UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
FORT MYERS DIVISION

JOSE HINOJOSA GARCIA,

Petitioner, Case No. 2:25-cv-879-SPC-NPM

v.

SECRETARY, U.S. DEPARTMENT OF HOMELAND SECURITY, *et al.*,

Respondents.
_____/

RESPONSE TO THE COURT'S ORDER TO SHOW CAUSE AND MOTION TO DISMISS EMERGENCY PETITION FOR WRIT OF HABEAS CORPUS AND FOR IMMEDIATE RELIEF OR A BOND HEARING

Respondents, by and through undersigned counsel, hereby respond to the Court's October 7, 2025 Order (ECF No. 7), and move to dismiss Petitioner's Writ of Habeas Corpus Pursuant to 28 U.S.C. § 2241, And For Immediate Release Or, In The Alternative, A Prompt Individualized Bond Hearing ("Hab. Pet.") (ECF No. 1) for lack of jurisdiction and failure to state a claim under Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6), respectively. As support, Respondents state as follows:

BACKGROUND

Petitioner is a native and citizen of Mexico who unlawfully entered the United States at an unknown place on an unknown date. Ex. A, Notice to Appear. On September 18, 2025, Petitioner was detained by U.S. Immigration and Customs

Enforcement ("ICE").[1] Hab. Pet., ¶ 28. On October 3, 2025, Petitioner filed the instant action in the U.S. District Court seeking emergency relief pursuant to the All Writs Act, Administrative Procedures Act ("APA") and the Fifth Amendment Due Process Clause. *See* Hab. Pet., ¶¶ 33-46. On October 7, 2025, the Court issued an order instructing Respondents to respond to Petitioner's filing and show cause why it should not be granted. ECF No. 7. Respondents have until October 14, 2025 to respond to this order. *Id.*

In response to this Court's order, ECF No. 7, and for the reasons set forth below, Respondents respectfully request that this Court dismiss Petitioner's Writ of Habeas Corpus Pursuant to 28 U.S.C. § 2241, And For Immediate Release Or, In The Alternative, A Prompt Individualized Bond Hearing.

LEGAL STANDARDS

I. Rule 12(b)(1) – Lack of Subject Matter Jurisdiction

Federal Rule of Civil Procedure 12(b)(1) requires dismissal of claims where the Court "lack[s] jurisdiction over the subject matter." Fed. R. Civ. P. 12(b)(1). A court may resolve a motion to dismiss brought pursuant to Fed. R. Civ. P. 12(b)(1) in two ways: a facial challenge or a factual challenge. *Kennedy v. Floridian Hotel, Inc.*, 998 F.3d

[1] At the time this petition was filed, Petitioner was detained in the Middle District of Florida at Alligator Alcatraz but he has since been transferred to the KROME facility in Miami, Florida. Once jurisdiction is properly acquired, a petitioner's removal to another judicial district does not destroy a court's jurisdiction. *Ex parte Endo*, 323 U.S. 283, 306 (1944); *Major v. Warden, FCC Coleman - Low*, No. 5:18-CV-269-OC-02PRL, 2019 WL 4194673, at *1 (M.D. Fla. Sept. 4, 2019). Indeed, "[j]urisdiction attaches upon the initial filing of the § 2241 petition and will not be destroyed by a petitioner's subsequent Government-effectuated transfer and accompanying change in physical custodian." *Major*, 2019 WL 4194673 at *1.

1221, 1230 (11th Cir. 2021). "A facial attack challenges whether a plaintiff "has sufficiently alleged a basis of subject matter jurisdiction, and the allegations in his complaint are taken as true for the purposes of the motion." *Id.* By contrast, a factual attack "challenges the existence of subject matter jurisdiction irrespective of the pleadings, and extrinsic evidence may be considered." *Id.*

II. Rule 12(b)(6) – Failure to State a Claim

Federal Rule of Civil Procedure 12(b)(6) tests the legal sufficiency of the complaint, not the merits of the allegations. To survive a motion to dismiss under this Rule, a complaint must contain sufficient factual matter, accepted as true, to "state a claim to relief that is plausible on its face." *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009) (quoting *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 570 (2007)).

III. Writs of Habeas Corpus

As relevant here, the Court has power to grant writs of habeas corpus where a petitioner "is in custody in violation of the Constitution or laws or treaties of the United States." 28 U.S.C. § 2241(c)(3); *Walker v. Johnston*, 312 U.S. 275, 286 (1941). "The burden rests on the person in custody to prove his detention is unlawful." *Benito Vasquez v. Moniz*, No. 25-11737-NMG, 2025 WL 1737216, at *1 (D. Mass. June 23, 2025).

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ARGUMENT

I. The Court Lacks Jurisdiction Over Petitioner's Claims.

Federal courts have limited jurisdiction and "possess only that power authorized by Constitution and statute." *Kokkonen v. Guardian Life Ins. Co. of Am.*, 511 U.S. 375, 377 (1994). Further, "APA review does not apply when '(1) statutes preclude judicial review; or (2) agency action is committed to agency discretion by law.'" *Kanapuram v. Dir., U.S. Citizenship & Immigr. Servs.*, 131 F.4th 1302, 1306 (11th Cir. 2025) (quoting 5 U.S.C. § 701(a)). In this case, Sections 1252(g) and 1252(b)(9) of the INA divest this Court's jurisdiction to consider Petitioner's claims of unlawful detention. Further, Petitioner has failed to exhaust other remedies available to him before turning to the District Court for intervention.

A. The Jurisdictional Bar at 8 U.S.C. § 1252(g)

There is no jurisdiction to review "any cause or claim . . . arising from the decision or action by the Attorney General to commence proceedings, adjudicate cases, or execute removal orders." 8 U.S.C. § 1252(g); *Gupta v. McGahey*, 709 F.3d 1062, 1065 (11th Cir. 2013). This provision bars habeas review in federal courts when the claim arises from "discrete acts of commencing proceedings, adjudicating cases, and executing removal orders." *Reno v. American-Arab Anti-Discrimination Committee*, 525 U.S. 471, 483 (1999) (cleaned up). These activities "represent the initiation or prosecution of various stages in the deportation process" that Congress had "good reason" to withhold from judicial review. *Id.*

This bar is subject to limitations and must be applied "to just those three specific actions" listed. *Jennings v. Rodriguez*, 583 U.S. 281, 294 (2018). In doing so, "courts must focus on the action being challenged." *Canal A Media Holding, LLC v. USCIS*, 964 F.3d 1250, 1258 (11th Cir. 2020). The law is clear: detaining an alien while a removal determination remains pending constitutes an action taken to commence proceedings. *Gupta*, 709 F.3d at 1065; *see also Alvarez v. ICE*, 818 F.3d 1194, 1203 (11th Cir. 2016) ("Because [the alien] challenges the methods that ICE used to detain him prior to his removal hearing, these claims are foreclosed by § 1252(g) and our decision in *Gupta*."); *Johnson v. U.S. Att'y Gen.*, 847 F. App'x 801, 802 (11th Cir. 2021). "By its plain terms, [§ 1252(g)] bars us from questioning ICE's discretionary decisions to commence removal—and thus necessarily prevents us from considering whether the agency should have used a different statutory procedure to initiate the removal process." *Alvarez*, 818 F.3d at 1203. Here, Petitioner is being detained "while awaiting a removal determination." *Gupta*, 709 F.3d at 1065. Under *Gupta*'s binding interpretation of Section 1252(g), the Court plainly has no jurisdiction. *Id.* The Court must therefore dismiss this action for lack of subject matter jurisdiction.[2]

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[2] Respondents recognize that in a separate habeas case heard in September 2025, Judge Steele declined to find the jurisdictional bar applicable where the petitioner's NTA was filed after the individual was detained. *See Brito Matom v. U.S. Immigr. & Customs Enf't*, 2025 WL 2577424, at *2 (M.D. Fla. Sept. 5, 2025). Respondents respectfully disagree with this conclusion. In *Brito*, the Court relied on a single Southern District of Florida case in which no NTA was filed at all. *Id.* (citing *Gonzales v. FedEx Ground Package Sys., Inc*, 2013 WL 12080223, at *9 (S.D. Fla. Aug. 1, 2013)). Here, Petitioner was served with an NTA two days after he was detained and the NTA has since been filed with the immigration court. ICE has indeed detained him "while awaiting a removal determination."

B. The Jurisdictional Bar at 8 U.S.C. § 1252(b)(9)

The Court also lacks jurisdiction on separate grounds. The INA precludes the Court's review of "all questions of law and fact . . . arising from any action taken or proceeding brought to remove an alien from the United States" except when brought pursuant to judicial review of a final order of removal. 8 U.S.C. § 1252(b)(9). This is known as the "zipper clause" and applies where a petitioner seeks "review of an order of removal [or] the decision to seek removal." *Canal A*, 964 F.3d at; *DHS v. Regents of Univ. of Cal.*, 591 U.S. 1, 19 (2020) (cleaned up). In reading this subsection alongside 8 U.S.C. § 1252(a)(5)—the subsection that provides the single, proper path for judicial review of removal orders—courts have concluded that petitioners must funnel all aspects of challenges to removal proceedings through the avenue set forth in Section 1252(a)(5), which takes place after a final order of removal has issued. *Nasrallah v. Barr*, 590 U.S. 573, 580 (2020) ("The REAL ID Act clarified that final orders of removal may not be reviewed in district courts, even via habeas corpus, and may be reviewed only in the courts of appeals."); *see also Bonhometre v. Gonzales*, 414 F.3d 442, 446 (3d Cir. 2005) (There is "clear intent to have all challenges to removal orders heard in a single forum (the courts of appeals).").

The zipper clause's restrictions are broad, but not without limitation. *See, e.g.*, *Canal A*, 964 F.3d at 1257. However, a claim that arises from actions or proceedings brought to remove an alien clearly falls within its parameters. *See Regents of Cal.*, 591

U.S. at 19 (finding the bar inapplicable where parties did not challenge removal proceedings). Here, where Petitioner challenges ICE's detention determination—an action arising from its choice to commence removal proceedings—Section 1252(b)(9)'s zipper clause has been triggered and judicial review in this Court is inappropriate and contrary to the statutory scheme.

C. Petitioner Has Not Exhausted Otherwise Available Remedies.

Though claiming that he "has not been afforded the necessary procedural safeguards to guarantee against the erroneous deprivation of his liberty[,]" Petitioner concedes that he has not sought review of ICE's bond determination with the immigration court system before turning to this Court to intervene. Hab. Pet., ¶¶ 15, 37. Instead, he alleges that, in light of a recent Board of Immigration Appeals decision, doing so would be futile. *Id.* ¶ 16. The Eleventh Circuit does not share Petitioner's view on futility in the context of 28 U.S.C. § 2241 actions. *See McGee v. Warden, FDC Miami*, 487 F. App'x 516, 518 (11th Cir. 2012) (finding that the district court lacked jurisdiction to consider a Section 2241 petition where the petitioner failed to exhaust remedies, notwithstanding his argument that doing so would be futile). Futility is not a blank check to relieve a petitioner from the requirement to exhaust his remedies, but this district has—on occasion—considered exceptions to a petitioner's exhaustion requirement under exceptional circumstances. *See, e.g.*, *Sanchez v. Warden, FCC Coleman - Low*, No. 5:23-CV-79-WFJ-PRL, 2023 WL 4489472, at *2 (M.D. Fla. July 12, 2023) (declining to find an exception where prisoner still had ample time in his sentence to seek administrative review); *see also Faison v. Warden, FCC Coleman,* No.

5:23-CV-67-WFJ-PRL, 2023 WL 4489471 (M.D. Fla. July 12, 2023); *Vasquez v. Warden, FCC Coleman Low*, No. 5:22-CV-517-WFJ-PRL, 2023 WL 4157364, at *2 (M.D. Fla. June 23, 2023).

Here, Petitioner has not demonstrated that an exception should apply, particularly where he is in ongoing immigration proceedings and not currently subject to a final, executable order of removal. Ex. A. Finally, to the extent that Petitioner alleges that his "detention without a bond hearing exceeds statutory authority and is arbitrary and capricious"—Hab. Pet., ¶ 42—the regulations put the responsibility for requesting a hearing in the hands of the alien or his legal representative, not Respondents. *See* 8 C.F.R. § 1003.19(b); *see also* Hab. Pet., ¶ 46 (alleging categorical denial of bond hearings). The absence of a bond hearing after ICE made the initial determination is not due to any wrongdoing by Respondents but rather due to Petitioner's inaction.

Federal regulations give an alien the ability to seek review of ICE's initial custody before an immigration judge. 8 C.F.R. § 1003.19(a). This does not happen automatically; rather, an alien must specifically request it. *Id.* § 1003.19(b). And should an alien be dissatisfied with an immigration judge's ultimate decision—including one in which the alien is found subject to mandatory detention—he has available to him the opportunity to appeal the immigration judge's order to the Board of Immigration Appeals. *Id.* § 1003.1(b)(7). Petitioner has not availed himself of either opportunity. Even were futility applicable, Petitioner has not sufficiently demonstrated why his circumstances warrant an exception.

II. Petitioner Fails to Adequately State a Claim for Relief.

Petitioner seeks relief by way of the All Writs Act, Administrative Procedures Act, and the 5th Amendment of the United States Constitution. Hab. Pet. at ¶¶33-46. Petitioner alleges that ICE's decision to detain him is arbitrary and capricious, deprives him of his liberty contrary to law, and violates his substantive and procedural due process rights. *Id.* ¶ 32. Petitioner's claims fail as a matter of law on all counts because he was detained lawfully.

A. Petitioner's Detention Under Section 1225 Is Lawful

Petitioner alleges that his detention pursuant to 8 U.S.C. § 1225 is unlawful. Hab. Pet., ¶ 41. To interpret the relevant parts of the INA, courts first turn to the "plain meaning of the statute." *Esquivel-Quintana v. Sessions*, 581 U.S. 385, 391 (2017). If the statutory text is clear—as it is here—the analysis ends there. *Bostock v. Clayton County, Georgia*, 590 U.S. 644, 674 (2020).

The statutory scheme at Section 1225(a) provides that "An alien present in the United States who has not been admitted . . . shall be deemed for purposes of this chapter an applicant for admission." 8 U.S.C. § 1225(a)(1); *DHS v. Thuraissigiam*, 591 U.S. 103, 140 (2020). An applicant for admission is "an alien present in the United States who has not been admitted or who arrives in the United States, whether or not at a designated port of arrival . . . ." 8 U.S.C. § 1225(a)(1). Applicants for admission generally fall into one of two categories with arriving aliens and those initially determined to have not been admitted or paroled into the United States falling under Section 1225(b)(1), and all other applicants for admission not encompassed by (b)(1)

falling within Section 1225(b)(2). *Jennings*, 583 U.S. at 287; 8 U.S.C. § 1225(b). Under Section 1225(b)(1) aliens are detained for the purpose of removal under an expedited process—still allowing credible fear screening for asylum where applicable—whereas under Section 1225(b)(2), the "alien shall be detained for a proceeding under section 1229a" after "the examining immigration officer determines that an alien seeking admission is not clearly and beyond a doubt entitled to be admitted." 8 U.S.C. § 1225(b)(2)(A). Thus, read most naturally, these subsections mandate detention of applicants for admission until certain proceedings have concluded." *Jennings*, 583 U.S. at 297.

The alternate statutory provision Petitioner argues applies, Section 1226, governs apprehension and detention of aliens "pending a decision on whether the alien is to be removed from the United States." 8 U.S.C. § 1226(a). It applies to aliens who are deportable under 8 U.S.C. § 1227(a), including those "who were inadmissible at the time of entry or who have been convicted of certain criminal offenses since admission." *Jennings*, 583 U.S. at 288. Aliens subject to detention under Section 1226 fall into one of two categories with those arrested on a warrant issued by DHS eligible for bond, and those who have committed or been convicted of certain crimes subject to mandatory detention. *Id.* § 1226(a), (c). An alien's status as an applicant for admission is what distinguishes Sections 1225 and 1226.

Here, looking at the plain meaning of each statute, ICE has properly detained Petitioner—an applicant for admission—under Section 1225(b). Petitioner entered the United States without inspection. Hab. Pet., ¶ 2. Detention under these circumstances

is therefore not unlawful; rather, it is statutorily required. 8 U.S.C. §§ 1225(b)(1)(B)(ii), (iii)(IV); 1225(b)(2)(A); *see Chaviano v. Bondi*, 2025 WL 1744349, at *6-8 (S.D. Fla. June 23, 2025) (holding detention lawful under Section 1225(b)(1)); *Moore v. Nielsen*, 2019 WL 2152582, at *3 (N.D. Ala. May 3, 2019) (detention under Section 1225(b)(2) mandatory).

Petitioner's argument that Section 1225(b)(2) does not apply to individuals "who previously entered the country and have been residing in the country prior to being apprehended" is not compelling. *See* Hab. Pet., ¶ 40. Petitioner seemingly asserts that those who entered without inspection but have remained in the United States for an undefined, extended period of time fall outside the scope of Section 1225. But the plain language of the statute does not support this conclusion, and where the statutory text is clear, the analysis ends. *See King v. Burwell*, 576 U.S. 473, 486 (2015). Section 1225(b) is unambiguous. There are no qualifiers, nor any temporal limitations. *See* 8 U.S.C. § 1225(b)(2). By contrast, such time limitations indeed appear in other parts of the same statute. *See, e.g.*, 8 U.S.C. § 1225(b)(1)(A)(iii)(II) (expedited removal provision, enacted contemporaneously with Section 1225(b)(2), applicable to certain aliens lacking admission or parole who have not been continuously physically present in the United States for the two-year period immediately preceding the determination of inadmissibility). Where Congress includes particular language in one part of a statue but omits it in another, there is a presumption that Congress acted intentionally. *Shotz v. City of Plantation, Fla.*, 344 F.3d 1161, 1168 (11th Cir. 2003). The Court cannot read a "period of residence" requirement into Section 1225(b)(2) because it simply is not

there, a reflection of Congressional intent not to include it. *See Germain v. U.S. Att'y Gen.*, 9 F.4th 1319, 1325 (11th Cir. 2021) (*citing Russello v. United States*, 464 U.S. 16, 23 (1983)).

For these reasons, an applicant for admission's period of residence is irrelevant under a plain reading of the statute. What is relevant, however, is an alien's manner of entry into the United States. *See* 8 U.S.C. § 1225(a)-(b). Legislative intent bolsters this interpretation. The statutory scheme that 8 U.S.C. §§ 1225 and 1226 replaced was structured such that aliens who entered the United States undetected retained certain benefits—such as the availability of bond—where those who presented themselves at the border did not:

> This subsection is intended to replace certain aspects of the current "entry doctrine," under which illegal aliens who have entered the United States without inspection gain equities and privileges in immigration proceedings that are not available to aliens who present themselves for inspection at a port of entry. Hence, the pivotal factor in determining an alien's status will be whether or not the alien has been lawfully admitted.

H.R. Rep. No. 104-469, pt. 1, at 225 (1996). Recognizing that such a scheme incentivized evasion over presenting oneself at a port of entry, Congress set out to restructure the law to distinguish between deportability—applicable to admitted aliens—and inadmissibility—applicable to those present without admission. *Id.* at 226. Thus, aliens who enter surreptitiously "will not be considered to have been admitted . . ." *Id.* Accordingly, Petitioner—who did not present himself for inspection—has not been admitted and falls under the statutory scheme in Section 1225.

Finally, Petitioner asserts that prior to publication of a recent Board of Immigration Appeals decision interpreting Section 1225 consistent with Respondents' interpretation, most aliens who entered without inspection received bond hearings. Hab. Pet., ¶ 23; *see also Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025). Petitioner's reliance on past practice is misplaced. The statute is clear and unambiguous: Petitioner is subject to Section 1225 and the analysis should end there. *See Bostock*, 590 U.S. at 674; *see also Yajure Hurtado*, 29 I&N Dec. at 225-26. Legislative history only supports Respondents' custody determination. But even were the Court to consider historical practice, the Constitution empowers the Judiciary to exercise judgment regarding the interpretation of laws *independent from* the political branches. U.S. Const. art. 3, § 2, cl. 1; *Loper Bright Enters. v. Raimondo*, 603 U.S. 369, 385 (2024). The question therefore is not one of historical practice, but whether the statute is being interpreted correctly in this instance. For all of the foregoing reasons, Respondents have demonstrated that it has, and Petitioner's claims should be dismissed.

B. Petitioner Has Not Demonstrated That Section 1226 Should Apply.

Petitioner alleges that his detention under Section 1225 is improper and suggests that his detention status should instead be considered pursuant to Section 1226. Hab. Pet., ¶¶ 23, 40. But Petitioner has not met his burden in establishing by a preponderance of the evidence that his detention is unlawful where he has not demonstrated that Section 1226 rather than Section 1225 applies.

Section 1226(a) provides that "On a warrant issued by the Attorney General, an alien may be arrested and detained pending a decision on whether the alien is to be

removed from the United States" and "[e]xcept as provided in subsection (c) and pending such decision, the Attorney General . . . may release the alien on . . . bond . . . or conditional parole . . . ." 8 U.S.C. § 1226(a). Key here is the clear and unambiguous requirement that the alien be detained "on a warrant." Here, Petitioner—who bears the burden of establishing that his detention was wrongful and that he is instead subject to Section 1226(a)—has failed to present evidence sufficient to support this conclusion. *See Vargas Lopez v. Trump*, 2025 WL 2780351, at *2 (D. Neb. Sept. 30, 2025) (finding the failure of the petitioner to attach evidence that he was arrested under a warrant prevented him from meeting his burden in habeas proceedings). Petitioner has not presented a warrant nor any reference to a warrant.[3] *See generally* Hab. Pet.

CONCLUSION

Petitioner's claims must be dismissed. Respondents have shown that Petitioner's detention pursuant to Section 1225 is lawful. The INA mandates his detention and Petitioner has not demonstrated that he falls within the ambit of Section 1226's detention scheme. Even so, this Court lacks jurisdiction to act on Petitioner's claims. Two separate jurisdictional bars prohibit judicial intervention and Petitioner has failed to avail himself of the opportunity to seek a bond review before an Immigration Judge prior to coming to this Court for assistance. *See* 8 C.F.R. § 1003.19(a). Petitioner fails to state a claim for relief under the APA, Due Process

[3] Even had Petitioner shown that he was arrested under warrant, that would not definitively categorize him as subject to detention under Section 1226. *See Matter of Yajaure Hurtado*, 29 I. & N. Dec. at 227 ("the mere issuance of an arrest warrant does not endow an Immigration Judge with authority to set bond for an alien who falls under section 235(b)(2)(A) of the INA, 8 U.S.C. § 1225(b)(2)(A).").

Clause, or All Writs Act and fails to establish that this Court has subject matter jurisdiction. All counts should be dismissed.

LOCAL RULE 3.01(g) CERTIFICATION

Pursuant to Local Rule 3.01(g), the undersigned certifies that she has contacted Plaintiffs' counsel, who opposes dismissal of the Habeas Petition.

DATED: October 10, 2025

Respectfully submitted,

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DEPARTMENT OF HOMELAND SECURITY
NOTICE TO APPEAR

DOB: [redacted]/1994
Event No: [redacted]

In removal proceedings under section 240 of the Immigration and Nationality Act:

Subject ID: [redacted] FINS: [redacted] File No: [redacted] 181

In the Matter of:

Respondent: JOSE RAFAEL HINOJOSA-GARCIA currently residing at:

[redacted] Miami, FL 33194

(Number, street, city, state and ZIP code) (Area code and phone number)

☐ You are an arriving alien.

☒ You are an alien present in the United States who has not been admitted or paroled.

☐ You have been admitted to the United States, but are removable for the reasons stated below.

The Department of Homeland Security alleges that you:

1. You are not a citizen or national of the United States;
2. You are a native of MEXICO and a citizen of MEXICO;
3. You entered the United States at or near unknown place, on or about unknown date;
4. You were not then admitted or paroled after inspection by an Immigration Officer.
5. You are an immigrant not in possession of a valid unexpired immigrant visa, reentry permit, border crossing card, or other valid entry document required by the Immigration and Nationality Act; and/or See Continuation Page Made a Part Hereof

On the basis of the foregoing, it is charged that you are subject to removal from the United States pursuant to the following provision(s) of law:

See Continuation Page Made a Part Hereof

☐ This notice is being issued after an asylum officer has found that the respondent has demonstrated a credible fear of persecution or torture.

☐ Section 235(b)(1) order was vacated pursuant to: ☐ 8CFR 208.30 ☐ 8CFR 235.3(b)(5)(iv)

YOU ARE ORDERED to appear before an immigration judge of the United States Department of Justice at:

18201 SW 12TH ST, BLDG 1 STE C, BLDG 1 STE C MIAMI, FLORIDA 33194. KROME NORTH SERVICE PROCESSING
(Complete Address of Immigration Court, including Room Number, if any)

on October 27, 2025 *(Date)* at 8DO am *(Time)* to show why you should not be removed from the United States based on the charge(s) set forth above.

D 6670 COOPER - (a) SDDO Daniel C Cooper
(Signature and Title of Issuing Officer)

Date: September 29, 2025

PANAMA CITY BEACH, FL
(City and State)

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