

**JUDGE KATHLEEN CARDONE**

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
El Paso Division**

Devon Axell Bustillos Perez,

*Petitioner,*

v.

Kristi Noem, *Secretary of Homeland Security,*

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

Pamela Bondi, *Attorney General,*

Mary De Anda-Ybarra, *Director, El Paso ICE  
Field Office, U.S. Immigration and  
Customs Enforcement,*

Warden, *ERO El Paso Camp East Montana,*

*Respondents.*

**EP 25 CV 0564**

Civil Action No. \_\_\_\_\_

**PETITION FOR WRIT OF HABEAS CORPUS**

1. On March 26, 2025, an immigration court found that Petitioner Devon Axell Bustillos Perez would more likely than not be tortured if he were sent to his native Nicaragua. The immigration court therefore granted Petitioner statutory withholding of removal, which prohibits Respondents from removing him to Nicaragua. Should Respondents wish to remove Petitioner to Nicaragua, the law sets forth specific procedures by which they can reopen the case and seek to set aside the grant of withholding of removal. Should Respondents wish to remove Petitioner to any *other* country, they would first need to provide him with notice and the opportunity to apply for protection as to *that* country as well. Until they do either of these things, they cannot remove Petitioner from the United States. Nonetheless, Respondents continue to detain Petitioner without

any significant likelihood of removal in the reasonably foreseeable future. Such conduct cries out for immediate judicial relief.

### **JURISDICTION AND VENUE**

2. 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).

3. 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.

4. Venue lies in this District because Petitioner is currently detained in the custody of U.S. Immigration and Custom Enforcement (ICE) at the ERO El Paso Camp East Montana in El Paso, Texas, within the Western District of Texas; and each Respondent is an officer of the United States sued in his or her official capacity. 28 U.S.C. § 2241; 28 U.S.C. § 1391(e)(1). In addition, the Field Office Director for the El Paso ICE Field Office, maintains his or her principal place of business in El Paso, Texas.

### **THE PARTIES**

5. Petitioner Devon Axell Bustillos Perez is a native of Nicaragua, currently detained by Respondents at ERO El Paso Camp East Montana, Texas.

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

7. Respondent Todd Lyons is the Acting Director of ICE. He is the head of the federal

agency responsible for all immigration enforcement in the United States.

8. Respondent Pamela Bondi is the Attorney General of the United States. The immigration judges who decide removal cases and applications for relief from removal do so as her designees.

9. Respondent Mary De Anda-Ybarra is the Field Office Director of the El Paso ICE Field Office, and in this position is responsible for overseeing ICE operations pertaining to noncitizens within its territorial jurisdiction, such as Petitioner, including detentions, enforcement, and removal operations. She is the immediate legal custodian of Petitioner for purposes of a federal habeas petition.

10. Respondent Warden of the ERO El Paso Camp East Montana is the immediate custodian who is currently holding Petitioner in physical custody in El Paso, TX. They are sued in their official capacity.

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

#### **LEGAL BACKGROUND**

12. Withholding of removal under 8 U.S.C. § 1231(b)(3) prohibits the government from removing a noncitizen to a country where it is more likely than not that the individual would be persecuted on account of race, religion, nationality, membership in a particular social group, or political opinion. See 8 C.F.R. § 1208.16(b). This form of relief is mandatory if the applicant meets the standard and is distinct from asylum in that it does not lead to permanent residency.

13. To qualify for withholding of removal, the noncitizen bears the burden of proving that it is more likely than not that they would face persecution if returned to their country of origin. The government may not remove an individual with a valid withholding order to that country

unless the order is formally terminated following the procedures set forth in the regulations. *See* 8 C.F.R. § 1208.24(f).

14. If a noncitizen is granted withholding of removal, “DHS may not remove the alien to the country designated in the removal order unless the order of withholding is terminated.” *Johnson v. Guzman Chavez*, 594 U.S. 523, 531 (2021). No exceptions lie.

15. Federal regulations provide a procedure by which a grant of withholding of removal issued by an immigration judge may be terminated: DHS must move to reopen the removal proceedings before the immigration judge and must prove, by a preponderance of the evidence, that the individual would no longer face persecution. 8 C.F.R. § 1208.24(f). Only after termination may removal proceed.

16. However, withholding of removal is a country-specific form of relief. Should the government wish to remove an individual with a grant of withholding of removal to some *other* country, it must first provide that individual with notice and an opportunity to apply for withholding of removal as to *that* country as well, if appropriate. 8 U.S.C. § 1231(b)(3)(A). *See also Andriasian v. INS*, 180 F.3d 1033, 1041 (9th Cir. 1999); *Kossov v. INS*, 132 F.3d 405, 408-09 (7th Cir. 1998); *El Himri v. Ashcroft*, 378 F.3d 932, 938 (9th Cir. 2004); *cf. Protsenko v. U.S. Att’y Gen.*, 149 F. App’x 947, 953 (11th Cir. 2005) (per curiam) (permitting removal to third country only where individuals received “ample notice and an opportunity to be heard”).

17. Finally, for individuals with a removal order but who cannot be removed (because there is no country designated to which they can lawfully be removed, or because logistical or practical considerations prevent execution of an otherwise lawfully executable order), 8 U.S.C. §1231(a) permits the government to detain noncitizens during the “removal period,” which is

defined as the 90-day period during which “the Attorney General shall remove the alien from the United States.” 8 U.S.C. §1231(a)(1)(A).

18. After the expiration of the removal period, 8 U.S.C. § 1231(a)(3) provides that the government shall release unremovable noncitizens on an order of supervision (the immigration equivalent of supervised release, with strict reporting and other requirements). Pursuant to 8 U.S.C. § 1231(a)(6), even noncitizens with aggravated felony convictions may be “released” if “subject to the terms of supervision” set forth in 8 U.S.C. § 1231(a)(3).

19. Constitutional limits on detention beyond the removal period are well established. Government detention violates due process unless it is reasonably related to a legitimate government purpose. *Zadvydas v. Davis*, 533 U.S. 678, 701 (2001). “[W]here detention’s goal is no longer practically attainable, detention no longer ‘bear[s][a] reasonable relation to the purpose for which the individual [was] committed.’” *Id.* at 690 (quoting *Jackson v. Indiana*, 406 U.S. 715, 738 (1972)). Additionally, cursory or pro forma findings of dangerousness do not suffice to justify prolonged or indefinite detention. *Zadvydas*, 533 U.S. at 691 (“But we have upheld preventative detention based on dangerousness only when limited to especially dangerous individuals [like suspected terrorists] and subject to strong procedural protections.”)

20. The purpose of detention during and beyond the removal period is to “secure[] the alien’s removal.” *Zadvydas*, 533 U.S. at 682. In *Zadvydas*, the Supreme Court “read § 1231 to authorize continued detention of an alien following the 90-day removal period for only such time as is reasonably necessary to secure the alien’s removal.” *Demore v. Kim*, 538 U.S. 510, 527 (2003) (citing *Zadvydas*, 533 U.S. at 699).

21. As the Supreme Court explained, where there is no possibility of removal, immigration detention presents substantive due process concerns because “the need to detain the

noncitizen to ensure the noncitizen's availability for future removal proceedings is "weak or nonexistent." *Zadvydas*, 533 U.S. at 690-92. Detention is lawful only when "necessary to bring about that alien's removal." *See id.* at 689.

22. To balance these competing interests, the *Zadvydas* Court established a rebuttable presumption regarding what constitutes a "reasonable period of detention" for noncitizens after a removal order. *Id.* at 700-01. The Court determined that six months' detention could be deemed a "presumptively reasonable period of detention," after which the burden shifts to the government to justify continued detention if the noncitizen provides a "good reason to believe that there is not significant likelihood of removal in the reasonably foreseeable future." *Id.* at 701.

23. Where a petitioner has provided "good reason to believe there is no significant likelihood of removal in the reasonably foreseeable future," the burden shifts to the government to rebut that showing. *Zadvydas*, 533 U.S. at 701.

24. The order of supervision regulation 8 C.F.R. § 241.4 addresses continued detention beyond the period of removal. Subsection 241.4(l)(1) provides that "[u]pon revocation, the alien will be notified of the reasons for revocation of his or her release or parole."

25. The regulation allows re-detention, inter alia, when "[i]t is appropriate to enforce a removal order." 8 C.F.R. § 241.4(l)(2)(iii).

26. Finally, the regulation promises: "The alien will be afforded an initial informal interview promptly after his or her return to Service custody to afford the alien an opportunity to respond to the reasons for revocation stated in the notification." 8 C.F.R. § 241.4(l)(1).

27. Specific officials are authorized to revoke an order of supervision, namely the Executive Associate Commissioner. *See* 8 C.F.R. § 241.4(l)(2). However, that authority can be

delegated to the district director when “revocation is in the public interest and circumstances do not reasonably permit referral of the case to the Executive Associate Commissioner.” *Id.*

28. An individual subject to a final order of removal, who is released on an order of supervision, is eligible for work authorization “only if the alien cannot be removed due to the refusal of all countries designated by the alien or under section 241 of the Act to receive the alien, or because the removal of the alien is otherwise impracticable or contrary to the public interest...” *See* 8 C.F.R. § 274a.12(c)(18); *see also* 8 U.S.C. § 1231(a)(7)(A).

### FACTS

29. Petitioner Devon Axell Bustillos Perez is a native and citizen of Nicaragua. He was born on  1993, in Nicaragua, and has no claim to citizenship or legal immigration status in any other country.

30. On or about March 3, 2022, Petitioner entered the United States at or near Nogales, Arizona, and was subsequently issued a Notice to Appear in Immigration Court on April 6, 2022. *See* Ex. 1, Notice to Appear.

31. In September 2024, Respondents apprehended and detained Petitioner, and he has been held in uninterrupted custody by Respondents since that date.

32. On March 26, 2025, an Immigration Judge ordered Petitioner removed to Nicaragua, but also granted Petitioner’s application for withholding of removal under 8 U.S.C. § 1231(b)(3); thereby prohibiting Petitioner’s removal to Nicaragua. *See* Ex. 2, Order of the Immigration Judge.

33. ICE did not appeal that decision. To date, Respondents have taken no steps to reopen or rescind the grant of relief.

34. Since being granted withholding of removal, Petitioner has remained in detention at the ERO El Paso Camp East Montana in El Paso, TX within the territorial jurisdiction of this Court.

35. Towards the end of September 2025, after being informed he was being moved to Texas, an ICE official told Petitioner that he would be removed to Mexico and instructed him to sign a document to that effect, but Petitioner refused.

36. Since Petitioner has no legal immigration status in Mexico, were he sent to that country, Mexico would promptly remove him to Nicaragua, where it has already been determined that he would face torture. Such indirect removal—or chain refoulement—would violate the withholding of removal statute and the Convention Against Torture just as clearly as a direct removal to Nicaragua.

37. On November 4, Petitioner requested a Reasonable Fear Interview to Mexico, including a signed affidavit outlining his fear of removal to Mexico, but no such interview has yet been scheduled. *See* Ex. 3, Reasonable Fear Interview request.

38. Respondents currently lack any factual or legal basis to detain Petitioner, since Respondents cannot establish that that Petitioner will likely be removed from the United States in the reasonably foreseeable future.

39. Petitioner's continued detention has resulted in serious and dangerous medical neglect. After being transferred to Texas, Petitioner became extremely ill for two to three weeks, suffering from fever, sore throat, and other persistent symptoms. Despite requesting medical assistance verbally and through the established sign-up sheet at the detention center, Petitioner was only seen by a medical professional several days later. He was given only a single Tylenol pill and, at one point, a few cough drops, and was repeatedly told to "rest." On another occasion, the

detention center did not have enough food, and Petitioner was simply denied a meal. During one of his transfers, all of Petitioner's personal belongings were lost, including his Bible, family letters, photographs, and other irreplaceable items. Although Petitioner reports he was told about a month ago that some of the property had been located, nothing has been returned to him as of date. These conditions have caused Petitioner severe emotional distress and have significantly worsened the hardship faced by his family.

40. Petitioner's detention has caused severe and ongoing hardship to his wife and their 14-month-old daughter, whom Petitioner has never met. Petitioner's wife spent her entire pregnancy alone after Petitioner was arrested when she was only three to four months pregnant, and she worked until the very last day of her pregnancy in order to support herself and prepare for their child's birth. She remains solely responsible for caring for their infant daughter while struggling to pay outstanding hospital bills from the delivery. Petitioner's wife works on a farm providing medical care to animals, and the emotional strain of raising a young child without her partner's support has caused her significant insomnia and constant anxiety. She is currently awaiting a medical evaluation to determine whether she needs medication to manage her symptoms. The absence of Petitioner's support—both emotional and financial—has placed extraordinary strain on the family, as his wife has been forced to shoulder all responsibilities entirely on her own.

41. Petitioner has exhausted all administrative remedies. No further administrative remedies are available to Petitioner.

**FIRST CLAIM FOR RELIEF:  
Violation of 8 U.S.C. § 1231(a)(6)**

42. Petitioner re-alleges and incorporates by reference the preceding paragraphs 1-41.
43. Petitioner's continued detention by the Respondents violates 8 U.S.C. § 1231(a)(6),

as interpreted by *Zadvydas*. Petitioner's 90-day statutory removal period and six-month presumptively reasonable period for continued removal efforts have long since passed.

44. No significant likelihood of removal in the reasonably foreseeable future exists.

45. Under *Zadvydas*, the continued detention of someone like Petitioner is unreasonable and not authorized by 8 U.S.C. § 1231.

**SECOND CLAIM FOR RELIEF:  
Due Process/Detention**

46. Petitioner re-alleges and incorporates by reference the preceding paragraphs 1-41.

47. Petitioner's detention during the removal period is only constitutionally permissible under the Due Process Clause when there is a significant likelihood of removal in the reasonably foreseeable future.

48. Respondents continue to detain Petitioner without evidence that they will be able to remove him imminently, to Mexico or to any other country.

49. Respondents' detention of Petitioner no longer bears any reasonable relation to a legitimate government purpose, and thus violates the Due Process Clause.

**THIRD CLAIM FOR RELIEF:  
Habeas Corpus, 28 U.S.C. § 2241**

50. Petitioner re-alleges and incorporates by reference the preceding paragraphs 1-41.

51. The writ of habeas corpus is available to any individual who is held in custody of the federal government in violation of the Constitution or laws or treaties of the United States.

52. Respondents presently have no legal basis to detain Petitioner in immigration custody, and the writ of habeas corpus should issue.

53. In the alternative, as set forth above, Respondents intend to remove Petitioner to a third country which will in turn remove Petitioner back to Nicaragua without adequate notice and opportunity to be heard, thus violating this law.

**FOURTH CLAIM FOR RELIEF:  
Violation of Due Process/Reasonable Fear Interview Review**

54. Petitioner incorporates the foregoing paragraphs 1-41 by reference.

55. Petitioner has expressed a fear of removal to Mexico. *See* Ex. 3. Respondents must now give Petitioner a fear screening as to Mexico before a USCIS asylum officer. But if Petitioner does not pass that fear screening, Respondents intend to remove him to Mexico without the right of review before an Immigration Judge.

56. To deny Petitioner an Immigration Judge review of a denied Reasonable Fear Interview violates Petitioner's right to due process under the Fifth Amendment to the U.S. Constitution. *See, e.g., Sagastizado v. Noem*, 2025 WL 2957002, at \*9 (S.D. Tex. Oct. 2, 2025) ("Petitioner has demonstrated a likelihood of success as to his claim that he cannot be removed to a third country without sufficient notice and a meaningful opportunity to raise a claim, and that Respondents' failure to provide him with review of his negative RFI determination deprives him of his rights under the Due Process Clause of the Fifth Amendment.").

**REQUEST FOR RELIEF**

Petitioner prays for judgment against Respondents and respectfully requests that the Court enters an order:

- a) Issuing an Order to Show Cause, ordering Respondents to justify the basis of Petitioner's detention in fact and in law, forthwith;
- b) Preliminarily and permanently enjoining Respondents from removing Petitioner to Nicaragua unless and until his order of Withholding of Removal is terminated, including all appeals;
- c) Preliminarily and permanently enjoining Respondents from removing Petitioner to any other country (including but not limited to Mexico) without first providing him notice and offering him adequate opportunity to apply for withholding of removal as to *that* country by conducting a fear interview, including providing an Immigration Judge review of any denied fear interview;
- d) Issuing a writ of habeas corpus, and ordering that Petitioner be released from physical custody forthwith, pursuant to an Order of Supervision;
- e) Granting Petitioner his costs of suit; and
- f) Granting such other relief at law and in equity as justice may require.

Respectfully submitted,

//s//Simon Sandoval-Moshenberg  
Simon Sandoval-Moshenberg, Esq.\*  
Virginia State Bar no. 77110  
Murray Osorio PLLC  
4103 Chain Bridge Road, Suite 300  
Fairfax, Virginia 22030  
Telephone: 703-352-2399  
Facsimile: 703-763-2304  
ssandoval@murrayosorio.com

Date: November 17, 2025

*Counsel for Petitioner*  
*\*Pro Hac Vice Application Forthcoming*

**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 Western District of Texas  
700 East San Antonio Avenue, Suite 200  
El Paso, TX 79901

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

Warden, ERO El Paso Camp East Montana  
6920 Digital Road  
El Paso, TX 79936

Respectfully submitted,

//s//Simon Sandoval-Moshenberg  
Simon Sandoval-Moshenberg, Esq.  
Virginia State Bar no. 77110  
Murray Osorio PLLC  
4103 Chain Bridge Road, Suite 300  
Fairfax, Virginia 22030  
Telephone: 703-352-2399  
Facsimile: 703-763-2304  
ssandoval@murrayosorio.com

Date: November 17, 2025

*Counsel for Petitioner*

In the Matter of: DEVON AXELL BUSTILLO-PEREZ currently residing at

Respondent: [REDACTED] CHILTON, WISCONSIN, 53014  
(Number, street, city, state and ZIP code)

Department of Homeland Security  
Immigration and Customs Enforcement  
La Palma Correctional Center  
6601 N. La Palma Rd.  
Eloy, AZ 85131

- 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 NICARAGUA and a citizen of NICARAGUA ;
3. You arrived in the United States at or near NOGALES, AZ , on or about March 3, 2022 ;
4. You were not then admitted or paroled after inspection by an Immigration Officer.

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:

212(a) (6) (A) (i) of the Immigration and Nationality Act, as amended, in that you are an alien present in the United States without being admitted or paroled, or who arrived in the United States at any time or place other than as designated by the Attorney General.

- 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 **BOIR**  
525 W. VAN BUREN, SUITE 500, CHICAGO, IL 60607 1705 E. Hanna Rd.  
(Complete Address of Immigration Court, including Room Number, if any) Eloy, AZ 85131

on APR 08 6 2022 at 10:00 AM to show why you should not be removed from the United States based on the charge(s) set forth above.  
ROBERT NICOLAUS  
Acting / Principal Immigration Officer in Charge  
(Signature and Title of Issuing Officer) (Sign in ink)

Date: March 03, 2022 Nogales, Arizona  
(City and State)



UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
CHICAGO IMMIGRATION COURT

Respondent Name:

BUSTILLO-PEREZ, DEVON AXELL

To:

Bird Serrano, Jorge Fernando



Greenville, SC 29607

A-Number:



Riders:

In Removal Proceedings

Initiated by the Department of Homeland Security

Date:

03/26/2025

ORDER OF THE IMMIGRATION JUDGE

- This is a summary of the oral decision entered on . The oral decision in this case is the official opinion, and the immigration court issued this summary for the convenience of the parties.
- Both parties waived the issuance of a formal oral decision in this proceeding.

I. Removability

The immigration court found Respondent  removable  inadmissible under the following Section(s) of the Immigration and Nationality Act (INA or Act): 212(a)(6)(A)(i)

The immigration court found Respondent  not removable  not inadmissible under the following Section(s) of the Act:

II. Applications for Relief

Respondent's application for:

A. Asylum/Withholding/Convention Against Torture

- Asylum was  granted  denied  withdrawn with prejudice  withdrawn without prejudice
- Withholding of Removal under INA § 241(b)(3) was  granted  denied  withdrawn with prejudice  withdrawn without prejudice
- Withholding of Removal under the Convention Against Torture was  granted  denied  withdrawn with prejudice  withdrawn without prejudice
- Deferral of Removal under the Convention Against Torture was  granted  denied  withdrawn with prejudice  withdrawn without prejudice
- Respondent knowingly filed a frivolous application for asylum after notice of the consequences. *See* INA § 208(d)(6); 8 C.F.R. §1208.20

B. Cancellation of Removal

- Cancellation of Removal for Lawful Permanent Residents under INA § 240A(a) was  granted  denied  withdrawn with prejudice  withdrawn without prejudice
- Cancellation of Removal for Nonpermanent Residents under INA § 240A(b)(1) was  granted  denied  withdrawn with prejudice  withdrawn without prejudice
- Special Rule Cancellation of Removal under INA § 240A(b)(2) was  granted  denied  withdrawn with prejudice  withdrawn without prejudice

C. Waiver

- A waiver under INA § was  granted  denied  withdrawn with prejudice  withdrawn without prejudice

D. Adjustment of Status

- Adjustment of Status under INA § was  granted  denied  withdrawn with prejudice  withdrawn without prejudice

E. Other

III. Voluntary Departure

- Respondent's application for  pre-conclusion voluntary departure under INA § 240B(a)  post-conclusion voluntary departure under INA § 240B(b) was  denied.
- Respondent's application for  pre-conclusion voluntary departure under INA § 240B(a)  post-conclusion voluntary departure under INA § 240B(b) was  granted, and Respondent is ordered to depart by . The respondent must post a \$ bond with DHS within five business days of this order. Failure to post the bond as required or to depart by the required date will result in an alternate order of removal to taking effect immediately.
- The respondent is subject to the following conditions to ensure his or her timely departure from the United States:
  - Further information regarding voluntary departure has been added to the record.
  - Respondent was advised of the limitation on discretionary relief, the consequences for failure to depart as ordered, the bond posting requirements, and the consequences of filing a post-order motion to reopen or reconsider:

If Respondent fails to voluntarily depart within the time specified or any extensions granted by the DHS, Respondent shall be subject to a civil monetary penalty as provided by relevant statute, regulation, and policy. See INA § 240B(d)(1). The immigration court has set

- the presumptive civil monetary penalty amount of \$3,000.00 USD
- \$ USD instead of the presumptive amount.

If Respondent fails to voluntarily depart within the time specified, the alternate order of removal shall automatically take effect, and Respondent shall be ineligible, for a period of

10 years, for voluntary departure or for relief under sections 240A, 245, 248, and 249 of the Act, to include cancellation of removal, adjustment of status, registry, or change of nonimmigrant status. *Id.* If Respondent files a motion to reopen or reconsider prior to the expiration of the voluntary departure period set forth above, the grant of voluntary departure is automatically terminated; the period allowed for voluntary departure is not stayed, tolled, or extended. If the grant of voluntary departure is automatically terminated upon the filing of such a motion, the penalties for failure to depart under section 240B(d) of the Act shall not apply.

If Respondent appeals this decision, Respondent must provide to the Board of Immigration Appeals (Board), within 30 days of filing an appeal, sufficient proof of having posted the voluntary departure bond. The Board will not reinstate the voluntary departure period in its final order if Respondent does not submit timely proof to the Board that the voluntary departure bond has been posted.

In the case of conversion to a removal order where the alternate order of removal immediately takes effect, where Respondent willfully fails or refuses to depart from the United States pursuant to the order of removal, to make timely application in good faith for travel or other documents necessary to depart the United States, to present himself or herself at the time and place required for removal by the DHS, or conspires to or takes any action designed to prevent or hamper Respondent's departure pursuant to the order of removal, Respondent may be subject to a civil monetary penalty for each day Respondent is in violation. If Respondent is removable pursuant to INA § 237(a), then he or she shall be further fined or imprisoned for up to 10 years.

#### IV. Removal

- Respondent was ordered removed to Nicaragua
- In the alternative, Respondent was ordered removed to
- Respondent was advised of the penalties for failure to depart pursuant to the removal order:

If Respondent is subject to a final order of removal and willfully fails or refuses to depart from the United States pursuant to the order, to make timely application in good faith for travel or other documents necessary to depart the United States, to present himself or herself at the time and place required for removal by the DHS, or conspires to or takes any action designed to prevent or hamper Respondent's departure pursuant to the order of removal, Respondent may be subject to a civil monetary penalty for each day Respondent is in violation. If Respondent is removable pursuant to INA § 237(a), then he or she shall be further fined or imprisoned for up to 10 years.

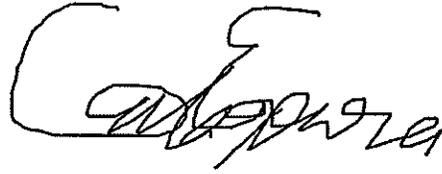
#### V. Other

- Proceedings were  dismissed  terminated with prejudice  
 terminated without prejudice  administratively closed.

Respondent's status was rescinded under INA § 246.

Other:

Respondent's removal to Nicaragua is hereby withheld under INA 241(b)(3).



Immigration Judge: ESPINOZA, CARLA 03/26/2025

Appeal: Department of Homeland Security:  waived  reserved  
Respondent:  waived  reserved

Appeal Due:

**Certificate of Service**

This document was served:

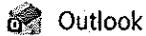
Via: [ M ] Mail | [ P ] Personal Service | [ E ] Electronic Service | [ U ] Address Unavailable

To: [ ] Noncitizen | [ ] Noncitizen c/o custodial officer | [ E ] Noncitizen's atty/rep. | [ E ] DHS

Respondent Name : BUSTILLO-PEREZ, DEVON AXELL | A-Number : 

Riders:

Date: 03/26/2025 By: Giamarusti, Gabrielle, Court Staff



---

**THIRD COUNTRY RFI REQUEST - Devon Axell Bustillos Perez**

---

From Julio Medina <Jmedina@murrayosorio.com>  
Date Fri 11/7/2025 1:36 PM  
To elpaso.outreach@ice.dhs.gov <elpaso.outreach@ice.dhs.gov>  
Cc Briya Brown <bbrown@murrayosorio.com>

3 attachments (1 MB)

G-28\_Devon\_.pdf; OJ - Oral Decision Summary - BUSTILLO-PEREZ, DEVON AXELL.pdf; Affidavit of Devon Axell.pdf;

Dear Sir or Madam,

I hope this email finds you well. This firm represents Mr. Devon Axell Bustillos Perez (A/██████████), who is currently detained by ICE at Camp East Montana Detention Facility. Attached to this email, please find a duly executed G28, fear letter, and a Copy of IJ order granting Withholding of Removal.

We respectfully request that Mr. Devon Axell Bustillos Perez be placed in the Reasonable Fear Process, as he fears returning to his home country NICARAGUA, and also fears returning to MEXICO.

Please notify our office prior to the Reasonable Fear Interview so that the attorney, Briya Brown, may be present. Her direct line is (571) 455-1915.

I appreciate your assistance with this matter. If any issues should arise regarding his custody or removal, I can be reached at (571) 455-1996 or Briya Brown: (571) 455-1915

Sincerely,

Julio Medina on behalf of Briya Brown, Esq.



**MURRAY  
OSORIO**  
PLLC

Julio Medina | Senior Paralegal  
Murray Osorio PLLC: Full-Service Immigration Law  
Fairfax, VA | Silver Spring, MD | Newark, NJ  
T: (571) 455-1996 | F: (703) 763-2304  
[www.murrayosorio.com](http://www.murrayosorio.com) | Follow us on social media [here](#)



**Notice of Entry of Appearance  
as Attorney or Accredited Representative**

Department of Homeland Security

**DHS**  
**Form G-28**  
OMB No. 1615-0105  
Expires 05/31/2021

**Part 1. Information About Attorney or Accredited Representative**

1. USCIS Online Account Number (if any)  
  XXXXXXXXXX

**Name of Attorney or Accredited Representative**

2.a. Family Name (Last Name)   
 2.b. Given Name (First Name)   
 2.c. Middle Name

**Address of Attorney or Accredited Representative**

3.a. Street Number and Name   
 3.b.  Apt.  Ste.  Flr.   
 3.c. City or Town   
 3.d. State  3.e. ZIP Code   
 3.f. Province   
 3.g. Postal Code   
 3.h. Country

**Contact Information of Attorney or Accredited Representative**

4. Daytime Telephone Number   
 5. Mobile Telephone Number (if any)   
 6. Email Address (if any)   
 7. Fax Number (if any)

**Part 2. Eligibility Information for Attorney or Accredited Representative**

Select all applicable items.

1.a.  I am an attorney eligible to practice law in, and a member in good standing of, the bar of the highest courts of the following states, possessions, territories, commonwealths, or the District of Columbia. If you need extra space to complete this section, use the space provided in Part 6. Additional Information.

Licensing Authority

1.b. Bar Number (if applicable)

1.c. I (select only one box)  am not  am subject to any order suspending, enjoining, restraining, disbaring, or otherwise restricting me in the practice of law. If you are subject to any orders, use the space provided in Part 6. Additional Information to provide an explanation.

1.d. Name of Law Firm or Organization (if applicable)

2.a.  I am an accredited representative of the following qualified nonprofit religious, charitable, social service, or similar organization established in the United States and recognized by the Department of Justice in accordance with 8 CFR part 1292.

2.b. Name of Recognized Organization

2.c. Date of Accreditation (mm/dd/yyyy)

3.  I am associated with , the attorney or accredited representative of record who previously filed Form G-28 in this case, and my appearance as an attorney or accredited representative for a limited purpose is at his or her request.

4.a.  I am a law student or law graduate working under the direct supervision of the attorney or accredited representative of record on this form in accordance with the requirements in 8 CFR 292.1(a)(2).

4.b. Name of Law Student or Law Graduate

**Part 3. Notice of Appearance as Attorney or Accredited Representative**

If you need extra space to complete this section, use the space provided in Part 6. Additional Information.

This appearance relates to immigration matters before (select only one box):

- 1.a.  U.S. Citizenship and Immigration Services (USCIS)
- 1.b. List the form numbers or specific matter in which appearance is entered.
- 2.a.  U.S. Immigration and Customs Enforcement (ICE)
- 2.b. List the specific matter in which appearance is entered.
- 3.a.  U.S. Customs and Border Protection (CBP)
- 3.b. List the specific matter in which appearance is entered.
- 4. Receipt Number (if any)
- 5. I enter my appearance as an attorney or accredited representative at the request of the (select only one box):  
 Applicant    Petitioner    Requestor  
 Beneficiary/Derivative    Respondent (ICE, CBP)

**Information About Client (Applicant, Petitioner, Requestor, Beneficiary or Derivative, Respondent, or Authorized Signatory for an Entity)**

- 6.a. Family Name (Last Name)
- 6.b. Given Name (First Name)
- 6.c. Middle Name
- 7.a. Name of Entity (if applicable)
- 7.b. Title of Authorized Signatory for Entity (if applicable)
- 8. Client's USCIS Online Account Number (if any)
- 9. Client's Alien Registration Number (A-Number) (if any)

**Client's Contact Information**

- 10. Daytime Telephone Number
- 11. Mobile Telephone Number (if any)
- 12. Email Address (if any)

**Mailing Address of Client**

**NOTE:** Provide the client's mailing address. Do not provide the business mailing address of the attorney or accredited representative unless it serves as the safe mailing address on the application or petition being filed with this Form G-28.

- 13.a. Street Number and Name
- 13.b.  Apt.    Ste.    Flr.
- 13.c. City or Town
- 13.d. State    13.e. ZIP Code
- 13.f. Province
- 13.g. Postal Code
- 13.h. Country

**Part 4. Client's Consent to Representation and Signature**

**Consent to Representation and Release of Information**

I have requested the representation of and consented to being represented by the attorney or accredited representative named in Part 1. of this form. According to the Privacy Act of 1974 and U.S. Department of Homeland Security (DHS) policy, I also consent to the disclosure to the named attorney or accredited representative of any records pertaining to me that appear in any system of records of USCIS, ICE, or CBP.

**Part 4. Client's Consent to Representation and Signature (continued)**

**Options Regarding Receipt of USCIS Notices and Documents**

USCIS will send notices to both a represented party (the client) and his, her, or its attorney or accredited representative either through mail or electronic delivery. USCIS will send all secure identity documents and Travel Documents to the client's U.S. mailing address.

If you want to have notices and/or secure identity documents sent to your attorney or accredited representative of record rather than to you, please select all applicable items below. You may change these elections through written notice to USCIS.

- 1.a.  I request that USCIS send original notices on an application or petition to the business address of my attorney or accredited representative as listed in this form.
- 1.b.  I request that USCIS send any secure identity document (Permanent Resident Card, Employment Authorization Document, or Travel Document) that I receive to the U.S. business address of my attorney or accredited representative (or to a designated military or diplomatic address in a foreign country (if permitted)).

**NOTE:** If your notice contains Form I-94, Arrival-Departure Record, USCIS will send the notice to the U.S. business address of your attorney or accredited representative. If you would rather have your Form I-94 sent directly to you, select Item Number 1.c.

- 1.c.  I request that USCIS send my notice containing Form I-94 to me at my U.S. mailing address.

**Signature of Client or Authorized Signatory for an Entity**

- 2.a. Signature of Client or Authorized Signatory for an Entity
- 2.b. Date of Signature (mm/dd/yyyy)

**Part 5. Signature of Attorney or Accredited Representative**

I have read and understand the regulations and conditions contained in 8 CFR 103.2 and 292 governing appearances and representation before DHS. I declare under penalty of perjury under the laws of the United States that the information I have provided on this form is true and correct.

- 1. a. Signature of Attorney or Accredited Representative
- 1.b. Date of Signature (mm/dd/yyyy)
- 2.a. Signature of Law Student or Law Graduate
- 2.b. Date of Signature (mm/dd/yyyy)

**Part 6. Additional Information**

If you need extra space to provide any additional information within this form, use the space below. If you need more space than what is provided, you may make copies of this page to complete and file with this form or attach a separate sheet of paper. Type or print your name at the top of each sheet; indicate the Page Number, Part Number, and Item Number to which your answer refers; and sign and date each sheet.

1.a. Family Name (Last Name)

1.b. Given Name (First Name)

1.c. Middle Name

2.a. Page Number

2.b. Part Number

2.c. Item Number

2.d. \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

3.a. Page Number

3.b. Part Number

3.c. Item Number

3.d. \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

4.a. Page Number

4.b. Part Number

4.c. Item Number

4.d. \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

5.a. Page Number

5.b. Part Number

5.c. Item Number

5.d. \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

6.a. Page Number

6.b. Part Number

6.c. Item Number

6.d. \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**DECLARACIÓN JURADA DE DEVON AXELL BUSTILLOS PEREZ**

Yo, Devon Axell Bustillos Pérez, declaro bajo pena de perjurio que lo siguiente es verdadero y correcto a mi leal saber y entender:

1. Soy ciudadano de Nicaragua.
2. Se me concedió la Retención de Deportación el 26 de marzo de 2025 ante la Corte de Inmigración de Chicago.
3. Todavía tengo miedo de regresar a Nicaragua, donde estaría solo, vulnerable y expuesto al peligro.
4. De la misma manera, tengo miedo de que me envíen a México. De camino a los Estados Unidos, pasé por Chiapas, México. El Coyote que guiaba a nuestro grupo, nos entregó al Cártel de México. Vi cómo el cártel tenía armas y me asusté mucho. Las personas que tenían dinero pudieron pagar al cártel y pudieron continuar, pero los demás que no tenían dinero fueron secuestrados y llevados a un almacén. Tuve suerte de tener dinero en efectivo y no me secuestraron.
5. Continué mi viaje hacia Estados Unidos, éramos 15 personas en una camioneta, cuando la policía mexicana nos detuvo. Los dos oficiales nos hicieron salir a todos de la camioneta y comenzaron a revisar nuestras cosas. Los oficiales básicamente nos robaron el dinero a todos y amenazaron a las personas de nuestro grupo que no querían darles el dinero. Temía por mi vida, así que los dejé revisar mis cosas y tomar mi dinero.
6. Por esa razón, nunca se me pasó por la cabeza quedarme en México, no podía vivir allí por el peligro y la delincuencia. Ser indocumentado en México te pone en riesgo de ser víctima del cártel y también de la policía. No podía confiar en que la policía en México me protegiera, y no conozco a nadie en México.
7. También tengo miedo de que me envíen a cualquier otro país. No tengo estatus legal, protección o apoyo en ningún otro país del mundo. Temo que estaré en grave peligro si me deportan a cualquier lugar fuera de los Estados Unidos. Además, en algunos países, podrías ser perseguido por ser migrante o deportado sin ningún debido proceso. Temo que si me envían a otro país donde no tengo estatus legal, seré deportado a mi país de origen, lo que me pondrá en el mismo riesgo que ya he demostrado en mi caso anterior.
8. Temo que si me envían a un tercer país, podría ser detenido nuevamente, deportado rápidamente a Nicaragua, donde ya he demostrado que seré lastimado, torturado o asesinado.
9. Solicito respetuosamente una entrevista de miedo razonable.

Fecha: 7 de noviembre de 2025

Firma:  Nombre: Devon Axell Bustillos Perez

**AFFIDAVIT OF DEVON AXELL BUSTILLOS PEREZ**

I, Devon Axell Bustillos Perez, declare under penalty of perjury that the following is true and correct to the best of my knowledge:

1. I am a citizen of Nicaragua.
2. I was granted Withholding of Removal on March 26, 2025, before the Chicago Immigration Court.
3. I am still afraid to return to Nicaragua, where I would be alone, vulnerable and exposed to danger.
4. In the same way, I am afraid of being sent to Mexico. On my way to the United States, I passed through Chiapas, Mexico. The Coyote who was guiding our group, turned us in to the Mexico Cartel. I saw how the cartel had weapons and I was very scared. The people who had money were able to pay the cartel and were able to continue, but the others who did not have money were kidnapped and taken to a warehouse. I was lucky that I had cash and they didn't kidnap me.
5. I continued my journey to the United States, we were 15 people in a truck, when the Mexican police stopped us. The two officers made us all get out of the truck and began to check our things. The officers basically stole the money from all of us and threatened the people in our group who didn't want to give them the money. I feared for my life so I let them go through my things and take my money.
6. For that reason, it never crossed my mind to stay in Mexico, I could not live there because of the danger and crime. Being undocumented in Mexico puts you at risk of being a victim of the cartel and also of the police. I couldn't trust the police in Mexico to protect me, and I don't know anyone in Mexico.
7. I'm also afraid of being sent to any other country. I have no legal status, protection, or support in any other country in the world. I fear that I will be in grave danger if I am deported anywhere outside of the United States. In addition, in some countries, you could be persecuted for being a migrant or deported without any due process. I fear that if I am sent to another country where I have no legal status, I will be deported back to my home country, putting me at the same risk that I have already demonstrated in my previous case.
8. I fear that if I am sent to a third country, I could be detained again, quickly deported back to Nicaragua where I have already proven that I will be harmed, tortured or killed.
9. I respectfully request a Reasonable Fear Interview.

Date: November 7, 2025

Signature:           {Signature}           Name: Devon Axell Bustillos Perez

**CERTIFICATE OF TRANSLATION**

I, Julio A. Medina am competent to translate from Spanish to English and certify that the translation of this letter is true and accurate to the best of my abilities.



**Julio A. Medina**  
4103 Chain Bridge Road, Suite 300  
Fairfax, VA 22030  
(703) 952-3275



UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
CHICAGO IMMIGRATION COURT

Respondent Name:

BUSTILLO-PEREZ, DEVON AXELL

To:

Bird Serrano, Jorge Fernando



Greenville, SC 29607

A-Number:



Riders:

In Removal Proceedings

Initiated by the Department of Homeland Security

Date:

03/26/2025

ORDER OF THE IMMIGRATION JUDGE

- This is a summary of the oral decision entered on \_\_\_\_\_ . The oral decision in this case is the official opinion, and the immigration court issued this summary for the convenience of the parties.
- Both parties waived the issuance of a formal oral decision in this proceeding.

I. Removability

The immigration court found Respondent  removable  inadmissible under the following Section(s) of the Immigration and Nationality Act (INA or Act): 212(a)(6)(A)(i)

The immigration court found Respondent  not removable  not inadmissible under the following Section(s) of the Act:

II. Applications for Relief

Respondent's application for:

A. Asylum/Withholding/Convention Against Torture

- Asylum was  granted  denied  withdrawn with prejudice  withdrawn without prejudice
- Withholding of Removal under INA § 241(b)(3) was  granted  denied  withdrawn with prejudice  withdrawn without prejudice
- Withholding of Removal under the Convention Against Torture was  granted  denied  withdrawn with prejudice  withdrawn without prejudice
- Deferral of Removal under the Convention Against Torture was  granted  denied  withdrawn with prejudice  withdrawn without prejudice
- Respondent knowingly filed a frivolous application for asylum after notice of the consequences. *See* INA § 208(d)(6); 8 C.F.R. §1208.20

B. Cancellation of Removal

- Cancellation of Removal for Lawful Permanent Residents under INA § 240A(a) was  granted  denied  withdrawn with prejudice  withdrawn without prejudice
- Cancellation of Removal for Nonpermanent Residents under INA § 240A(b)(1) was  granted  denied  withdrawn with prejudice  withdrawn without prejudice
- Special Rule Cancellation of Removal under INA § 240A(b)(2) was  granted  denied  withdrawn with prejudice  withdrawn without prejudice

C. Waiver

- A waiver under INA § was  granted  denied  withdrawn with prejudice  withdrawn without prejudice

D. Adjustment of Status

- Adjustment of Status under INA § was  granted  denied  withdrawn with prejudice  withdrawn without prejudice

E. Other

III. Voluntary Departure

- Respondent's application for  pre-conclusion voluntary departure under INA § 240B(a)  post-conclusion voluntary departure under INA § 240B(b) was  denied.
- Respondent's application for  pre-conclusion voluntary departure under INA § 240B(a)  post-conclusion voluntary departure under INA § 240B(b) was  granted, and Respondent is ordered to depart by . The respondent must post a \$ bond with DHS within five business days of this order. Failure to post the bond as required or to depart by the required date will result in an alternate order of removal to taking effect immediately.
- The respondent is subject to the following conditions to ensure his or her timely departure from the United States:
  - Further information regarding voluntary departure has been added to the record.
  - Respondent was advised of the limitation on discretionary relief, the consequences for failure to depart as ordered, the bond posting requirements, and the consequences of filing a post-order motion to reopen or reconsider:

If Respondent fails to voluntarily depart within the time specified or any extensions granted by the DHS, Respondent shall be subject to a civil monetary penalty as provided by relevant statute, regulation, and policy. *See* INA § 240B(d)(1). The immigration court has set

- the presumptive civil monetary penalty amount of \$3,000.00 USD
- \$ USD instead of the presumptive amount.

If Respondent fails to voluntarily depart within the time specified, the alternate order of removal shall automatically take effect, and Respondent shall be ineligible, for a period of

10 years, for voluntary departure or for relief under sections 240A, 245, 248, and 249 of the Act, to include cancellation of removal, adjustment of status, registry, or change of nonimmigrant status. *Id.* If Respondent files a motion to reopen or reconsider prior to the expiration of the voluntary departure period set forth above, the grant of voluntary departure is automatically terminated; the period allowed for voluntary departure is not stayed, tolled, or extended. If the grant of voluntary departure is automatically terminated upon the filing of such a motion, the penalties for failure to depart under section 240B(d) of the Act shall not apply.

If Respondent appeals this decision, Respondent must provide to the Board of Immigration Appeals (Board), within 30 days of filing an appeal, sufficient proof of having posted the voluntary departure bond. The Board will not reinstate the voluntary departure period in its final order if Respondent does not submit timely proof to the Board that the voluntary departure bond has been posted.

In the case of conversion to a removal order where the alternate order of removal immediately takes effect, where Respondent willfully fails or refuses to depart from the United States pursuant to the order of removal, to make timely application in good faith for travel or other documents necessary to depart the United States, to present himself or herself at the time and place required for removal by the DHS, or conspires to or takes any action designed to prevent or hamper Respondent's departure pursuant to the order of removal, Respondent may be subject to a civil monetary penalty for each day Respondent is in violation. If Respondent is removable pursuant to INA § 237(a), then he or she shall be further fined or imprisoned for up to 10 years.

#### IV. Removal

- Respondent was ordered removed to Nicaragua
- In the alternative, Respondent was ordered removed to
- Respondent was advised of the penalties for failure to depart pursuant to the removal order:

If Respondent is subject to a final order of removal and willfully fails or refuses to depart from the United States pursuant to the order, to make timely application in good faith for travel or other documents necessary to depart the United States, to present himself or herself at the time and place required for removal by the DHS, or conspires to or takes any action designed to prevent or hamper Respondent's departure pursuant to the order of removal, Respondent may be subject to a civil monetary penalty for each day Respondent is in violation. If Respondent is removable pursuant to INA § 237(a), then he or she shall be further fined or imprisoned for up to 10 years.

#### V. Other

- Proceedings were  dismissed  terminated with prejudice  
 terminated without prejudice  administratively closed.
- Respondent's status was rescinded under INA § 246.
- Other:

Respondent's removal to Nicaragua is hereby withheld under INA 241(b)(3).



Immigration Judge: ESPINOZA, CARLA 03/26/2025

Appeal: Department of Homeland Security:  waived  reserved  
Respondent:  waived  reserved

Appeal Due:

**Certificate of Service**

This document was served:

Via: [ M ] Mail | [ P ] Personal Service | [ E ] Electronic Service | [ U ] Address Unavailable

To: [ ] Noncitizen | [ ] Noncitizen c/o custodial officer | [ E ] Noncitizen's atty/rep. | [ E ] DHS

Respondent Name : BUSTILLO-PEREZ, DEVON AXELL | A-Number : 

Riders:

Date: 03/26/2025 By: Giamarusti, Gabrielle, Court Staff