of arrival on or about the date noted in the chart below at paragraph 25.

19. Every plaintiff in this case was taken into immigration custody within 24 hours of their arrival in the United States.

20. Prior to their subsequent release from immigration custody, removal proceedings under 8 U. S. C. § 1229a were commenced against every plaintiff in this case via service of a notice to appear under § 1229(a). See *Perez-Sanchez v. U. S. Att'y Gen.*, 935 F.3d 1148, 1154 (CA11 2019) (“Congress intended for service of an NTA—not filing—to operate as the point of commencement for removal proceedings”).

21. Following service of notices to appear for full removal proceedings under 8 U. S. C. §§ 1229(a) & 1229a, every plaintiff in this case was released from immigration custody by the Department of Homeland Security, of its own volition, on or about the date noted in the chart below at paragraph 25.

22. Every plaintiff in this case was released from immigration custody by the Department of Homeland Security, of its own volition, without being given any documentation of parole out of custody under § 1182(d)(5)(A), and are being treated as if they had not been paroled out of custody.

23. Instead, every plaintiff in this case was released under, and remains subject to, an order of release on recognizance purporting to have been issued under the auspices of § 1226(a).

24. Upon information and belief, no plaintiff in this case was processed for expedited removal under § 1225(b)(1), contiguous return under § 1225(b)(2)(C), or reinstatement of removal under § 1231(a)(5), during and between the time of their arrival in the United States and their

release from custody as noted in the chart below at paragraph 25.

25. As alleged in the following chart, the plaintiffs in this case: (1) have the following names and alien numbers; (2) reside in the following cities and states; (3) arrived in the United States by land in between designated ports of arrival on the following dates at the following locations; and (4) were released from DHS custody on the following dates:

(# 1) Pedro Bello-Rubio		A [REDACTED]
Resides in: <u>Miami, FL</u>	Arrived on <u>April 1, 2022</u> at <u>San Luis, AZ</u>	
Released from physical custody on: <u>April 1, 2022</u>		
(# 2) Denis Lopez-Perez		A [REDACTED]
Resides in: <u>Miami, FL</u>	Arrived on <u>April 10, 2022</u> at <u>San Luis, AZ</u>	
Released from physical custody on: <u>April 12, 2022</u>		
(# 3) Miguel Alejandro Garcia-Mora		A [REDACTED]
Resides in: <u>Hialeah, FL</u>	Arrived on <u>October 25, 2021</u> at <u>San Luis, AZ</u>	
Released from physical custody on: <u>October 27, 2021</u>		
(# 4) Lismary Lopez-Quintero		A [REDACTED]
Resides in: <u>Hialeah, FL</u>	Arrived on <u>October 25, 2021</u> at <u>San Luis, AZ</u>	
Released from physical custody on: <u>October 27, 2021</u>		
(# 5) L-G-L- (a minor child)		A [REDACTED]
Resides in: <u>Hialeah, FL</u>	Arrived on <u>October 25, 2021</u> at <u>San Luis, AZ</u>	
Released from physical custody on: <u>October 27, 2021</u>		
(# 6) S-G-L- (a minor child)		A [REDACTED]
Resides in: <u>Hialeah, FL</u>	Arrived on <u>October 25, 2021</u> at <u>San Luis, AZ</u>	
Released from physical custody on: <u>October 27, 2021</u>		
(# 7) L-G-L- (a minor child)		A [REDACTED]
Resides in: <u>Hialeah, FL</u>	Arrived on <u>October 25, 2021</u> at <u>San Luis, AZ</u>	
Released from physical custody on: <u>October 27, 2021</u>		
(# 8) C-C-R- (a minor child)		A [REDACTED]
Resides in: <u>Miami, FL</u>	Arrived on <u>November 11, 2021</u> at <u>San Luis, AZ</u>	
Released from physical custody on: <u>November 12, 2021</u>		
(# 9) Alejandro Hernandez-Gomez		A [REDACTED]
Resides in: <u>Miami, FL</u>	Arrived on <u>May 23, 2022</u> at <u>San Luis, AZ</u>	

(# 988) Eduardo Garcia-Perez-de-Oro		A [REDACTED]
Resides in: <u>Coral Gables, FL</u>	Arrived on <u>November 14, 2022</u> at <u>San Luis, AZ</u>	
Released from physical custody on: <u>November 14, 2022</u>		
(# 989) Thalia Caridad Costa-Hernandez		A [REDACTED]
Resides in: <u>Hialeah, FL</u>	Arrived on <u>December 5, 2022</u> at <u>San Luiz, AZ</u>	
Released from physical custody on: <u>December 6, 2022</u>		
(# 990) Leidys Canizares-Caballero		A [REDACTED]
Resides in: <u>Tampa, FL</u>	Arrived on <u>March 17, 2022</u> at <u>Lukeville, AZ</u>	
Released from physical custody on: <u>March 21, 2022</u>		
(# 991) Aleagna Cabrera-Milanes		A [REDACTED]
Resides in: <u>Miami, FL</u>	Arrived on <u>February 11, 2022</u> at <u>Laredo, TX</u>	
Released from physical custody on: <u>February 13, 2022</u>		
(# 992) R-G-C- (a minor child)		A [REDACTED]
Resides in: <u>Miami, FL</u>	Arrived on <u>February 11, 2022</u> at <u>Laredo, TX city</u>	
Released from physical custody on: <u>February 13, 2022</u>		

LEGISLATIVE AND POLITICAL HISTORY

26. “‘Normal’ immigration from Cuba to the United States has not existed since the Cuban Revolution of 1959 brought Fidel Castro to power. For more than 50 years, the majority of Cubans who have entered the United States have done so through special humanitarian provisions of federal law” as part of “a unique set of circumstances [that] is unlike U. S. immigration policy toward any other nation in the world.” Bruno, A., Cong. Research Serv., *U. S. Policy on Cuban Migrants: In Brief*, at 1 (Dec. 16, 2016).¹

27. “[T]he exodus escalated, peaking at approximately 78,000 in 1962. In October of that year, Castro stopped regularly scheduled travel between the two countries, and the risky practice of asylum seekers setting sail from Cuba to Florida began.” Wasem, R. E., Cong. Research

¹ Available at: <https://fas.org/sgp/crs/row/R44714.pdf> (accessed June 19, 2025).

Serv., *Cuban Migration to the United States: Policy and Trends*, at 1 (June 2, 2009).²

28. “[T]he Cubans who arrived in the United States after the Cuban Revolution were paroled in, [and] considered to be refugees fleeing persecution.” Bruno, *supra* n. 1, at 1.

29. With the 1952 “consolidat[ion] [of] previous immigration laws into one statute,” “[t]he parole provision of the Immigration and Nationality Act, section 212(d)(5), [8 U. S. C. § 1182(d)(5),] incorporated into statutory law a provision authorizing the temporary parole of aliens into the United States, which had been an administrative practice of longstanding.” Staff of S. Comm. on the Judiciary, 96th Cong. 2d Sess., *Review of U. S. Refugee Resettlement Programs and Policies* (“Refugee Review”), at 7–8 (Comm. Print 1980).³

30. “Parole has since been used as the primary basis for entry of large numbers of refugees.” Refugee Review, *supra* n. 3, at 8.

31. For example, “[b]etween 1962 and 1979, hundreds of thousands of Cubans entered the United States under the Attorney General’s parole authority.” Wasem, *supra* n. 2, at 1 (footnote omitted).

32. In an attempt to move away from the ad hoc parole process, Congress enacted the “conditional entry provision,” as part of the 1965 move from race-based quotas to “the new immigrant visa preference system for the Eastern Hemisphere,” serving as a formal mechanism to admit refugees and allow them to obtain permanent resident status after two years of physical presence in the United States under another new provision in the INA. Refugee Review, *supra* n. 3, at 11–12.

33. “Cuban refugees . . . began to be paroled in the United States in 1961 when

² Available at: <https://fas.org/sgp/crs/row/R40566.pdf> (accessed June 19, 2025).

³ Available at: <https://files.eric.ed.gov/fulltext/ED206779.pdf> (accessed June 19, 2025).

diplomatic relations between the United States and Cuba were severed. As Western Hemisphere natives, Cubans were not eligible for conditional entry when that provision became law, since it applied only to the Eastern Hemisphere.” Refugee Review, *supra* n. 3, at 13.

34. Further, “[d]uring the mid-1960s, the Immigration and Nationality Act did not permit the adjustment of status of Western Hemisphere natives,” Refugee Review, *supra* n. 3, at 16, meaning that they were required to leave the United States to apply for an immigrant visa — available only to certain specified classes of persons — at a consular post abroad, see 8 U. S. C. § 1201(a)(1)(A).

35. In fact, at the time, “[e]xisting law, section 245(c) of the Immigration and Nationality Act, provide[d] that natives of any country of the Western Hemisphere, or of any adjacent island named . . . , [we]re precluded from applying for adjustment to permanent resident status while in the United States.” H.R. Rep. No. 89-1978, at 2 (1966) (Jud. Comm.).

36. Thus, Congress passed the Cuban Refugee Adjustment Act in 1966 which “enabled Cuban refugees to adjust their status to that of permanent residents” while inside the United States. Refugee Review, *supra* n. 3, at 16; accord Sullivan, M. P., Cong. Research Serv., *Cuba-U. S. Relations: Chronology of Key Events 1959-1999*, at 3 (Dec. 14, 1999) (“The objective was to give Cubans who had fled the island a preferential procedure for seeking permanent residency.”).⁴

37. Early agency precedent established that “this is remedial legislation, such [that] a strict interpretation is to be avoided if it thwarts the congressional intent.” *Matter of Riva*, 12 I. & N. Dec. 56, 58 (Reg. Comm’r 1967).

38. “The purpose of the Act upon which these applications are based is to provide a

⁴ Available at:

https://www.everycrsreport.com/files/19991214_RL30386_714aa7ff79cec8fc7f29926c448f6d1bc1d6bef2.pdf (accessed June 19, 2025).

ready means to permit certain Cuban refugees in the United States to adjust to permanent resident status,” such that a “major objective of this opportunity for adjustment of status was, therefore, to aid in these refugees’ resettlement by enhancing their opportunity to qualify for employment here and in turn reduce the Government’s expenditures in their behalf.” *Matter of Mesa*, 12 I. & N. Dec. 432, 434–45 (Dep. Assoc. Comm’r 1967) (footnote omitted).

39. Permanent residence under the Cuban Refugee Adjustment Act is available even where an applicant was paroled after having already physically entered the United States. *Matter of Rodriguez*, 12 I. & N. Dec. 549 (Reg. Comm. 1967).

40. These policy goals were in addition to the “very firm goal, a very strong desire that Cuba shall be freed from Communist domination and that the Cuban people will, again, be able to enjoy the benefits of freedom, living in a country which is, once more, a member of the free world family of nations.” H.R. Rep. No. 89-1978, at 4 (1966) (Jud. Comm.) (quoting Under Secretary of State George Ball).

41. In the late 1970s, Congress began work on what would become the Refugee Act of 1980, Pub. L. No. 96-212, 94 Stat. 102 (Mar. 17, 1980), in order “to provide a permanent statute revising U. S. refugee admissions policy” that would supplant the “[p]ast U. S. refugee policy [that] was often categorized as being ‘ad hoc,’ ‘piecemeal,’ or ‘stopgap’ in nature.” Refugee Review, *supra* n. 3, at 35.

42. However, the current asylum law adopted by the Refugee Act of 1980, 8 U. S. C. §§ 1101(a)(42), 1158, which is generally applicable to any foreign national or stateless person, is much narrower and inadequate when compared to broader refugee laws designed for specific populations of special concern. See, e. g., *Rocubert-Campo v. U. S. Att’y Gen.*, 2021 WL 3124300 (CA11 July 23, 2021) (affirming denial of Refugee Act asylum to Cuban national who was

repeatedly beaten and threatened by government officials due to his political opinion because substantial evidence supported a finding that this did not amount to persecution).

43. Since then, Cuban nationals continued to seek refuge in the United States, being granted parole through different programs established by the Departments of State and Justice, and then being permitted to pursue lawful permanent residence pursuant to the Cuban Refugee Adjustment Act.

44. Beginning on December 14, 1984, the United States has periodically made agreements with Cuba (part of the overall Migration Accords) in attempts to regularize immigration and repatriation between the two nations.

45. Per a 1994 agreement that is part of the Migration Accords, migrants rescued at sea attempting to enter the United States would not be permitted to enter the United States, but instead would be taken to safe haven facilities outside the United States, with the resumption of the United States accepting some legal migration from Cuba.

46. The new policy of returning Cubans interdicted at sea was a restrictionary measure, offering lesser refuge to Cuban nationals, and was the start of the “wet-foot/dry-foot policy.” Wasem, *supra* n. 2, at 2 (“Until 1995, the United States generally had not repatriated Cubans (except certain criminal aliens on a negotiated list) under a policy established when the government became Communist within two years of the 1959 revolution.”).

47. Effective April 1, 1997, the Congress overhauled many parts of the immigration code with the Illegal Immigration Reform and Immigrant Responsibility Act of 1996 (IIRIRA), Pub. L. No. 104-208, Div. C, Tit. III, Subtit. A, 110 Stat. 3009-546 (Sept. 30, 1996).

48. One of the new changes was the introduction of the expedited removal procedure for noncitizens seeking entry into the United States, disallowing them from accessing the full

process available before an immigration judge except for limited proceedings related to making a claim for asylum. § 302(a), IIRIRA (codified at 8 U. S. C. § 1225(b)(1)).

49. Among the new expedited removal proceedings was a provision that excluded Cuban nationals from its application. 8 U. S. C. § 1225(b)(1)(F) (“Subparagraph (A) shall not apply to an alien who is a native or citizen of a country in the Western Hemisphere with whose government the United States does not have full diplomatic relations and who arrives by aircraft at a port of entry.”); see *Eliminating Exception To Expedited Removal Authority for Cuban Nationals Encountered in the United States or Arriving by Sea*, 82 Fed. Reg. 4902, 4903–04 (Jan. 17, 2017) (describing additional exceptions applied to Cuban nationals relating to prior Federal Register notices which expanded the scope of expedited removal).

50. Section 606(a) of the IRRIRA provided that the Cuban Adjustment Act would remain in force until there is “a determination by the President under section 203(c)(3) of the Cuban Liberty and Democratic Solidarity (LIBERTAD) Act of 1996 (Public Law 104–114) that a democratically elected government in Cuba is in power.” 110 Stat. 3009-695.

51. No such declaration has ever been made.

52. Yet, on January 12, 2017, the Obama administration issued a Joint Statement with the Cuban government, being the latest iteration of the Migration Accords, declaring that it would end the wet-foot/dry-foot policy, thereby subjecting Cuban nationals to normal removal procedures, and that Cuba would begin accepting removals of Cuban nationals.

53. Five days later, the Secretary of Homeland Security announced that 8 U. S. C. § 1225(1)(F) would no longer be applied to Cuban nationals such that “Cuban nationals encountered on or after January 13, 2017 are included in the classes of aliens subject to expedited removal.” *Eliminating Exception To Expedited Removal Authority for Cuban Nationals*

Encountered in the United States or Arriving by Sea, 82 Fed. Reg. 4902, 4904 (Jan. 17, 2017).

54. Documents obtained through a FOIA litigation, *Catholic Charities v. Stein*, 20-cv-23846-BLOOM/Louis (S.D. Fla.), demonstrate that the following classes of persons were to be subjected to physical removal to Cuba:

- a. Cubans interdicted at sea, as had occurred before;
- b. Cubans who left Cuba following the issuance of the Joint Statement who have been outside of Cuba for no more than 4 years (subject to tolling);
- c. Other Cubans accepted by the Cuban government on a case-by-case basis;
- d. Cubans on the 1984 "Mariel List" including an allowance for substitutions of new persons onto the list.

55. However, this agreement essentially became a failure due to extremely low rates of removal to Cuba, as described by a Department of State Report to Congress on Cuban Compliance with the Migration Accords during October 2020.

56. In fact, as demonstrated by documents obtained through the *Catholic Charities* litigation, the Department of State secretly imposed visa sanctions upon Cuban government officials due to Cuba's failure to comply with removal requests.

57. Recently, removal flights to Cuba have resumed, but no public information is available to explain which categories of Cuban nationals are being subjected to removal, pursuant to what agreement, or whether these are just isolated acts against a backdrop of recalcitrance by the Cuban authorities.

LEGAL FRAMEWORK FOR ENTRY AND DETENTION

58. Current immigration law provides for substantially different treatment between foreign nationals who have been "admitted" to the United States, and those who are "applicants for admission."

59. “The terms ‘admission’ and ‘admitted’ mean, with respect to an alien, the **lawful entry** of the alien into the United States after inspection and authorization by an immigration officer.” 8 U. S. C. § 1101(a)(13)(A) (emphasis added).

60. Aside from being “admitted,” a noncitizen may also **lawfully enter** (physically) the United States following inspection and authorization through the process of “parole” that is codified at 8 U. S. C. § 1182(d)(5).

61. But these two concepts are expressly distinguished in that a parole “shall not be regarded as an admission.” § 1182(d)(5)(A); accord § 1101(a)(13)(B) (“An alien who is paroled under section 1182(d)(5) of this title or permitted to land temporarily as an alien crewman shall not be considered to have been admitted.”).

62. This distinction between admission and parole has historical purpose because parole is a method to allow an “inadmissible” foreign national, who has not been formally admitted to the United States, to be at liberty inside the country for a specific purpose within the agency’s discretion. *Leng May Ma v. Barber*, 357 U. S. 185, 190 (1958) (“The parole of aliens seeking admission is simply a device through which needless confinement is avoided while administrative proceedings are conducted.”).

63. Parole is in effect an “enlarge[ment]” from custody. *Id.*, at 189. It preserves the legal fiction that an “entry” has not occurred. *Id.*, at 188 (“For over a half century this Court has held that the detention of an alien in custody pending determination of his admissibility does not legally constitute an entry though the alien is physically within the United States.”) (citations omitted).

64. This fiction arises from the “fundamental distinction between excludable aliens and deportable aliens which permeates our immigration law” which leads to, among other specific

outcomes, a fiction where “[e]xcludable aliens are those who seek admission but have not been granted entry” and are thus “legally considered detained at the border.” *Garcia-Mir v. Smith*, 766 F.2d 1478, 1483–84 (CA11 1985); see also *Jean v. Nelson*, 727 F.2d 957, 969 (CA11 1984) (en banc) (describing the origins of the “entry doctrine fiction”).

65. Therefore, “parolees” are treated as applicants for admission even though they have been lawfully inspected and authorized to physically enter the United States. 8 U.S.C. § 1182(d)(5)(A) (“[W]hen the purposes of such parole shall, in the opinion of the Attorney General, have been served the alien shall forthwith return or be returned to the custody from which he was paroled and thereafter his case shall continue to be dealt with in the same manner as that of any other applicant for admission to the United States.”).

66. Being admitted brings with it important benefits. Some benefits overlap with the benefit of being paroled, while others are available only to persons who have been admitted.

67. Both classes of lawful entrants are treated equally when requesting permanent residence under the Cuban Adjustment Act which is available to Cuban nationals “who ha[ve] been inspected and **admitted or paroled** into the United States.” § 1, CAA, Pub. L. No. 89-732, 80 Stat. 116 (emphasis added).

68. However, whether a noncitizen has been admitted or paroled into the United States can be a crucial distinction.

69. An example of disparate treatment is that an admitted person (unlike a parolee) can only be removed from the United States based on a ground of deportability under 8 U.S.C. § 1227(a), as opposed to a ground of inadmissibility under § 1182(a) which requires a lesser showing to support removal.

70. In contrast, a parolee, who remains subject to inadmissibility under § 1182(a), is

considered an “applicant for admission” under § 1225(a)(1).

71. Parolees are not the only type of “applicant for admission,” as that classification applies to any noncitizen who is “present in the United States without admission or who arrives in the United States (whether or not at a designated port of arrival and including an alien who is brought to the United States after having been interdicted in international of United States waters).” § 1225(a)(1).

72. When an immigration officer encounters an applicant for admission, they must “inspect” the applicant for admissibility. §§ 1225(a)(3), (b).

73. Where doubts regarding admissibility arise during inspection, the immigration statute provides for two different methods of processing.

74. Under § 1225(b)(1), which applies to a limited class of persons defined in §§ 1225(b)(1)(A)(i)–(iii), removal is automatic subject to the ability to request asylum in accordance with the procedures in § 1225(b)(1)(B).

75. Under § 1225(b)(2)(A), which applies to persons who are “applicant[s] for admission” and who are also “seeking admission,” except those “to whom paragraph (1) applies,” § 1225(b)(2)(B)(ii),⁵ removal is pursued via full removal proceedings under § 1229a as generally used against admitted persons, § 1225(b)(2)(A).

76. “Both § 1225(b)(1) and § 1225(b)(2) authorize the detention of certain aliens,” *Jennings v. Rodriguez*, 138 S. Ct. 830, 837 (2018), such that both “§§ 1225(b)(1) and (b)(2) thus **mandate detention** of applicants for admission until certain proceedings have concluded,” *id.*, at 842 (emphasis added). “Until that point, however, nothing in the statutory text imposes any limit on

⁵ Crewman and stowaways are other sub-classes of applicants for admission who are subject to other forms of automatic removal. 8 U. S. C. §§ 1225(a)(2), 1225(b)(2)(B)(i) & (iii), 1282(b), and 1284(c).

the length of detention.” *Id.*

77. “The plain meaning of those phrases is that detention must continue until immigration officers have finished ‘consider[ing]’ the application for asylum, § 1225(b)(1)(B)(ii), or until removal proceedings have concluded, § 1225(b)(2)(A).” *Id.*, at 844. “[T]hey unequivocally mandate that aliens falling within their scope ‘shall’ be detained.” *Id.*; accord *Matter of Q. Li*, 29 I. & N. Dec. 66, 69, n. 4 (BIA 2025) (“Once an alien is detained under section [1225](b), DHS cannot convert the statutory authority governing her detention from section [1225](b) to section [1226](a) through the post-hoc issuance of a warrant.”).

78. And yet, “[r]egardless of which of those two sections authorizes their detention, applicants for admission may be temporarily released on parole ‘for urgent humanitarian reasons or significant public benefit.’ ” *Id.*, at 837 (citing § 1182(d)(5)(A); 8 CFR §§ 212.5(b), 235.3 (2017)); accord *id.*, at 844 (“With a few exceptions not relevant here, the Attorney General may ‘for urgent humanitarian reasons or significant public benefit’ temporarily parole aliens detained under §§ 1225(b)(1) and (b)(2).”) (citing § 1182(d)(5)(A));⁶ see also Procedures for Credible Fear Screening, 87 Fed. Reg. 18078, 18108 (Mar. 29, 2022) (describing “detention capacity” as a “public interest” factor in light of “other noncitizens whose release may pose a greater risk of flight or danger to the community”).

79. In fact, “[t]hat express exception to detention implies that there are no *other* circumstances under which aliens detained under § 1225(b) may be released.” *Id.* (emphasis in original) (citation omitted).

80. In so holding, the Supreme Court was clear in rejecting the suggestion that bond

⁶ Those “few exceptions” limit parole where the § 1157 refugee process is available, and during labor disputes for certain nonimmigrant crewmembers. § 1182(d)(5)(A) (referencing §§ 1182(d)(5)(B) & 1184(f)).

hearings and conditional parole are available to applicants for admission. *Id.*, at 845 (“For example, respondents argue that, once detention authority ends under §§ 1225(b)(1) and (b)(2), aliens can be detained only under § 1226(a). . . . To put it lightly, that makes little sense.”); accord *Matter of Q. Li*, 29 I. & N. Dec., at 69 (“The only exception permitting the release of aliens detained under section 235(b) of the INA, 8 U. S. C. § 1225(b), is the parole authority provided by section 212(d)(5)(A) of the INA, 8 U. S. C. § 1182(d)(5)(A).”)

ALLEGATIONS OF LAW

81. “An alien . . . who arrives in the United States (whether or not at a designated port of arrival . . .) shall be deemed for purposes of this chapter an applicant for admission.” 8 U. S. C. § 1225(a)(1).

82. “[T]he term ‘arriving’ applies to aliens, like the [plaintiffs] ‘who [are] apprehended’ just inside ‘the southern border, and not at a point of entry, on the same day [they] crossed into the United States.’ ” *Matter of Q. Li*, 29 I. & N. Dec. 66, 68 (BIA 2025) (citation omitted) (third and fourth alterations in original).

83. “Thus, the [plaintiffs are] alien[s] ‘who arriv[e] in the United States’ under section 235(a)(1) of the INA, 8 U. S. C. § 1225(a)(1).” *Matter of Q. Li*, 29 I. & N. Dec., at 68 (footnote omitted). Such persons are “ ‘deemed to be “seeking admission” under the immigration laws.’ ” *Id.*, at 6, n. 3 (citing *Matter of Lemus*, 25 I. & N. Dec. 734, 743 (BIA 2012)).

84. “[F]or aliens arriving in and seeking admission into the United States who are placed directly in full removal proceedings [under 8 U. S. C. § 1229a], section 235(b)(2)(A) of the INA, 8 U. S. C. § 1225(b)(2)(A), mandates detention ‘until removal proceedings have concluded.’ ” *Matter of Q. Li*, 29 I. & N. Dec., at 68 (quoting *Jennings v. Rodriguez*, 583 U. S. 281, 299 (2018)) (footnote omitted).

85. “[A]n applicant for admission who is arrested and detained without a warrant while arriving in the United States, whether or not at a port of entry, and subsequently placed in removal proceedings is detained under section 235(b) of the INA, 8 U. S. C. § 1225(b), and is ineligible for any subsequent release on bond under section 236(a) of the INA, 8 U. S. C. § 1226(a).” *Matter of Q. Li*, 29 I. & N. Dec., at 69 (footnote omitted).

86. Removal proceedings under 8 U. S. C. § 1229a commence upon service of a notice to appear under § 1229(a). *Perez-Sanchez v. U. S. Att’y Gen.*, 935 F.3d 1148, 1154 (CA11 2019) (“With respect to the first, Congress’s decision to nest ‘service’ of an NTA under ‘[i]nitiation of removal proceedings’ suggests to us that Congress intended for service of an NTA—not filing—to operate as the point of commencement for removal proceedings.”) (alteration in original) (footnote omitted).

87. “Once an alien is detained under section 235(b), DHS cannot convert the statutory authority governing her detention from section [1225](b) to section [1226](a) through the post-hoc issuance of a warrant.” *Matter of Q. Li*, 29 I. & N. Dec., at 69, n. 4.

88. The only lawful mechanism to explain such a person’s release from custody is parole under 8 U. S. C. § 1182(d)(5). *Matter of Q. Li*, 29 I. & N. Dec., at 69 (“The only exception permitting the release of aliens detained under section 235(b) of the INA, 8 U. S. C. § 1225(b), is the parole authority provided by section 212(d)(5)(A) of the INA, 8 U. S. C. § 1182(d)(5)(A).”) (citing *Jennings*, 583 U. S., at 300).

89. Board precedent, even when it alters prior precedent or prior agency understandings of law, is “entitled to full retroactive effect in all cases still open on direct review, regardless of whether the events predated the [Board]’s decision.” *Yu v. U. S. Att’y Gen.*, 568 F.3d 1328, 1334 (CA11 2009) (citation omitted).

90. Regardless, the Board's precedent in *Matter of Q. Li* only restates what the Supreme Court explained in *Jennings v. Rodriguez*, 583 U. S. 281 (2018), which, being Supreme Court precedent interpreting a statute, is an explanation of what the law has always meant. See *Aspilaire v. U. S. Att'y Gen.*, 992 F. 3d 1248, 1256 (CA11 2021) (“‘[A] judicial construction of a statute is an authoritative statement of what the statute meant before as well as after the decision of the case giving rise to that construction.’”) (quoting *Rivers v. Roadway Express, Inc.*, 511 U. S. 298, 312–13 (1994)).

91. Courts of Appeals and the Board of Immigration Appeals have long held in precedential decisions that whether or not a parole did or did not occur in a given case depends on the application of law to fact, regardless of what the Government's paperwork reflects. *Vitale v. INS*, 463 F. 2d 579 (CA7 1972); *Medina Fernandez v. Hartman*, 260 F. 2d 569 (CA9 1958); *Matter of O-*, 16 I. & N. Dec. 344 (BIA 1977). This tradition, known as the procedural regularity doctrine, is also true in the context of whether an admission has occurred. *Matter of Quilantin*, 25 I. & N. Dec. 285 (BIA 2010); *Matter of Areguillin*, 17 I. & N. Dec. 308 (BIA 1980). There is no authority to the contrary.

92. All of the plaintiffs and the members of the class arrived in the United States and were released from DHS custody, by DHS of its own volition, in the manner contemplated by the terms of *Matter of Q. Li*.

93. Thus, all of the plaintiffs and the members of the class were subject to mandatory detention under 8 U. S. C. § 1225(b)(2)(A) at the time of their release from DHS custody, by DHS of its own volition.

94. Therefore, parole under § 1182(d)(5) is the only lawful explanation for the plaintiffs' and the class members' release from DHS custody, by DHS of its own volition, under these

circumstances.

95. But DHS did not provide the plaintiffs and the members of the class with documentation of their parole from custody, and has been treating them as if they had not been paroled.

96. DHS' failure to provide the plaintiffs and the members of the class with documentation of their parole, and its failure to treat them as having been paroled for all intents and purposes, is unlawful.

97. Additionally, DHS' continued subjection of the plaintiffs and the members of the class to custody under an order of release on recognizance under the auspices of § 1226(a) is unlawful as well.

CLASS ALLEGATIONS

98. Plaintiffs bring this action for themselves, and as a class on behalf of other similarly situated persons pursuant to Federal Rules of Civil Procedure 23(a) and 23(b)(2), and hereby seek to represent the following nationwide class:

All Cuban nationals currently present in the United States:

- (1) who were "applicants for admission" under 8 U. S. C. § 1225(a)(1) at the time of their last physical arrival in the United States;
- (2) who were taken into DHS custody (in the form of physical detention or confinement) within 24 hours of their last physical arrival in the United States;
- (3) who, prior to their subsequent release from physical DHS custody, were subjected to the commencement of direct removal proceedings under § 1229a against them via service of a notice to appear under § 1229(a);
- (4) who were thereafter enlarged or released from physical DHS custody, by DHS of its own volition, into the United States pending a final determination of inadmissibility by an immigration judge in removal proceedings under § 1229a;
- (5) who were not, and have not been, provided with documentation of parole under § 1182(d)(5)(A), and who are being treated as not having been paroled at the time of their release from physical DHS custody;
- (6) who were released from physical DHS custody under, and remain subject to, an order

of release on recognizance purporting to have been issued under the auspices of § 1226(a); and

- (7) who were not processed for expedited removal under § 1225(b)(1), contiguous return under § 1225(b)(2)(C), or reinstatement of removal under § 1231(a)(5), or processed as unaccompanied alien children under 6 U.S.C. § 279 & 8 U.S.C. § 1232, during and between the time of their last physical arrival in the United States and their subsequent release from physical DHS custody as described above; and
- (8) who have not departed from the United States since their release from physical DHS custody.

Numerosity

99. The proposed class meets the requirements of Fed. R. Civ. P. 23(a)(1) because they are so numerous that joinder would be impracticable.

100. Here, 985 plaintiffs have brought the instant action on behalf of themselves and the proposed class.

101. While the true number of potential class members cannot be readily determined without further discovery from the Defendant, the class is sufficiently numerous. *Ibrahim v. Acosta*, 326 F.R.D. 696, 699 (S.D. Fla. 2018) (“While there is no fixed rule, generally a class size less than twenty-one is inadequate, while a class size of more than forty is adequate.”) (citations omitted).

Commonality

102. The proposed classes meet the requirements of Fed. R. Civ. Pro. 23(a)(2) because the members of the class share common issues of law and fact.

103. The common issues of law are whether, under the fact pattern applicable to the class, the release or enlargement of the members of the class from physical DHS custody, by DHS of its own volition, occurred pursuant to the parole authority under 8 U.S.C. § 1182(d)(5) as a matter of law because there is no other legal basis to explain said release or enlargement.

Typicality

104. The requirements of Fed. R. Civ. P. 23(a)(3) are satisfied because the named plaintiffs' claims are typical of those of the proposed class as a whole.

105. The named plaintiffs' claims are typical of the proposed class because they are in the same factual and procedural posture, have suffered the same injury from the same defendant because of the same legal error made by the defendant (not documenting and otherwise treating their releases from physical DHS custody as parole), and their injuries can be remedied by the same relief requested herein.

Adequacy

106. The requirements of Fed. R. Civ. P. 23(a)(4) are met because the named plaintiffs will adequately represent the proposed classes, the remedy they seek will cure the injury of all proposed class members, and the undersigned are qualified to represent the classes.

107. The proposed class also satisfies Fed. R. Civ. P. 23(b)(2) because "the party opposing the class has acted or refused to act on grounds that apply generally to the class, so that final injunctive relief or corresponding declaratory relief is appropriate respecting the class as a whole."

108. Class certification is allowed for habeas claims, even if the All Writs Act is deemed necessary to accomplish class wide relief. See, e.g., *U.S. ex rel. Sero v. Preiser*, 506 F.2d 1115, 1125–26 (CA2 1974); *Bijeol v. Benson*, 513 F.2d 965, 967 (CA7 1975); *Williams v. Richardson*, 481 F.2d 358, 361 (CA8 1973); *Mead v. Parker*, 464 F.2d 1108, 1112–13 (CA9 1972); *Napier v. Gertrude*, 542 F.2d 825, 827 & n.5 (CA10 1976); *LoBue v. Christopher*, 82 F.3d 1081, 1085 (CA DC 1996).

109. Accordingly, class wide core and declaratory habeas relief, and declaratory and injunctive APA relief is appropriate and necessary, and is in the best interests of judicial efficiency.

CLAIMS FOR RELIEF

**COUNT I
HABEAS CORPUS**

110. The allegations in paragraphs 1 through 109 are re-alleged and incorporated herein.

111. The plaintiffs' and the class members' ongoing subjection to orders of release on recognizance under the purported auspices of 8 U. S. C. § 1226(a) amounts to custody cognizable in habeas under 28 U. S. C. §§ 2241, et seq. See *Clements v. Fla.*, 59 F.4th 1204, 1213 (CA11 2023) ("non-citizens released on supervision while awaiting a final decision in their immigration proceedings are deemed to be 'in custody' for purposes of habeas corpus") (citing *Romero v. Sec'y, DHS*, 20 F.4th 1374, 1379 (CA11 2021); and *United States ex rel. Marcello v. Dist. Dir. of INS, New Orleans*, 634 F.2d 964, 971 & n. 11 (5th Cir. 1981) (precedential under *Bonner v. City of Prichard, Ala.*, 661 F.2d 1206, 1207 (CA11 1981) (en banc))); accord *Hensley v. Mun. Ct.*, 411 U. S. 345 (1973) (holding that "a person released on his own recognizance is 'in custody' within the meaning of the federal habeas corpus statute"); *Foster v. Gilbert*, 264 F. Supp. 209, 211–12 (S.D. Fla. 1967) ("the petitioner, having been released from arrest in the custody of his attorney, ... is enough to constitute 'custody' ").

112. In addition to immediate release from custody, "[d]eclaratory and injunctive relief are proper habeas remedies." *Mayorga v. Meade*, No. 24-cv-22131-BLOOM/Elfenbein, 2024 WL 4298815, at *2 (S.D. Fla. Sept. 26, 2024) (citations omitted); accord *Carafas v. LaVallee*, 391 U. S. 234, 239 (1968) ("[T]he statute does not limit the relief that may be granted to discharge of the applicant from physical custody."); *id.* ("The 1966 amendments to the habeas corpus statute seem specifically to contemplate the possibility of **relief other than immediate release** from physical custody.") (emphasis added).

113. Importantly, an order of release from custody is not an injunctive remedy. *Preiser*

v. Rodriguez, 411 U. S. 475, 484 (1973) (“It is clear . . . from the common-law history of the writ, that the essence of habeas corpus is an attack by a person in custody upon the legality of that custody, and that the traditional function of the writ is to **secure release** from illegal custody.”) (emphasis added); compare *Dep’t of Homeland Sec. v. Thuraissigiam*, 591 U. S. 103, 118 (2020) (“Such relief might fit an injunction or writ of mandamus—which tellingly, his petition also requested, *id.*, at 33—but that relief falls outside the scope of the common-law habeas writ.”); *id.* (“the historic role of habeas is to **secure release** from custody”) (emphasis added); see also *Wilkinson v. Dotson*, 544 U. S. 74, 79–80 (2005) (contrasting “an otherwise proper injunction” from “**immediate release or a shorter period of incarceration**”) (emphasis added); *Munaf v. Geren*, 553 U. S. 674, 692 (2008) (contrasting “request[ing] an injunction” from “**seek[ing] ‘release’**”) (emphasis added); contrast *Garland v. Aleman Gonzalez*, 596 U. S. 543, 551 (2022) (addressing “injunctions requiring the Government to provide bond hearings”).

114. The plaintiffs and the proposed class were subject to mandatory detention under 8 U. S. C. § 1225(b)(2)(A) at the time they were physically released from immigration custody via orders of release on recognizance under the purported auspices of 8 U. S. C. § 1226(a).

115. As such, parole under § 1182(d)(5) would have been the only lawful basis to release the plaintiffs and the class members from physical immigration custody, and thus the plaintiffs and the class members are not lawfully subject to orders of release on recognizance under the purported auspices of 8 U. S. C. § 1226(a).

116. Therefore, the plaintiffs and the class members are entitled to a writ (or writs) of habeas corpus immediately releasing them from their orders of release on recognizance, and declaring that they were paroled out of custody, thereby making them subject only to lawful conditions of parole under § 1182(d)(5) and its implementing regulations.

COUNT II
DECLARATORY RELIEF REGARDING
UNLAWFUL WITHHOLDING OF PAROLE DOCUMENTATION

117. The allegations in paragraphs 1 through 109 are re-alleged and incorporated herein.

118. Under 8 CFR § 235.1(h)(2), “[a]ny alien paroled into the United States under section 212(d)(5) of the Act, including any alien crewmember, **shall** be issued a completely executed Form I-94, endorsed with the parole stamp.” (emphasis added).

119. Under § 235.1(h)(2), the defendant has a mandatory, nondiscretionary obligation to provide evidence of parole to persons who have been paroled into the United States.

120. Although the only lawful explanation for the plaintiffs’ and the class members’ release from physical DHS custody, by DHS of its own volition, is via parole under 8 U. S. C. § 1182(d)(5), the defendant failed to provide the plaintiffs and the class members with evidence of their parole out of physical custody as required by 8 CFR § 235.1(h)(2).

121. The plaintiffs and the class members have “suffer[ed] legal wrong,” and have been “adversely affected” and “aggrieved” by the actions of the defendant. 5 U. S. C. § 702.

122. The defendant’s failure to provide the plaintiffs and the class members with evidence of their parole out of physical custody as required by 8 CFR § 235.1(h)(2) amounts to an unlawful withholding of agency action. § 706(1).

123. As such, the plaintiffs and the class members are entitled to declaratory relief, § 703, ruling that their releases from physical DHS custody, by DHS of its own volition, were paroles under 8 U. S. C. § 1182(d)(5)(A), and thus defendant has unlawfully failed to provide the plaintiffs and the class members with evidence of their parole out of physical custody as required by 8 CFR § 235.1(h)(2).

COUNT III
INJUNCTIVE RELIEF REGARDING
UNLAWFUL WITHHOLDING OF PAROLE DOCUMENTATION

124. The allegations in paragraphs 1 through 109 are re-alleged and incorporated herein.

125. Under 8 CFR § 235.1(h)(2), “[a]ny alien paroled into the United States under section 212(d)(5) of the Act, including any alien crewmember, **shall** be issued a completely executed Form I-94, endorsed with the parole stamp.” (emphasis added).

126. Under § 235.1(h)(2), the defendant has a mandatory, nondiscretionary obligation to provide evidence of parole to persons who have been paroled into the United States.

127. Although the only lawful explanation for the plaintiffs’ and the class members’ release from physical DHS custody, by DHS of its own volition, is via parole under 8 U. S. C. § 1182(d)(5), the defendant failed to provide the plaintiffs and the class members with evidence of their parole out of physical custody as required by 8 CFR § 235.1(h)(2).

128. The plaintiffs and the class members have “suffer[ed] legal wrong,” and have been “adversely affected” and “aggrieved” by the actions of the defendant. 5 U. S. C. § 702.

129. The defendant’s failure to provide the plaintiffs and the class members with evidence of their parole out of physical custody as required by 8 CFR § 235.1(h)(2) amounts to an unlawful withholding of agency action. § 706(1).

130. As such, the plaintiffs and the class members are entitled to injunctive relief, § 703, ordering that the defendant provide the plaintiffs and the class members with evidence of their parole out of physical custody as required by 8 CFR § 235.1(h)(2).

131. Further, the plaintiffs and the class members are entitled to injunctive relief, § 703, enjoining the defendant from refusing to recognize that the plaintiffs and the class members have been inspected and paroled into the United States for all intents and purposes.

PRAYER FOR RELIEF

Based upon the foregoing, the plaintiffs pray that the Court grant the following relief:

- (a) Assume jurisdiction over this matter;
- (b) Certify the proposed class, appoint a designated subset of the named plaintiffs as class representatives, and appoint the undersigned as class counsel;
- (c) Order the defendant to identify all class members who were not provided parole at the time of their release from DHS custody;
- (d) Under Count I, issue a writ (or writs) of habeas corpus immediately releasing the plaintiffs and the class members from their orders of release on recognizance, and declaring that they were paroled out of custody, thereby making them subject only to lawful conditions of parole under § 1182(d)(5) and its implementing regulations;
- (e) Under Count II, declare that the plaintiffs' and the class members' releases from physical DHS custody, by DHS of its own volition, were paroles under 8 U.S.C. § 1182(d)(5)(A), and that the defendant has unlawfully failed to provide the plaintiffs and the class members with evidence of their parole out of physical custody as required by 8 CFR § 235.1(h)(2);
- (f) Under Count III, order the defendant to provide the plaintiffs and the class members with evidence of their parole out of physical custody as required by 8 CFR § 235.1(h)(2);
- (g) Under Count III, enjoin the defendant from refusing to recognize that the plaintiffs and the class members have been inspected and paroled into the United States for all intents and purposes;
- (h) Retain jurisdiction over this case to ensure compliance with all of this Court's orders;

- (i) Award costs, and attorney's fees under the Equal Access to Justice Act (EAJA), as amended, 5 U. S. C. § 2412, and on any other basis justified under law; and
- (j) Grant any other and further relief that the Court deems just and proper.

Dated: September 10, 2025

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**VERIFICATION BY SOMEONE ACTING ON THE PLAINTIFFS' BEHALF
PURSUANT TO 28 U.S.C. § 2242**

We, the undersigned, are submitting this verification on behalf of the named plaintiffs because we are their attorneys. We have discussed with the plaintiffs the events described in this petition, reviewed papers and declarations provided by them, and have reviewed Freedom of Information Act productions relating to their immigration files. On the basis of those discussions and reviews, we hereby verify that the statements made in the foregoing Class Action Petition for Writ of Habeas Corpus and Complaint for Declaratory and Injunctive Relief are true and correct to the best of our knowledge.

Dated: September 10, 2025

s/ Claudia Canizares

Fla. Bar No. 98308

s/ Mark Andrew Prada

Fla. Bar No. 91997

s/ Anthony Richard Dominguez

Fla. Bar No. 1002234

Canizares Law Group, LLC

s/ Maitte Barrientos
Fla. Bar No. 1010180
Prada Dominguez, PLLC

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by e-mail, pursuant to consent in writing under Fed. R. Civ. P. 5(b)(2)(E), on September 10, 2025, on all counsel or parties of record on the Service List below.

Dated: September 10, 2025

s/ Mark Andrew Prada
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