

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA  
WAYCROSS DIVISION

JACOB IRA VIJANDRE,	§	
	§	
<i>Petitioner,</i>	§	
	§	
v.	§	Civil Action No. 5:25-cv-136-LGW-
	§	BWC
WARDEN, FOLKSTON ICE	§	
PROCESSING CENTER,	§	
	§	
<i>Respondent.</i>	§	
	§	

NOTICE

The Court instructed the parties to “file a notice on the docket if there are any changes in the status of [Mr. Vijandre’s] immigration case.” ECF No. 26 at 2.

On December 18, 2025, the Department of Homeland Security (“DHS”) filed a pre-hearing statement and accompanying evidence in Mr. Vijandre’s removal proceedings. See attached, exh. F and G.<sup>1</sup>

The pre-hearing statement further clarifies Respondent’s purported legal basis for retaining custody of Mr. Vijandre. The statement argues that Mr. Vijandre is alleged to be a terrorist (and is therefore ineligible to apply for asylum or withholding of removal) because of the endorse/espouse provision of the INA. See Exh. F at 8-9. It justifies application of this provision to Mr. Vijandre by stating that “direct participation in violence is not required” for the endorse/espouse provision to apply,

---

<sup>1</sup> DHS also filed evidence regarding country conditions in the Philippines. Because this habeas petition does not challenge the removal proceedings, this filing is not relevant and is not being attached to this notice.

and states: “Support for legal defense, expressions of sympathy, or advocacy framed as humanitarian do not negate the statutory bar where the conduct constitutes endorsement or material support.” *Id.* at 9.

The pre-hearing statement also restates the allegation that Mr. Vijandre has solicited funds for terrorist organizations. However, the statement clarifies that this allegation relates solely to raising funds to support legal defense campaigns in U.S. courts of law, as opposed to soliciting funds to support an ongoing conspiracy or terrorist activity. The pre-hearing statement puts forward the position: “DHS evidence shows that Respondent publicly solicited donations *to support legal defense funds* for [REDACTED] and [REDACTED]. See DHS NOF [Notice of Filing], Tab F. The solicitation of funds—regardless of purpose—for a terrorist organization constitutes terrorist activity under the statute.” *Id.* at 8. (Emphasis added).

However, the Notice of Filing does not include a “Tab F” or any information confirming Mr. Vijandre solicited funds for either [REDACTED] or the new group referenced in the filing for the first time, [REDACTED].” See Exh. It contains only exhibits A through E.

Petitioner also reiterates his prior requests for an evidentiary hearing and oral argument.

Dated: December 19, 2025

**/s/ Samantha C. Hamilton**

Samantha C. Hamilton  
Ga. Bar No. 326618

**/s/ Meredyth Yoon**

Meredyth Yoon  
Ga. Bar No. 204566  
ASIAN AMERICANS ADVANCING  
JUSTICE – ATLANTA  
5680 Oakbrook Pkwy., Ste. 148  
Norcross, G.A. 30093  
(470) 816-3319  
shamilton@advancingjustice-  
atlanta.org  
myoon@advancingjustice-atlanta.org

Respectfully Submitted,

**/s/ Eric Lee**

Eric Lee  
Mich. Bar No. P80058

**/s/ Christopher Godshall-Bennett**

Christopher Godshall-Bennett  
D.C. Bar No. 1780920  
LEE & GODSHALL-BENNETT LLP  
712 H St. NE, Unit 5019  
Washington, D.C. 20002  
(202) 949-2526  
eric@leegodshallbennett.com  
chris@leegodshallbennett.com

**/s/ Maria Kari**

Maria Kari  
Tex. Bar No. 241271161  
PROJECT TAHA  
5300 N Braeswood Blvd., Ste. 4-191  
Houston, T.X. 77096  
info@mariakari.org

*Attorneys for Petitioner*

**CERTIFICATE OF SERVICE**

I hereby certify that on December 19, 2025, I electronically filed the foregoing on the Court's CM/ECF system, that all participants in the case are registered CM/ECF users, and that service will be accomplished by the CM/ECF system.

*/s/ Eric Lee*

Eric Lee

*Attorney for Petitioner*