

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

Alexis Torres Torres,

Isaias Loyola-Garcia,

Petitioners,

v.

Kristi Noem, *Secretary of Homeland Security,*

Todd Lyons, *Acting Director, U.S. Immigration
and Customs Enforcement,*

Joseph Simon, *Washington Field Office
Director, U.S. Immigration and Customs
Enforcement,*

Pamela Bondi, *Attorney General,*

Jeffrey Crawford, *Warden,
Farmville Detention Center,*

Respondents.

Civil Action No. _____

PETITION FOR WRIT OF HABEAS CORPUS

Petitioners are each non-citizens of the United States. They each individually entered the United States without inspection between ports of entry on the U.S.-Mexico border and were arrested by U.S. Immigration and Customs Enforcement ("ICE") between 3 and 18 years after their entry. Petitioners have each individually been detained by U.S. Immigration and Customs Enforcement ("ICE"), under facts and circumstances that place him squarely within ICE's general detention authority 8 U.S.C. § 1226(a). Under that statute, Petitioners are eligible to seek discretionary release on bond from an Immigration Judge ("IJ"). However, due to a new policy

announced by ICE in July 2025, and a September 2025 Board of Immigration Appeals (BIA) decision that overturns decades of settled law, Respondents contend that Petitioners are actually detained under 8 U.S.C. § 1225(b)(2). However, while § 1225 requires mandatory detention and does not allow release on bond, it only applies to noncitizens apprehended at the border “seeking admission.” Petitioners therefore bring this action for a declaratory judgment from this Court that they are properly detained (if at all) only pursuant to 8 U.S.C. § 1226(a); and seeking an order that Respondents schedule each of them for a discretionary bond hearing pursuant to § 1226(a) before an IJ within 15 days.

JURISDICTION AND VENUE

1. This Court has jurisdiction to hear this case under 28 U.S.C. § 2241; 28 U.S.C. § 2201, the Declaratory Judgment Act; and 28 U.S.C. § 1331, Federal Question Jurisdiction. In addition, the individual Respondents are United States officials. 28 U.S.C. § 1346(a)(2).

2. The Court has authority to enter a declaratory judgment and to provide temporary, preliminary and permanent injunctive relief pursuant to Rules 57 and 65 of the Federal Rules of Civil Procedure, 28 U.S.C. §§ 2201-2202, the All Writs Act, and the Court’s inherent equitable powers, as well as issue a writ of habeas corpus pursuant to 28 U.S.C. § 2241.

3. This Court also has federal question jurisdiction, through the APA, to “hold unlawful and set aside agency action” that is “arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law.” 5 U.S.C. § 706(2)(A). APA review of a final agency action may proceed, absent a special statutory review proceeding, by “any applicable form of legal action, including actions for declaratory judgments or writs of prohibitory or mandatory injunction or habeas corpus, in a court of competent jurisdiction.” 5 U.S.C. § 703.

4. Venue lies in this District because Petitioners are currently detained within the

territorial jurisdiction of this division of this District; and each Respondent is an agency or officer of the United States sued in his or her official capacity. 28 U.S.C. § 2241; 28 U.S.C. § 1391(e)(1).

THE PARTIES

5. Petitioner Alexis Martin Torres is a citizen and native of Peru and is currently detained by Respondents in the Farmville Detention Center in Farmville, VA within the territorial jurisdiction of this Court.

6. Petitioner Isaias Loyola-Garcia is a citizen and native of Mexico and, upon information and belief, is currently detained by Respondents in the Farmville Detention Center in Farmville, VA within the territorial jurisdiction of this Court.

7. Respondent Kristi Noem is the Secretary of the Department of Homeland Security (“DHS”). She is the cabinet-level secretary responsible for all immigration enforcement in the United States.

8. Respondent Todd Lyons is the Acting Director of U.S. Immigration and Customs Enforcement (“ICE”). He is the head of the federal agency responsible for all immigration enforcement in the United States.

9. Respondent Joseph Simon is the Director of the Washington ICE Field Office. He is the head of the ICE office that unlawfully arrested each Petitioner, and such arrests took place under his direction and supervision. He is the immediate legal custodian of all Petitioners.

10. Respondent Pamela Bondi is the Attorney General of the United States. The Immigration Judges who decide removal cases and applications for bond and relief from removal do so as her designees.

11. Respondent Jeffrey Crawford is the warden of the Farmville Detention Center in Farmville, Va., where Petitioners are currently detained. He is the immediate custodian who is currently holding Petitioners in physical custody. He is sued in his official capacity.

12. All government Respondents are sued in their official capacities.

LEGAL BACKGROUND

A. Immigration Detention Legal Framework

13. When a noncitizen is alleged to have violated immigration laws, they are generally placed into traditional removal proceedings, during which an immigration judge will determine whether they are removable and then whether they have a legal basis to remain in the United States. 8 U.S.C. § 1229a.

14. Detention is authorized for “certain aliens already in the country pending the outcome of removal proceedings under § 1226(a) and 1126(c).” *See Jennings v. Rodriguez*, 583 U.S. 281, 289 (2018). The statute provides that an individual may be subject to either discretionary detention under 8 U.S.C. § 1226(a) generally, or mandatory detention under 8 U.S.C. § 1226(c) if they have been arrested or convicted of certain crimes. Discretionary detention under § 1226(a) has been described as the “default” provision for immigration detention for those subject to traditional removal proceedings. *Id.* at 288. Under § 1226(a), “[e]xcept as provided in subsection (c) of this section,’ the Attorney General ‘may release’ an alien detained under § 1226(a) ‘on ...bond’ or ‘conditional parole.’” *Id.*

15. Alternatively, mandatory detention is authorized for “certain aliens *seeking admission* into the country under §§ 1225(b)(1) and 1225(b)(2),” [emphasis added]. *Jennings*, 583 U.S. at 289. Individuals inspected under § 1225(b) and determined to be “applicants for

admission” may be subject to mandatory detention under two separate subsections. Applicants for admission include someone:

“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 and including an alien who is brought to the United States after having been interdicted in international or United States waters) shall be deemed for the purposes of this chapter to be an applicant for admission.”

§ 1225(a)(1).

16. The first subset, under 8 U.S.C. § 1225(b)(1), may be subject to expedited removal and mandatory detention if they are determined to be an “arriving alien,” and if they have not been physically present in the United States continuously for a two-year period immediately prior. Regulations define an “arriving alien” as:

“an applicant for admission coming or attempting to come into the United States at a port-of-entry, or an alien seeking transit through the United States at a port-of-entry, or an alien interdicted in international or United States waters and brought into the United States by any means, whether or not to a designated port-of-entry, and regardless of the means of transport.”

8 C.F.R. § 1.2.

17. Otherwise, 8 U.S.C. § 1225(b)(2) provides for the detention of “applicant for admission” specifically when “the examining immigration officer determines that an alien *seeking admission* is not clearly and beyond a doubt entitled to be admitted, the alien shall be detained for a proceeding under section 1229a of this title,” i.e. for traditional removal proceedings [emphasis added].

18. An “arriving alien” or an applicant for admission “seeking admission” may only be released from detention on parole (which is a form of release on recognizance), under 8 U.S.C. § 1182(d)(5). *Jennings*, 583 U.S. at 288. There is no bond available to an arriving alien or applicant

for admission seeking admission. *Id.* There is no such thing as a “parole bond” – a release must be either parole under § 1182(d)(5) or a bond (conditional parole) under § 1226(a). *Id.*

19. For a noncitizen subject to discretionary detention under 8 U.S.C. § 1226(a), ICE makes an initial custody determination to either set a bond or hold the individual at no bond. The noncitizen may then seek a review of ICE’s initial custody determination before the IJ (a “custody review hearing”), who has the authority to modify ICE’s custody determination and set bond in a case in which ICE has designated no bond, lower bond when ICE has set a cash bond amount, or deny bond completely. 8 C.F.R. § 1003.19.

20. Custody review hearings are separate from hearings in the underlying removal proceedings. 8 C.F.R. § 1003.19(d). If a noncitizen is granted bond by the IJ, she must still appear in immigration court for the IJ to determine her removability and hear any claim for relief from removal. At a custody review hearing, once jurisdiction over bond is established, the IJ’s inquiry is limited to whether the detainee is a danger to the community or a flight risk, and bond may only be granted when an IJ has determined that the detainee meets his burden of proof that he is neither. *Matter of Guerra*, 24 I&N Dec. 37 (BIA 2006).

21. For decades, it has been Respondents’ practice to afford § 1226(a) discretionary bond hearings and custody review hearings to those individuals who have been encountered neither at a point of entry nor seeking admission to the United States. *See Rosado v. Figueroa*, No. CV 25-02157 PHX DLR (CDB), 2025 WL 2337099, at *10 (D. Ariz. Aug. 11, 2025), *report and recommendation adopted sub nom. Rocha Rosado v. Figueroa*, No. CV-25-02157-PHX-DLR (CDB), 2025 WL 2349133 (D. Ariz. Aug. 13, 2025) (“Respondents’ proposed application of § 1226 is also belied by the Department of Homeland Security’s ‘longstanding practice’ of treating noncitizens taken into custody while living in the United States, including those detained and found

inadmissible upon inspection and then released into the United States with the government's acquiescence, who have committed no crime after release, as detained under § 1226(a)." citing *Loper Bright Enter. v. Raimondo*, 603 U.S. 369, 386 (2024)).

B. New ICE memo reinterpreting 8 U.S.C. § 1225(b)(2)

22. On July 8, 2025, Respondent ICE issued new interim guidance that announced a breathtakingly broad interpretation of 8 U.S.C. § 1225(b)(2). See ICE memorandum "Interim Guidance Regarding Detention Authority for Applications for Admission."¹ This memo concerns the detention of "applicants for admission" as defined by § 1225(a)(1). "Effective immediately, it is the position of DHS that such aliens are subject to detention under INA § 235(b) [8 U.S.C. § 1225(b)(2)] and may not be released from ICE custody except by INA § 212(d)(5) [8 U.S.C. § 1182(d)(5)]." *Id.* DHS is explicit that this new policy is a marked deviation from prior interpretation and treatment of affected noncitizens. *Id.* ("For custody purposes, these aliens are now treated in the same manner that "arriving aliens" have historically been treated.")

23. In addition to the announcement re-interpreting § 1225(b)(2), the memo further clarifies that "[t]he only aliens eligible for a custody determination and release on recognizance, bond or other conditions under INA § 236(a) [8 U.S.C. § 1226(a)] during removal proceedings are aliens admitted to the United States and chargeable with deportability under INA § 237 [8 U.S.C. § 1227], with the exception of those subject to mandatory detention under INA § 236(c) [8 U.S.C. § 1226(c)]." *Id.*

24. Moreover, ICE maintains that "DHS does not take the position that prior releases of applicants for admission pursuant to INA § 236(a) were releases on parole under INA §

¹ Available at: <https://www.aila.org/library/ice-memo-interim-guidance-regarding-detention-authority-for-applications-for-admission> (last visited Sept. 25, 2025).

212(d)(5) based on this change in legal position.” *Id.* ICE fails to clarify under what legal authority, then, those prior releases were effectuated. Rather, ICE signals the resulting lack of “correct” paperwork is nonetheless permissible. *Id.* (“Accordingly, ERO and HIS are not required to ‘correct’ the release paperwork by issuing INA § 212(d)(5) parole paperwork.”)

25. Nationwide implementation of the ICE § 1225(b)(2) mass detention policy ensued.

C. Recent BIA decision *Matter of Yajure Hurtado*

26. On September 5, 2025, the Board of Immigration Appeals (BIA), which oversees all appeals of IJ decisions including custody redeterminations, upheld ICE’s re-interpretation of § 1225(b)(2). *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025).

27. The BIA held that the respondent was an “applicant for admission” within the scope of § 1225(b), and therefore subject to mandatory detention.

28. The BIA characterized the issue before it as “one of statutory construction: Does the INA require that *all* applicants for admission, even those like the respondent who have entered without admission or inspection and have been residing in the United States for years without lawful status, be subject to mandatory detention for the duration of their immigration proceedings, and thus the Immigration Judge lacks authority over a bond request filed by an alien in this category?” [emphasis added]. *Id.* at 220.

29. The BIA reasoned that individuals “who surreptitiously cross into the United States remain applicants for admission until and unless they are lawfully inspected and admitted by an immigration officer.” *Id.* at 228.

30. The BIA acknowledged the decades of precedent preceding its decision that authorized release of individuals present without having been inspected and admitted or paroled under § 1226(a). *Id.* at 225, FN6 (“We acknowledge that for years Immigration Judges have

conducted bond hearings for aliens who entered the United States without inspection. However, we do not recall either DHS or its predecessor, the Immigration and Naturalization Service, previously raising the current issue that is before us. In fact, the supplemental information for the 1997 Interim Rule titled ‘Inspection and Expedited Removal of Aliens; Detention and Removal of Aliens; Conduct of Removal Proceedings; Asylum Procedures,’ 62 Fed. Reg. 10312, 10323 (Mar. 6, 1997), reflects that the Immigration and Naturalization Service took the position at that time that ‘[d]espite being applicants for admission, aliens who are present without having been admitted or paroled (formerly referred to as aliens who entered without inspection) will be eligible for bond and bond redetermination.’”)

31. Ultimately, the BIA upheld the decision that the IJ lacked jurisdiction under 8 U.S.C. § 1225(b)(2) to consider the respondent for discretionary bond. *Id.* at 229.

32. The BIA decision is binding on all immigration judges nationwide.

33. Respondents’ new policy and interpretation of 8 U.S.C. § 1225(b)(2) stand to sweep millions of noncitizens into mandatory detention, without any consideration for release on bond (regardless of their ties to their community or lack of dangerousness or flight risk). *Rosado*, 2025 WL 2337099, at *11 (“It has been estimated that this novel interpretation would require the detention of millions of immigrants currently residing in the United States.”)

FACTS

Petitioner Alexis Torres Torres

34. Petitioner Torres Torres is a citizen of Peru. He entered the United States without inspection between ports of entry, across the U.S.-Mexico border, on or about February 2022.

35. Petitioner Torres Torres then made his way to Maryland. area, where he established a life. He currently resides in Manassas, Maryland with his whole family

36. Petitioner Torres Torres was pulled over and detained on October 14, 2025, near Arlington, Virginia, while on his way to home.

37. Petitioner Torres Torres is currently detained at the Farmville Detention Center in Farmville, VA within the territorial jurisdiction of this Court. See ICE Detainee Locator information (available at <https://locator.ice.gov/> (last visited on October 24, 2025)):

The screenshot shows the ICE Detainee Locator website. At the top is a navigation bar with links: Home, Who We Are, What We Do, Newsroom, Information Library, and Contact ICE. The main content area is titled 'Facility Page' and includes a 'BACK TO RESULTS' button. It displays detention information for ALEXIS MARTIN TORRES-TORRES, whose country of birth is Peru. A photograph of the Farmville Detention Center is shown. Below the photo, the current detention facility is listed as Abyon | Farmville Detention Center, located at 508 WATERWORKS RD, FARMVILLE, VA 23901. Visitor information is provided as (434) 395-8114. On the right side, there is a 'Related Information' section with links to 'Helpful Info' (Status of a Case, About the Detainee Locator, Brochure, ICE ERO Field Offices, ICE Detention Facilities, Privacy Notice) and 'External Links' (Bureau of Prisons Inmate). A 'MORE INFORMATION' button is located at the bottom left of the facility page.

Home Who We Are What We Do Newsroom Information Library Contact ICE

BACK TO RESULTS

Facility Page

Detention Information For:

ALEXIS MARTIN TORRES-TORRES
Country of Birth: Peru

Current Detention Facility:

Abyon | Farmville Detention Center
508 WATERWORKS RD
FARMVILLE, VA 23901
Visitor Information: (434) 395-8114

Related Information

Helpful Info

- Status of a Case
- About the Detainee Locator
- Brochure
- ICE ERO Field Offices
- ICE Detention Facilities
- Privacy Notice

External Links

- Bureau of Prisons Inmate

MORE INFORMATION

38. Petitioner Torres Torres has pending removal proceedings (his Master Calendar Hearing is scheduled for November 12, 2025), and is not subject to a final order of removal. See EOIR Automated Case Information (available at <https://acis.eoir.justice.gov/> (last visited on October 24, 2025)):

Automated Case Information	
Name: TORRES-TORRES, ALEXIS MARTIN A-Number: 220-748-715 Docket Date: 5/1/2024	
Next Hearing Information Your upcoming MASTER hearing is on November 12, 2025 at 9:00 AM. JUDGE Choi, Raphael COURT ADDRESS 7619 LITTLE RIVER TPK., 4TH FL. ANNANDALE, VA 22003	Court Decision and Motion Information This case is pending.
BIA Case Information No appeal was received for this case.	Court Contact Information If you require further information regarding your case, or wish to file additional documents, please contact the Immigration court. COURT ADDRESS 7619 LITTLE RIVER TPK., 4TH FL. ANNANDALE, VA 22003 PHONE NUMBER (703) 343-4000

39. Petitioner Torres Torres suffers from chronic anxiety, which has previously led to serious medical complications. In 2020, during a severe anxiety episode, Petitioner Torres Torres experienced facial paralysis that required medical treatment. His current detention has significantly worsened his condition, increasing his anxiety levels and placing him at risk of another paralysis episode. Continued detention therefore poses a serious threat to Petitioner Torres Torres's physical and mental health.

40. All Respondents consider that Petitioner Torres Torres is detained pursuant to 8 U.S.C. § 1225(b)(2). *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216. Accordingly, it would be futile for Petitioner Torres Torres to request a bond from an Immigration Judge. Exhaustion of administrative remedies would therefore be futile.

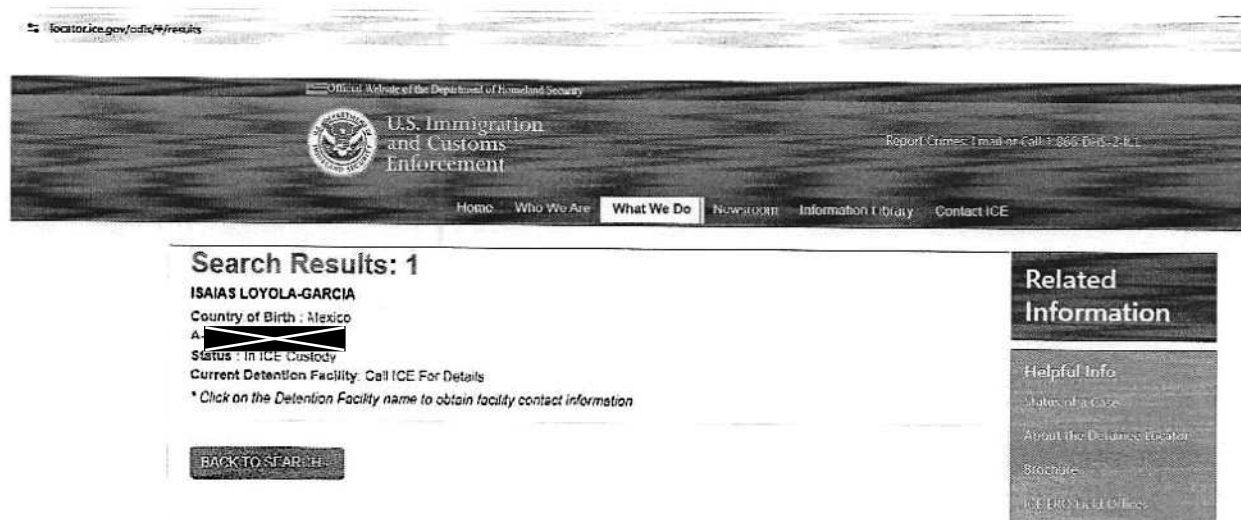
Petitioner Isaias Loyola-Garcia

41. Petitioner Loyola-Garcia is a citizen of Mexico. Petitioner Loyola-Garcia entered the United States without inspection, between ports of entry across the U.S.-Mexico border, in approximately 1999, 2005 and for the last time in 2007. Upon information and belief, he was released into the United States following a brief encounter with immigration officers.

42. Petitioner Loyola-Garcia then made his way to Maryland area, where he established a life. He currently resides in Manassas, Maryland with his whole family.

43. Petitioner Loyola-Garcia was pulled over and detained on October 23, 2025, near Arlington, Virginia, while on his way home.

44. Upon information and belief, Petitioner Loyola-Garcia has been transferred from the ICE Field Office in Chantilly, VA to the Farmville Detention Center in Farmville, VA within the territorial jurisdiction of this Court. See ICE Detainee Locator information (available at <https://locator.ice.gov/> (last visited on October 24, 2025)):



45. Petitioner Loyola-Garcia has pending removal proceedings (his Master Calendar Hearing is scheduled for November 18, 2025), and is not subject to a final order of removal. See EOIR Automated Case Information (available at <https://acis.eoir.justice.gov/> (last visited on October 24, 2025)):

Automated Case Information

Name: LOYOLA-GARCIA, ISAIAS AMADO | A-Number: 221-472-610 | Docket Date: 10/24/2025

Next Hearing Information Your upcoming MASTER hearing is on November 18, 2025 at 1:30 PM. JUDGE Donoso-Stevens, Karen COURT ADDRESS 7619 LITTLE RIVER TPK., 4TH FL ANNANDALE, VA 22003	Court Decision and Motion Information This case is pending.
BIA Case Information No appeal was received for this case.	Court Contact Information If you require further information regarding your case, or wish to file additional documents, please contact the immigration court. COURT ADDRESS 7619 LITTLE RIVER TPK., 4TH FL ANNANDALE, VA 22003 PHONE NUMBER (703) 343-4000

46. Petitioner Loyola-Garcia was the primary breadwinner for his family, including his U.S. citizen wife and three children (ages 2, 7, and 11 years old). His unlawful detention will cause them profound financial and emotional hardship. His wife is currently recovering from breast cancer surgery and radiation. His wife is also the sole caretaker for their youngest child, and so is not currently employed outside of the home. Petitioner Loyola-Garcia's 7-year-old suffers from Encopresis, which they are still trying to manage. His children have not been able to attend school since his arrest due to the emotional distress. In Petitioner Loyola Garcia's absence, all household responsibilities will fall to his wife, and she is not certain how they will make ends meet at this time with him.

47. All Respondents consider that Petitioner Loyola-Garcia is detained pursuant to 8 U.S.C. § 1225(b)(2). *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216. Accordingly, it would be futile for Petitioner Loyola-Garcia to request a bond from an Immigration Judge. Exhaustion of administrative remedies would therefore be futile.

**FIRST CLAIM FOR RELIEF:
Declaratory Judgment**

48. Petitioners re-allege and incorporate by reference the preceding paragraphs 1-47.

49. Petitioners request a declaration from this Court that they each are not an applicant for admission “seeking admission” or “an arriving alien” subject to mandatory detention under 8 U.S.C. §§ 1225(b)(1) or (b)(2), and that their current detention by Respondents is proper, if at all, only under 8 U.S.C. § 1226(a).

**SECOND CLAIM FOR RELIEF:
No-Bond Detention in Violation of 8 U.S.C. § 1226(a)**

50. Petitioners re-allege and incorporate by reference the preceding paragraphs 1-47.

51. Since Petitioners are not an applicant for admission “seeking admission” or “an arriving alien” subject to 8 U.S.C. §§ 1225(b)(1) or (b)(2), and have no disqualifying criminal arrests or convictions subject to 8 U.S.C. § 1226(c), they are entitled to a bond redetermination hearing by an immigration judge pursuant to 8 U.S.C. § 1226(a).

52. Respondents’ actions, as set forth herein, violate Petitioners’ statutory right to a bond redetermination hearing in front of an immigration judge.

**THIRD CLAIM FOR RELIEF:
Detention in Violation of Due Process**

53. Petitioners re-allege and incorporate by reference the preceding paragraphs 1-47.

54. Immigration detention is civil, not criminal, in nature. There are only two permissible reasons for immigration detention: to avoid flight risk, and to avoid danger to the community.

55. After entering the United States unlawfully, Petitioners went on to develop ties to the community over the course of several years. Petitioners are each therefore a “person” within

the meaning of the Due Process Clause of the Fifth Amendment to the U.S. Constitution, and have a liberty interest in freedom from physical restraint.

56. Respondents' actions in detaining Petitioners without a bond hearing before a neutral and detached magistrate deprives Petitioners of their rights without due process of law.

REQUEST FOR RELIEF

Petitioners pray for judgment against Respondents and respectfully request that the Court enters an order:

- a) Issuing an Order to Show Cause, ordering Respondents to justify the basis of Petitioners' detention in fact and in law, forthwith;
- b) Enjoin Petitioners' transfer outside of this judicial district pending this litigation;
- c) Declare that Petitioner are not an applicant for admission "seeking admission" or "an arriving alien" subject to 8 U.S.C. § 1225(b);
- d) Declare that Respondents' actions, as set forth herein, violate Petitioners' due process rights;
- e) Declare that Respondents may properly detain Petitioners, if at all, only pursuant to 8 U.S.C. § 1226(a);
- f) Order that Respondents conduct a bond hearing for Petitioners pursuant to 8 U.S.C. § 1226(a) within 15 days;
- g) Grant the writ of habeas corpus and order Respondents to release Petitioners forthwith, upon payment of the bond as ordered by the Immigration Judge;
- h) Award Petitioners their costs of suit; and
- i) Grant any other relief that this Court deems just and proper.

Respectfully submitted,

Date: October 24, 2025

/s/ Simon Sandoval-Moshenberg
Simon Sandoval-Moshenberg, Esq.
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Counsel for Petitioners

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on this date, I uploaded the foregoing, with all attachments thereto, to this court's CM/ECF system, which will send a Notice of Electronic Filing (NEF) to all case participants. I furthermore will send a copy by certified U.S. mail, return receipt requested, to:

Civil Process Clerk
U.S. Attorney's Office for the Eastern
District of Virginia
2100 Jamieson Ave
Alexandria, VA 22314

Jeffrey Crawford, Warden
Farmville Detention Center
P.O. Box 488
Farmville, VA 23901

Office of the General Counsel
U.S. Department of Homeland Security
245 Murray Lane, SW, Mail Stop 0485
Washington, DC 20528-0485

Pamela Bondi, Attorney General of the
United States
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

Office of the Principal Legal Advisor
U.S. Immigration and Customs
Enforcement
500 12th Street SW, Mail Stop 5902
Washington, DC 20536-5902

Respectfully submitted,

Date: October 24, 2025

/s/ Simon Sandoval-Moshenberg
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