



**I. PARTIES & CUSTODY**

1. Petitioner Denis Daniel Lopez Cruz is currently detained at the Immigration and Customs Enforcement (“ICE”) Joe Corley Processing Center, located at 500 Hilbig Road, Conroe, Texas 77301. He has been in ICE custody since September 15, 2025.
2. Respondent Grant Dickey, in his official capacity as Associate Warden of the ICE Joe Corley Processing Center has refused to effect Petitioner’s release from unlawful custody at that facility.
3. Respondent Raymond Thompson, in his official capacity as Associate Warden of the ICE Joe Corley Processing Center has refused to effect Petitioner’s release from unlawful custody at that facility.
4. Respondent Bret Bradford, in his official capacity as Director of the Houston Field Office of ICE Enforcement and Removal Operations, has refused to effect Petitioner’s release from unlawful custody at the ICE Joe Corley Processing Center.
5. Respondent Kristi Noem, in her official capacity as Secretary of the United States Department of Homeland Security, has refused to exercise her authority to oversee her department’s ICE Enforcement and Removal Operations and thereby effect Petitioner’s release from unlawful custody at the ICE Joe Corley Processing Center.
6. Respondent Pam Bondi, in her official capacity as Attorney General of the United States, has refused to exercise her authority to oversee her department’s ICE Enforcement and Removal Operations and thereby effect Petitioner’s release from unlawful custody at the ICE Joe Corley Processing Center.

## **II. JURISDICTION & VENUE**

7. This Court has jurisdiction pursuant to 28 U.S.C. § 2241 to issue writs of habeas corpus when the petitioner is in custody in violation of the Constitution or laws of the United States.
8. Venue is proper in this district because Petitioner is detained within this district.

## **III. EXHAUSTION OF ADMINISTRATIVE REMEDIES**

9. Petitioner has exhausted his administrative remedies to the extent required by law.
10. Petitioner has fully cooperated with Respondents and has not delayed or obstructed his detention.
11. Petitioner has requested parole via a packet submitted to ICE, asking that a bond amount be set to permit his release from custody. ICE has not granted Petitioner's parole request.
12. Petitioner's only remedy is by way of this judicial action.

## **IV. FACTUAL AND PROCEDURAL BACKGROUND**

13. Petitioner is a twenty-one year old male native and citizen of Cuba. *See attached*, Exhibit A: Petitioner's Identification. He fled Cuba on October 16, 2022 due to persecution and threats of violence against him because of his previous political activism in that country. *See attached*, Exhibit B: Petitioner's Form I-589 Application for Asylum.
14. On October 18, 2022, Petitioner entered the United States without inspection near Marathon, Florida. *See attached*, Exhibit C: Record of Sworn Statement in Proceedings under Section 235(b)(1) of the INA.

15. On that same day, an Immigration Officer determined Petitioner was inadmissible and gave a notice and order of expedited removal. He was then released from custody and asked to check in with ICE Enforcement and Removal Operations *See attached*, Exhibit D: Notice of Order and Expedited Removal.
16. On May 2, 2023, Petitioner filed to a Form I-589 Application for Asylum and for Withholding of Removal under the Convention Against Torture with USCIS. *See attached*, Exhibit B: *supra*.
17. On November 8, 2023 Petitioner was issued an Employment Authorization Document under the asylum category. *See attached*, Exhibit E: Work Permit
18. On September 15, 2025, Petitioner was detained by ICE officers at his credible fear interview at USCIS offices. He was transferred to Joe Corley.
19. On September 24, 2025, the court conducted a credible fear review, at the conclusion of which the court affirmed the findings and conclusions of the Asylum Officer and returned the case to the DHS for respondent to be removed from the United States. *See attached*, Exhibit F: Order of the Immigration Judge.
20. On that same day, after further review of the case, the Court determined that necessary components of the DHS credible fear determination were missing and ordered that the Court's September 24, 2025 oral decision and order affirming the findings and conclusions of the Asylum Officer is withdrawn and the DHS credible fear determination is vacated. . *See attached*, Exhibit F, *supra*.

21. Petitioner has still not been released by ICE following the DHS credible fear determination being vacated and is still in custody to this day.
22. **On November 7, 2025, Petitioner sent a parole request packet to U.S. Immigration and Customs Enforcement asking for a bond amount to be set to \$1500. The parole request has not been granted by ICE. See attached, Exhibit G, Parole Request Packet.**
23. Petitioner is currently being detained under ICE custody undergoing removal proceedings at the Joe Corley Processing Center.
24. The government has not been able to articulate any meaningful reason why Petitioner should continue to remain in detention despite the fact that no removal proceedings are pending against him.
25. Petitioner, through Counsel, now submits the present Petition for Writ of Habeas Corpus to this Honorable Court, and respectfully requests the Court to order Respondents to effect his immediate release.

#### **V. LEGAL FRAMEWORK FOR RELIEF SOUGHT**

26. Under U.S. Code 28 § 2241, writs of habeas corpus may be granted by the district courts on behalf of a prisoner in several instances, including when they are (1) “in custody under or by the authority of the United States or is committed for trial before some court thereof,” (3) “in custody in violation of the Constitution or laws and treaties of the United States,” and (4) when they, “being a citizen of a foreign state and domiciled therein [are] in custody for an act done or omitted under any alleged right, title, authority, privilege, protection, or

exemption claimed under the commission, order or sanction of any foreign state, or under color thereof, the validity and effect of which depend upon the law of nations[.]”

27. Courts have consistently recognized “habeas corpus as an appropriate vehicle through which noncitizens may challenge the fact of their civil immigration detention.” *Vazquez Barrera v. Wolf*, 455 F. Supp. 3d 330, 336 (S.D. Tex. 2020) (citing *Zadvydas v. Davis*, 533 U.S. at 688 (ruling on merits of habeas petition challenging validity of indefinite mandatory detention)).

## **VI. CLAIMS FOR RELIEF**

### **COUNT ONE:**

**RESPONDENTS HAVE UNLAWFULLY DETAINED PETITIONER  
IN VIOLATION OF THE IMMIGRATION AND NATURALIZATION ACT.**

28. Petitioner alleges and incorporates by reference paragraphs 1 through 27 above.
29. Petitioner is currently in no proceedings before the Conroe Immigration Court, and there has been no final order of removal issued against him. Respondents lack statutory authority to detain him and no removal order has been issued.
30. Petitioner poses no risk of danger to the community. In the three years since Petitioner came to the United States, he has never been charged with a crime, nor has he demonstrated any conduct whatsoever indicating that he is a threat to the United States or otherwise eligible for deportation.
31. Therefore, **Petitioner merits immediate release** because there has been no final order of removal issued against him, and the government cannot articulate any meaningful reason why she should continue to remain in detention despite having no proceedings against him.

**COUNT TWO:**

**RESPONDENTS HAVE UNLAWFULLY DETAINED PETITIONER  
IN VIOLATION OF CONSTITUTIONAL DUE PROCESS**

32. Petitioner alleges and incorporates by reference paragraphs 1 through 31 above.
33. Petitioner's continued detention violates his right to substantive and procedural due process guaranteed by the Fifth Amendment to the U.S. Constitution.
34. Petitioner is unlawfully in custody pursuant to INA § 241(a)(6), 8 U.S.C. § 1231(a)(6) (2018) ("Section 241"). Under *Zadvydas*, that provision prohibits the indefinite detention of noncitizens who (i) cannot be repatriated in the reasonably foreseeable future, and (ii) pose no threat to the community. Any such detention is unconstitutional. *See Zadvydas*, 533 U.S. at 689, emphasis added ("In our view, the statute [Section 241], read in light of the Constitution's demands, limits an alien's post-removal-period detention to a period reasonably necessary to bring about that alien's removal from the United States. It does not permit indefinite detention.").
35. The Fifth Amendment's Due Process Clause prohibits the government from detaining individuals without legal authority.
36. Under 8 U.S.C. § 1231(a)(1), detention during the removal period is only authorized after a removal order becomes "final."
37. As stated above, Petitioner has no proceedings in immigration court. A removal order has not been issued and thus, there is no basis for continued detention.

38. Furthermore, under *Zadvydas*, a non-citizen petitioner is not barred from seeking a writ of habeas corpus as relief for indefinite detention when there has been no final order issued. *See Zadvydas*, 533 U.S. at 688 (“The aliens here, however, do not seek review of the Attorney General's exercise of discretion; rather, they challenge the extent of the Attorney General's authority under the post-removal-period detention statute. And the extent of that authority is not a matter of discretion . . . [therefore we] conclude habeas corpus proceedings remain available. . . .”).
39. Therefore, this petition is not barred, as the Petitioner is not seeking to collaterally attack the final removal order, because there is no final order yet issued by the Court.
40. Petitioner's continued detention lacks statutory authority and violates his right to substantive due process under the Constitution. Therefore, he should be immediately released from custody.

## VII. REQUEST FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Honorable Court **IMMEDIATELY** issue a temporary restraining order:

1. **Directing Respondents to immediately release Petitioner from custody;**
2. Restraining and enjoining Respondent, their agents, employees, and successors from removing Petitioner from the United States;
3. Directing Respondent to take all necessary steps to halt any removal preparations;
4. Requiring Respondent to notify all relevant personnel that Petitioner shall not be removed;
5. Set an expedited hearing on Petitioner's motion for preliminary injunction;

6. After hearing, issue a preliminary injunction maintaining the relief requested above during the pendency of this action;
7. Waive or set security in a nominal amount;
8. Award attorney's fees and costs; and
9. Grant such other relief as this Court deems just and proper.

Respectfully submitted,

/s/ Matthew Mendez  
Matthew Mendez  
Attorney for Petitioner  
State Bar No. 24098092  
6300 Gulfton Street  
Houston, Texas 77081  
Tel. (346) 205-4343  
matt@mendezlawoffice.com

#### **PETITIONER VERIFICATION**

Petitioner, Denis Daniel Lopez Cruz, is currently detained in ICE custody, and has authorized Counsel, Matthew Mendez, to verify, on his behalf, that the facts stated therein are true and correct to the best of his knowledge and belief.

/s/ Matthew Mendez  
Matthew Mendez  
Attorney for Petitioner

November 13, 2025  
Date

**CERTIFICATE OF SERVICE**

On November 13, 2025, Counsel for Plaintiff served a copy of the attached Motion via USPS Mail, in compliance with Rule 4 of Federal Rules of Civil Procedure, upon the **Respondent, Grant Dickey, in his Official Capacity as Co-Associate Warden of the Joe Corley Processing Center**, at (1) Office of the Warden, 500 Hilbig Road, Conroe, Texas 77301, and (2) to the United States at Civil Process Clerk, U.S. Attorney's Office, 1000 Louisiana Street, Suite 2300, Houston, Texas 77002.

/s/ Matthew Mendez  
Matthew Mendez  
Attorney for Petitioner

November 13, 2025  
Date

**CERTIFICATE OF SERVICE**

On November 13, 2025, Counsel for Plaintiff served a copy of the attached Motion via USPS Mail, in compliance with Rule 4 of Federal Rules of Civil Procedure, upon the **Respondent, Raymond Thompson, in his Official Capacity as Co-Associate Warden of the Joe Corley Processing Center**, at (1) Office of the Warden, 500 Hilbig Road, Conroe, Texas 77301, and (2) to the United States at Civil Process Clerk, U.S. Attorney's Office, 1000 Louisiana Street, Suite 2300, Houston, Texas 77002.

/s/ Matthew Mendez  
Matthew Mendez  
Attorney for Petitioner

November 13, 2025  
Date

**CERTIFICATE OF SERVICE**

On November 13, 2025, Counsel for Plaintiff served a copy of the attached Motion via USPS Mail, in compliance with Rule 4 of Federal Rules of Civil Procedure, upon the **Respondent, Bret Bradford, in his Official Capacity as Field Office Director, of ICE Enforcement and Removal Operations Houston Field Office**, at (1) Office of the Field Office Director, Enforcement and Removal Operations, Houston Field Office, 126 Northpoint Drive, Houston, Texas 77060, and (2) to the United States at Civil Process Clerk, U.S. Attorney's Office, 1000 Louisiana Street, Suite 2300, Houston, Texas 77002.

/s/ Matthew Mendez  
Matthew Mendez  
Attorney for Petitioner

November 13, 2025  
Date

**CERTIFICATE OF SERVICE**

On November 13, 2025, Counsel for Plaintiff served a copy of the attached Motions via USPS Mail, in compliance with Rule 4 of Federal Rules of Civil Procedure, upon the **Respondent, Kristi Noem, in her Official Capacity as Director of U.S. Department of Homeland Security**, at (1) Office of General Counsel, U.S. Department of Homeland Security, 245 Murray Lane, SW, Mail Stop 0485, Washington, D.C. 20530; and (2) to the United States at Civil Process Clerk, U.S. Attorney's Office, 1000 Louisiana Street, Suite 2300, Houston, Texas 77002.

/s/ Matthew Mendez  
Matthew Mendez  
Attorney for Petitioner

November 13, 2025  
Date

**CERTIFICATE OF SERVICE**

On November 13, 2025, Counsel for Plaintiff served a copy of the attached Motion via USPS Mail, in compliance with Rule 4 of Federal Rules of Civil Procedure, upon the **Respondent, Pam Bondi, in her Official Capacity as Attorney General of the United States**, at (1) U.S. Attorney General, 950 Pennsylvania Avenue, NW, Washington, D.C. 20530-0001; and (2) to the Assistant Attorney General for Administration, U.S. Department of Justice, Justice Management Division, 950 Pennsylvania Avenue, NW, Room 1111, Washington, D.C. 20530; and (3) to the United States at Civil Process Clerk, U.S. Attorney's Office, 1000 Louisiana Street, Suite 2300, Houston, Texas 77002.

/s/ Matthew Mendez  
Matthew Mendez  
Attorney for Petitioner

November 13, 2025  
Date



**TABLE OF EXHIBITS**

<b>EXHIBIT A. Petitioner's ID</b>	<b>2</b>
<b>EXHIBIT B. Form I589</b>	<b>4-10</b>
<b>EXHIBIT C. Record of Sworn Statement in Proceedings</b>	<b>12-14</b>
<b>EXHIBIT D. Notice of Order and Expedited Removal</b>	<b>16</b>
<b>EXHIBIT E. Work Permit</b>	<b>18-20</b>
<b>EXHIBIT F. Order of Immigration Judge</b>	<b>22-23</b>
<b>EXHIBIT G. Parole Request Packet</b>	<b>25-26</b>
<b>CERTIFICATE OF SERVICE</b>	<b>27-29</b>

# **EXHIBIT C**

Record of Sworn Statement in Proceedings under Section 235(b)(1) of the Act

U.S. Department of Homeland Security

Office: MARATHON, FL, BORDER PATROL STATION

File No. [REDACTED]  
Event No. [REDACTED]

Statement by: LOPEZ CRUZ, DENIS DANIEL

In the case of: DENIS DANIEL, LOPEZ CRUZ

Date of Birth: [REDACTED]

Gender (select one):  Male  Female

At: MARATHON, FL, BORDER PATROL STATION

Date: October 18, 2022

Before: JAYDEN RICHARDS

BORDER PATROL AGENT

In the: SPANISH

language. Interpreter

Employed by

I am an officer of the United States Department of Homeland Security. I am authorized to administer the immigration laws and to take sworn statements. I want to take your sworn statement regarding your application for admission to the United States. Before I take your statement, I also want to explain your rights, and the purpose and consequences of this interview.

You do not appear to be admissible or to have the required legal papers authorizing your admission to the United States. This may result in your being denied admission and immediately returned to your home country without a hearing. If a decision is made to refuse your admission into the United States, you may be immediately removed from this country, and if so, you may be barred from reentry for a period of 5 years or longer.

This may be your only opportunity to present information to me and the Department of Homeland Security to make a decision. It is very important that you tell me the truth. If you lie or give misinformation, you may be subject to criminal or civil penalties, or barred from receiving immigration benefits or relief now or in the future.

Except as I will explain to you, you are not entitled to a hearing or review.

U.S. law provides protection to certain persons who face persecution, harm or torture upon return to their home country. If you fear or have a concern about being removed from the United States or about being sent home, you should tell me so during this interview because you may not have another chance. You will have the opportunity to speak privately and confidentially to another officer about your fear or concern. That officer will determine if you should remain in the United States and not be removed because of that fear.

Until a decision is reached in your case, you will remain in the custody of the Department of Homeland Security.

Any statement you make may be used against you in this or any subsequent administrative proceeding.

Q. Do you understand what I've said to you?

A. YES

Q. Do you have any questions?

A. NO

Q. Are you willing to answer my questions at this time?

A. YES

Q. Do you swear or affirm that all statements you are about to make are true and complete?

A. YES

REFUSED TO SIGN

msung Galaxy A14 5G

**U.S. DEPARTMENT OF HOMELAND SECURITY  
NOTICE TO ALIEN ORDERED REMOVED/DEPARTURE VERIFICATION**

A. Fee No.   
Date: 

Alien's name: RODOLFO DANIEL LOPEZ GONZ

You have been found to be inadmissible to the United States under the provisions of section 212(a) of the Immigration and Nationality Act (Act) or deportable under the provisions of section 237 of the Act as a Visa Waiver Pilot Program violator. In accordance with the provisions of section 212(a)(9) of the Act, you are prohibited from entering, attempting to enter, or being in the United States:

- For a period of 5 years from the date of your departure from the United States as a consequence of your having been found inadmissible as an arriving alien in proceedings under section 235(b)(1) or 240 of the Act.
- For a period of 10 years from the date of your departure from the United States as a consequence of your having been ordered removed in proceedings under any section of the Act other than section 235(b)(1) or 240, or of being ordered excluded under section 230 of the Act in proceedings commenced prior to April 1, 1997.
- For a period of 20 years from the date of your departure from the United States as a consequence of being found inadmissible and being previously excluded, deported, or removed from the United States.
- At any time because in addition to being found inadmissible, you have been convicted of a crime designated as an aggravated felony.

After your removal has been effected, you must request and obtain permission from the Secretary of Homeland Security to reapply for admission to the United States during the period indicated. You must obtain such permission before commencing your travel to the United States. Application forms for requesting permission to reapply for admission may be obtained by contacting any United States Consulate or U.S. Department of Homeland Security office. Refer to the above file number when requesting forms or information.

**WARNING FOR ALL REMOVED ALIENS:** It is a crime under Title 18 United States Code, Section 1188, for an alien who has been removed from the United States to enter, attempt to enter, or be found in the United States without the Secretary of Homeland Security's express consent. Depending on the circumstances of the removal, conviction for this crime can result in imprisonment of a period of from 2 to 20 years and/or a fine up to \$250,000.

**SPECIAL NOTICE TO SEX OFFENDERS:** Federal Law requires a convicted sex offender, including an alien who has been removed from or otherwise departed the United States and subsequently returns, to register in each jurisdiction in the United States in which he or she resides, is employed, or is a student. Violation of this requirement can result in prosecution and imprisonment for up to 10 years under Title 18 United States Code, Section 2259.

JAYDEN W. RICHARDS  
(Signature of officer taking removal)

BORDER PATROL AGENT  
(Title of officer)

MARATHON, FLORIDA  
(Location of DHS Office)

**Verification of Removal**  
(Complete this section for file copy only)

Departure Date	Port of Departure	Manner of Departure
Signature of Verifying Officer		Title of Officer



Photograph of Alien



Right Index Finger

(Signature of alien whose fingerprint and photograph appear above)

(Signature of official taking fingerprint)

ER



Department of Homeland Security  
 Immigration and Customs Enforcement  
 2805 SW 145<sup>TH</sup> AVE.  
 MIRAMAR, FL 33025

Name: Lopez Cruz, Denis Daniel

DOI

A#

Please EMAIL the office shown below immediately in connection with an official matter.

OFFICE Email Address:	ICE-ERO-MIA-MMO-ScheduleAppt-SMB@ice.dhs.gov																			
DATE AND HOUR	Upon your release from custody, you are required to check in with ICE Enforcement and Removal Operations using one of the following options:																			
	<table border="1"> <tr> <th>With I-385</th> <th>With Electronic Monitoring Device</th> <th>All others</th> </tr> <tr> <td><a href="https://checkin.ice.gov/ios">https://checkin.ice.gov/ios</a></td> <td>MIA-ATDU@ice.dhs.gov</td> <td>ICE-ERO-MIA-MMO-ScheduleAppt-SMB@ice.dhs.gov</td> </tr> <tr> <td>As soon as possible</td> <td>Within 72-hours</td> <td>Within 72-hours</td> </tr> </table>	With I-385	With Electronic Monitoring Device	All others	<a href="https://checkin.ice.gov/ios">https://checkin.ice.gov/ios</a>	MIA-ATDU@ice.dhs.gov	ICE-ERO-MIA-MMO-ScheduleAppt-SMB@ice.dhs.gov	As soon as possible	Within 72-hours	Within 72-hours	<table border="1"> <tr> <th>With I-385</th> <th>With Electronic Monitoring Device</th> <th>All others</th> </tr> <tr> <td><a href="https://checkin.ice.gov/ios">https://checkin.ice.gov/ios</a></td> <td>MIA-ATDU@ice.dhs.gov</td> <td>ICE-ERO-MIA-MMO-ScheduleAppt-SMB@ice.dhs.gov</td> </tr> <tr> <td>As soon as possible</td> <td>Within 72-hours</td> <td>Within 72-hours</td> </tr> </table>	With I-385	With Electronic Monitoring Device	All others	<a href="https://checkin.ice.gov/ios">https://checkin.ice.gov/ios</a>	MIA-ATDU@ice.dhs.gov	ICE-ERO-MIA-MMO-ScheduleAppt-SMB@ice.dhs.gov	As soon as possible	Within 72-hours	Within 72-hours
With I-385	With Electronic Monitoring Device	All others																		
<a href="https://checkin.ice.gov/ios">https://checkin.ice.gov/ios</a>	MIA-ATDU@ice.dhs.gov	ICE-ERO-MIA-MMO-ScheduleAppt-SMB@ice.dhs.gov																		
As soon as possible	Within 72-hours	Within 72-hours																		
With I-385	With Electronic Monitoring Device	All others																		
<a href="https://checkin.ice.gov/ios">https://checkin.ice.gov/ios</a>	MIA-ATDU@ice.dhs.gov	ICE-ERO-MIA-MMO-ScheduleAppt-SMB@ice.dhs.gov																		
As soon as possible	Within 72-hours	Within 72-hours																		
	Detailed instructions on how to schedule an appointment are attached.																			
REQUEST APPOINTMENT	INCLUDE YOUR NAME, ADDRESS, TELEPHONE NUMBER AND A#																			

**You must have a scheduled appointment prior to presenting yourself.**  
 Please only report at the scheduled date and time.

SIGNATURE	DATE
-----------	------

Very truly yours,

*S.D. Jenkins*  
 S.D. Jenkins  
 Deportation Officer

# **EXHIBIT D**

U.S. Department of Homeland Security

Notice and Order of Expedited Removal

DETERMINATION OF INADMISSIBILITY

Event No. [Redacted]
File No. [Redacted]
Date: October 18, 2022

In the Matter of: DENIS DANIEL LOPEZ CRUZ

Pursuant to section 235(b)(1) of the Immigration and Nationality Act (Act), (8 U.S.C. 1225(b)(1)), the Department of Homeland Security has determined that you are inadmissible to the United States under section(s) 212(a) [ ] (6)(C)(i); [ ] (6)(C)(ii); [X] (7)(A)(i)(I); [ ] (7)(A)(i)(II); [ ] (7)(B)(i)(I), and/or [ ] (7)(B)(i)(II) of the Act, as amended, and therefore are subject to removal, in that:

- 1. You are not a citizen or national of the United States.
2. You are a native of CUBA and a citizen of CUBA.
3. 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.

JAYDEN W. RICHARDS
BORDER PATROL AGENT
Name and title of immigration officer (Print)

[Signature]
Signature of immigration officer

ORDER OF REMOVAL
UNDER SECTION 235(b)(1) OF THE ACT

Based upon the determination set forth above and evidence presented during inspection or examination pursuant to section 235 of the Act, and by the authority contained in section 235(b)(1) of the Act, you are found to be inadmissible as charged and ordered removed from the United States.

Name and title of immigration officer (Print)

Signature of immigration officer

Name and title of supervisor (Print)

Signature of supervisor, if available

[ ] Check here if supervisory concurrence was obtained by telephone or other means (no supervisor on duty)

CERTIFICATE OF SERVICE

I personally served the original of this notice upon the above-named person on [Date]

Signature of immigration officer

# EXHIBIT F

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

Matter of	)	
Denis Daniel Lopez Cruz .	)	
<i>Respondent</i>	)	
	)	Case No. 
	)	
	)	IJ: Hon. Robert L. Powell
	)	
In Credible Fear Proceedings	)	Date: September 24, 2025
	)	

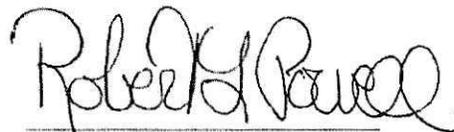
Order of the Immigration Judge

On September 24, 2025, the Court conducted a credible fear review, at the conclusion of which the Court affirmed the findings and conclusions of the Asylum Officer and returned the case to the DHS for respondent to be removed from the United States.

On further review of the case, the Court determined that necessary components of the DHS credible fear determination were missing (*e.g.*, the Asylum Officer's interview notes).

ORDERED that the Court's September 24, 2025, oral decision and order affirming the findings and conclusions of the Asylum Officer is *withdrawn*.

FURTHER ORDERED that the DHS credible fear determination is VACATED.

  
 \_\_\_\_\_  
 ROBERT L. POWELL  
 Immigration Judge

CERTIFICATE OF SERVICE

SERVED BY: MAIL (M) PERSONAL SERVICE (P) ELECTRONIC SERVICE (E)

TO: ALIEN ( ) ALIEN C/O CUSTODIAN ( ) ALIEN'S ATTY/REP (X) DHS (E)

DATE: 9/24/25 BY: COURT STAFF SCE

ATTACHMENTS:  EOIR-33  EOIR-28  LEGAL SERVICES LIST  OTHER

# **EXHIBIT G**

**BOND REQUEST WORKSHEET**

Alien's Name: Denis Daniel Lopez Cruz Alien Number: A [REDACTED]

Attorney's Name: Matthew Mandz Phone Number: [REDACTED]

Interpreter requested \_\_\_\_\_ Language: Spanish

Initial Bond Set by DHS: \_\_\_\_\_ Bond Amount Requested: \$1500

Is the respondent subject to mandatory custody provisions of Section 236(c) of the Act?

**Background Information:** Age: 21 Marital Status: married Date of Marriage: 10/2022

Spouse's Status (e.g., USC or LPR): N/A Children (yes or no) Number of Children: 1

List children's names, dates of birth, and immigration status (if USCs, attach copies of birth certificates):

[REDACTED] [REDACTED] [REDACTED] USC  
(Child's Name) (DOB) (Status)

\_\_\_\_\_  
(Child's Name) (DOB) (Status)

\_\_\_\_\_  
(Child's Name) (DOB) (Status)

\*Please use additional sheets if necessary

Birthplace of mother: Cuba Immigration Status: N/A

Birthplace of father: Cuba Immigration Status: LPR

Is the respondent claiming citizenship of the United States? NO If yes, will the claim be by birth in the U.S., naturalization, acquisition or derivation? \_\_\_\_\_

Does the respondent have any brothers or sisters in the United States? NO

List siblings' names, dates of birth and immigration status in the United States:

\_\_\_\_\_  
(Sibling's Name) (DOB) (Status)

\_\_\_\_\_  
(Sibling's Name) (DOB) (Status)

\_\_\_\_\_  
(Sibling's Name) (DOB) (Status)

\*Please use additional sheets if necessary

Education (both in the U.S. and elsewhere): 11th - Politechnico Cuba.

\*Please use additional sheets to list schools attended, graduation dates, etc.

**Dates of Entry:** First date respondent entered the United States: 10/18/2022

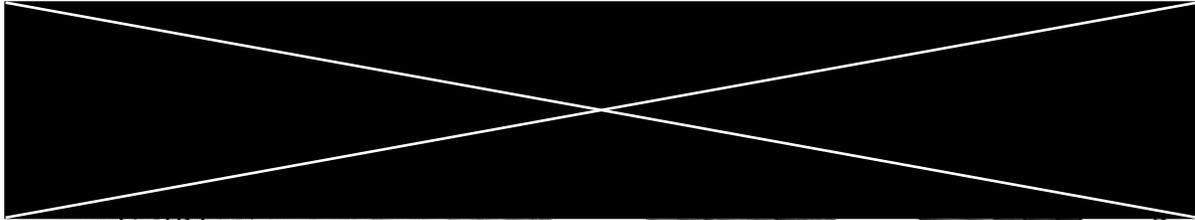
Last date respondent entered the United States: 10/18/2022 Current status: \_\_\_\_\_

Years Resided in the U.S. 3 yrs Date became Legal Permanent Resident: \_\_\_\_\_

**Work Authorization:** Does the respondent have authorization to work in the United States? Yes

Has the respondent ever used illegal documentation to work in the U.S.? No

List last three places of employment, dates of employment, and last salary received:



(Employer)

(Dates)

(Salary)

**Criminal History:** List all convictions, dates of convictions, sentences received and time served: NO

_____	_____	_____	_____
(Crime)	(Date Convicted)	(Sentence)	(Time Served)
_____	_____	_____	_____
(Crime)	(Date Convicted)	(Sentence)	(Time Served)
_____	_____	_____	_____
(Crime)	(Date Convicted)	(Sentence)	(Time Served)

\*Please use additional sheets if necessary

**Immigration Custody:** Date the respondent came into custody of DHS/ICE: 9/15/25

How did the respondent come into custody of DHS/ICE? USCIS credible fear

List any previous deportations, voluntary departures, and voluntary returns: NO

**Relief:** List all forms of relief the respondent will seek: Asylum, Withholding of Removal, protection under Convention Against Torture (CAT)

Has anyone ever filed a petition for alien relative for the respondent? NO When? \_\_\_\_\_

Does the respondent own any real estate in the U.S.? \_\_\_\_\_ If yes, how much equity? \_\_\_\_\_

Where will the respondent live if released? \_\_\_\_\_

With whom will the respondent reside? \_\_\_\_\_

\*Other considerations:

\*Please use additional sheets if necessary

**CERTIFICATE OF SERVICE**

On November 13, 2025, Counsel for Plaintiff served a copy of the attached Exhibits via USPS Mail, in compliance with Rule 4 of Federal Rules of Civil Procedure, upon the **Respondent, Grant Dickey, in his Official Capacity as Co-Associate Warden of the Joe Corley Processing Center**, at (1) Office of the Warden, 500 Hilbig Road, Conroe, Texas 77301, and (2) to the United States at Civil Process Clerk, U.S. Attorney's Office, 1000 Louisiana Street, Suite 2300, Houston, Texas 77002.

/s/ Matthew Mendez  
Matthew Mendez  
Attorney for Petitioner

November 13, 2025  
Date

**CERTIFICATE OF SERVICE**

On November 13, 2025, Counsel for Plaintiff served a copy of the attached Exhibits via USPS Mail, in compliance with Rule 4 of Federal Rules of Civil Procedure, upon the **Respondent, Raymond Thompson, in his Official Capacity as Co-Associate Warden of the Joe Corley Processing Center**, at (1) Office of the Warden, 500 Hilbig Road, Conroe, Texas 77301, and (2) to the United States at Civil Process Clerk, U.S. Attorney's Office, 1000 Louisiana Street, Suite 2300, Houston, Texas 77002.

/s/ Matthew Mendez  
Matthew Mendez  
Attorney for Petitioner

November 13, 2025  
Date

**CERTIFICATE OF SERVICE**

On November 13, 2025, Counsel for Plaintiff served a copy of the attached Exhibits via USPS Mail, in compliance with Rule 4 of Federal Rules of Civil Procedure, upon the **Respondent, Bret Bradford, in his Official Capacity as Field Office Director, of ICE Enforcement and Removal Operations Houston Field Office**, at (1) Office of the Field Office Director, Enforcement and Removal Operations, Houston Field Office, 126 Northpoint Drive, Houston, Texas 77060, and (2) to the United States at Civil Process Clerk, U.S. Attorney's Office, 1000 Louisiana Street, Suite 2300, Houston, Texas 77002.

/s/ Matthew Mendez  
Matthew Mendez  
Attorney for Petitioner

November 13, 2025  
Date

**CERTIFICATE OF SERVICE**

On November 13, 2025, Counsel for Plaintiff served a copy of the attached Exhibits via USPS Mail, in compliance with Rule 4 of Federal Rules of Civil Procedure, upon the **Respondent, Kristi Noem, in her Official Capacity as Director of U.S. Department of Homeland Security**, at (1) Office of General Counsel, U.S. Department of Homeland Security, 245 Murray Lane, SW, Mail Stop 0485, Washington, D.C. 20530; and (2) to the United States at Civil Process Clerk, U.S. Attorney's Office, 1000 Louisiana Street, Suite 2300, Houston, Texas 77002.

/s/ Matthew Mendez  
Matthew Mendez  
Attorney for Petitioner

November 13, 2025  
Date

**CERTIFICATE OF SERVICE**

On November 13, 2025, Counsel for Plaintiff served a copy of the attached Exhibits via USPS Mail, in compliance with Rule 4 of Federal Rules of Civil Procedure, upon the **Respondent, Pam Bondi, in her Official Capacity as Attorney General of the United States**, at (1) U.S. Attorney General, 950 Pennsylvania Avenue, NW, Washington, D.C. 20530-0001; and (2) to the Assistant Attorney General for Administration, U.S. Department of Justice, Justice Management Division, 950 Pennsylvania Avenue, NW, Room 1111, Washington, D.C. 20530; and (3) to the United States at Civil Process Clerk, U.S. Attorney's Office, 1000 Louisiana Street, Suite 2300, Houston, Texas 77002.

/s/ Matthew Mendez  
Matthew Mendez  
Attorney for Petitioner

November 13, 2025  
Date