

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No. 25-cv-03078-WJM-KAS

JESUS MORALES LOPEZ,

Petitioner,

v.

JUAN BALTASAR, Warden of the Denver Contract Detention Facility, Aurora, Colorado,
in his official capacity;

ROBERT HAGAN, Field Office Director, Denver Field Office, U.S. Immigration and
Customs Enforcement, in his official capacity;

KRISTI NOEM, Secretary, U.S. Department of Homeland Security, in her official
capacity;

TODD LYONS, Acting Director of Immigration and Customs Enforcement, in his official
capacity; and

PAM BONDI, Attorney General, U.S. Department of Justice, in her official capacity,

Respondents.

RESPONDENTS' SECOND STATUS REPORT

Respondents submit the following Status Report pursuant to the Court's Order dated December 24, 2025. ECF No. 44.

On December 15, 2025, the Court ordered that Respondents provide Petitioner with a bond hearing pursuant to Section 1226(a). See ECF No. 40. The Court directed Respondents to provide a status report within five days of that bond hearing, "informing the Court of [Petitioner's] current detention status," among other items to be addressed. *Id.* at 2. On December 24, 2025, Respondents filed a first Status Report

notifying the Court that Petitioner was provided a bond hearing. See ECF No. 43.

Respondents explained that a written bond order, granting Petitioner bond, was signed on December 22, 2025. See *id.* As of 8:00 am on December 24, 2025, however, Respondents had not confirmed Petitioner's release. See *id.* at 2.

On December 24, 2025, Petitioner filed an Emergency Motion asking the Court to order his immediate release. See ECF No. 42 at 4. The Court issued a Minute Order directing Respondents to provide a second status report updating the Court on Petitioner's detention by 5:00 pm on December 25, 2025. ECF No. 44.

Pursuant to that Order, Respondents update the Court with the following information.

Respondents' counsel has been in contact with ICE, and on December 23, 24, and 25, 2025, ICE's Enforcement and Removal Operations was alerted that Petitioner has attempted to post bond. As of the morning of December 25, 2025, ICE is continuing to experience technical problems with its electronic (online) bond system. Respondents' counsel informed Petitioner's counsel of this, and informed Petitioner's counsel that if he is able to re-post his bond in the electronic system, or alternatively, provide a cash bond at the ICE detention facility, he should be released today.

On December 25, 2025, Petitioner's counsel confirmed that Petitioner was able to repost his bond, which appears to have been processed in the online bond system. As of 1:15 pm, however, the bond form was pending review. Respondents' counsel

relayed this information to ICE, who is working to effectuate Petitioner's release.

Respondents anticipate that Petitioner will be released by close of business today.¹

Pursuant to the Court's Order at ECF No. 44, Respondents will provide another status report before the close of business on December 26, 2025.

Respectfully submitted this 25th day of December, 2025.

PETER MCNEILLY
United States Attorney

s/ Leslie Schulze
Leslie Schulze
Assistant United States Attorney
U.S. Attorney's Office
1801 California Street, Suite 1600
Denver, CO 80202
Telephone: (303) 454-0131
Email: Leslie.schulze@usdoj.gov

Counsel for Respondents

¹ Respondents' counsel will be on an airplane from 2:00 pm to 6:00 pm, and thus files this Second Status Report before departing to ensure Respondents meet the Court's 5:00 pm deadline. See ECF No. 44. If Respondents' counsel receives confirmation that Petitioner is released by close of business on the date of this filing (December 25, 2025), she will promptly file a third status report informing the Court of Petitioner's release.

CERTIFICATE OF SERVICE

I hereby certify that on December 25, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Skylar Madison Larson, Esq.
8275 East 11th Avenue
Suite 200176
Denver, CO 80220
skylarmlarsonesq@gmail.com

s/ Leslie Schulze
U.S. Attorney's Office