

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

Iverson Esmaycol MEJIA-JUAREZ,
Petitioner,

v.

Pamela BONDI, Attorney General;
Kristi NOEM, Secretary,
Department of Homeland Security;
Bret BRADFORD, Field Office
Director, Immigration and Customs
Enforcement;
Defendants.

No. _____

Alien No. A 

PETITION FOR WRIT OF HABEAS CORPUS
AND COMPLAINT FOR INJUNCTIVE
AND DECLARATORY RELIEF

COMES NOW, IVERSON ESMAYCOL MEJIA JUAREZ, Petitioner, by and through his counsel, ROBERT K. HOFFMAN, in the above-styled and numbered cause, and petitions this Honorable Court for a writ of habeas corpus and injunctive relief to remedy his indefinite detention, in violation of the laws and regulations of the United States. In support of this petition and complaint for injunctive relief, Petitioner would show unto the court the following:

1. Petitioner Iverson Esmaycol MEJIA-JUAREZ is in the physical custody of the Department of Homeland Security (DHS) - Immigration and Customs Enforcement (ICE) by order of Field Office Director Bret Bradford, detained at the Montgomery Processing Center, 806 Hilbig Rd., Conroe, Texas, a facility contracted by ICE to hold immigration detainees. See Exhibit 1. He has been detained at that facility by Defendants since May 30, 2025, approximately.

I. PARTIES

2. Petitioner Iverson Esmaycol MEJIA-JUAREZ is a native and citizen of Guatemala. The Department of Health and Human Services (HHS) denoted that the minor's legal name is an alias and that his actual name is "Everson Mejia Juarez." See Exhibit 3. However, his identity document from his country of origin lists his legal name as Iverson Esmaycol MEJIA-JUAREZ. The ICE Online Detainee Locator denotes the name provided by HHS. The Petitioner's legal name is accurately denoted as Iverson Esmaycol MEJIA-JUAREZ in all Department of Justice documents and correspondence.
3. Defendant Bret BRADFORD is the Field Office Director for Detention and Removal with Immigration and Customs Enforcement (ICE) and administers the immigration laws on behalf of the Secretary of the Department of Homeland Security (DHS) and the Attorney General, and as such has immediate control and custody of the Petitioner. He is sued in his official capacity only.
4. Defendant, Kristi NOEM, is the Secretary of the Department of Homeland Security (DHS). She is responsible for the administration,

implementation and enforcement of the immigration laws and is a legal custodian of the Petitioner. 8 USC § 1103(a). She is sued in her official capacity only.

5. Defendant, Pamela BONDI, is the Attorney General of the United States, and is authorized by law to administer and enforce the immigration laws pursuant to 8 USC § 1103(g). She is sued in her official capacity only.

II. JURISDICTION AND VENUE

6. This action arises under Article 1, Section 9, Clause 2 of the Constitution of the United States, 28 U.S.C. § 2241(c) (the codification of the Great Writ), 28 U.S.C. § 1651 (All Writs Act), 28 U.S.C. § 1331 (federal question jurisdiction), the Immigration and Nationality Act (I.N.A.), 8 U.S.C. § 1101 et seq., and the Administrative Procedures Act (A.P.A.), 5 U.S.C. § 701 et seq.
7. This Court has jurisdiction to consider this petition pursuant to 28 U.S.C. § 2241, Art. I § 9, cl. 2 of the United States Constitution (Suspension Clause), and 28 U.S.C. § 1331, as the Petitioner is presently in the physical custody under color of the authority of the United States, and such custody is in violation of the Constitution, laws or treaties of the United States. *See INS v. St. Cyr*, 533 US 289 (2001); *Zadvydas v. Davis, et. Al.*, 533 US 678; *Heikkila v. Barber*, 345 US 229 (1953); *Felker v. Turpin*, 518 US 651 (1996). This Court may grant relief pursuant to 28 U.S.C. § 2241, the A.P.A., the

Declaratory Judgment Act, 28 U.S.C. § 2201 et seq., and the All-Writs Act, 28 U.S.C. § 1651.

8. Venue lies in the United States District Court for the Southern District of Texas, the judicial district in which Defendant BRADFORD, Field Office Director, ICE, is located, and it is the District in which a substantial part of the events or omissions giving rise to the claim occurred, including the facility in which the Petitioner is currently detained. 28 U.S.C. § 1391(e).

III. CASE AND PROCEDURAL HISTORY

9. Petitioner, IVERSON ESMAYCOL MEJIA-JUAREZ (hereinafter MEJIA-JUAREZ) entered the United States without inspection on or about April 15, 2021, as a 16-year-old minor. He was detained at entry, designated an Unaccompanied Alien Child (UAC) and subsequently referred to Health and Human Service's Office of Refugee Resettlement (ORR) per the William Wilberforce Trafficking Victims Protection Reauthorization Act (TVPRA) and the Flores Settlement agreement. See generally 8 U.S.C. § 1232 (c)(2); Flores, *et al. v. Reno*, Case No. CV 85-4544-RJK (C.D. CA, 1997) (available at https://cliniclegal.org/sites/default/files/attachments/flores_v._reno_settlement_agreement_1.pdf.) ORR subsequently released MEJIA-JUAREZ to his Maternal Aunt, Liliana Mariny Juarez Vasquez.
10. The Petitioner was arrested for the offense of Driving While Intoxicated, in Brazos County, Texas. Upon release from custody from Brazos County, he was transferred to the custody of ICE, where he remains today.

11. On July 18, 2025, the Immigration Judge ordered his release upon payment of a \$8,000 bond after full consideration of the evidence presented. See Exhibit 2. Whereas no appeal was reserved by Respondent, the Department of Homeland Security (DHS) reserved appeal.
12. On July 24, 2025, DHS filed an appeal with the Board of Immigration Appeals (BIA), the entity with jurisdiction over adverse decisions by the Immigration Judge. The appeal remains pending.
13. While the Petitioner does not have access to DHS's brief in support of their appeal of the grant of bond, the appeal is likely premised on a novel interpretation of the regulatory/statutory framework of the INA. (See Generally *Matter of Q. Li*, 29 I&N Dec. 66 (BIA 2025)) Discussed supra.
14. Subsequent to the granting of bond by the Immigration Judge, the family of the Petitioner attempted to post bond with ICE on various occasions, both before and after ICE filed their appeal with the BIA.
15. Immigration bonds can be paid at ICE Field Offices or online at cebonds.ice.gov. The person paying the bond (the obligor) must be either a U.S. citizen or legal permanent resident.
16. The Petitioner was not afforded an opportunity to post bond prior to the filing of DHS's appeal and thereby was not afforded the opportunity to avail himself of the least restrictive setting as he is confined to a setting where his freedom of movement is most severely limited. Specifically, such attempt to post bond was made on July 21, 2025.
17. Despite a statutory obligation, under the TVPRA, to hold the Petitioner, a person designated a UAC, in the "least restrictive

setting.” ICE refused to accept the bond and continues to hold the Petitioner in violation of the order of the Immigration Judge and *ultra vires* to the statutory framework. See 8 U.S.C. § 1232 (c)(2)(B)

IV. EXHAUSTION OF REMEDIES

18. A person seeking habeas relief must first exhaust available administrative remedies. *Hinojosa v. Horn*, 896 F.3d 305, 314 (5th Cir. 2018). “The exhaustion of administrative remedies doctrine requires not that only administrative remedies selected by the complainant be first exhausted, but instead that all those prescribed administrative remedies which might provide appropriate relief be pursued prior to seeking relief in the federal courts.” *Id.* at 314 (quoting *Hessbrook v. Lennon*, 777 F.2d 999, 1003 (5th Cir. 1985), *abrogated on other grounds by* *McCarthy v. Madigan*, 503 U.S. 140, 112 S. Ct. 1081, 117 L. Ed. 2d 291 (1992), *superseded by statute on other grounds, Woodford v. Ngo*, 548 U.S. 81, 126 S. Ct. 2378, 165 L. Ed. 2d 368 (2006); *see also* *Lee v. Gonzales*, 410 F.3d 778, 786 (5th Cir. 2005) (“[A] petitioner must exhaust available avenues of relief and turn to habeas only when no other means of judicial review exists.”).
19. Conversely, “[e]xceptions to the exhaustion requirement are appropriate where the available administrative remedies either are unavailable or wholly inappropriate to the relief sought, or where the attempt to exhaust such remedies would itself be a patently futile course of action.” *Fuller v. Rich*, 11 F.3d 61, 62 (5th Cir. 1994) (*per curiam*) (quoting *Hessbrook*, 777 F.2d at 1003); *Hinojosa*, 896 F.3d at

315 (finding that procedures provided a basis for the Plaintiffs to rectify the wrongful determination that they are not citizens, so they could not show that pursuing such remedies would be futile); *Fuller* F.3d at 62 (finding that the Plaintiff could not show his appeal would be futile as Plaintiff did not file an appeal even though it was untimely).

20. There is no administrative remedy to compel DHS to place a detainee in the least restrictive setting. There is no administrative remedy to compel DHS to allow the Petitioner to post bond.
21. Had the Petitioner's bond been denied by the Immigration Judge, Petitioner would have pursued an appeal with the Board of Immigration Appeals. 8 C.F.R. § 1236.1 (d)(1). However, the Petitioner's attempt to exhaust such remedies would be a patently futile course of action since the Petitioner's bond was already granted by the Immigration Judge, yet his release has been thwarted by ICE's refusal to accept the payment of the bond.
22. The Petitioner has exhausted his administrative remedies to the extent required by law, and his only remedy is by way of this habeas petition. He has sought release through the administrative procedures established by regulation and has obtained an order granting his release on bond. Notwithstanding the final order of the Immigration Judge, Defendant BRADFORD refuses to accept the bond ordered by the Judge and release the Petitioner. The Petitioner challenges the constitutionality of the Defendant's actions, and the government's interpretation of the relevant statutes. He is being detained indefinitely, at the whim of the agency.

23. Assuming *arguendo* that the Petitioner has failed to exhaust his administrative remedies, the Petitioner should be exempt from complying with the exhaustion of administrative remedies doctrine as his continued detention, in spite of his vested liberty interest, will result in irreparable harm (i.e. loss of liberty) and/or such administrative remedies would be futile and/or there are constitutional questions that cannot be resolved through the administrative process.

V. PETITIONER'S LIBERTY INTEREST

24. Petitioner remains detained contrary to statutory mandate and pursuant to the unilateral decision of the Defendants, despite the approval of a bond request by an Immigration Judge.
25. Under the William Wilberforce Trafficking Victims Protection Reauthorization Act (TVPRA), an unaccompanied alien child (UAC) shall be promptly placed in the least restrictive setting that is in the best interest of the child. *See* 8 U.S.C. § 1232(c)(2)(B).
26. Although the Petitioner is no longer a minor, his designation as unaccompanied alien child remains intact since it has not been previously revoked and he is a class member under the *J.O.P. v. DHS settlement agreement* that was rendered on November 25, 2024. *J.O.P v. DHS*, No. 8:19-CV-01944-SAG (D. Md).
27. This settlement agreement was the result of a disagreement whether a UAC maintained that designation after reaching the age of 18 or being reunified with a parent. DHS claimed that it lacked initial jurisdiction over an asylum application filed by a child in removal proceedings who had previously been determined to be a UAC and who applied

for asylum after turning 18 or reunifying with a parent or legal guardian and so rejected such an asylum application. *Id.* DHS also claimed that a child previously determined to be a UAC would be subject to the one-year deadline for filing asylum applications—a deadline from which UACs are statutorily exempt—if they applied for asylum after turning 18 or reunifying with a parent or a legal guardian. *Id.*: 8 C.F.R. § 208.4(a)(5).

28. In the *J.O.P. v. DHS settlement agreement*, DHS agreed that it would accept jurisdiction over asylum applications filed by class members who had previously been determined a UAC and were no longer 18 years old or had reunified with a parent or legal guardian. *Id.* In addition, DHS agreed to hold such applications exempt from the one-year deadline requirement that holds that an applicant must file their asylum application within 1 year after the date of the alien's arrival in the United States. *Id.*; 8 U.S.C. §1158(a)(2)(B). Thus, if a class member, the UAC status continues even after turning 18 years old or being reunified with a parent.
29. An individual is a class member under this settlement agreement if before February 24, 2025, they (1) were determined to be a UAC; and (2) who filed an asylum application that was pending with the U.S. Citizenship and Immigration Services (USCIS); and (3) on the date they filed their asylum applications with USCIS, were 18 years of age or older, or had a parent or legal guardian in the United States who is available to provide care and physical custody; and (4) for whom USCIS has not adjudicated the individual's asylum application on the merits. *Id.* An unaccompanied alien child is someone who is under 18 years old without lawful immigration status and does not have a parent

or legal guardian in the United States available to provide care and physical custody. 6 U.S.C. § 279(g)(2).

30. Here, the Petitioner was determined to be a UAC because he entered the United States on April 15, 2021, when he was 16 years old and did not have a parent or legal guardian to provide care and physical custody. See Exhibits 2 and 3. The Petitioner's UAC status is evidenced by both the Office of Refugee Resettlement (ORR) Verification of Release (VRF) Form and the Immigration Judge's order, which states the Petitioner entered as a UAC. See Exhibit 2 and Exhibit 3.
31. The Petitioner filed an asylum application that continues to be pending with USCIS (Form I-589 Receipt number ZHN2358843350). See Exhibit 4. The Petitioner filed his asylum application on April 7, 2023, when he was 18 years and 9 days old. See Exhibit 4. Lastly, USCIS has not adjudicated the Petitioner's asylum application. See Exhibit 4. As such, the Petitioner is a class member under the *J.O.P. v. DHS settlement agreement*, and his UAC designation remains intact.
32. Under the terms of the *J.O.P. v. DHS settlement agreement* DHS is foreclosed from arguing that the Petitioner is not UAC if the UAC is a *J.O.P.* class member. As established above, the Petitioner is a class member, so his UAC designation remains in effect despite the fact that he is over the age of 18. Any argument by DHS that the Petitioner is not a UAC would violate the terms of the agreement thereby subjecting it to further legal action.

33. The Petitioner is being deprived of his TVPRA liberty interest as he is not in the least restrictive setting while he is detained with ICE despite his UAC status.
34. It is a violation of the Petitioner's ongoing liberty interest that DHS's appeal be permitted to run its course while the Petitioner remains in the most restrictive setting possible: federal detention.
35. DHS's overly broad interpretation of the statutory/regulatory scheme entails holding every non-citizen who entered without inspection subject to mandatory detention with no opportunity to be released on bond. Such interpretation is contrary to BIA precedent (*Matter of Akhmedov*, 29 I&N Dec. 166 (BIA 2025)), contrary to Congressional intent (See Generally, Public Law 119-1; The Laken-Riley Act) and decades of contrary interpretation and the Petitioner should be allowed to post bond and avail himself of his constitutional right to liberty during deportation proceedings. *Doherty v. Barr*, 503 US 901 (1992)(finding that even aliens unlawfully present in the US have a "substantive due process right to liberty during deportation proceedings.")
36. In *Matter of Akhmedov*, the BIA's position is that those who entered unlawfully are necessarily detained under 8 U.S.C. § 1226, which gives an Immigration Judge discretion to grant a bond to a detainee. DHS, however, paints with a broad brush and holds that anyone who enters without inspection is subject to 8 U.S.C. § 1225, a much more stringent provision under which immigration judges lack jurisdiction to grant bond.
37. DHS's position that all non-citizens who enter without inspection are subject to mandatory detention and thus ineligible for bond would run

contrary to Congressional intent as it would make the Laken-Riley Act unnecessary and superfluous. Congress would have had no need to carve out an exception that excludes non-citizens who entered without inspection *and* have been charged with a theft or assault offenses from requesting bond if *everyone* who entered unlawfully was ineligible for bond, thus demonstrating congressional intent that those who entered without inspection are eligible for bond under 8 U.S.C. § 1226.

38. Should the Board of Immigration Appeals favor the Department of Homeland Security's appeal, ICE should have no difficulty in detaining the Petitioner as the Immigration Judge has already determined that he is neither a flight risk nor a danger to society. See Exhibit 2.

V. STATUTORY AND CONSTITUTIONAL FRAMEWORK

39. The Due Process Clause of the Fifth Amendment provides that “[n]o person shall be...deprived of life, liberty, or property, without due process of law.” U.S. Const. Amend. V. “Freedom from bodily restraint has always been at the core of the liberty protected by the Due Process Clause from arbitrary governmental action.” *Foucha v. Louisiana*, 504 US 71, 80 (1992). See also *St. John v. McElroy*, 917 F. Supp. 243, 250 (S.D.N.Y. 1996)(“[T]he private interest affected is St. John’s liberty interest, which is of the highest constitutional import.”); *Doherty v. Barr*, 503 US 901 (1992)(finding that even aliens unlawfully present in the US have a “substantive due process right to liberty during deportation proceedings.”)

40. Substantive due process requires that detention authorized for non-punitive purposes not be “excessive in relation to the regulatory goal Congress sought to achieve.” *United States v. Salerno*, 481 US 739, 747 (1987). Government detention violates the Due Process Clause unless it is ordered in a criminal proceeding with adequate procedural safeguards, or in certain special and non-punitive circumstances “where a special justification...outweighs the individual’s constitutionally protected interest in avoiding physical restraint.” *Kansas v. Hendricks*, 521 US 346, 356 (1997).
41. Even if the Petitioner’s continued detention did not violate his constitutional right to substantive due process, his continued detention violates his constitutional right to procedural due process. The Petitioner has been indefinitely deprived of his liberty by the unilateral decision of an ICE official without being heard at a meaningful time and in a meaningful manner. *Matthews v. Eldridge*, 424 US 319, 334 (1976).
42. This Honorable Court must consider three factors in analyzing a violation of procedural due process claim: 1) the nature of the private interest affected by the government action; 2) the risk of an erroneous deprivation of the interest as a result of the procedures used and the probable value of additional or substitute safeguards; and, 3) the government’s interest in using its own procedures and the fiscal and administrative burdens by additional or substitute safeguards. *Matthews, supra* at 335.
43. The private interest here is the right to be free from detention for a potentially indefinite period of time in the absence of any removal proceeding. Freedom from government custody or detention “lies at

the heart of the liberty” that due process protects. *Zadvyas, supra* at 690. The Defendants have failed to demonstrate that Petitioner presents an identified and articulable threat to the community, or a flight risk, so as to justify his continued detention.

44. The risk of an erroneous deprivation of his liberty interest is substantive and grave considering that he has been in ICE custody for over two months already, and that the Defendants have refused to accept a valid order granting release on bond at an administrative hearing. The value of additional and substitute safeguards is nil, as they continue to detain him indefinitely.
45. The government’s interest in using its own procedures and the fiscal and administrative burdens by additional or substitute safeguards is not particularly relevant as the government’s fiscal and administrative burdens are actually higher while the Petitioner is detained than they would otherwise be if he was released.

VI. REQUEST FOR INJUNCTIVE RELIEF

46. For all the reasons outlined, *supra*, which are incorporated and re-urged herein as if fully set forth verbatim, the Petitioner respectfully requests injunctive relief in the form of the entry of an order enjoining the Defendants from further and continuing detention of the Petitioner, absent a new basis for such detention arising subsequent to this action, and independent of his manner of entry to the United States.
47. This injunction is necessary as Defendants have shown themselves unwilling to abide by orders granting the Petitioner bond under their own administrative framework.

VII. REQUEST FOR DECLARATORY RELIEF

48. For all the reasons outlined, *supra*, which are incorporated and re-urged herein as if fully set forth verbatim, the Petitioner respectfully requests declaratory relief in the form of the entry of a decree which specifies the rights and liabilities of the parties to the instant litigation. The Petitioner also requests that this Honorable Court retain continuing jurisdiction over this civil action and that, after reasonable notice of hearing and hearing had, it enter any further declaratory, mandatory, or other injunctive order that is necessary to enforce any declaratory judgment. 28 U.S.C. § 22.02.

VIII. REQUEST FOR ATTORNEY FEES AND COSTS

49. The Petitioner is entitled to recover reasonable attorney's fees and costs of court, both of which he respectfully requests under the Equal Access to Justice Act. 28 U.S.C. § 2412. The position of the Defendants herein is not substantially justified, and no circumstances exist which would render an award of fees and costs unjust. 28 U.S.C. § 2412(d)(1)(A).

IX. PRAYER

50. WHEREFORE, PREMISES CONSIDERED, in view of the arguments and authority noted herein, Petitioner respectfully prays that the Defendants be cited to appear and answer herein and that, upon due consideration, this Honorable Court:

- (a) grant Petitioner's petition for writ of habeas corpus and issue a declaratory judgment stating that Defendants' continuing detention of the Petitioner is arbitrary and capricious, clearly contrary to law, and in excess of statutory jurisdiction, and that Petitioner be released on recognizance, or in the alternative, permitted to post the bond as per the administrative judge's order and released forthwith;
- (b) issue an order enjoining Defendants from further, continuing detention of the Petitioner absent new cause arising subsequent to this action and not dependent upon his status at entry to the United States;
- (c) retain jurisdiction over this civil action to the extent necessary to ensure the entry of any declaratory, injunctive, or mandatory order that may be necessary or proper to enforce any declaratory judgment;
- (d) award Petitioner reasonable attorney's fees and costs; and
- (e) grant such other relief at law and in equity as justice may require.

Respectfully submitted,

/s/Robert K. Hoffman

Robert K. Hoffman
Rushton Hoffman and Associates, PLLC
Attorneys for Petitioner
Texas Bar No. 24073807
5909 West Loop S., Ste. 150
Bellaire, TX 77401
(713)838-8500
(713)838-9826 Fax

LIST OF ATTACHMENTS

Exhibit	Description
1	ICE Online Detainee Locator Printout
2	Order of the Immigration Judge granting bond
3	Verification of Release
4	Receipt of I-589 – Application for Asylum and for Withholding of Removal
5	Petitioner's Passport Biographic Page

8/19/25, 11:16 AM

search

Official Website of the Department of Homeland Security



Report

Main Menu

Search Results: 1

EVERSON MEJIA-JUAREZ

Country of Birth : Guatemala

A-Number [REDACTED]

Status : In ICE Custody

State: TX

Current Detention Facility: MONTGOMERY PROCESSING CTR (IHSC)

** Click on the Detention Facility name to obtain facility contact information*

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1/2

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UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
CONROE IMMIGRATION COURT

Respondent Name:

MEJIA-JUAREZ, IVERSON ESMAYCOL

To:

Leon, Laura Patricia
1716 Briarcrest Drive
Suite 860
Bryan, TX 77802

A-Number:



Riders:

In Custody Redetermination Proceedings

Date:

07/18/2025

ORDER OF THE IMMIGRATION JUDGE

The respondent requested a custody redetermination pursuant to 8 C.F.R. § 1236. After full consideration of the evidence presented, the respondent's request for a change in custody status is hereby ordered:

☐ Denied, because

☒ Granted. It is ordered that Respondent be:

☐ released from custody on his own recognizance.

☒ released from custody under bond of \$ 8,000.00

☒ other:

Respondent not a flight risk or a danger to society.

☒ Other:

Respondent entered as a UAC and was processed under Section 237.



Immigration Judge: D'ANDREA, HOLLY 07/18/2025

Appeal: Department of Homeland Security: ☐ waived ☒ reserved
Respondent: ☒ waived ☐ reserved
Appeal Due: 08/18/2025

Certificate of Service

This document was served:

Via: [M] Mail | [P] Personal Service | [E] Electronic Service | [U] Address Unavailable

To: [] Noncitizen | [] Noncitizen c/o custodial officer | [E] Noncitizen's atty/rep. | [E] DHS

Respondent Name : MEJIA-JUAREZ, IVERSON ESMAYCOL | A-Number : 

Riders:

Date: 07/18/2025 By: CANFIELD, ELISE, Court Staff

Department of Homeland Security
U.S. Citizenship and Immigration Services

Form I-797C, Notice of Action

THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.



 Received Date: 04/07/2023 Notice Date: 04/10/2023		Priority Date: Page: 1 of 1	Case Type: 1589 - APPLICATION FOR ASYLUM AND FOR WITHHOLDING OF REMOVAL Applicant: MEJIA JUAREZ, IVERSON ESMAYCOL
IVERSON MEJIA JUAREZ c/o LAURA LEON LAURA LEON LAW PLLC 1716 BRIARCREST DR STE 860 BRYAN TX 77802			Notice Type: Receipt Notice

We have mailed an official notice about this case (and any relevant documentation) according to the mailing preferences you chose on Form G-28, Notice of Entry of Appearance as Attorney or Accredited Representative. This is a courtesy copy, not the official notice.

What the Official Notice Said

*** ACKNOWLEDGEMENT OF RECEIPT ***

Your complete Form I-589, Application for Asylum and for Withholding of Removal was received and is pending as of 04/07/2023.

You may remain in the U.S. until your asylum application is decided. If you wish to leave while your application is pending, you must obtain advance parole or, for Temporary Protected Status (TPS) recipients, approval of Form I-512T, Authorization for Travel by a Noncitizen to the United States (sometimes referred to as MTINA TPS travel authorization), from USCIS. If you change your address, send written notification of the change within 10 days to the Asylum Office at the below address or using the USCIS Online Change of Address system at <https://egov.uscis.gov/col/displayCOAForm.do>. If you filed your asylum application online, update your address in your USCIS online account profile accessible at myaccount.uscis.gov/.

You will receive a notice informing you when you and those listed on your application as a spouse or child dependents must appear at an Application Support Center (ASC) for biometrics collection. You will also receive a notice informing you when you and those listed on your application as a spouse or child dependents must appear for an asylum interview. Those notices will contain instructions for what to bring to your ASC appointment and what to bring to your asylum interview.

WARNING: Failure to appear at the ASC for biometrics collection or for your asylum interview may affect your eligibility for employment authorization and may also result in the dismissal of your asylum application or referral of your asylum application to an immigration judge.

Applicant(s):



Name

MEJIA JUAREZ, IVERSON

Please see the additional information on the back. You will be notified separately about any other cases you filed.

USCIS encourages you to sign up for a USCIS online account. To learn more about creating an account and the benefits, go to <https://www.uscis.gov/file-online>.

Houston Asylum Office
U.S. CITIZENSHIP & IMMIGRATION SVC
PO Box 670626
Houston TX 77267

USCIS Contact Center: www.uscis.gov/contactcenter



If this is an interview or biometrics appointment notice, please see the back of this notice for important information.

Form I-797C 10/13/21

CERTIFICATE OF SERVICE

I, Robert K. Hoffman, hereby certify that a true and correct copy of the foregoing "Petition for Writ of Habeas Corpus and Complaint for Injunctive Relief", including all attachments, will be served on Defendants via US Postal Service Certified mail addressed as follows:

Pamela Bondi
Attorney General
US Department of Justice
950 Pennsylvania Ave, NW
Washington, DC 20530-0001

Kristi Noem
Secretary
US Department of Homeland Security
Washington, DC 20528

Bret Bradford
Field Office Director
United States Immigration and Customs Enforcement
Houston District Office
126 Northpoint
Houston, TX 77060

Nicholas J. Ganjei
US Attorney
1000 Louisiana, Ste. 2300
Houston, TX 77002

On this the 21st day of August 2025.

Respectfully submitted,
/s/Robert K. Hoffman

Robert K. Hoffman
Rushton Hoffman and Associates, PLLC
Attorneys for Petitioner
Texas Bar No. 24073807
5909 West Loop S., Ste. 150
Bellaire, TX 77401
(713)838-8500
(713)838-9826 Fax