IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

LORENZO CARDENAS PEREZ, **Petitioner,**	§	
vs.	§	
KRISTI NOEM, Secretary, U.S. Department of Homeland Security; MIGUEL VERGARA, Field Office Director of Enforcement and Removal Operations, Harlingen and San Antonio Field Offices, Immigration and Customs Enforcement; CARLOS D. CISNEROS, Assistant Field Office Director of Enforcement and Removal Operations, Harlingen Field Office; TODD LYONS, Acting Director, Immigration and Customs Enforcement; NORBAL VASQUEZ, Warden, Rio Grande Processing Center, PAMELA BONDI, U.S. Attorney General, in their official capacities,	§	**Civil Action No. 1:25-cv-181**
Respondents.	§	

SECOND AMENDED PETITION FOR WRIT OF HABEAS CORPUS

INTRODUCTION

1. Petitioner, Lorenzo Cardenas Perez ("Mr. Cardenas"), has resided in the Rio Grande Valley of Texas for nearly three decades where he raised his six children.

2. On August 2, 2025, immigration officials arrested Mr. Cardenas at his worksite in Weslaco, Texas and detained him at Port Isabel Service Processing Center ("PISPC") until approximately August 24, 2025, when they transferred Mr. Cardenas to Rio Grande Processing Center ("RGPC"), where Mr. Cardenas remains today. He is charged in removal proceedings with one ground of inadmissibility – having entered the United States without inspection under 8 U.S.C. § 1182(a)(6)(A)(i). The U.S. Department of Homeland Security ("DHS") refused to set a bond for Mr. Cardenas's release.

3. In accordance with the applicable statute and regulations, Mr. Cardenas sought a bond hearing before the Immigration Judge ("IJ"). 8 U.S.C. § 1226(a) (authorizing arrest, detention, and release on bond); 8 C.F.R. §§ 1003.19, 1236(d)(1) (authorizing requests to immigration judges for bond re-determination). On August 14, 2025, the IJ found jurisdiction for this proceeding, agreed that Mr. Cardenas was eligible for release on bond, and, after individualized consideration of whether Mr. Cardenas poses a flight risk or danger to the community, signed an order requiring that Mr. Cardenas be released upon posting a reasonable bond in the amount of $4,000.00.

4. DHS argued unsuccessfully at the bond hearing that the IJ lacked jurisdiction and Mr. Cardenas is not bond eligible because he is detained pursuant 8 U.S.C. § 1225(b)(2)(A) (authorizing mandatory detention for certain non-citizens). Their argument, and DHS's new policy requiring that certain individuals be treated as subject to mandatory detention, are contrary to the plain language and legislative history of relevant statutes and regulations and even contrary to Respondents' long-standing interpretations of 8 U.S.C. § 1226(a) and 8 U.S.C. § 1225(b)(2). Nonetheless, on August 15, 2025, DHS filed a Notice of ICE Intent to Appeal Custody Determination invoking an automatic stay of the IJ's bond decision. *See* 8 C.F.R. §§ 1003.19(i)(2), 1003.6(c). As a result, Mr. Cardenas remains detained.

5. Mr. Cardenas files this habeas petition pursuant to 28 U.S.C. § 2241 and respectfully requests an order requiring Respondents to release him from custody consistent with the IJ's bond decision.

JURISDICTION

6. Petitioner is in the physical custody of Respondents at RGPC in Laredo, Texas. District courts have jurisdiction to consider habeas petitions from non-citizens who challenge the

lawfulness of their detention. *See Demore v. Kim*, 538 U.S. 510, 516-17 (2003); *Garza-Garcia v. Moore*, 539 F.Supp.2d 899, 903-04 (S.D. Tex. 2007) (courts retain jurisdiction over questions of law regarding statutory authority and regulatory framework).

7. This Court has jurisdiction under 28 U.S.C. §§ 2241 (requiring habeas cases be filed in the "district wherein the restraint complained of is had," not the division) 1331 (federal question), 1651 (All Writs Act), and the U.S. Const. I, § 9, Cl. 2 (Suspension Clause).

8. This Court may grant relief pursuant to 28 U.S.C. §§ 2241, 2201 (Declaratory Judgment Act), and 1651.

VENUE

9. Venue lies in the U.S. District Court for the Southern District of Texas because Mr. Cardenas is detained at RGPC. *See Braden v. 30th Judicial Circuit Court of Kentucky*, 410 U.S. 484, 498 (1973).

10. Venue is also proper in this Court under 28 U.S.C. § 1391 because Respondents are employees, officers, and agencies of the United States, and because a substantial part of the events or omissions giving rise to the claims occurred in this district.

PARTIES

11. Mr. Cardenas is a citizen of Mexico who has resided in south Texas since approximately 1998. On August 2, 2025, immigration officials arrested Mr. Cardenas in Weslaco, Texas and refused to set a bond for his release. At the time of filing of this habeas petition, Mr. Cardenas is detained in Respondents' custody at RGPC in Laredo, Texas.

12. Respondent Kristi Noem is the Secretary of the Department of Homeland Security. She is responsible for the implementation and enforcement of the Immigration and Nationality Act ("INA") and oversees U.S. Immigration and Customs Enforcement ("ICE"), which is responsible

for Petitioner's detention. Ms. Noem has ultimate custodial authority over Petitioner and is sued in her official capacity.

13. Respondent Miguel Vergara is the Director of the Harlingen and San Antonio Field Offices of ICE's Enforcement and Removal Operations division. As such, Respondent Vergara is responsible for Petitioner's detention and removal. He is sued in his official capacity.

14. Respondent Carlos D. Cisneros is the Assistant Director of the Harlingen Field Office of ICE's Enforcement and Removal Operations division. As such, Respondent Cisneros is responsible for Petitioner's detention. He is sued in his official capacity.

15. Respondent Todd Lyons is the Acting Director of ICE. He is responsible for implementation and enforcement of the INA and oversees ICE's Enforcement and Removal Operations division, which is responsible for Petitioner's detention. He is sued in his official capacity.

16. Respondent Norbal Vasquez is the Warden of Rio Grande Processing Center in Laredo, Texas where Petitioner is detained. He is Petitioner's immediate custodian.

17. Respondent Pamela Bondi is the Attorney General of the United States. She is responsible for the Department of Justice, of which the Executive Office for Immigration Review and the immigration court system it operates is a component agency. She is sued in her official capacity.

ARGUMENT AND AUTHORITIES

18. This case concerns two different detention provisions in the INA – 8 U.S.C. § 1226(a) and 8 U.S.C. § 1225(b)(2). Section 1226(a) permits release from detention on bond, while Section 1225(b)(2) makes detention mandatory. The plain language of these provisions confirms that Section 1226(a) applies to Mr. Cardenas, not Section 1225(b)(2).

a. By its plain language, Section 1226(a) applies to Mr. Cardenas.

19. Section 1226(a) applies broadly to anyone who is detained "pending a decision on whether the alien is to be removed from the United States." 8 U.S.C. § 1226(a); *see Jennings v. Rodriguez*, 583 U.S. 281, 289 (2018) (describing Section 1226(a) as the "default rule" and applicable when an individual is "already in the country"). This includes individuals who are "inadmissible" as well as "deportable." *Id.*, at § 1226(c) (excepting certain inadmissible non-citizens from bond procedures in Section 1226(a)).[1] The fact that Section 1226(c) excepts certain inadmissible non-citizens from bond hearings confirms Section 1226(a)'s applicability to other inadmissible non-citizens. To read Section 1226 as inapplicable to allegedly inadmissible non-citizens who entered the United States without inspection and resided in the United States for many years fails to "give independent legal effect to every word and clause in [the] statute." *United States v. Palomares*, 52 F.4th 640, 644 (5th Cir. 2022); *Aguilar Maldonado v. Olson, et al.*, No. 25-cv-3142 (SRN/SGE), 2025 WL 2374411, at *12 (D. Minn. Aug. 15, 2025) (describing the presumption against superfluity when interpreting Section 1226(c) and 1225(b)(2)).

20. In contrast, Section 1225(b)(2) applies to "applicant[s] for admission" who are "seeking admission" to the United States. 8 U.S.C. § 1225(b)(2)(A). This provision is primarily concerned with non-citizens who are "seeking entry into the United States," not individuals who have resided in the United States for decades. *Rodriguez*, 583 U.S. at 297.

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[1] Generally, non-citizens who have previously been legally admitted into the United States – such as Lawful Permanent Residents and some visa holders – are subject to grounds of deportability, *see* 8 U.S.C. § 1227, while non-citizens who have not been legally admitted to the United States are subject to grounds of inadmissibility. 8 U.S.C. § 1182.

21. In the last several weeks, district courts throughout the United States have found that Section 1226(a), including its bond provisions, governs detention of non-citizens whom the Government alleges are inadmissible and who entered the United States without inspection and resided in the country for significant periods of time. *See, e.g., Rodriguez v. Bostock*, 779 F.Supp.3d 1239, 1256-1261 (W.D. Wash. 2025); *Gomes v. Hyde*, No. 1:25-CV-11571-JEK, 2025 WL 1869299, at *2-*8 (D. Mass. July 7, 2025); *Lopez Benitez v. Francis*, No. 25 CIV. 5937 (DEH), 2025 WL 2371588, at *2-*9 (S.D.N.Y. Aug. 13, 2025); *Rocha Rosado v. Figueroa, et al.*, No. CV 25-02157 PHX DLR (CDB), 2025 WL 2337099, at *3-*15 (D. Az. Aug. 11, 2025); *Aguilar Maldonado*, 2025 WL 2374411, at *9-*13 (D. Minn. Aug. 15, 2025).

b. Legislative history and administrative guidance confirm Section 1226(a)'s applicability.

22. The legislative history and relevant administrative guidance also confirm Section 1226(a)'s applicability to Mr. Cardenas. Both Section 1226(a) and 1225(b)(2) were enacted as part of the Illegal Immigration Reform and Immigrant Responsibility Act ("IIRIRA") of 1996, Pub. L. No. 104-–208, Div. C, §§ 302–03, 110 Stat. 3009-546, 3009–582 to 3009–583, 3009–585. Section 1226(a) was most recently amended earlier this year by the Laken Riley Act, Pub. L. No.119-1, 139 Stat. 3 (2025).

23. Prior to the passage of IIRIRA, the statute that authorized detention of non-citizens within the United States pending deportation proceedings included provisions for release of non-citizens on bond. *See* 8 U.S.C. § 1252(a) (1994). Separate "exclusion" proceedings applied to non-citizens "arriving at ports of the United States." 8 U.S.C. §§ 1225, 1226 (1994).

24. Congress enacted the current Section 1226(a) with the passage of IIRIRA and explained that this provision merely "restates the current provisions in [8 U.S.C. § 1252(a) (1994)]

regarding the authority of the Attorney General to arrest, detain, and release on bond a[] [non-citizen] who is not lawfully in the United States." H.R. Rep. No. 104-469, pt. 1, at 229 (1996).[2]

25. At the same time, Congress enacted new detention provisions as part of the expedited removal scheme applicable to non-citizens arriving at or who recently entered the United States. *See* 8 U.S.C. § 1225(b)(1)-(2). The former federal agency charged with implementing IIRIRA clarified that non-citizens who had entered the United States without inspection would be "eligible for bond and bond redetermination" under Section 1226(a). Inspection and Expedited Removal of Aliens, 62 Fed. Reg. 10312, 10323 (Mar. 6, 1997).[3]

c. Respondents' new policy contravenes Section 1226(a).

26. The federal government's long-standing interpretation was that that Section 1226(a) applied to non-citizens who entered the United States without inspection and were later apprehended. *See id.*; *see also* Tr. of Oral Argument at 44:23–45:2, *Biden v. Texas*, 597 U.S. 785 (2022) (No. 21-954)) ("[Solicitor General]: . . . DHS's long-standing interpretation has been that 1226(a) applies to those who have crossed the border between ports of entry and are shortly thereafter apprehended.");[4] *Loper Bright Enter. v. Raimondo*, 603 U.S. 369, 386 (2024) (A "longstanding practice of the government…can inform a court's interpretation of what the law is.") (internal citations omitted).

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[2] *Available at*: https://www.congress.gov/committee-report/104th-congress/house-report/469/1?outputFormat=pdf (accessed Aug. 17, 2025).

[3] *Available at*: https://www.govinfo.gov/content/pkg/FR-1997-03-06/pdf/97-5250.pdf (accessed Aug. 17, 2025).

[4] Full transcript available at: https://www.supremecourt.gov/oral_arguments/argument_transcripts/2021/21-954_m6hn.pdf (accessed Aug. 19, 2025).

27. On or about July 8, 2025, DHS adopted a new policy ("Mandatory Detention Policy") claiming that all people who entered the United States without inspection shall now be deemed "applicants for admission" under 8 U.S.C. § 1225, and subject to mandatory detention under Section 1225(b)(2)(A).[5] Respondent's Mandatory Detention Policy drastically expands who is considered an "applicant for admission" and "seeking admission" under § 1225(b)(2)(A) to anyone inside of the United States, regardless of whether they have applied for admission. *See, e.g., Torres v. Barr*, 976 F.3d 918, 927 (9th Cir 2020) (individual becomes applicant for admission at "the moment in time when the immigrant actually applies for admission to the United States"). It also inexplicably reads "inadmissible" non-citizens out of Section 1226's coverage, stating: "The only aliens eligible for a custody determination and release on…bond…under INA 236(a) during removal proceedings are aliens admitted to the United States and chargeable with deportability under INA § 237…."[6]

28. DHS's Mandatory Detention Policy was issued "in coordination with DOJ," of which EOIR and the BIA are sub-agencies, and the BIA has recently adopted the same erroneous interpretation of Section 1225(b)(2), finding it applicable to non-citizens without an application for admission who have resided in the United States for many years.[7]

d. 8 C.F.R. § 1003.19(i)(2) and 8 C.F.R. §§ 1003.6(c), (d) unlawfully prolong detention.

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[5] *See* Immigration and Customs Enforcement, "Interim Guidance Regarding Detention Authority for Applicants for Admission," July 8, 2025, *available at*: https://www.aila.org/library/ice-memo-interim-guidance-regarding-detention-authority-for-applications-for-admission (accessed Aug. 20, 2025).

[6] *Id.*, at n.6.

[7] *Available at*: https://nwirp.org/our-work/impact-litigation/assets/vazquez/59-1%20ex%20A%20decision.pdf (accessed Aug. 19, 2025).

29. Despite unsuccessfully advocating the erroneous Mandatory Detention Policy before the IJ, Respondents have been able to continue Mr. Cardenas's detention by filing an appeal to the Board of Immigration Appeals ("BIA") pursuant to 8 C.F.R. § 1003.19(i)(2). Exh. 1. The automatic stay lapses if it is not ruled on by the BIA within 90-days from the filing of a notice of appeal. 8 C.F.R. § 1003.6(c)(4). However, the stay may be extended by DHS by seeking a discretionary stay under 8 C.F.R. § 1003.19(i)(1). *See* 8 C.F.R. § 1003.6(c)(5). This filing alone may extend the stay of the IJ's bond order for up to 30-days. *Id.*

30. If the BIA rules in favor of the detained individual, denies a motion for a discretionary stay, or if an automatic stay lapses, the detained individual's release is automatically stayed an additional five business days. 8 C.F.R. § 1003.6(d). During those five business days, DHS may refer the case to the Attorney General which triggers another 15-day automatic stay of release. *Id.* Additionally, the Attorney General may "order a discretionary stay pending the disposition of any custody case by the Attorney General or the [BIA]." *Id.*

31. This regulation creates a substantial risk of erroneous deprivation of liberty interests of people in immigration detention. It confers on Executive agency officials the power to "unilaterally override the immigration judge's decision" and is "anomalous in our legal system…." *Gunaydin v. Trump*, No. 25-CV-01151 (JMB/DLM), 2025 WL 1459154, at *8 (D. Minn. May 21, 2025). 8 C.F.R. § 1003.19(i)(2) and the automatic stay provisions of 8 C.F.R. §§ 1003.6(c) and (d) also omit any individualized consideration of factors relevant to the decision about whether an individual should be detained, further increasing the risk of erroneous deprivation of liberty. *See Aguilar Maldonado v. Olson, et al.*, No. 25-cv-3142 (SRN/SGE), 2025 WL 2374411, at *13 (D. Minn. Aug. 15, 2025); *see also Mayo Anicasio v. Kramer et al.*, No. 4:25-CV3158, 2025 WL 2374224, at *2-*5 (D. Ned. Aug. 14, 2025).

32. Mr. Cardenas has constitutionally protected interests in remaining at liberty during the pendency of his removal proceedings and in the benefit of bond re-determination proceedings available under 8 U.S.C. § 1226(a). *See Hamdi v. Rumsfeld*, 542 U.S. 507, 529 (2004) (freedom from physical restraint "is the most elemental of liberty interests"). He is separated from his family and community and will undoubtedly encounter difficulties preparing defenses to his removal proceedings while detained that he would not experience in the community.

33. There is an unreasonably high risk of erroneous and prolonged detention because Respondents rely on the automatic stay provisions of 8 C.F.R. §§ 1003.19(i)(2) and 1003.6(c). These regulations apply to Mr. Cardenas even though he has demonstrated to an IJ that he is not a significant flight risk or danger to the community such that a reasonable bond is sufficient to secure his release pending the conclusion of removal proceedings. DHS unilaterally invokes this provision, overriding the decision of the neutral arbiter regarding Mr. Cardenas's custody. *See Zavala v. Ridge*, 310 F.Supp.2d 1071, 1078 (N.D. Cal. 2004) (8 C.F.R. § 1003.19(i)(2) "creates a potential for error because it conflates the functions of adjudicator and prosecutor."). Additional procedural safeguards exist to protect Respondents' interest including the IJ's bond determination and additional stay procedures. *See* 8 C.F.R. § 1003.10(i)(1) (authorizing discretionary stay by the BIA).

34. Respondents' interest in securing Mr. Cardenas's attendance at all hearings in his removal proceedings is adequately protected by the IJ's reasonable bond determination and other procedural safeguards. Respondent has no separate interest in prolonging Mr. Cardenas's unlawful detention.

FACTS

35. Mr. Cardenas is a 63 year-old man who first entered the United States in approximately

1998. He has resided in the Rio Grande Valley area of Texas for nearly thirty years. He works in construction and raised his six children – all of whom are now adults – in Texas. ECF Dkt. 8-2 (Decl. of Cardenas).

36. On or about August 2, 2025, Mr. Cardenas was arrested by immigration officials at his worksite. *Id.* DHS refused to set a bond for Mr. Cardenas.

37. A Notice to Appear ("NTA") initiating formal removal proceedings under 8 U.S.C. § 1229a was filed with the Immigration Court on August 2, 2025. ECF Dkt. 8-5 (NTA). The NTA sets out one charge of inadmissibility, that Mr. Cardenas entered the United States without inspection under 8 U.S.C. § 1182(a)(6)(A)(i).

38. Pursuant to 8 C.F.R. § 1236.1(d), Mr. Cardenas requested that the IJ set a bond for his release during the pendency of removal proceedings.

39. On August 14, 2025, the IJ found jurisdiction for a bond determination hearing, conducted a bond hearing consistent with Section 1226(a) and 8 C.F.R. § 1236.1(d), granted Petitioner's request for a bond redetermination, and ordered that he be released from custody under bond of $4,000.00. *See* ECF Dkt. 8-7 (Bond Order).

40. The same day, an attorney with ICE filed a "Notice of Intent to Appeal Redetermination" in Mr. Cardenas's removal proceedings invoking an automatic stay under 8 C.F.R. § 1003.19(i)(2) and 8 C.F.R. § 1003.6(c). *See* ECF Dkt. 8-6 (Notice of Intent to Appeal).

41. Mr. Cardenas remains detained at PISPC and faces the prospect of additional months of detention pending the outcome of his removal proceedings.

EXHAUSTION OF REMEDIES

42. Mr. Cardenas is not required to exhaust remedies before pursuing habeas relief for unlawful detention. *See Fuller v. Rich*, 11 F.3d 61, 62 (5th Cir. 1994) (exhaustion not required

where administrative remedies are unavailable, wholly inappropriate to the relief sought, or where exhaustion would be patently futile).

43. Given that Mr. Cardenas challenges the very regulations permitting a stay of the IJ's bond order as violative of the INA and the Fifth Amendment, it would be wholly inappropriate to deny this habeas petition because Mr. Cardenas sought relief before receiving the BIA's decision regarding his custody.

44. Any appeal to the BIA is futile. DHS's new policy was issued "in coordination with DOJ," which oversees the immigration courts.[8] Further, as noted, the most recent unpublished BIA decision on this issue held that persons like Petitioner are subject to mandatory detention as applicants for admission. Finally, in the *Rodriguez Vazquez* litigation, where EOIR and the Attorney General are defendants, DOJ has affirmed its position that individuals like Petitioner are applicants for admission and subject to detention under § 1225(b)(2)(A). *See* Mot. to Dismiss, *Rodriguez Vazquez v. Bostock*, No. 3:25-CV-05240-TMC (W.D. Wash. June 6, 2025), Dkt. 49 at 27–31.

CLAIMS FOR RELIEF

Count 1 – Violation of the INA

45. Petitioner incorporates by reference the allegations of fact set forth in the preceding paragraphs.

46. The mandatory detention provision at 8 U.S.C. § 1225(b)(2) does not apply to all noncitizens residing in the United States who are subject to the grounds of inadmissibility. As relevant here, it does not apply to those who previously entered the country and have been residing in the United States prior to being apprehended and placed in removal proceedings by

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[8] *Supra*, at n.6.

Respondents. Such noncitizens are detained under § 1226(a), unless they are subject to § 1225(b)(1), § 1226(c), or § 1231.

47. The application of § 1225(b)(2) to Petitioner unlawfully mandates his continued detention is *ultra vires* and violates the INA.

48. The automatic stay provisions of 8 C.F.R. § 1003.19(i)(2) and 8 C.F.R. §§ 1003.6(c) and (d) effectively eliminate the IJ's individualized bond redetermination decision and permits mandatory detention of a new class of non-citizens whom Congress saw fit to make eligible for bond under 8 U.S.C. § 1226(a).

49. To the extent automatic stay provisions of 8 C.F.R. § 1003.19(i)(2) and 8 C.F.R. §§ 1003.6(c) and (d) provide the basis for Mr. Cardenas's ongoing detention these regulations violate the INA, are *ultra vires*, and are invalid.

Count 2 – Violation of Due Process

50. Petitioner incorporates by reference the allegations of fact set forth in the preceding paragraphs.

51. The government may not deprive a person of life, liberty, or property without due process of law. U.S. Const. amend. V. "Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that the Clause protects." *Zadvydas v. Davis*, 533 U.S. 678, 690, 121 S.Ct. 2491, 150 L.Ed.2d 653 (2001). Petitioner has a fundamental interest in liberty and being free from official restraint.

52. Denying Mr. Cardenas release upon posting of a reasonable bond as determined by the IJ pursuant to 8 U.S.C. § 1226(a) and prolonging his detention pursuant to an inapplicable statute, 8 U.S.C. § 1225(b)(2), violates procedural and substantive due process.

53. Denying Mr. Cardenas's release by relying on the automatic stay provisions set out in 8 C.F.R. § 1003.19(i)(2) and 8 C.F.R. §§ 1003.6(c) and (d) violates procedural and substantive due process. To the extent 8 C.F.R. § 1003.19(i)(2) or 8 C.F.R. §§ 1003.6(c) or (d) provide the basis for Mr. Cardenas's ongoing detention the regulations violate due process and are invalid.

RELIEF REQUESTED

Petitioner requests that this Court grant the following relief:

A. Assume jurisdiction over this matter;

B. Order Respondents to timely respond to this petition in accordance with 28 U.S.C. § 2243;

C. Issue a writ of habeas corpus requiring that Respondents release Petitioner from custody or, alternatively, requiring that Respondents release Petitioner from custody in accordance with the terms set out in the Immigration Judge's August 14, 2025, bond order;

D. Award Petitioner attorney's fees and costs under the Equal Access to Justice Act ("EAJA"), as amended, 28 U.S.C. § 2412, and on any other basis justified under law; and

E. Grant any other and further relief that this Court deems just and proper.

Dated: August 24, 2025.

Respectfully submitted

/s/ Carlos M. Garcia

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

As of the date of filing, Respondents and their counsel have not appeared. Counsel for Petitioner will deliver a copy of the foregoing Second Amended Petition for Writ of Habeas Corpus by certified mail to Respondents along with the summons and petition and any other documents required to be served issued by the Court.

/s/ Peter McGraw
Peter McGraw

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States that the statements included in "FACTS" section of my Petition for Writ of Habeas Corpus and the foregoing declaration are true and correct.

Dated: August 19, 2025

Lorenzo Cardenas Perez
LORENZO CARDENAS PEREZ

CERTIFICATE OF INTERPRETATION

I certify that I am proficient in both Spanish and English and capable of interpreting the foregoing declaration and the Petition for Writ of Habeas Corpus. On August 19, 2025, I interpreted the foregoing declaration and the "FACTS" section of the Petition for Writ of Habeas Corpus from English into Spanish for Lorenzo Cardenas Perez who indicated to me that he understood the statement and that each of the statements contained therein are true and correct.

CARLOS GARCIA